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ISSN: 2169-0286

Journal of Hotel & Business Management

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Digital Object Identifier: <http://dx.doi.org/10.4172/2169-0286.1000e114>

The Concept of Environmental Management Systems

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The “greening” of the hospitality industry is currently a topic receiving a high amount of attention in the accommodation sector of the tourism industry due to research, in academia and industry alike, identifying “green” as a profit-center. Hotels are profit-focused entities, and with consumers willing to pay additional fees to support environmentally sound practices the focus on “green” is warranted. The implementation of “greening” is worrisome though. Past studies have identified green-washing as more commonplace than “greening”. A majority of hotels have identified “green-washing” as paying more dividends than sustainability. There are opportunities for improvement though. One such opportunity warranting investigation but lacking research is Environmental Management Systems (EMS). EMS is formal indicators of “greening” practices. EMS certification programs such as ISO 14.000 limit green-washing possibilities. Currently, EMS certification programs are not popular in the hotel industry though. This is due to power relations amongst trend-setters in the hotel industry, perceived costs associated with going “green”, a lack of succinct Best Practices for hoteliers to go “green”, a general laissez-faire attitude towards “greening”, and other factors. Furthermore, “greening” programs are only a component of sustainability. Sustainability is a goal of “greening” practices, but there is a general misconception amongst industry practitioners as to what CSR, sustainability, “greening”, and EMS are. I am writing this research note to discuss the current status of EMS, the application of EMS to the global hotel industry, and provide recommendations for improving the application of EMS in the hotel industry. I am proposing a methodology specific to hospitality in hopes researchers will investigate potential new opportunities.

Introduction

There is a trend towards “greening” in the accommodation sector of the tourism industry. This can be exemplified by visiting web pages of major hoteliers. Marriott’s website states the company’s inclusion in a program called “Spirit to preserve”. This program is focused on minimizing impacts to the Brazilian Amazon Rainforest, which the [1] website states accounts for more than 20% of the world’s natural carbon off-setting. Starwood has two flagship brands (Aloft and Element) that are marketed as “green” [2,3]. Hilton has set goals for all of their properties to enhance “greening” attributes by 2014 [4]. Marriott also has a stated goal for all new build properties flagged under the Marriott brand to be LEED certified [5].

Sustainable “greening” programs and business approaches by hoteliers have been formulated in response to customers’ stated desires and market trends. Consumers are willing to pay a premium to organizations using what they perceive to be sustainable practices in the accommodation sector. This is according to multiple industry studies, as compiled by [6]:

- a Travel Industry Association of America study found 54% of Americans are more likely to patronize hotels that practice environmental responsibility than those that do not;
- an Orbitz study that figured 67% of Americans place importance on the eco-friendliness of an organization when choosing a hotel;

- a Travelocity study stated 80% of Americans are willing to spend more on an eco-friendly destination;
- and finally, a Cone Roper Study Saunders cited found that 95% of consumers in the accommodation sector of the hospitality industry have a more positive image of a company that supports causes they care about.

Certification programs, indicators, and Best Practices have been created for hoteliers in an attempt to “green” the accommodation sector of the tourism industry. There are more than one hundred “green” certification programs for hoteliers operating in the United States and more than four hundred worldwide (World Tourism Organization, 2002). The discrepancy in programs available within the United States and globally has been researched. The World Tourism Organization (2002) conducted extensive research and found that many certification programs are specific to small geographical areas. This allows for indicators that are specific to biodiversity and socio-cultural conditions.

Font and Harris (2004) identified fifty-nine certification programs that claim to be indicators of sustainability. Only seven of the fifty-nine programs include socio-cultural factors, which are an integral element of sustainability. Many of the “green” programs claim to be sustainable. Companies such as Marriott (2010) claim there is an ethical responsibility to be “sustainable”. Whether the ethical responsibility covers socio-cultural factors or only “greening”, and what the boundaries of the proposed “ethics” are, is undefined.

What is an Environmental Management System (EMS)?

