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Quarterly Trends Report

March 2026

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Contents

Introduction

Early 2026 has brought disruption and uncertainty, from armed conflict in the Middle East and global trade tensions to questions over the impacts of AI.

Corporate sustainability has not been immune to this. Economic and political forces require companies to view sustainability through a pragmatic lens—one where execution outweighs aspirational rhetoric.

This shift in focus can be seen in sustainable finance, where clear commercial benefit opportunities are driving new action among financial firms, and in the disclosure space, where the European Union (EU) Omnibus I aims to balance sustainability considerations with economic growth.

Companies also face an energy landscape undergoing significant change driven by U.S. policy shifts in favor of fossil fuels, geopolitical forces placing a premium on energy security, and the way power considerations are shaping both energy supply and AI and data center conversations.

These topics featured prominently at the just concluded CERAWeek in Houston, where overarching themes of convergence and competition shaped conversations on the role of energy in a world where it is closely connected to technology and geopolitics.

This quarterly trends report covers these developments and more, highlighting how external forces and internal pressures are converging to shape the next evolution of corporate sustainability.[1]

1 The March 2026 Quarterly Trends Report follows the structure of the ERM Sustainability Institute's 2026 Annual Trends Report, highlighting key developments across the four trends covered in that earlier report.

Sustainability that pays

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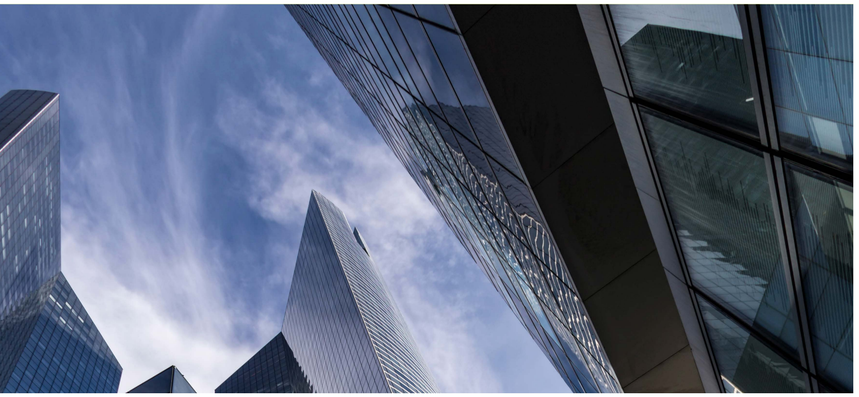


SIGNAL 1:

Strong performance amid pressures defines sustainable finance landscape

Sustainable finance deals are paying off for financial firms, highlighting that, despite recent shocks and a first-ever annual outflow from sustainability funds, organizations continue to benefit from green investment. Even as sustainable finance delivers commercial benefit, political pressures are leading some firms to drop proxy advisors, with unclear implications for sustainability-related shareholder proposals.

Financial firms pursue new sustainable finance initiatives generating strong performance

- *Sustainable finance deals outearn fossil fuels:* Major banks earned more from financing projects such as renewables and batteries ($3.7 billion) than from financing fossil fuels ($2.9 billion) for the fourth straight year in 2025.
- *Lender ambitions signal momentum is likely to continue:* Standard Chartered issued its first green bond in January for $1.14 billion (€1 billion) to finance renewables and green buildings. Also in January, AllianzGI launched a $1 billion fund to help emerging market firms invest in climate mitigation. Outside of Europe, Emirates NBD issued the largest ($1 billion) combined blue-green bond ever in January.
- *Sustainable funds record first-ever annual outflow:* Globally, sustainable funds recorded their first-ever annual outflow in 2025 since Morningstar began tracking the segment in 2018, with investors removing $84 billion, compared with $38 billion of inflows in 2024, led by Europe and the U.S.

Sustainability-related shareholder proposal approaches reshaped amidst political pressures

- *JPMorgan Chase and Wells Fargo drop ties with proxy advisors:* In early January, JPMorgan Asset Management announced it would no longer use proxy advisors when considering shareholder proposals and said that it would instead use an in-house AI tool to inform votes. Wells Fargo made a similar move, launching an internal proxy voting service and cutting ties with proxy advisor ISS. Both actions followed recent criticism of proxy advisors for overemphasizing sustainability-related issues.
- *Proxy advisors adjust approaches to sustainability-related shareholder proposals:* Both ISS' and Glass Lewis's 2026 proxy voting policies now require them to evaluate sustainability-related proposals on a case-by-case basis instead of supporting them by default. Each advisor will still support such proposals where there are clear links to investor interests such as value creation and risk mitigation.

WHAT COMPANIES NEED TO KNOW

→ **Recognize opportunities for sustainable financing:** With sustainable finance deals yielding strong results, lenders are more likely to offer financing for sustainability-related projects and upgrades, creating opportunities for companies to scale their ambitions via improved capital access.

