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Sustainable communication: green PR and the export of corporate environmentalism, 1989–1997

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ABSTRACT

This article evaluates the role of public relations (PR) consultants as influential actors in the politics of environmental governance. It examines the historical case of EnviroComm, a network of environmental PR firms that sought to define and manage the communication of environmental issues during the consolidation of the European Single Market in the early 1990s. The article presents EnviroComm as an epistemic community, drawing on in-depth interviews and archival research to show how its members engaged in information sharing, capacity building, and rule setting around environmental management. The network developed and successfully promoted environmental standards, practices and disclosure processes among public and private sector clients throughout Europe, the United States, and Mexico during a critical time period in international environmental governance. By diffusing its core principles of sustainable communication as best practices, EnviroComm helped not only to diffuse an American variant of corporate environmentalism as an alternative to public policy but also to cement environmental communication as a field in its own right. More than an intermediary, it acted as a cultural producer in the realm of environmental governance.

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Introduction

Studies on environmental governance have frequently employed the notion of epistemic communities, 'since the complex and uncertain nature of environmental problems appears to privilege experts in determining the nature of environmental problems and the technical requirements needed to address them' (Bernstein 2001, 19). Defined as self-structured groups sharing professional expertise, beliefs and common objectives for influencing public policy (Haas 2016), epistemic communities claim authority over expert knowledge and seek to embed this legitimacy into their objectives. Despite their lack of *de jure* authority, epistemic communities can shape future policy development by defining the issue at stake and providing standards or normative guidance that is not otherwise available. As 'knowledge-based networks' (Cross 2015), epistemic communities also influence meaning-making processes by circulating particular understandings of issues among different publics.

This article shows how public relations (PR) consultants develop and maintain expert knowledge, authority, and legitimacy in the realm of international environmental governance. Following Levy and Newell (2005), we employ the term environmental governance 'to signify the broad range of political, economic and social structures and processes that

shape and constrain actors' behavior towards the environment'. In this understanding, environmental governance is not limited to rule-making and enforcement or the creation of institutions but encompasses 'a soft infrastructure of norms, expectations, and social understandings of acceptable behavior towards the environment' that require multiple actors' participation in order to be realized (2).

While organizational PR theory recognizes the role of strategic communication and persuasion in building public awareness and influencing behavioral change, PR practitioners are still rarely seen as knowledge producers but instead as mediators of existing knowledge, as 'value-neutral' intermediaries and not as 'value-driven' social agents. In contrast, we consider environmental PR as a source of specialized knowledge and expertise through which particular ideas about the environment are conceptualized and stabilized. Though PR professionals, like accountants and lawyers, putatively only mediate the beliefs and objectives of their clients, in practice they can be autonomous, value-creating actors whose work has important implications for governance (Power 2007; Stark 2009). PR professionals constitute an epistemic community. They are engaged in the production of knowledge, creating and structuring information in order to foster consensus around particular values (Haas 2016) that may conduce to policy decisions. In this optic, PR is not about the communication of preexisting ideas and

information but about creating the ideas and information standards that shape political contexts.

We examine the political context of transnational environmental governance in the early 1990s through a genealogy of international environmental PR. We locate the origins of this lineage in the activities of a small number of PR and public affairs firms that operated as part of the EnviroComm network, a lobbying and PR franchise created in the late 1980s in Washington, DC, that grew over the next 10 years to include PR firms across Europe as well as in Mexico. While it was not the first international network of PR companies, EnviroComm was the first network to focus exclusively on 'green' PR and on disseminating environmental communication tools and expertise among its members and clients. We examine the emergence of this network and the organizational forms and practices in which it becomes enmeshed as well as the content of its claims. We trace the mechanisms by which the PR consultants of the EnviroComm network constituted themselves as an epistemic community, becoming carriers of 'green communication'.

We use the case of EnviroComm to make three interlinked arguments. First, PR actors and other strategic communicators should be understood as knowledge experts who participate in both the social construction (Berger and Luckman 1966) of environmental problems and in developing the social, cultural, and technical means to address them. Past studies on expert networks of international development (Mosse 2005a) and climate science (Oreskes and Conway 2010) have shown how expert knowledge, especially around ambiguous concepts like 'sustainability' or 'resilience' (Mosse 2005a; Green 2013; Bollig 2014) is manufactured within these networks and circulated internationally. The case of EnviroComm shows how PR action around international environmental governance created the ideological conditions for diffusing 'green communication' and thus for championing a particular 'brand' of environmentalism overseas, one rooted in voluntary, strategic, and entrepreneurial approaches to environmental problems.

Second, EnviroComm demonstrates the importance of a historical perspective in understanding regime change in both the private and public sectors. The time period from 1989 to 1997 was a critical juncture in international relations and environmental politics. The publication in 1987 of the United Nations WCED report, *Our Common Future*, and the UNCED Earth Summit at Rio in 1992, pushed the concept of sustainability to the fore of international environmental concern. Meanwhile, the Single European Act signed in 1987 extended European Economic Community jurisdiction over several aspects of social policy, including environmental policy (Calfee 1998). American company leaders worried that new European Union rules on environmental protection and public health would compromise business practices. To quell the growing tension between calls for top-down

regulatory frameworks and self-regulation initiatives in the realm of green governance, EnviroComm built its network out from the United States across Europe and into Mexico, encouraging its public and private sector clients to adopt 'sustainable communication' standards, practices and disclosure processes and forcing competitors to follow suit (see also Garcia-Johnson 2000). Without this key historical context, we miss a full understanding of how a regime of environmental management that privileged economic growth along with ecological concerns became normalized and embedded in transnational contexts.

Third, we argue that a sociological and transnational approach is best suited to examine processes of knowledge diffusion among transnational institutions and industries in the realm of environmental governance. We explain the intensification of green communication across borders and among 'contentious' industries (including tobacco, fossil fuels, and chemicals) through an examination of the actors and platforms that actively promoted it in these realms. By showing how the EnviroComm network was formed and operated, we reveal its capacity to create and reproduce repertoires of action, transforming green PR from a specialized skill into part of the 'dogma' of environmental management (Hoffman 2001). This approach is focused less on the policies themselves than on the means by which certain forms of governance are made to appear more legitimate than others.

The article proceeds as follows. First, we discuss the rationale for considering PR counselors as an epistemic community and the methodological considerations that follow therefrom. Next, we explain the logic of our case selection, research design, and data collection process. We then offer an analysis of the social and political context for the origins of EnviroComm and its role in the evolution of corporate attention to environmental issues. We identify how EnviroComm defined and facilitated the diffusion of 'green communication' principles throughout its network membership, targeting potential clients in the public and private sectors as well as the general public. We conclude by evaluating the implications of EnviroComm for extending critical understandings of international environmental norms and practice.