One of the most popular terms used to describe programs intended for environmental “greening” practices according to a scholarly literature review is Environmental Management Systems (EMS). EMS can be defined as, “A transparent, systematic process known corporate-wide, with the purpose of prescribing and implementing environmental goals, policies, and responsibilities, as well as regular auditing of its elements” [7]. Furthermore, “EMS allows an organization to systematically manage its environmental...matters” [8].

The Environmental Protection Agency (EPA) is the primary government oversight on EMS in the United States [8]. The EPA has developed a Best Practice implementation program based upon Edward Deming’s model of quality management for organizations interested in implementing an EMS program. The Best Practice implementation guide from the EPA is:

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Received January 25, 2014; Accepted January 25, 2014; Published February 13, 2014

Citation: Taillon J (2014) The Concept of Environmental Management Systems. *J Hotel Bus Manage* 3: e114. doi:10.4172/2169-0286.1000e114

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- Plan – Planning, including identifying environmental aspects and establishing goals
- Do – Implementing, including training and operational controls
- Check – Checking, including monitoring and corrective action
- Act – Reviewing, including progress reviews and acting to make needed changes to the EMS [8].

The evolution of EMS can be traced to the Rio Summit, where Agenda 21, coupled with the creation of the International Standard for Organization's (ISO) 14.000 EMS series, created a new approach to sustainable development, sustainability, and "greening". Although the Rio Summit provided the framework for what became integral to sustainability measures in the hospitality and tourism industry, tourism as an industry was not an element of the sustainability focus. Rather, Agenda 21 and the ISO 14.000 series were created ambiguous so they could be applied to any one of many industries. They are approaches, not indicators, of environmental practices.

Agenda 21 was a sustainability-based referendum aimed at providing a comprehensive set of guidelines for achieving sustainable measures. The program was reaffirmed as paramount to the future sustainability of the planet in the early nineteen-nineties at the United Nations General Assembly meeting in a special session in South Africa. Agenda 21 has been defined as a "comprehensive plan of action to be taken globally, nationally, and locally by organizations of the United Nations System, Governments, and Major Groups in every area in which human impacts on the environment" [9]. Between August 26 and September 4 of 1992 178 governments committed themselves to Agenda 21, specifically agreeing to promote adherence to the Rio Declaration on Environment and Development and the Statement of Principles for the Sustainable Management of Forests [9].

When Agenda 21 protocols were initially formulated they received voluntary verbal backing and statements of approval from governments in the United Nations. Yet, adoption of Agenda 21 has been rare; below 40% of Agenda 21's sustainable development activities have been enacted and much of what is in place was in place prior to Agenda 21 meetings and/or had nothing to do with Agenda 21 [10]. The United States government compiled a report in conjunction with the United Nations in regards to the implementation of Agenda 21. The report investigated 32 categories in more than 150 nations. It was realized that in 1998, more than six years after Agenda 21's inception, that little progress had been made (Appendix A).

The ISO 14.000 series is the second element of the Rio Summit that will be discussed in this paper. The goal of ISO's EMS 14.000 series is to provide "a framework for a holistic, strategic approach to the organization's environmental policy, plans, and actions" (International Organization for Standardization, 2009, para. 4). The ISO is an NGO that was created in the middle part of the twentieth century to improve communication and create standardization of processes across international and cultural boundaries in order to facilitate the international exchange of goods and services [11]. The ISO 14.000 series was not created specifically for the tourism and/or hotel industry but it is widely credited as a possible certification program for the hotel and tourism industry [12,13].

Babakri, et al. [12] believe that the most likely reason implementation is lacking is the level of dedication and time necessary for the implementation of the ISO 14.000 series. The ISO 14.000 series includes a set of twenty voluntary generic environmental process-based

standards. None of the content in the 14.000 series specifies levels of environmental performance. This creates a situation where standards are necessary for each specific business activity.