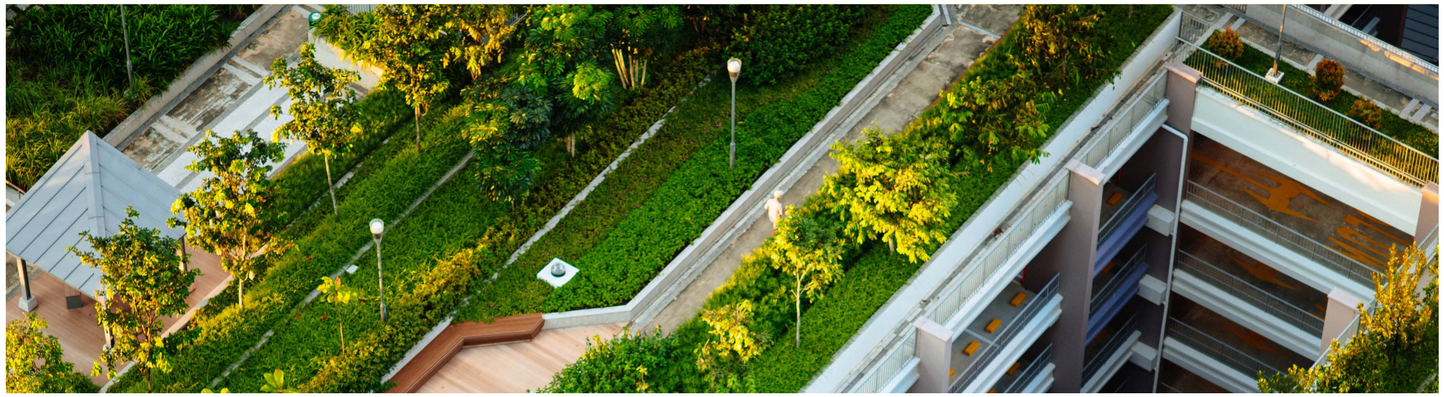
→ **Expect reduced support for sustainability-focused proposals:** As financial firms move away from external proxy advisors and political pressures continue, there may be less support for sustainability-focused shareholder proposals from institutional investors.

→ **Direct investor dialogue is likely to grow:** The trend towards in-house proposal analysis will likely require companies to engage investors more directly on their sustainability initiatives than under the previous proxy advisor-dominated system.

SIGNAL 2:

Sustainability reporting undergoes simplification and expansion

The finalization of the EU Omnibus I simplifies sustainability reporting for companies operating in the bloc, but has also triggered some negative reactions. Outside Europe, the expansion of sustainability disclosure regulation signals that regulators continue to value sustainability information.



EU Omnibus simplifies European sustainability reporting and generates concerns

- *EU Omnibus I finalized:* The EU Council approved the Omnibus I directive in late February, amending the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD). The reforms narrow the CSRD's scope to companies with over 1,000 employees and €450 million in turnover, while the CSDDD now applies only to companies with over 5,000 employees and €1.5 billion in turnover.
- *Concerns that Omnibus I will weaken disclosure persist:* A January study by European Financial Reporting Advisory Group (EFRAG) found that 55% of sustainability data users are worried that simplified European Sustainability Reporting Standards (ESRS) under the Omnibus I reforms will weaken disclosure quality. This percentage rose to 67% among financial firms, who cited concerns about reduced data comparability and fewer mandatory data points.
- *European Central Bank (ECB) warns of investor impacts:* In February, the ECB published a staff opinion piece warning that the Omnibus I reforms would "significantly reduce transparency for investors and other market participants," potentially weakening the availability and comparability of the sustainability information needed for investment decisions and financial stability monitoring.

Sustainability disclosure regulations and standards continue to expand

- *California moves forward with greenhouse gas (GHG) emissions reporting regulation:* In February, the California Air Resources Board (CARB) approved regulation to establish the administration of and fee assessment process for SB 253, which requires companies operating in the state with revenues of over $500 million or $1 billion, depending on the statute, to report their Scope 1 and 2 GHG emissions.
- *ISSB-aligned reporting requirements proliferate across geographies:* In January, the UK Financial Conduct Authority opened consultation on the implementation of mandatory ISSB-aligned sustainability disclosures starting in 2027. Elsewhere, countries including China, the Philippines, and Nigeria recently issued updated sustainability reporting standards aligned with IFRS S1 and S2, formalizing ISSB-based frameworks in their domestic reporting regimes.

WHAT COMPANIES NEED TO KNOW

→ **Simplification, not cessation:** Despite simplification of the EU's sustainability disclosure regime, most major companies with significant operations in the bloc will still be required to align their reporting with EU standards. Companies will need to carefully review applicability, timelines, and obligations, and ensure they have the internal structures and processes in place to comply.

→ **Disclosure quality is still critical:** As responses to the EU Omnibus I highlight, disclosure quality is still an important topic to users of sustainability information. Companies will need to assess the preferences of their stakeholders and adapt their disclosure accordingly.