Epistemic communities and the construction of expert knowledge

Building upon Fleck's 'thought communities', Holznier's 'epistemic communities', and Foucault's '*episteme*',¹ anthropologists (Mosse 2005a; Green 2013), political scientists (Adler 1987; Haas 1989; Mitchell 2002) and sociologists (Knorr Cetina 1999; Krause 2014) have advanced the idea over the last 20 years. Epistemic communities are conventionally understood as

networks that can shape policy-making processes as a result of their authority over a particular area of expertise. They can be composed of scientists and/or other kinds of experts, and they can be located both inside and outside of bureaucratic arrangements (Cross 2013; Dunlop 2017). It is their professionalism, 'which includes norms, standards, training, socialization, status, and jurisdiction over a certain area of knowledge and work' that separates them from other kinds of networks pursuing a common policy goal (Cross 2013, 159).

Despite the different analytical approaches used by social scientists studying epistemic communities, these studies have drawn similar conclusions when describing the role of these knowledge networks within regimes of global governance. By manufacturing transferable expert knowledge, epistemic communities help create consensus, order, and control. Epistemic communities define standards, universal principles, common sense models, and core categories that shape policy-making, and build compliance within and outside official documents (Green 2013). Scholars have argued that these knowledge-based networks can engage in a 'soft form of socio-political steering' (Pattberg 2007) by promoting notions of deregulation or pro-regulation (Oreskes and Conway 2010).

Our use of the concept takes up Cross's (2013) observation that 'the epistemic community literature thus far has focused too narrowly on scientists because of the misguided notion that scientific knowledge is somehow superior to other forms of knowledge' (159). Other kinds of experts, such as business networks, think tanks, international foundations, and multinational consultants can facilitate the exchange of knowledge among decision-makers across borders, using 'their intellectual authority or market expertise to reinforce and legitimate certain forms of policy or normative standards as best practice' (Stone 2004, 556).

Past studies on transnational governance have noted that consultancies 'have contributed to the globalization of the core values of Western culture generally, and the transmission of the idea of liberalization specifically', pointing out that name-brand firms can act as 'reputational intermediaries' (Stone 2004, 557). Consultancies can 'legitimate and signal to a wider international audience of investors and financial institutions that a country is a "prudent economic manager," "that the right kind of people are involved in the process" who "understand the global standards and are in compliance"' (Orenstein 2003 cited in Stone 2004, 557). Even if there is no direct policy transfer, private rule-setting initiatives (such as those spread through consultancy networks) still provide a venue for testing regulatory solutions (Dadush 2015).

The sociocultural turn in communications scholarship has done much to move researchers beyond a functional focus on PR and other professional consultants as managerial or technical workers to consider how such practitioners are active agents in the

communications process (Edwards and Hodges 2011; Edwards 2011).² Inherent to these newer approaches is greater attention to the political significance of PR and its interrelationship with power (Edwards 2018). Edwards (2016) in particular stresses the role of PR in deliberative systems, where PR can prompt policy change through its pluralistic and inclusive capacity, helping to facilitate reflexive debate on matters of public interest. Despite this renewed focus, however, no one to our knowledge has yet considered the role of PR professionals as an epistemic community shaping environmental governance at a transnational scale.

The study of epistemic communities presents some methodological challenges. First, considering how other kinds of experts besides scientists create and broker knowledge in global governance contexts requires an expanded idea of what constitutes 'knowledge' in such networks. The focus on *scientific* expertise in epistemic community paradigms has tended to reify expertise as an objective, consensus-seeking and cooperative form of knowledge (Levy and Newell 2005, 26). These paradigms neglect 'the contested nature of knowledge', whereby various actors 'are actively engaged in supporting or challenging particular interpretations of evidence that sustain or subvert the case for action' (26). The outcome of an epistemic community may thus be located in the steering process that moves decision-makers away from specific outcomes, or in the absence of policy, or via the failure of mandates. Recognizing the contingent nature of knowledge requires concerted attention to how particular historical and social contexts are made relevant by a given epistemic community and others made unavailable. The objective of scholarly work studying the role of 'alternative' epistemic communities within international policy frameworks should move toward an account of how social and political contexts are manifested (Latour 1996 cited in Mosse 2005a, 17) to favor certain policy outcomes while disabling others. This is particularly relevant in the case of environmental politics, where economic and technological arguments are often presented as alternatives to scientific frames for policy decisions and where business plays an outsized role, enabling 'voluntary' adherence to soft mandates in lieu of government regulation (Levy and Newell 2005, 26, 309).

Second, while the documents produced by these expert networks serve as discourse representations, they do not reveal the effort that goes into preparing and negotiating these texts. As Mosse has argued:

They cannot be read at face value without reference to the arguments, interests and divergent points of view that they encode and to which they allude... project design texts have to be interpreted backwards to reveal the social relations that produced them, the future contests they anticipate and the wider

'discourse coalitions' (Fairhead and Leach 2002, 9) they are intended to call forth. In short, a sociology of the document is needed to 'dispel the discursive hold of the text'. (Apthorpe 2014 [1996], 16) (Mosse 2005b, 15).

It is thus essential to focus on not only the texts produced by epistemic communities but also on their 'operational knowledge' (Bogner, Littig, and Menz 2009, 30) such as organizational routines, rules of thumb, and informal negotiation mechanisms (Mosse 2005a; Green 2013; Krause 2014) in order to understand how universal models emerge from specialized contexts. The challenge is to apprehend the sociological conditions of the production of expert knowledge, employing methods to capture practices of communication and organization, the constitution of explicit and tacit knowledge, and the conditions of knowledge production within the epistemic community.

In the following sections, we show how discourse analysis of expert interviews (Meuser and Nagel 2009), combined with textual analysis of institutional and industrial archives and contextual analysis of the broader sociohistorical conditions of environmental action (Apthorpe and Gasper 2014 [1996]), can help researchers overcome some of these challenges, especially when studying a historical case.

Research process and data collection

In order to assess the relevance of EnviroComm at a critical historical juncture in transnational environmental governance, we first conducted a thorough review of all available public documentation pertaining specifically to EnviroComm, including industrial archives, library collections, and trade journals (archival documents listed in Table 2). Archives consulted include the Environmental Science and Public Policy Archives at Harvard University; the Public Relations Society of America Records at the Wisconsin Historical Society in Madison, WI; the H. John Heinz III Collection (House Papers and Senate Papers) at Carnegie Mellon University; and the Truth Tobacco Industry Documents at the University of California, San Francisco.

Additionally, we collected international news and magazine articles as well as television segments featuring EnviroComm or its members from 1982 to 1997. We also reviewed multiple articles, reports, and white papers authored by EnviroComm network members before and after their participation in the network.

