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IR/PS CSR Case #07-16

Green Seal and the Lodging Industry



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Corporate Social Responsibility
Fall 2007

Executive Summary

Green Seal is a non-profit organization offering certification for lodging properties that prove they are in compliance of effective environmental business practices. The goal of this paper is to evaluate whether consumers and the lodging industry can have confidence in this organization. Through assessment of several areas, this paper identifies areas that are weak and questionable and finds that on the whole, Green Seal can serve as an effective third-party verifier for the lodging industry.

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I. Introduction

A growing trend among the hotel industry is to differentiate themselves by seeking third-party verification that they are engaging in effective environmental practices. Incentives for investing resources into necessary upgrades and improvements to meet a verifier's standards relate to various reasons. This includes the ability to validate their claims to customers and the public. In addition, there is a return on investment created by several types of savings such as energy cost and water cost. Customers also do actively seek lodging properties that advertises a "seal of approval." Green Seal is one such organization that provides this label. This paper will explore the lodging industry's movement toward going "green" and evaluate how Green Seal provides a solution to the demand. Their program effectiveness will be assessed in terms of the certification process, credibility and reliability. Two recipients of the Green Seal will be discussed followed by an overall program assessment.

II. The Lodging Industry: Moving Towards "Green"

In 2006, the U.S. lodging industry generated \$133.4 billion in sales.¹ As the nation's second largest employer,² the lodging industry contributes to significant energy use and waste generation. In one week, an average sized hotel buys more products than 100 families in a year.³ Waste accumulation can grow up to 30 pounds per room while 80 percent of the waste can be recycled.⁴ In California, the hotel and lodging industry contributes to two percent of the state's

¹ American Hotel and Lodging Association, 2007 Lodging Industry Profile:
http://www.ahla.com/products_info_center_lip_2007.asp

² Green Seal: www.green Seal.org

³ California Green Lodging Program: <http://www.ciwmb.ca.gov/EPP/GreenLodging/>

⁴ Ibid

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food waste.⁵ Electricity use is considerably high for the industry and can make up 60 to 70 percent of the utility costs for an average hotel.⁶ Typical hotel rooms can use 218 gallons of water per day while water efficient fixtures can save 25 to 30 percent of that water usage.⁷

These figures show that the lodging industry significantly impacts the sustainability of the environment and important resources. With increasing attention to preserving natural resources and protecting the environment, the lodging industry is hearing the call. More and more hotels are moving toward “greening” their facilities in order to highlight their part in preserving the environment and gain credibility. In the past, it was considered too expensive to “green” a hotel. Now it has become a myth and savings generated from important upgrades has shown to provide a return on investment in a short period of time. Before, green hotel development represented a 10-20 percent cost premium, which was too expensive for most developers.⁸ “Today the premium cost for green certification can be as low as 1-2 percent, and developers can expect economic payback of that premium in as little as 12-24 months,” said Jim Butler, chairman of JMBM’s Global Hospitality Group.

Combined with generous tax breaks on property and on sales tax for construction material, development of new “green” hotels and buildings can even be profitable.⁹ Going “green” has become more than just being a responsible business leader, but also as a hip and trendy thing to do. One such magazine highlights this trend. Green Hotelier is “a magazine for people who care about a more environmentally and socially responsible hotel industry and its

⁵ Ibid

⁶ Ibid

⁷ Ibid

⁸ No author. “JMBM lawyers announce first green hotel development conference; carbon-neutral event gives economic reasons why today’s smart money is green.” Business Wire 15, July 2007.

⁹ Hotel Law Blog: www.hotellawblog.com

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contribution to sustainable travel and tourism.”¹⁰ The magazine highlights various hotels and chains that are engaging in good practices and offers solutions for implementation of effective programs.

With the increased popularity towards the movement, the problem has been the definition of “green.” What makes a hotel “green?” There is no nationally accepted standard for what makes a hotel green and there are many organizations in the U.S. offering to certify green hotels as a third party body. Around the world, there are about 3 dozen organizations certifying products or commercial services as environmentally friendly.¹¹ One organization in the U.S such as Energy Star, evaluates products based on their energy efficiency.¹² Co-op America Seal of Approval offers businesses to be listed in their “National Green Pages” directory through a screening process that proves that they are “socially and environmentally responsible.”¹³ In addition, businesses such as Green Suites International are taking advantage of the increasing need for hotel supplies and equipment that are environmentally friendly.