→ **ISSB as a global baseline:** With more countries adopting ISSB-aligned reporting requirements, companies should consider anchoring their sustainability disclosure systems to the ISSB's S1 and S2 frameworks to ease alignment and improve efficiency.

Energy conundrums

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SIGNAL 1:

U.S. policy changes reshape energy landscape

The U.S. federal government made major energy policy changes in the first few months of 2026. Despite policies that now prioritize fossil fuels, other factors are likely to ensure renewables continue to be a factor in U.S. energy mixes. Discussions at CERAWeek highlighted this dichotomy and ongoing global energy policy divergence, which is pushing companies to strike a balance between pragmatic and impactful climate action.

Major federal energy policy shifts sweep the U.S.

- *U.S. Department of Energy (DOE) restructures loan portfolio:* In January, the U.S. DOE's Office of Energy Dominance Financing announced it had restructured, revised, or eliminated more than $83 billion in loans and conditional commitments from the prior administration's energy loan portfolio, realigning federal energy support away from renewables to natural gas and nuclear.
- *U.S. EPA rescinds Endangerment Finding:* In February, the U.S. EPA rescinded its 2009 Greenhouse Gas Endangerment Finding, which deemed greenhouse gases a danger to public health. The finding was the foundation for most U.S. climate regulation under the Clean Air Act, serving as the legal basis for regulating climate-warming vehicle, power plant, and other emissions.
- *U.S. DOE announces National Environmental Policy Act (NEPA) exclusions for advanced nuclear reactors:* The U.S. DOE announced NEPA exclusions for certain advanced nuclear reactors in February, streamlining environmental review requirements to accelerate deployment of the technology.

Mixed responses among private sector to U.S. policy evolutions

- *Some industry associations applaud endangerment finding rollback:* The Specialty Equipment Market Association (SEMA) celebrated the endangerment finding's rescindment, noting it restores consumer choice and shifts vehicle policy back to market demand. The Independent Petroleum Association of America (IPAA) also backed the EPA's move, arguing that it addresses regulatory overreach and gives oil and gas producers clearer, more consistent rules from which to make decisions.
- *Companies eye renewables despite policy upheaval:* Despite federal policy changes, many private sector organizations are still pursuing renewables. In early February, Google signed a 15-year, 1 GW Power Purchase Agreement with TotalEnergies to supply its AI data centers in Texas. AI-related energy demands also influenced Enel's decision to invest over €53 billion in U.S. renewables to meet AI-driven power demand growth, which it acted on in late February when it acquired an 830 MW U.S. wind and solar portfolio.

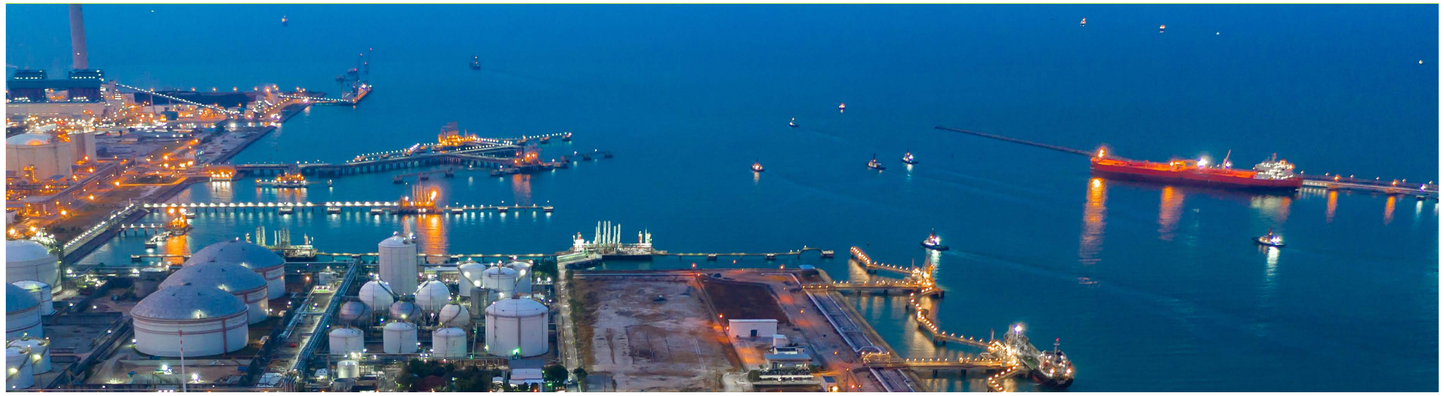
WHAT COMPANIES NEED TO KNOW

- → **Energy permitting reforms may create opportunities:** After the U.S. DOE's move to streamline permitting for advanced nuclear reactors and growing momentum behind permitting reform in Congress, companies may be able to advance energy projects that had not previously made financial sense.
- → **Renewables remain attractive:** Factors beyond the energy policy arena, namely generation cost-effectiveness and power demand growth, continue to make renewable energy attractive for companies operating in the U.S., despite recent policy changes favoring fossil fuels.
- → **Political cycles should not distract from the long-term:** Even as the U.S. energy policy landscape shifts, diversified energy strategies that take advantage of the cost and scalability benefits of renewables and the flexibility of energy sources like natural gas and nuclear will help insulate companies against policy shifts.