The framework of the ISO 14.000 series consists of eight especially important guidelines in regards to applicability to the hospitality industry. These eight regulations are:

- ISO 14.001 – Specifications and guidance for achieving EMS certification
- ISO 14.004 – Guidelines in regards to principles, systems, and supporting techniques
- ISO 14.010 – Guidelines for environmental auditing
- ISO 14.011 – Audit procedures
- ISO 14.012 – Qualification criterion for environmental auditors
- ISO 14.024 – Environmental Labeling
- ISO 14.040 – Life cycle assessment
- ISO 14.060 – Guide for the inclusion of environmental aspects in product standards

Certification of the ISO 14.000 series necessitated a five-step systematic program that leads to a formal EMS program through ISO. These five steps are:

- Environmental Policy – the business being certified must develop a clear policy dictating environmental protection. This includes an obligation to observe environmental regulation and legislation in their industry and countries of operations. The organization must create indicators and make continual efforts to improve their environmental stance. When buy-in has been created, from inclusion in the vision statement to support staff, then an environmental policy can begin to be implemented. This leads to step two, which is planning for the implementation of an environmental policy.
- Planning – An analysis of both the macro and micro aspects of the proposed EMS must occur prior to implementation and subsequent successful operation of said EMS. This should include SWOT and PESC+E (politics, economics, social, cultural, and environmental) Analyses.
- Implementation and Operation – Specific elements of the plan are enacted upon. This includes the development of a structure and set of responsibilities, training procedures, operational controls, and documentation.
- Checking and taking Corrective Action – A performance evaluation takes place. Performance is monitored against ordained indicators and corrective and preventive action in cases of non-conformance is taken.
- Management Review – In this stage the management must review the procedures by conducting a full assessment of the EMS. Alterations should be proposed and made to the framework of the EMS. Then, the aforementioned five steps should be repeated in the same order.

Problematic Qualities of EMS and the ISO 14.000 Series

Chan and Wong [13] believed a study was necessary to understand the shortcomings and barriers of ISO's 14.000 series in the hotel industry. The study concluded that 36% of hotel managers in their

study (the study took place in China, Macau, and Hong Kong) had only a minimal or complete lack of understanding of EMS and/or the ISO 14.000 series. The authors attempted to establish motivations for implementing, or not participating in conjunction with, the ISO's 14.000 EMS standards. Chan and Wong [13] found that there was little external pressure from upper level management, employees, national and/or local governments, or market conditions. There was no regulating force pushing for compliance with EMS ISO 14.000's standards. Chan and Wong [13] deciphered the quantitative data received to formulate a belief that there exists an internal motivation in property managers to create more environmentally sustainable practices in the industry. Yet, the data also shows that the management responsible for implementation lacks motivation and customers are perceived to give little attention to purchasing decisions by property managers.

Hersey (1998) indicated that a revision of the EPA's Best Practice implementation of EMS and ISO's 14.000 Series was necessary. Hersey's EMS outline includes: commitment via employee and management buy-in to a policy of EMS, planning for a formal EMS, the implementation of a formal EMS, the measurement and evaluation of EMS via set indicators that are updated as needed through not only the original implementation of the program but also through annual revalidation, and continuous review and improvement. Hersey's approach to EMS has been referred to as a "formal EMS". Chan [11] defined Hersey's formal EMS program as, "A management system that includes organizational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, and reviewing, and maintaining the environmental policy" (p. 188).

"Some hotels have implemented some environmental best practices" [13]. These are primarily short-sighted attempts to save money on water, electricity, and labor costs according to Chan and Wong [13] Formal EMS have not been implemented in the hotel industry [13].

One issue consistently credited with hindering the implementation of EMS programs in the accommodation portion of the hospitality industry is a perceived lack of financial incentive [14]. The issue is not that there are no financial savings. The issue is that the costs outweigh the benefits. Thus, one possibility to explain why EMS is failing worldwide is the lack of understanding of how EMS can affect the "bottom line" of hoteliers' financial situation [7,15]. This is especially in relation to the Uniform System of Accounts for the Lodging Industry (USALI) [16]. Furthering the cost/benefit financial aspect of EMS is the issue of "who" would benefit and where would the "cost" originate from for EMS implementation. This is because the current hospitality industry has many stakeholders at each level of the ownership and management structure. Goldberg [17] states that 75% of the hotels in the United States are owned, managed, and flagged by three different companies.