After this initial archival research stage, we contacted a list of actors who appeared prominently in the documentation. We prepared a semi-structured interview guide designed to elicit perspectives on the EnviroComm network and the period during which it operated. Questions covered individual professional trajectories and engagements with the field of green communication before and after joining EnviroComm. Interviewees were also asked to reflect on what constitutes the field of green communication, its evolution and implications for both the field of PR and for processes of environmental governance within their countries and internationally. They were asked about EnviroComm's values, its team, client portfolio, and services. Interviews were conducted in English, French, and Spanish. Each interview lasted between 30 min and 1 h and was recorded and transcribed.

After an initial round of interviews with a small pool, we adhered to a limited snowball sampling method in which interviewees were asked to recommend other network members or other actors relevant to interview. We repeated our method of research, approach, and interview with this secondary pool. The snowball sampling was both methodological and analytical, as it helped us to learn more about which actors were considered more central or active in the network and which were more peripheral. Twenty network members were contacted; 13 were interviewed. Given the total size of the EnviroComm network (30 members across 12 consultant companies and a research institute), the prominence of the interviewees (all of the senior network members were interviewed) and the historical distance (three network members were deceased), we consider the total interview sample (Table 1) to be representative.

Table 1. List of interviewees.

Interviewee	Date interviewed	Professional affiliation at time of enviroComm participation	Professional title in enviroComm network
Respondent 1	21 June 2017	ITESM, Mexico	Network Member (Mexico)
Respondent 2	24 August 2017	Sanchis & Asociados, Madrid	Network Member (Spain)
Respondent 3	10 June 2017	The Mistral Group, Oxford	Network Member (Netherlands)
Respondent 4	23 February 2017	Harrison International	Chairman (Europe)
Respondent 5	8 June 2017	AEF/Harrison International	Director (Brussels)
Respondent 6	17 July 2017	Interel, Brussels	Network Member (Belgium)
Respondent 7	1 August 2017	EnviroComm Europe	Managing Director (Europe)
Respondent 8	3 August 2017	EBH Co.	Advisor (U.S.)
Respondent 9	7 August 2017	Russell Communications, Geneva	Network Member (Switzerland)
Respondent 10	1 August 2017	Sanchis & Asociados, Madrid	Network Member (Spain)
Respondent 11	21 July 2017	Spector Associates	Advisor (U.S.)
Respondent 12	22 March 2017	EBH Co.	Advisor (U.S.)
Respondent 13	9 September 2017	Sanchis & Asociados, Madrid	Network Member (Spain)

Table 2. List of archival materials.

Author	Document name	Document type	Date produced	Source
E. Bruce Harrison Co.	ETS Strategies	Client Report	7 September 1994	Truth Tobacco Archives http://industrydocuments.library.ucsf.edu/tobacco/docs/lfk0087
EnviroComm	El reto ambiental es más educativo que técnico	Promotional materials	n/d	Personal collection provided to authors
EnviroComm	EnviroComm Overview	Promotional materials	November 1994	Personal collection provided to authors
EnviroComm	12 Ways to Sell EnviroComm Service	Internal training materials	1995	Personal collection provided to authors
EnviroComm	Employee Environmental Awareness Training	Internal training materials	1995	Personal collection provided to authors
EnviroComm	EnviroComm Issues Brief (x 2)	Client Newsletter	March 1995	Personal collection provided to authors
EnviroComm	EnviroComm System Guideline	Internal training materials	1995	Personal collection provided to authors
EnviroComm	Environmental Reputation Benchmarking	Internal guide	1995	Personal collection provided to authors
EnviroComm	News Notes	Client newsletter	May 1997	Personal collection provided to authors
EnviroComm	EnviroComm Institute	Internal Correspondence	1999	Personal collection provided to authors
EnviroComm	'If You Think Like This...'	Print advertisement	n/d	Personal collection provided to authors
EnviroComm	EnviroComm Services	Promotional materials	n/d	Personal collection provided to authors
Andersson Elffers Felix	Monitoring Project	Client report	20 July 1989	Personal collection provided to authors
Andersson Elffers Felix	Annual Report	Annual report	1993	Personal collection provided to authors
EnviroComm	EnviroComm Locations	Client report	1994	http://industrydocuments.library.ucsf.edu/tobacco/docs/qpvw0058
EnviroComm	EnviroComm Franchise Network	Internal directory	1995	Personal collection provided to authors
Kohtes & Klewes	Case Studies	Internal correspondence	17 February 1997	Personal collection provided to authors
GörmannGruppen	(untitled)	Internal correspondence	1997	Personal collection provided to authors
(Legal Representative)	License Agreements	Internal correspondence	1997	Personal collection provided to authors
E. Bruce Harrison	(untitled)	Internal correspondence	23 May 1997	Personal collection provided to authors
Bikker Communicatie	Meeting Agenda	Meeting agenda	28 May 1997	Personal collection provided to authors
EnviroComm	1998 Franchise Participation Application	Network Membership Application	1998	Personal collection provided to authors
EnviroComm	EnviroComm.com	Web page	9 January 2000	Archive.is http://web.archive.org/web/20000109100618/http://www.envirocomm.com/4-e.htm
EnviroComm	EnviroComm.com	Website planning document	n/d	Personal collection provided to authors
R. Allison, P. Bowman, L. Gossett	Techniques for Public Involvement in Industrial Self-Regulation	Conference paper	1997	http://industrydocuments.library.ucsf.edu/tobacco/docs/xpfp0094
British American Tobacco Industries	Annual Meeting of the Issue and Non-Governmental Organizations Programme	Annual Meeting Report	9 September 1992	http://industrydocuments.library.ucsf.edu/tobacco/docs/nqfy0197
BSI Standards	Overview of Activities related to the Environment in ISO/IEC and CEN	International and European Environmental Policy Steering Newsletter	31 January 1992	http://industrydocuments.library.ucsf.edu/tobacco/docs/tjmv0202
Bates & Wacker	EC Environmental Issue Manager	Speech to International Public Relations Association World Congress	December 1994	http://industrydocuments.library.ucsf.edu/tobacco/docs/tswg0094
Björn Stigson	The World in Action	Briefing paper	17 June 1997	http://industrydocuments.library.ucsf.edu/tobacco/docs/pjimp0206
International Chamber of Commerce et al.	Business Briefing on UNCED for the Prime Minister	Briefing paper	8 February 1992	http://industrydocuments.library.ucsf.edu/tobacco/docs/phgp0203
Business International (The Economist)	Weekly report	Business community briefing	1 April 1991	http://industrydocuments.library.ucsf.edu/tobacco/docs/hgx0200
OECD	Eco-Efficiency	Report	1998	??
D. Robinson, S. Tonkin, S. Shah, British American Tobacco	Environmental Risk Assessments for the Tobacco Industry	Report	1999	http://industrydocuments.library.ucsf.edu/tobacco/docs/ntnj0202
UK Business (magazine)	The Government's Sustainable Development Strategy: What Does It Mean for UK Business? (untitled)	Magazine article	1999	http://industrydocuments.library.ucsf.edu/tobacco/docs/jzkf0195
U.S. Council for International Business		Newsletter	October 1994	http://industrydocuments.library.ucsf.edu/tobacco/docs/fmv0071

(Continued)

Table 2. (Continued).