SIGNAL 2:

Splintering geopolitical environment spotlights energy security concerns

The recent conflict in the Middle East has upended the global energy system. Oil and gas market disruptions highlight energy security pitfalls, while renewables face their own challenges despite their detachment from fuel supply chains. A sense of a fracturing global energy landscape was common throughout CERAWeek, with energy security considerations increasingly seen as central factors not only in companies' energy strategies but also in their decarbonization ambitions.



Oil and gas markets in a state of flux as the world grapples with conflict

- *LNG supply disruptions signal opportunity for players outside the Middle East:* On March 4, Qatar, the world's second largest LNG exporter, shut down its natural gas liquefaction facilities for at least a month due to Iranian attacks on energy infrastructure in the region. Anticipating potential shortages in places such as Europe and Japan, LNG exporters outside the region such as Venture Global and Cheniere Energy raced to increase export capacity at their U.S. facilities.
- *Shipping stoppages via Strait of Hormuz pressure oil prices:* Major maritime insurers canceled war risk coverage for vessels operating in the Strait of Hormuz because of the Iran conflict. Ship traffic through the strait subsequently dropped by 94%, a fall that contributed to substantial oil price rises worldwide, given approximately 20% of the world's oil passes through the bottleneck.
- *Oil firms move to shore up global supply:* An ExxonMobil executive speaking at a conference in early March noted the company is optimizing its assets and transportation options to buffer against oil market disruptions. Also in early March, OPEC Plus announced that it would increase oil production by 206,000 barrels a day in April to help protect against oil price spikes because of the Iran conflict.

Renewable energy could benefit but headwinds remain

- *Renewable energy's energy security credentials boosted:* Conflict-driven disruptions to oil and gas supplies generally make renewable energy more attractive from an energy security perspective. The EU, for example, added approximately 80 GW of renewables in 2023, double what it added in 2021 before Russia's 2022 invasion of Ukraine, largely to counteract the loss of Russian natural gas imports.
- *Microsoft energy lead sees geopolitical turmoil benefiting renewables:* Speaking with the Financial Times in early March, Microsoft's global vice-president for energy noted that the war in the Middle East strengthens the argument for renewables as a hedge against volatile fossil fuel prices, especially given their price stability once operational.
- *Iran conflict's macroeconomic impacts could slow renewables deployment:* The capital-intensive nature of renewable energy projects leave them vulnerable to interest rate fluctuations, which could slow deployment if higher energy prices spur inflation and force central banks to raise rates.

WHAT COMPANIES NEED TO KNOW

→ **Anticipate energy market volatility to continue:** Notwithstanding developments in the Middle East, geopolitical trends point to an increasingly fragmented world where strained country relations are likely to lead to more, not less energy market volatility.

→ **Energy diversification is critical:** Reliance on particular energy sources can leave companies exposed to disruptions. Diversified energy strategies that spread consumption across renewables, fossil fuels, and other sources can help minimize shocks.

→ **Account for macroeconomic impacts on renewables:** Despite their relative geopolitical insulation, renewables' exposure to macroeconomic forces could derail projects that do not undertake risk management such as long-term contracting and interest-rate hedging.

SIGNAL 3:

Power infrastructure needs in focus amid demand surges

Governments are backing power infrastructure measures, while companies are turning their focus to batteries and grid expansion. Together, these moves signal a broader realignment to modernize and strengthen power systems to meet load growth while reducing emissions. Rising power demand featured at CERAWeek, where participants focused on solutions to expand generation capacity and modernize grids.

Governments move to spur power infrastructure development

- *Nigeria launches climate fund to cut emissions and strengthen power system:* Nigeria announced a $2 billion climate investment fund in early January to accelerate its energy transition, particularly within its power system. Supported by green bonds, the fund will finance renewable energy projects and enabling power infrastructure.
- *U.S. allocates funding to domestic grid component supply chains:* The U.S. Congress's FY2026 Energy and Water appropriations bill included $375 million in funding to the DOE's Grid Deployment Office to support domestic supply chains for electrical grid components such as transformers that are experiencing supply shortages due to booming power demand.
- *EU launches Affordable Energy Action Plan to secure accessible supply:* The European Commission launched its Affordable Energy Action Plan in late February, establishing measures to lower energy costs and strengthen energy security by accelerating renewables, improving grid infrastructure, reforming network charges, and boosting energy efficiency.

