

# SEC 'Going Deep' in ESG Enforcement, New Cases Show

Media Mentions

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**Rachel Goldman**, co-chair of Bracewell's [ESG practice](#), spoke with *Agenda Week* about recent SEC enforcement actions related to public statements made by companies on environmental, social and governance issues.

"The SEC is finally making good on their promise to take aggressive enforcement action in the ESG space," said Goldman, noting that the SEC is "looking very carefully at the statements companies make outside of SEC filings."

The recent enforcement action against Vale S.A., for example, is "the first real evidence" that the SEC is relying heavily on sustainability and CSR reports. "They are really going deep," she said.

Goldman advises boards of directors to take steps to ensure their companies have the proper compliance and governance structures in place and that ESG efforts are not siloed or "left in marketing's hands."

"Make sure the data that is being gathered is accurate and being reported accurately so [companies] don't find themselves defending it in the same way as financial statements," Goldman concluded.

## Related People

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