Author	Document name	Document type	Date produced	Source
Fleishman Hillard Public Relations The International Business Issues Monitor	Valdez Principles International Environmental Regulation	Memo Newsletter	25 April 1991 26 June 1992	http://industrydocuments.library.ucsf.edu/tobacco/docs/zkx0200 http://industrydocuments.library.ucsf.edu/tobacco/docs/gtjm0212
International Chamber of Commerce	ICC Business Charter for Sustainable Development	Report	17 December 1990	http://industrydocuments.library.ucsf.edu/tobacco/docs/kyl0200
Infogram Vol 8 No. 9	European Parliament Elections Inspire German Poster Campaign (untitled)	Advertising campaign report	10 July 1989	http://industrydocuments.library.ucsf.edu/tobacco/docs/ljdg0045
International Public Relations Association (IPRA)	ICC Industry Forum on Environment and Development (untitled)	Correspondence	5 May 1992	Environmental Science and Public Policy Archives, Harvard University (Box 467)
International Chamber of Commerce (ICC)	ICC Industry Forum on Environment and Development (untitled)	Meeting Agenda	27–28 May 1992	Environmental Science and Public Policy Archives, Harvard University (Box 467)
International Chamber of Commerce (ICC)		Correspondence	3 December 1991; 11 February 1992; 8 May 1992; 14 May 1992	Environmental Science and Public Policy Archives, Harvard University (Box 467)
Society for International Development (x 2)	(untitled)	Correspondence	6 May 1992; 21 May 1992	Environmental Science and Public Policy Archives, Harvard University (Box 467)
C. Herkströter	Contributing to a Sustainable Future: The Royal Dutch/Shell Group in the Global Economy	Speech to Erasmus University, Rotterdam	17 March 1997	http://industrydocuments.library.ucsf.edu/tobacco/docs/qrxk0202
Corporate Europe Observatory	Ending Corporate Secrecy	Magazine article	June 1999	http://industrydocuments.library.ucsf.edu/tobacco/docs/kpbf0195
World Business Council for Sustainable Development	What is the WBCSD?	Web pages and member directory (wbcscd.ch)	16 May 2000	http://industrydocuments.library.ucsf.edu/tobacco/docs/ffl0065
World Health Organization	WHO Initiates Europe-wide action to tackle environmental and health problems	Press release	June 1994	http://industrydocuments.library.ucsf.edu/tobacco/docs/tmxy0191
World Health Organization	Concern for Europe's Tomorrow: Health and the Environment in the WHO European Region	Report	1996	http://industrydocuments.library.ucsf.edu/tobacco/docs/qhwv0099
International Chamber of Commerce	Background Note on the ICC Business Charter for Sustainable Development	Internal Planning Report	1991	http://industrydocuments.library.ucsf.edu/tobacco/docs/lyxl0200
Unknown	Environmental Update	Internal planning document	19 April 1991	http://industrydocuments.library.ucsf.edu/tobacco/docs/skx0200
J. A. Willums	Sponsorship of the WICEM II Conference	Correspondence	1991	http://industrydocuments.library.ucsf.edu/tobacco/docs/gnx0200

All interviewees occupied roles in PR and strategic communications before joining EnviroComm. While some had already practiced environmental communication, others took on clients or adopted strategies in the corporate-environmental sector as a direct result of their work with EnviroComm. Interviewees landed in PR from many paths. Some had worked in government at both federal (U.S.) and local (European) levels. A number had careers in public affairs or government relations for large corporations. Some had backgrounds working as communication managers in related (i.e. chemical, petroleum, manufacturing) trade associations or business councils, including the Business Council of Sustainable Development (BCSD). Still others had worked in journalism. At the time of EnviroComm's activities, most of the respondents were senior-level executives in PR or public affairs firms who had been directly involved in their firms' negotiations to join the EnviroComm network. At the time of our interviews, some were still engaged in public affairs work in the same country where they had been during the EnviroComm years (Switzerland, Belgium, Netherlands, Spain, Mexico). Many were retired.

The interviews allowed us to supplement archival data and media documentation by giving us a sense of organizational routines, practices, and tensions among EnviroComm's members. Furthermore, two informants provided strategy-planning documents, company reports, and press releases for our use, which were enormously helpful in reconstructing the network's business mission. Our mixed-method approach gave us a more detailed understanding of the broader social and political context. Moreover, it allowed us to assess not only the construction of knowledge but also 'the construction of the machineries by which knowledge is being constructed' (Knorr Cetina, 2002, cited in Bogner, Littig, and Menz 2009, 28).

Making the corporate 'environment': EnviroComm and the emergence of sustainable communication

Policy and organizational sociology scholars situate the rise of self-regulation initiatives and other soft forms of environmental private governance in the early 1990s in response to a number of near-simultaneous events. Previous studies have identified the growing frequency of chemical and oil spills in the late 1980s, such as the Bhopal, Chernobyl, and Exxon Valdez disasters, as triggers for a shift in corporate environmentalism (Bulkeley et al. 2014; Pattberg 2007) where environmental protection would no longer be seen as a threat but as an opportunity, 'one that would increase [corporations'] competitive advantage in the marketplace' (Hoffman 2001, 3). Other studies have argued that a weakened environmental movement, the failure at Rio to transform the movement's principles into enforceable regulation, and the dismantling of the United Nations Center on

Transnational Corporations (Ritcher 2001, cited in Pattberg 2007, 89), contributed to the emergence of private self-regulation and co-regulation efforts and more 'proactive' forms of environmental management.

Furthermore, major economic transformations at the international level, such as the regional integration of 'the world's biggest marketplace' (Revzin 1989) in Europe, along with new European Community standards for environmental protection, added external pressure for a change in corporate culture. For American corporations, the consolidation of the European Single Market held both promise and potential peril. In terms of promise, U.S. firms could help European companies learn the ropes of environmental compliance. American companies had already been exposed to environmental controls by federal bodies such as the Environmental Protection Agency in the context of right-to-know legislation and the Clean Air Act debates. In terms of peril, many of the European proposals for environmental standards, such as eco-labeling and emission restrictions, were much more demanding than their American counterparts. American companies with units abroad sought advice on how to navigate these new rules along with their regulators.