Power industry players turn to battery storage and grid expansion

- *Largest battery project in U.S.'s PJM Interconnection to help address grid reliability:* Elevate Renewable's Prospect Power Storage asset in Northern Virginia will be the biggest battery storage facility in the U.S.'s PJM Interconnection at 150 MW when it comes online later this year. The facility will help address capacity shortfalls and integrate renewable energy into the regional grid, which has seen significant power demand rises.
- *Partnership to deliver 5 GWh of battery storage to QCells renewables projects:* LG Energy Solution Vertech and Qcells entered into a multi-year agreement in early February to deploy 5 GWh of utility-scale energy storage projects across the United States. Under the partnership, LG Energy Solution Vertech will supply U.S. manufactured lithium-ion battery systems that meet domestic content requirements.
- *Adani Energy secures financing for Indian renewable power transmission project:* Adani Energy Solutions Ltd secured long-term financing from a consortium of Japanese lenders in early February to support the development of an Indian transmission project that will deliver up to 6,000 MW of solar power to the national grid.

WHAT COMPANIES NEED TO KNOW

- → **Power infrastructure opportunities abound:** Companies can benefit from increased government focus on power infrastructure by factoring policy support and public funding into their project decision-making.
- → **Grid constraints likely to continue:** With growing power demands straining grids and supply chains struggling to keep pace, grid constraints are likely to be a persistent factor in corporate electricity dynamics.
- → **Batteries to play a bigger role:** Corporate uptake of batteries is likely to continue amid demand growth and renewable energy integration, as companies and power sector actors look to strengthen grid reliability and ease capacity-addition pressures.

Sustainability in the digital era

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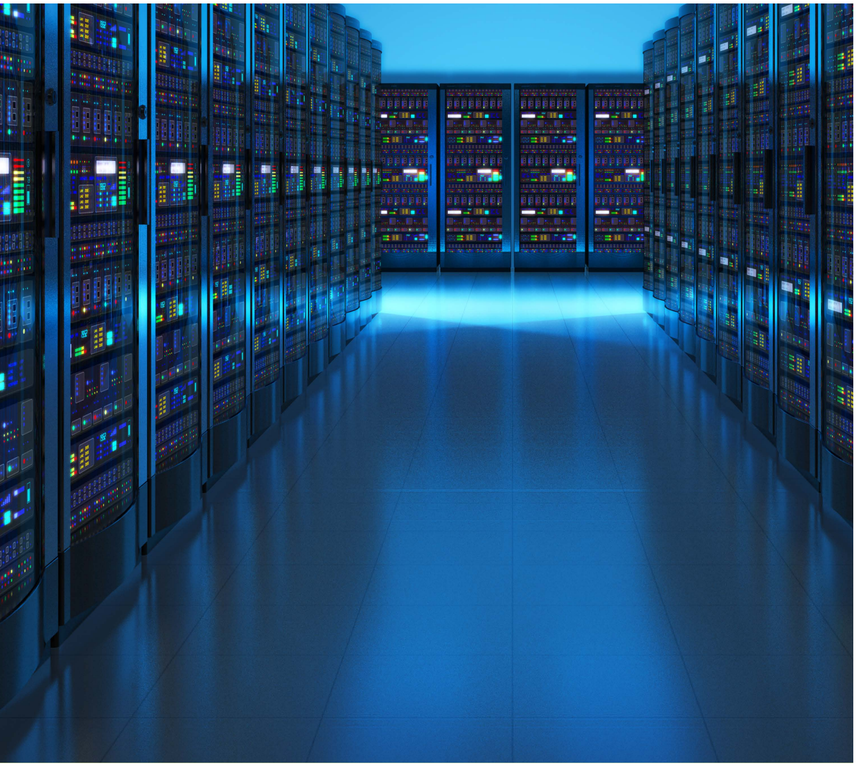


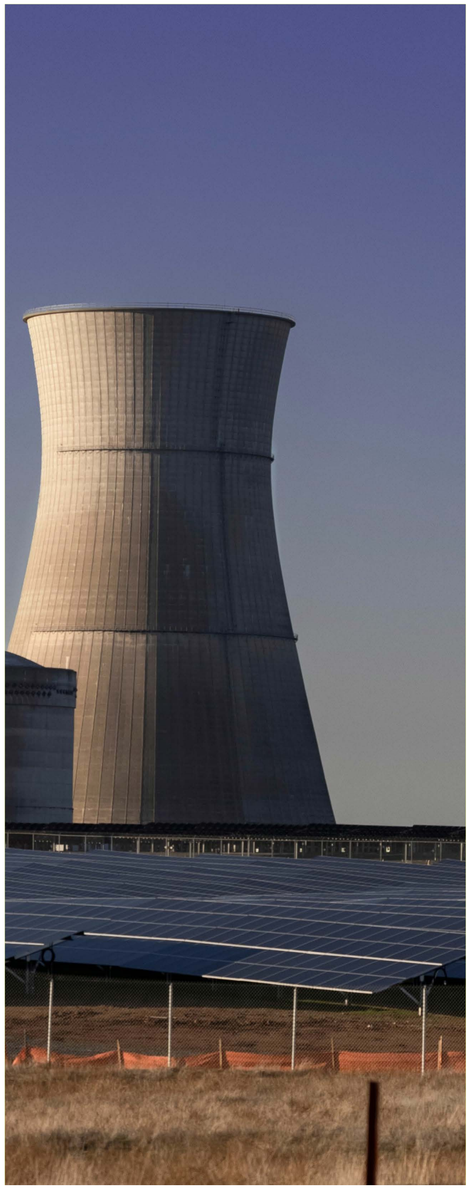
SIGNAL 1:

Question of who pays defines U.S. data center power conversation

U.S. data center actors face rising pressure to minimize the electricity price impacts of their data centers, while actors outside the country grapple with similar pressures while trying to access the energy required to support their own capacity needs. With the data center power conversation unlikely to dissipate, these actors are committing to pay their own way on power and ensure local communities benefit.

Pressure grows on data center actors to reduce electricity price impacts

- *Data centers drive up U.S. power prices:* Electricity prices are up to 267% **higher** than they were five years ago in regions with high concentrations of data centers such as Northern Virginia.
- *Americans are weary of data center price effects:* A February poll **found** that only 37% of U.S. adults would support a new data center in their area if it would increase their monthly energy bills.
- *Governments apply affordability lens to data center power impacts:* The U.S. federal government is **seeking** voluntary commitments from data center actors to not raise consumer electricity prices. At the state level, Pennsylvania Governor Josh Shapiro **called** for data center actors to fund their own power needs, while Washington's House of Representatives **passed** a bill that would require utilities to ensure data centers cover interconnection and grid upgrade costs.



Data center actors move to pay their way on power

- *Microsoft commits to being a "good neighbor" in data center communities:* In mid-January, Microsoft launched its Community-First AI Infrastructure initiative, a five-part plan to pay its own way on data center power, replenish more water than its data centers use, and invest in local economies hosting data centers.
- *OpenAI to partner with local communities for Stargate data centers:* In late January, OpenAI announced tailored community plans for its Stargate campuses that will include commitments to pay for generation and grid upgrades to prevent passing on electricity price rises to consumers.
- *Anthropic vows to address data center power costs:* In mid-February, Anthropic committed to pay 100% of grid upgrade costs to interconnect its data centers, bring net-new power generation online to match its electricity needs, and invest in curtailment systems to reduce its data center's power usage during times of high demand.

WHAT COMPANIES NEED TO KNOW

- → **Plan for data center power costs:** With data center construction unlikely to slow, accounting for interconnection and grid upgrade costs in project plans and site selection will be critical to ensuring financial viability and social acceptance.
- → **On-site power generation solutions offer relief:** On-site power generation solutions, whether renewables, geothermal, natural gas turbines, or nuclear, can help data center actors meet power demands while reducing impacts on local communities.
- → **Community involvement is essential:** Beyond power, giving a voice and listening to local concerns and delivering long-term economic benefits is key to building and maintaining stakeholder support for data center developments.

SIGNAL 2:

Emerging oversight needs shape AI's role in sustainability programs

Companies are wrestling with the governance implications of their increasing AI adoption, with many finding they are not yet prepared to assess AI's sustainability impacts fully. Pressure to do so is likely to intensify, as stakeholders turn their attention to AI and data centers.

AI governance challenges rise up the corporate sustainability agenda

- *Governance concerns rise over AI's role in corporate sustainability workflows:* Takeaways from the GreenBiz 26 conference in February showed that as companies use AI in sustainability applications, governance challenges remain top-of-mind. Attendees highlighted an "AI literacy gap," with teams adopting tools without a deep understanding of the technology and noted that AI is becoming a bigger governance issue as its environmental impacts and enterprise risk implications grow more tightly linked.
- *AI governance gaps emerge as material sustainability risks:* A February 2026 study from the Thomson Reuters Foundation revealed a widening disconnect between corporate AI principles and practice, with 97% of companies failing to consider the environmental impacts of AI and 68% not adequately assessing social impacts despite rising investor expectations that they do so.
- *Anthropic and U.S. Department of Defense (DOD) clash over AI governance:* The U.S. ordered federal agencies and contractors to stop working with Anthropic in late February, labeling it a "supply chain risk," even as the DOD continues to use Anthropic models. The move came after the AI developer refused to allow its models to be used for mass surveillance and in fully autonomous weapons. Anthropic has since sued the DOD over the order.
- *Global institutions spotlight need for science-led AI oversight:* At the February 2026 UN AI Impact Summit, the UN Secretary-General stressed that science-led AI governance is essential to accelerate progress toward the Sustainable Development Goals, reinforcing the mounting policy attention given to responsible AI use.