When there are a minimum of three ownership stakeholder groups new issues arise. First, creating buy-in to the vision statement of the organization would be difficult because the employees are outsourced in many departments. Secondly, which company would pay for the EMS certification, which is a time consuming and labor intensive job according to Babakri et al. [12]. Hilton does not own or manage the property, but they would receive the highest benefit due to the customer's name brand awareness [18]. The ownership of the hotel would receive very little financial benefit, although the financial burden of certification would fall on to their shoulders [18].

There are many more stated reasons for a lack of implementation of EMS. A comprehensive listing of available literature identifies the following issues as reasons for the lack of implementation:

- criteria in certification programs refers to general management actions rather than specific indicators [19]
- most environmental factors are specific to Europe, where specific areas of emphasis exist that are not correlation or feasible in practice in locales outside of Europe [20]
- it is difficult, and it has even been deemed "impossible", to capture environmental interactions, criteria, and indicators in financial terms [21]
- there is uncertainty about the benefit of implementing environmental standards, particularly in regards to financial benefits [12]. This is further compounded by a lack of case studies depicting tangible financial benefits [19]
- assessors complete their jobs in different manners due to a lack of specific indicators [22] and this leads to uncertainty and unreliability in data collection, and thus certification [23]
- the under-development of holistic indicators (political, economic, socio-cultural, and environmental) [19]
- certification programs are often following different regulations, some of which actually contradict each other, and thus providing evidence there is a lack of industry Best Practices [24]
- information sharing amongst practitioners in regards to practices, vendors, and contractors is poor [25]
- green-washing techniques in the hospitality industry are no longer self-serving financially long-term although they dominate the industry due to their perceived short-term profitability [11,26]
- there is a high cost associated with EMS certification [12]
- the current abundance of labels, awards, and endorsements has confused consumers and practitioners alike, to the extent of preferring to disregard green messages [27]
- and the timeline and personnel advised and necessary to implement an EMS as advised by the EPA and International Standard for Organization (ISO) is not conducive to the framework of management and employees in the accommodation sector [12]

EMS is failing worldwide, particularly in hotels, because it is not being implemented [7]. Universally-accepted existing EMS guidelines as promoted by the EPA, ISO, and governmental organizations, were not created for the hospitality industry, but for industrial organizations, which is creating implementation difficulties on a wide basis [7]. Customer service in a manufacturing plant is not compared to customer service in the hospitality industry in the context of certification programs. Should environmental regulations be the same?

What Should an Environmental Management System Look Like?

Five hotel companies currently control the hotel market as well the vast majority of the industry's standards in the United States (Hilton, Marriott, Choice, Wyndham/Cendant, and IHG [28]). Overall,

ten companies own and operate more than 62% of the world's hotel room capacity [28]. These ten companies are trend-setters worldwide and have approached the "greening" concept with caution. If EMS is going to play a role in the industry then there must be buy-in from the industry. This means the largest hotel companies need to have buy-in to EMS.

A consensus has been reached by the hotel companies that adopting "green" standards in the industry would harm the profitability [27]. This ideology is exemplified by the lack of dedication to "green" standards that improve the carbon footprint the properties leave and by the way in which practices are marketed as "green" when they are not in fact environmentally sound according to accepted standards including: other industries, EMS practices, Agenda 21, ISO 14000 series, certification programs, and more [27]. Some of the difficulty in establishing EMS in the accommodation sector of the hospitality industry can be related to the industry's unique characteristics, such as the aforementioned ownership and management structure.

Establishing an EMS is not simple. The average ISO 14000 EMS takes approximately sixteen months to achieve certification [7]. Therefore, the creation of an EMS should be based upon best practices that have been previously identified. This is particularly important in the hotel industry due to the labor intensive nature of the business and the costly attributes of creating an EMS program. A literature review of Best Practices that exist show that there are contradictions in purported "best practices" [24]. The reason for these contradictions is most likely location [20]. A succinct listing of best practices does not exist [29].