It is at this conjuncture of events that EnviroComm emerges in the late 1980s. EnviroComm was a network of environmental PR firms that stretched from Washington to Brussels and eventually across Europe and into Mexico, until it was disbanded in 1997. In keeping with definitions of epistemic communities (Cross 2015; Haas 2016), these firms shared beliefs, professional judgment, common notions of validity, and the goal of standardizing and diffusing best practices of green communication. The EnviroComm network acted as a horizontal collective, founded on the basis of existing relations among its members and devoted to the promotion of what it called 'sustainable communication' principles through the organization of public and private events and meetings. The following section describes how it evolved from a monitoring system to a transnational network of environmental PR firms engaged in a common set of practices, committed to the diffusion of 'sustainable communication'.

Epistemic authority and trust-building

In 1989, the environmental PR firm E. Bruce Harrison Co. entered into a partnership with the Brussels-based public affairs consultancy, Andersson Elffers Felix (AEF). AEF/Harrison International was designed to provide 'an early warning system' for client companies, monitoring up to 18 'agent institutions' involved in the making of the European Community's environmental policy and sending regular reports back to Washington (See Figure 1) (AEF 1989, 5; Doyle and

- (1) European Commission (EC)
- (2) Directorates General
- (3) EC representatives in the member states
- (4) Council of Ministers
- (5) European Parliament
- (6) Economic and Social Committee
- (7) European action and pressure groups
- (8) European employers' and workers' organizations
- (9) Permanent representatives at the EC
- (10) EC liaison offices
- (11) EC advisory centers
- (12) National departments and governments
- (13) National political parties and people's representatives
- (14) Regional chambers of commerce
- (15) Regional and municipal administrations
- (16) Diplomatic missions in the member states
- (17) Employers' and workers' organizations in the member states
- (18) EFTA (European Free Trade Association) countries

Figure 1. 'Agent institutions' engaged in environmental policy in the European Community. Source: AEF 1989, 5.

May 1991). In addition to monitoring environmental policy for clients, AEF's role was 'to influence [policy] creation' through strategic lobbying (AEF 1989).

As for any other expert network, EnviroComm's capacity to make authoritative claims over environmental communication rested in part upon its members' reputation and experience in the field. In this case, the establishment of environmental communication as a field of its own was directly linked to the reputation of EnviroComm's founder: the American firm E. Bruce Harrison Co.

The E. Bruce Harrison Company had been well known in American business for decades. As Manager of Environmental Information for the Chemical Manufacturers Association (the industry's major trade association) in the early 1960s, Harrison led the industry's response to the publication of *Silent Spring*, the book by journalist Rachel Carson that is widely seen to have launched the environmental movement in the United States (Harrison 1993a). While large American PR firms established in the Washington, DC, area, such as Hill & Knowlton, Burson-Marsteller, and Manning, Selvage & Lee, already had considerable experience managing environmental issues for the tobacco and oil industries, the E. Bruce Harrison Company distinguished itself in two ways. First, the boutique firm exclusively provided environmental communication services. Second, the firm engineered its client base by forming, and then representing, coalitions of like-minded organizations. Harrison founded his eponymous firm in 1973 by assembling an industry-labor coalition he called the National Environmental Development Association (NEDA), a group of contractors, corporations, labor unions and other interests that was collectively 'opposed to some types of environmental control' (Anon 1982, 1).³ Harrison drafted a 'declaration of principles' (Anon 1982, 2) which helped to recruit additional members; and hosted regional and national conferences 'as part of a continuous research and

education program' (NEDA 1979) to diffuse these principles. Over the next 30 years, NEDA became the umbrella structure for a series of issue coalitions organized around 'softening' specific federal legislative initiatives.⁴ By the late 1980s, the firm was highly successful, consistently ranked by *O'Dwyers* (the leading trade publication) among the top 10 environmental PR firms in terms of billings. In 1992, the firm claimed to represent 'through coalitions and direct service...more than eighty of the Fortune 500' (Harrison 1992). One former EnviroComm member commented on the firm's distinctiveness:

That was part of the genius of Bruce...Bruce created clients out of nothing, and so he would build these little fields of dreams, you know... he would build these and then get people to contribute to these coalitions which he would then manage and do the public relations for. And so not only did he create a client, but he essentially owned the client. Which created also a lot of stability and longevity because it was very difficult to get fired from a client that you owned. (Respondent 8)

With the understanding that shaping environmental policy required not only political but also cultural influence, AEF/Harrison International organized and participated in several public events to present its experience in managing environmental affairs for corporate clients. While positioning itself as a source of expert knowledge in the European context, AEF/Harrison International urged companies to integrate a green PR component into their environmental management activities.

To demonstrate the value of its expertise abroad, AEF/Harrison International created and sponsored media events designed to raise the visibility and legitimacy of the firm's offerings. One such event was the international promotion of a newly published book by a Harrison Company vice-president, Ernest Wittenberg, and his wife Elisabeth Wittenberg, *How to Win in Washington: Very Practical Advice about Lobbying the Grassroots and the Media* (1989). While domestic promotion focused on building up the Wittenbergs as super-connected Washington insiders,⁵ the European coverage was framed to highlight the growing similarities between American-style and European public affairs. The Brussels-based financial magazine, *Trends*, called *How to Win in Washington* 'a blockbuster at the Berlaymont' and claimed, 'In one evening [of reading the book] you will learn how to get the eye and the ear of lawmakers in Brussels, Luxembourg and Strasbourg' (Anon 1989, 66; see also Kuethe 1989; Van Heuverswyn and Schuybroek 1990; Zagorin 1989). Wittenberg himself also wrote op-eds in the *New York Times* and elsewhere underlining the growing industry for U.S. public affairs men in Europe (Wittenberg 1989).

A second means of promoting green PR in Europe was to relay the message that companies that do not seek representation for environmental issues in Europe ran considerable economic and political risk. One article sums up the general mood:

French producers of mineral water forward the idea that Bonn's decision to offer a rebate for plastic PVC bottles as a form of environmental protection is in fact a form of disguised protectionism. Tobacco producers fight against a ban on TV commercials for cigarettes...printers worry that new antipollution laws will make certain solvents unusable...They are all hurrying to Berlaymont, the headquarters of the European Commission, with the same obsession: To advance their cause (law, regulation, financing request, complaint). Their credo: 'What happens without us risks working against us'. (Michel 1990)

As a third means of building epistemic authority, Harrison sought membership in and stewardship of international organizations. In 1992, Harrison was invited to Rio as PR counsel to the major corporations participating in the United Nations Conference on Environment and Development (UNCED), also known as the Earth Summit. Encouraged by Conference Secretary Maurice Strong, the private sector played a significant role in the outcome of the conference. The BCSD, created in Geneva at Strong's request to coordinate industry participation in UNCED, elaborated a voluntary code of conduct for environmental management (the Business Charter for Sustainable Development), adherence to which was promoted as the international business community's commitment to environmental sustainability. A second outcome of the UNCED was Agenda 21, a global environmental practices agenda in which business also played an important role. That these legally non-binding codes of conduct allowed companies to sidestep the considerably stricter frameworks of environmental legislation was not lost on critical commentators, who derided the conference as 'the corporate capture of sustainable development' and as leading to an ultimate 'compromise of liberal environmentalism' in which economic concerns trumped environmental ones (Bernstein 2001; Sklair 2000).