WHAT COMPANIES NEED TO KNOW

- → **AI is about execution. Its governance should be too:** Corporate AI uptake is all about enhancing and streamlining execution. Corporate approaches to governing the technology should heed these same motivations and ensure that companies have the controls in place to execute responsible AI governance.
- → **Greater scrutiny of AI usage likely:** With calls for AI oversight growing, companies can expect greater scrutiny of their AI use and how it aligns with their wider sustainability strategy.
- → **Questions over the ethical implications of AI to shape corporate decision making:** While the Anthropic-U.S. DOD dispute is one of the first major escalations in the debate over AI's role in sensitive applications, it is bound not to be the last. While most companies will not confront AI's role in weapons, the episode highlights how ethical quandaries are likely to emerge as the technology is integrated more deeply into operations.

EHS Transformation

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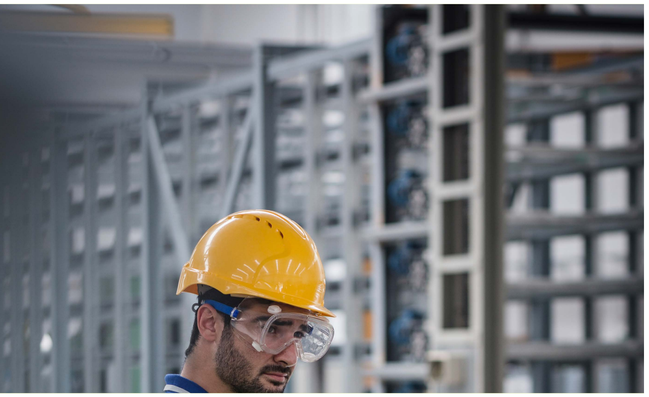


SIGNAL 1:

EHS programs need to evolve to deliver strategic impact

Corporate EHS program remits are growing beyond ensuring regulatory compliance to delivering strategic value. Audits will be central to this shift by helping evaluate EHS effectiveness, yet company approaches are often not up to the task.

Corporate EHS audits have room to improve

- *Companies to bolster EHS audits as confidence wavers:* ERM's February 2026 report Beyond Compliance: Reimagining EHS audits for Strategic impact found that only 7% of EHS professionals globally are very confident that their audits address root causes. Still, 93% plan to maintain or increase investment in their EHS audit programs over the next 12-18 months, highlighting that they are focused on improvement.
- *Majority of companies not yet integrating AI into EHS audits:* The same ERM report found that 66% of EHS teams have yet to integrate AI into their audit processes, while only 12% have fully embedded the technology. However, respondents are confident that when they fully adopt AI, efficiency improvements will free auditors to spend more time on-site, helping them form a more complete risk picture than possible from afar.

WHAT COMPANIES NEED TO KNOW

- → **From compliance checks to root-cause analysis:** EHS audit approaches have traditionally focused on compliance. This approach is no longer enough. As EHS programs are asked to deliver impact, they will need to redesign audits to generate insights on underlying risk drivers and efficiency opportunities.
- → **AI to augment, not replace, on-the-ground intelligence:** AI is poised to reinforce EHS audit programs rather than replace them, helping teams improve efficiency and strengthen risk analysis while unlocking teams from desks to spend more time on site.