The hotel industry is not striving for EMS implementation. Furthermore, the acceptance of ISO 14000 by academics as a standard to be strived for in the hospitality industry is troubling. Hotels are a unique product. They must be treated as such. The identification and development of a succinct list of Best Practices for the hotel industry is necessary for sustainability practices to be implemented properly.

Recommendations for EMS in the Accommodation Sector of the Hospitality Industry

Problems face the implementation of EMS in the accommodation sector of the hospitality industry. Listed below is a record of these problems, as fashioned from issues founded in this paper:

- current approaches to EMS focus on general management actions rather than specific indicators
- EMS programs are specific to Europe [20]
- USALI does not outline or account for current EMS programs, creating a misunderstanding of the financial benefits of an EMS
- assessors do not have a succinct list of Best Practices and indicators to judge properties by
- there are a lack of holistic indicators
- there is no unifying certification program
- green-washing techniques as company policy are "working" according to industry personnel, particularly because there is a lack of proper auditing [19]
- there is a high cost associated with certification
- the timeline to achieve certification is too intensive
- and power relations between the ownership structure of a hotel,

the management company working daily operations at the property, and the employees at the property are not accounted for in academic literature. The most usual corporate structure for hotel ownership is not conducive to EMS

The aforementioned problems need to be better understood prior to creating a new approach to EMS, CSR, and sustainability certification. The issues need to be dealt with in a manner unique to the hospitality industry. The structure of the hospitality industry is not conducive to existing certification programs. Recommendations for action towards this goal can be approached supported in the knowledge base of this paper. Based upon the problems identified in this paper a new approach to sustainable certification is advised. The new certification approach should include EMS and socio-cultural CSR practices. It should be specific to the hotel sector of the tourism industry. Figure 1 depicts an approach to sustainable EMS implementation in the hotel industry. The chart is based on founded literature included and described in this research note.

The chart begins with professional associations. Assessors from respectable organizations from within the field may be necessary. Professional associations, in lieu of governmental regulation, understand the industry, have specific ties to the industry, and have buy-in from personnel working in the industry. This is exemplified through HFTP's handling of USALI and AAA's handling of the Diamond Rating system. Two options for the regulation of the hotel industry are HFTP or AAA, as depicted in the second step of Figure 1. AAA already visits properties to assess their status. HFTP manages USALI and could build a certification and assessment program in to USALI, which more than 80% of hotels in the United States already use (Tanya Venegas, personal communication, February 18, 2010).