As the PR representative for business leaders attending the summit, Harrison was centrally involved in the events leading up to the conference as well as the preparation of the Business Charter for Sustainable Development. Of the 203 companies and business organizations worldwide which had signed on to the Business Charter by March 1991, 37 were American companies; and of these 37, more than half were clients of the E. Bruce Harrison Co. The successful experience of U.S. corporate leaders and their representatives at UNCED crystallized for Harrison the opportunity to promote such voluntary

compliance programs and codes of conduct internationally, and the role of PR in doing so.

Furthermore, as chairman of the International Public Relations Association's (IPRA) Environment Committee, Harrison authored a series of articles promoting the strategic role of environmental communication and conducted a yearlong survey of corporate leaders in Europe and elsewhere to assess their commitment to environmental principles (Harrison 1996; IPRA 1995; Russel 1995). In a 1993 article for IPRA members, Harrison introduced his concept of 'sustainable communication':

The Rio meeting clearly foreshadowed the stormy process by which sustainable development will evolve from a mantra to real policies forged by hundreds of parties with conflicting aims and motives. In the midst of the tempest, it will fall to communicators to build support for a vision of our planetary future that can reconcile and accommodate greening and growth. This is where sustainable communication comes in: *it will illuminate the road to sustainable development.* (Harrison 1993b, 5)

'Sustainable communication', for Harrison, was a form of environmental risk management rooted in 'soft' approaches to environmentalism. By promoting voluntary environmental compliance programs, industry benchmarking, strategic alliances with environmental organizations, and proactive disclosure, all in terms of 'sustainable communication', Harrison could participate in the control of sustainability debates and leverage his expertise as the prime mover of such commitments. EnviroComm would promote the value of sustainability through the professional tools and techniques of PR that Harrison had helped to develop. Unlike the short-term, crisis-response mode of most corporate PR at that time, Harrison defined sustainable communication as a process of continuous engagement:

Environmental communication should be used to help integrate corporate environmental goals, the ever-growing body of global regulatory requirements and the expectations of critical publics. In fact, communication devices can and should be used in strategic business planning to anticipate expectations and requirements, deal with critical negative opinion, and create useful partnerships.⁶

By 1994, Harrison had renamed AEF/Harrison International as EnviroComm and established a network of 10 PR firms in 10 European countries (See Figure 2). Harrison's choice of European PR firms to join the EnviroComm network was motivated by these firms' prior experience working with clients in the tobacco industry (Harrison himself had worked extensively with R. J. Reynolds).⁷ The network operated on a franchise model. Each firm paid Harrison an annual membership fee of US\$10,000 and was additionally required to 'spend

- E. Bruce Harrison Company (USA)
- Beau Fixe (France)
- Bikker Communicatie (Netherlands)
- EnviroComm Europe [Secretariat] (Brussels)
- GörmanGruppen (Sweden)
- Mistral (UK)
- Promotiva (Finland)
- Plaza de las Cortes (Spain)
- GAIA Srl (Italy)
- Trevor Russel Communications (Switzerland)
- Interel (Belgium)
- Arvizu, S. A. de CV (Mexico)
- ITESM (Mexico)

Figure 2. Public relations firms in EnviroComm network, March 1995. Source: EnviroComm Franchise Network List (unpublished).

at least US\$50,000 on advertising for EnviroComm in media with substantial readership among business and governmental executives' in their country.⁸ Franchisees were also expected to use the name and resources of EnviroComm in their marketing and the title of their office locations.

European PR firms were attracted to the network for a variety of reasons. Our informants noted how a combination of environmental scandals and disasters, as discussed earlier, substantially decreased public trust in corporate affairs while also strengthening calls for governmental regulation. EnviroComm promised to 'certify' network members as having specialized knowledge in environmental communication and the ability to impose standards on client organizations that would not require government oversight. Second, EnviroComm network members, all independent firms, sought to rise in the international rankings of PR billings to attract clients. Although some of the firms joining the network were top-ranked nationally, they could not compete with the massive multinational PR firms such as Hill & Knowlton or Burson-Marsteller. Presenting themselves as a group allowed the network members to combine resources for ranking purposes.

The promotion of green communication

To implement the EnviroComm vision, its members engaged in a series of information sharing, capacity building, and rule setting practices that would further cement the network's reputation and ensure certainty around a green communication objective: the integration of environmental concerns into the corporate business model through voluntary initiatives and self-regulation mechanisms that would anticipate global regulatory requirements.

Harrison met directly with network members two or three times per year. At these meetings, EnviroComm's members shared best practices, discussed political challenges, and debated future courses of action for the network. EnviroComm's core team based in Brussels and Washington produced regular bulletins, training

manuals, and guidelines and circulated these among member firms. An important piece of the EnviroComm system was the Responsible Care (RC) Program. RC is a voluntary industrial compliance program developed in 1989 by the Chemical Manufacturers Association (CMA) in response to public outcry after 'the world's worst industrial disaster', a gas leak from the Union Carbide Corporation's pesticide plant in Bhopal, India, in 1984. The company and the industry at large were subject to strict regulation in the context of the rising Right to Know movement (Fortun 2001). Developed while Union Carbide CEO Robert Kennedy was president of the CMA, RC represented a concerted attempt to improve the reputation of the company and the industry as a whole (Garcia-Johnson 2000). Indeed the adoption of RC by the CMA was part of the trade association's own attempt to become 'a public relations promoter and private performance regulator' (Garcia-Johnson 2000, 72). As Fortun writes, 'Responsible Care established the institutional structures through which public concern about chemicals would be articulated' (Fortun 2001, 65). While aspects of the program are dedicated to managing risk, a central function of the program is to manage information, ensuring that the industry maintained a hold over how it was represented in public forums (Fortun 2001).