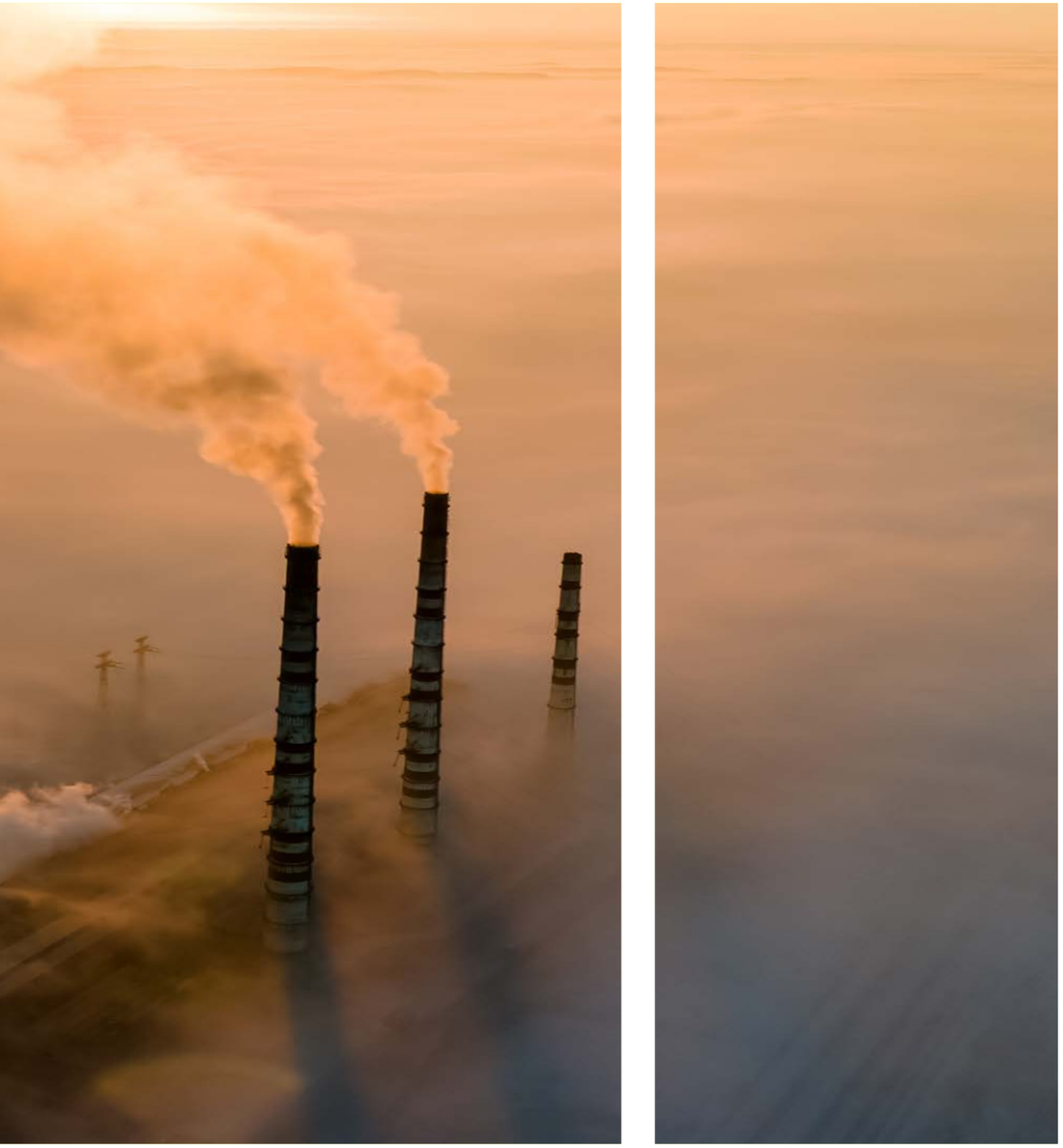
SIGNAL 2:

Environmental regulations expand and contract

PFAS remain front and center for regulators implementing a diverse set of restrictions and requirements for the chemical class. The story for air quality regulation is similar, as countries pursue contrasting approaches informed by economic and political dynamics.

PFAS approaches diverge across geographies

- *New EU PFAS drinking water limits enter into force:* The EU's new limits and monitoring requirements for PFAS in drinking water entered into force in January, requiring Member States to choose between two options: 0.1 µg/L for the sum of 20 PFAS compounds included in the regulation or 0.5 µg/L for total PFAS.
- *U.S. PFAS reporting window opens in April but exemptions likely forthcoming:* The window for PFAS manufacturers to report data (e.g., uses, volumes, disposal) on their PFAS or PFAS-containing articles to the U.S. EPA opens April 13, 2026. However, the scope of requirements is likely to change based on a November 2025 EPA proposal that exempts mixtures or products with PFAS concentrations below 0.1%, imported articles, and other outputs.
- *U.S. states move forward with PFAS regulations of their own:* Both Colorado and Maine implemented new bans on products (e.g., cookware and dental floss) with PFAS to start in 2026. Other states like Connecticut and Illinois implemented PFAS disclosure rules on January 1, requiring manufacturers to indicate when and why PFAS are used in products.



Air pollutants see mix of regulatory and deregulatory action

- *China implements air quality and hazardous chemical laws:* Starting in March, China will tighten its national air quality standards, placing interim limits on pollutants including PM2.5 and PM10 that regulators will further strengthen in 2031. China will also begin to enforce its first Hazardous Chemicals Safety Law in May, which mandates that new production facilities or expansion projects must be located within designated chemical industrial parks (unless exempted) and use real-time risk monitoring.
- *U.S. to roll back air quality rules for power plants:* The U.S. EPA in February announced it would revert to 2012 rules governing mercury and other hazardous air emissions rather than enforce more stringent rules implemented in 2024. The EPA noted that the move would save utilities up to $78 billion in compliance costs annually, helping them keep coal plants in operation to meet power demand growth.

WHAT COMPANIES NEED TO KNOW

→ **Plan for PFAS regulatory fragmentation:** Different geographies are taking different approaches to PFAS regulations that require jurisdiction-specific strategies rather than single global approaches.

→ **Regulations always in motion:** A cautious, not assumptive, approach to the long-term direction of environmental regulation will help companies avoid locking in strategies geared towards regulatory easing that could backfire when political winds shift.

Authors

Andrew Angle
ERM

Sakshi Jain
ERM

Lauren Kwok
ERM

Contributors

Aiste Brackley, ERM
Jacco Kroon, ERM
Mark Lee, ERM

Design

Bruce Stoddart, ERM
Yatish Pal Singh, ERM

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