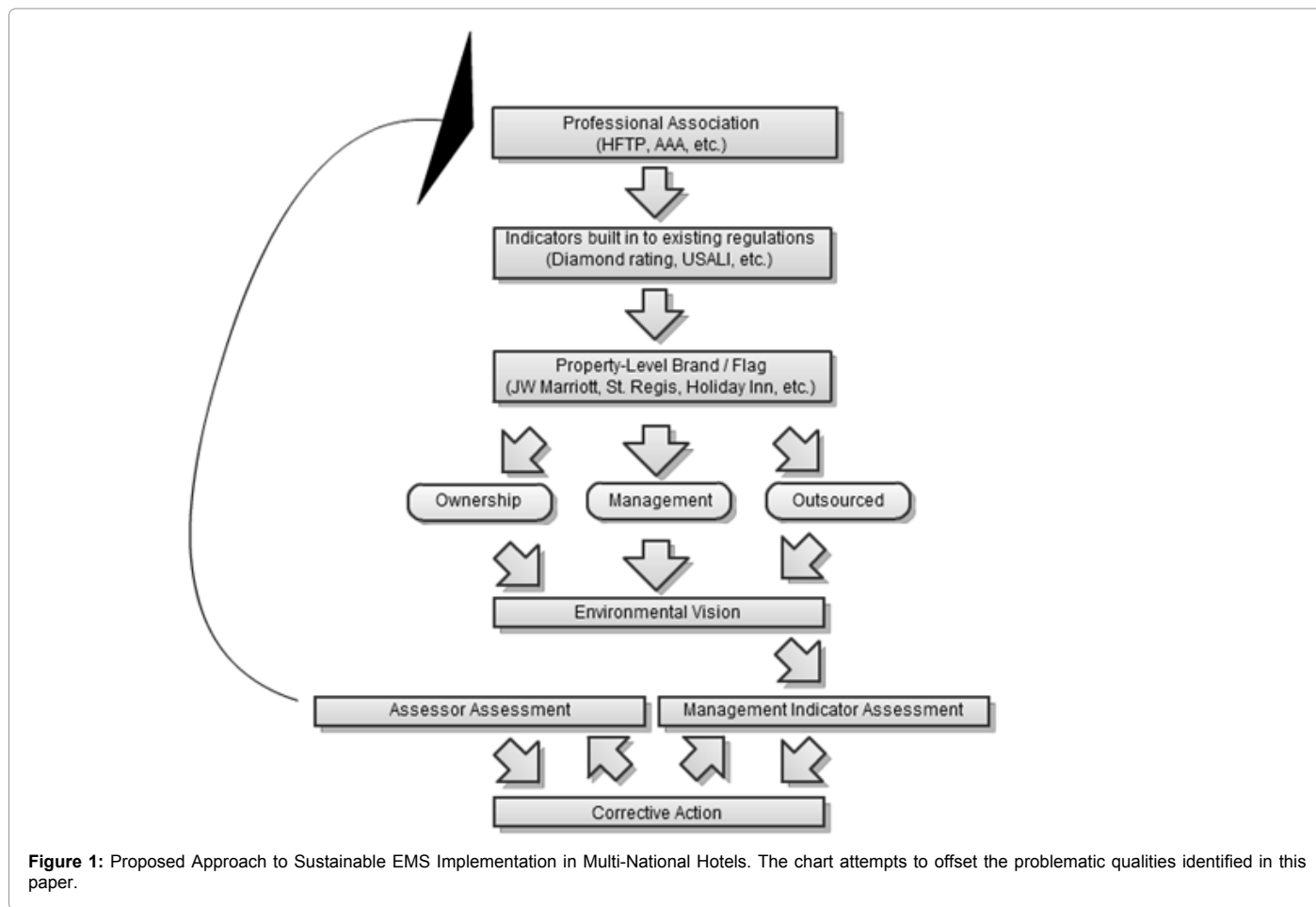
An assessment of the individual hotel flag is the third step. By judging each hotel individually, but also judging each hotel chain, there exists a layered assessment of the hotel. In this manner customers will not be confused by Marriott's LEED certification at one property and lack of any certification at another property.

The fourth step permits the assessment of the management company, ownership group, and outsourced organizations. This allows for a holistic view of the stakeholders. It will allow for successes and failures to be noted at all levels of the property. All three of the groups must come together for a singular vision though. Buy-in at the property is a necessity for successful sustainable management of hotel properties.

Once the vision for sustainability and a formal EMS are created the management staff needs to assess them, take corrective action, and reassess them until they meet set indicators. Then, an assessor from the professional association will visit the property to certify the property using a succinct set of Best Practices that are accepted locally, nationally, and globally. The assessor will bring the new information back to the professional association, where the process will continue indefinitely.

The chart depicts answers to problems raised in an extensive literature review. Further studies are necessary to better understand the ability of such an approach to certification of EMS in the hotel industry. A list of Best Practices for the hotel sector of the tourism industry is needed before a program of assessment could begin.

The chart does not answer all questions though. More research is needed. The chart needs to be tested. Hopefully my fellow researchers and industry partners will test this in various situations!



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Citation: Taillon J (2014) The Concept of Environmental Management Systems. J Hotel Bus Manage 3: e114. doi:[10.4172/2169-0286.1000e114](https://doi.org/10.4172/2169-0286.1000e114)

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