Since Harrison had begun his PR career with the CMA and remained, in the early 1990s, a regular attendee at CMA events and panel meetings, at certain points conducting legislative monitoring for the association; and since Union Carbide was a client of E. Bruce Harrison, it was not surprising that RC was one of the tools proposed by EnviroComm to its European clients. EnviroComm advocated a multi-level communications program to implement RC: Operational guidelines and program recommendations to plant managers and company divisions; employee activities such as lunch-hour events where RC films are shown to educate staff; and community relations. Here EnviroComm proposed companies create community advisory groups to hold meetings 'to inform neighbors about environmental advances at individual plants'. They proposed that information about the RC program and other environmental measures 'be distributed to local schools for classroom use'; and they proposed that 'letters...be sent to leaders of the community inviting them to share your company's Responsible Care commitment and appeal to leaders to adopt similar principles in the locality'.⁹

The bulletins and guidelines produced by EnviroComm introduced industrial environmental concerns as first and foremost problems of information, which EnviroComm experts could solve with their communication skills. These documents presented industry leaders as the creators and shapers of environmental information rather than its recipients. For example, describing the need for

environmental reputation benchmarking, the EnviroComm guidelines explain:

In the world today, billions of dollars have been invested in raising the level of environmental performance within the private sector. Billions more will continue to be invested. Yet, missing from this very expensive equation is an agreed-upon method for judging what level of environmental performance is acceptable, and who gets to define environmental performance.¹⁰

For the PR counselors involved in the network, EnviroComm was a vital source of knowledge about corporate environmental issues. EnviroComm's members and clients were impressed by EnviroComm's U.S. standing, which helped to create a source of competitive advantage for these firms in securing clients. As one explained, '[EnviroComm] gave us a listening ear for environmental aspects...[clients] recognize us as a consultancy that was having this knowledge and experience in the field' (Respondent 6). A second counselor interviewed said, '[EnviroComm] allowed us to think about environmental issues and specialize and focus on the environment...it gave us special notoriety. We're not just...in Brussels or Belgium but we have this huge network. If you have an [environmental] issue in Spain, well, we can help you. So, we thought of it as an official trump card' (Respondent 2). The network invested clients with greater visibility. A third counselor interviewed noted,

The field of environmental communication was very incipient in Spain when we joined the network. It was too novel. Our team felt a bit lost at EnviroComm's kick-off meeting in Rome. We received the 'decologue' of environmental communication (...) Looking back, I believe it was beneficial for Spain to become part of a global network, share ideas, and learn from countries like Germany that were more advanced in this field. (Respondent 10)

EnviroComm drew further legitimacy from Harrison's role at UNCED and adhered to the principles outlined in Agenda 21, most notably in Chapter 30: Strengthening the Role of Business and Industry. This chapter highlights the importance for business and industry in 'recogniz[ing] environmental management as among the highest corporate priorities and as a key determinant to sustainable development', through voluntary initiatives and self-regulation. Examples included the implementation of RC and 'product stewardship policies and programmes, fostering openness and dialogue with employees and the public and carrying out environmental audits and assessments of compliance' (United Nations 1994, 237).¹¹

EnviroComm also looked to promote capacity building among its members. In a series of 'issues briefs', EnviroComm circulated details of ongoing environmental standards processes in Europe, with a focus on planned European eco-management and

auditing schemes. EnviroComm members were encouraged to develop ISO 9000 knowledge and experience to assist their clients in gaining accreditation for environmental management systems (EMS). In one issue brief, EnviroComm advised its members as follows: 'Rules for the "impartiality" of the EMS certifiers are likely to state that EMS certifiers cannot be engaged in activities including environmental consulting for the target company. However, this precept is likely to be held in abeyance for two years "to encourage transfer of expertise...when the field will be relatively small and sufficient control on a case-by-case basis can be exercised"'.¹²

Finally, EnviroComm circulated studies that would help its members advise their clients on environmental risk management. Issues covered included the conversion of 'brownfields' into serviceable properties while managing concerns from potentially disenfranchised local residents; reputation management programs among investors, employees, and publics as environmental issues are translated into health concerns; and managing communications to de-escalate crisis situations.

Discussion

This article analyzed the social and political context for the origins of EnviroComm and its role in the evolution of corporate attention to environmental issues. We reviewed mechanisms of trust building, information sharing, capacity building, and rule-setting that EnviroComm employed to promote the principles of 'sustainable communication' and voluntary compliance programs (mirroring Agenda 21 and CMA's RC program), and further strengthen its authority over green communication. We have argued that EnviroComm functioned as an epistemic community that contributed to the stabilization of environmental communication as a matter of transnational environmental governance.

The case of EnviroComm deepens previous analyses of the social and political impact of industrial environmental advocacy in three ways. First, it contributes to extant studies of the transfer of strategic information across contentious sectors including tobacco, fossil fuels, and chemicals (Union of Concerned Scientists 2007; Oreskes and Conway 2010; White and Bero 2010; Center for International Environmental Law 2016). While Oreskes and Conway (2010) focus on an epistemic community of scientists who travel across contentious industries to advance similar knowledge products, we focus on PR actors as an epistemic community that advanced ideological and material change in the international environmental sphere.

Second, our research contributes to studies of the 'Americanization' of international environmental

norms and practices through corporate advocacy (Garcia-Johnson 2000). We argue that the export of 'sustainable communication' from the E. Bruce Harrison Co. into international PR firms helped to instill a specifically American understanding of environmentalism in international public and political decision-making arenas. The surprisingly similar environmental attitudes and behaviors of international firms, expressed as a 'balance' between economic growth and environmental protection, can be at least partly explained by the cultural discipline imposed by American PR.

Third, EnviroComm demonstrates the relevance of 'environmental communication' as a tool of governance. The network's efforts to promote the concept of 'sustainable communication' paved the way for green PR to be transformed from a specialized skill into part of the 'dogma' or institutional expectations of environmental management (Hoffman 2001). By showing how the EnviroComm network was formed and operated, we aimed to show how PR creates and reproduces discourse and repertoires of action, governing through the diffusion of values and standards designed to create a collective sense that companies are 'doing something' about the environment without having to submit to state-led regulatory controls. The strategies of action contained in EnviroComm's guidelines helped to both create the field of international environmental PR and embed an American approach to environmental issues into international companies.

At the same time, we must be careful to critically acknowledge the limits of the EnviroComm case in a number of realms. First, there remains considerable concern that environmental corporate advocacy is more effective for industrial image making than for actual improvements in environmental protection. Charges of 'greenwashing' by critics require substantive rebuttal with scientific evidence and patterned (as opposed to ad-hoc or piecemeal) change in order to be accepted as more than branding exercises.

Second, while corporate sustainability has become a clearly established field of research and practice over the last 25 years, there remain limitations to this body of work. The idea that corporate 'citizenship' requires attention to social and environmental impacts of company operations in addition to financial and profit concerns has become well entrenched in management principles and practice. The proliferation in academic corners of journals (e.g. *Journal of Industrial Ecology*), special issues (e.g. *Business & Society*), and books further speak to the increasingly central role of environmental attitudes and behaviors in corporate strategy, whether in the form of 'green business', environmental impact reporting, technological innovation, or product design. Yet within business circles, the environmental impact of corporate activity

is still largely evaluated in terms of instrumental and relativist logics (e.g. 'Are emissions lower than last year's?' or 'Is Company X's proprietary environmental benchmarking system more popular than Company Y's?') rather than ideological ones (Hahn et al. 2017). Proponents of 'softer' forms of capital generation such as the 'triple bottom line' to communicate sustainability initiatives assume the three values (financial, social, environmental) are congruent and commensurable. But since the mid-1990s, the basic question of whether market-led economic growth and environmental protection can be reconciled has fallen off the agenda. Corporate sustainability scholars Hahn et al. (2017) put it delicately: '...The more fundamental debate on the incommensurability of growth and sustainability...has, with very few exceptions... not found widespread further echo in corporate sustainability research within the field of management and organization studies' (160).

Finally, our case demonstrates that while a combination of discursive and contextual analysis can help overcome critical challenges in the study of epistemic communities from a historical perspective, it is not without shortcomings. We showed how the political and historical context of international environmental governance in the early 1990s helped to establish the conditions in which a network of American professional communicators could create and diffuse expert knowledge of environmental issues. In emphasizing the sociological process of knowledge generation rather than the determinate consequences of such knowledge, we cannot account for the effects of this knowledge on the failure of policy proposals, the limits to mandates, or the non-adoption of rules. Instead, by attending to the practices of negotiation, communication and organization in the constitution and extension of expertise, we offer an approach that recognizes the ways that alternative actors such as businesses or industry groups play central roles in environmental negotiations. In these contexts, we argue, looking only to policy and/or regulation as determinants of outcome can limit the potential to reveal other forms of standard-setting and norm generation germane to epistemic communities.

Conclusion

EnviroComm was a pioneering network of communicators that defined and positioned 'environmental communication' as a key tool for the emerging field of environmental management at a key historical juncture. EnviroComm functioned as an epistemic community in its ability to create and disseminate expertise and information, establish shared meaning systems and practices, and offer regular interaction

with a range of relevant actors through private meetings and public events. Through the ongoing influence of the network's owner, E. Bruce Harrison, and its members, as well as their prior experience working in contentious industries in the United States, the network gained authority among its private and public sector clients across Europe and Mexico. EnviroComm was able to embed the concept of 'sustainable communication' in international corporate approaches to environmental management across an unprecedented geographic range. It diffused an American brand of corporate governance that promotes voluntary compliance programs and self-regulation over submitting to federal and state-led regulatory controls.

Taking up a historical case as the focus of this study allowed us to overcome a common problem affecting analysts of industrial documentation and expert testimonies: the self-aggrandizing and market-oriented nature of these professional arenas can obscure the distinction between the promotional character of documents or discourses and their actual socio-political impact. At a historical distance, such distinctions narrow. Interlocutors may be more willing to speak candidly about their experiences, and archival material compared to contemporary standards and practices. The historical character of our study helped us identify and analyze the specific role of actors within the EnviroComm network, and the practices of communication and organization that this network used to produce and circulate expert knowledge.

It seems clear that situating communication as the locus of sustainability allowed EnviroComm to deflect attention away from the actual requirements of environmental sustainability, such as preventing natural resource depletion, limiting energy and water consumption, or reducing waste. At the same time, PR wielded power through a 'subterranean politics' in which rankings, standards, and codes of conduct contribute to making environmentalism 'observable, comparable and governable' across industries (Gordon and Johnson 2017, 708). In the current context of weather abnormalities, political polarization, and the ongoing institutionalization of delay (Brulle 2014) or denial of environmental realities by active and well-funded countermovements, the terrain of cultural change around climate change remains highly uneven.

Notes

1. Sociologist Ludwik Fleck first used the term 'thought communities' in *Genesis and Development of a Scientific Fact* (1979[1935], 45, 103). It is Burkart Holzner, however, who coined the term 'epistemic

communities' in *Reality Construction in Society* (1968, 69). Michel Foucault uses the term 'episteme' in *The Order of Things* (1994[1966]).

2. Other disciplines have experienced their own socio-cultural turn in evaluating the influence of consultants as value-driven intermediaries. For a sociological example, see Bessy and Chauvin (2013).
3. By 1978, NEDA membership included the Laborer's International Union; the National Cattlemen's Association; Ashland Oil; the Pennzoil Company; the Kennecott Copper Corporation; Chromalloy American Corp.; the AMREP Corporation; the International Union of Operating Engineers; the Florida Fruit & Vegetable Association; Associated General Contractors of America; the Dravo Corporation; the Atlantic City Electric Company; the Campbell Soup Company; Deseret Ranches of Florida; and the Pacific Gas & Electric Company.
4. Umbrella groups were primarily organized around single legislative initiatives: NEDA/CAAP (Clean Air Act Project); NEDA/CWA (Clean Water Act); NEDA/RCRA (Resource Conservation and Recovery Act); and NEDA/TIEQ (Total Indoor Environmental Quality), among others.
5. See, e.g., an interview with the Wittenbergs on C-SPAN: <https://www.c-span.org/video/?10259-1/grassroots-lobbying-washington>.
6. Harrison (1995).
7. EnviroComm network firms with tobacco clients include Interel (Philip Morris); Kohtes Klewes (Lucky Strikes); Sanchis (R. J. Reynolds); Trevor Russel (Philip Morris). Based also on a report prepared by the Harrison Company for R. J. Reynolds advocating a European expansion of public affairs capabilities, we surmise that Harrison also envisioned EnviroComm as a European platform from which to counter or weaken legislation on tobacco and/or air quality. See <http://industrydocuments.library.ucsf.edu/tobacco/docs/lfkv0087>.
8. Franchise Agreement between EnviroComm International, Inc. and The Mistral Group Limited, 1994 (unpublished).
9. Responsible Care & Environmental Community Relations: A Business Development Aid for the Exclusive Use of EnviroComm™ Practitioners. 1995 EnviroComm Guide, 9 pp. (unpublished).
10. Environmental Reputation Benchmarking: A Business Development Aid for the Exclusive Use of EnviroComm™ Practitioners. 1995 EnviroComm Guide, 8 pp. (unpublished).
11. Agenda 21 was also enforced in a range of other organizations with which Harrison and/or his clients were involved: the United Nations Environment Program (UNEP), the International Chamber of Commerce (ICC), the U.S. Council on International Business (USCIB), the Chemical Manufacturers Association (CMA), the Global Environmental Management Initiative (GEMI), the International Network for Environmental Management (INEM), and the Business Roundtable (U.S.)
12. EnviroComm International (1995).

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