The lack of a unified standard and the numerous organizations available create a problem of choice for the lodging industry. What makes a third party certification body reliable and credible? How does one know their certification standards are good? How can consumers be confident that hotels are actually engaging in significant environmental practices? These questions will be explored related to Green Seal.

¹⁰ Green Hotelier: <http://www.greenhotelier.org/>

¹¹ No author. “Green Seal Program certifies eco-friendly products, services.” *Voice of America News* 5, July 2007.

¹² Ibid

¹³ Co-op America: <http://www.coopamerica.org/greenbusiness/sealofapproval.cfm>

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A. U.S. Green Building Council

Most popular for seeking a credible certification body has been the U.S. Green Building Council's LEED program. Standing for Leadership in Energy and Environmental Design, the program aims to serve as an independent, third-party verifier for environmentally responsible buildings. As well, the program has a rating system described as "the nationally accepted benchmark for the design, construction and operation of high-performance green buildings."¹⁴ Certification is based on environmentally friendly components that include efficient energy and water capabilities, recycled construction materials and solar lighting. Credibility for the program is further highlighted by the fact that Governor Arnold Schwarzenegger has ordered that all new big government buildings to be constructed must be LEED certified.¹⁵ About 800 buildings throughout the U.S. have been certified and 6,000 more are in the process, including 30 hotels.¹⁶

Although LEED serves as the green benchmark for new and existing buildings, standards are set for commercial buildings and not specifically for hotels. Other organizations such as the Green Hotels Association offer membership for any hotel with a paid fee but no oversight for compliance. Members get a booklet of how they can "green" their facilities and takes the hotel's word for following their suggestions.

III. Green Seal

Compared to LEED, Green Seal does offer a certification program specifically for lodging properties. It is an independent non-profit organization based in Washington D.C and established in 1989. Currently, Green Seal has certified 42 lodging properties in various states that include: Arizona, Georgia, Nevada, Oregon, Pennsylvania, Utah, Virginia, Washington, DC,

¹⁴ U.S. Green Building Council: <http://www.usgbc.org/DisplayPage.aspx?CategoryID=19>

¹⁵ Levy, Ari and Carole Zimmer. "California hotels go green with low-flow toilets, solar lights." *Bloomberg* 27, Apr. 2007, <http://www.bloomberg.com/apps/news?pid=20670001&refer=us&sid=afIESX3LdgnQ>

¹⁶ Ibid

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Washington State and Wyoming. Currently, Green Seal expects to have an additional 20 – 30 lodging properties certified within the next year.

In addition to lodging properties, the organization certifies several types of products considered to be environmentally friendly. Products include: cleaners, hand cleaners, electric chillers, floor care products, paints and coatings, windows, doors, papers and newsprint. Cleaning services and fleet vehicle maintenance are also certified by Green Seal.

According to their website, “Green Seal provides science-based environmental certification standards that are credible, transparent, and essential in an increasing educated and competitive marketplace.”¹⁷ Their goal is to help protect the environment and “transform the marketplace” by “promoting the manufacture, purchase, and use of environmentally responsible products and services.”¹⁸

When a product or service gains the Green Seal mark, it means that it has undergone “rigorous evaluation, testing and a plant visit” and “evaluated without bias or conflict of interest.”¹⁹ The organization also insists that “The Green “Seal of Approval” has come to stand for reliability, fairness, and integrity.”²⁰

Businesses that have gained the seal are able to use the Green Seal logo on their product packaging and advertisements. Green Seal’s website offers testimonials from businesses that have benefited financially from customers’ recognition of the seal.

Various incentives lie in a business’ pursuit for third-party verification. It may be for credibility, financial gain, or to prove environmental responsibility. Whatever the incentives, Green Seal appears to prove itself as an authoritative figure in the marketplace with the numerous products

¹⁷ Green Seal: <http://www.greenseal.org/about/index.cfm>

¹⁸ Green Seal: www.greenseal.org

¹⁹ Green Seal: <http://www.greenseal.org/about/power.cfm>

²⁰ Ibid

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they have certified over the years. Products with their seal can be purchased at stores such as Office Depot, Whole Foods and Lowe's Home Improvement Stores.²¹

A. Method and Standards

Green Seal works with several scientists, experts and several other organizations in helping to form their standards. Their main research partner is the Center for Clean Products and Clean Technologies at the University of Tennessee at Knoxville.²² Their standards comply with international standards for eco-labeling, specifically ISO 14020 and 14024. As well, Green Seal complies with the U.S. Environmental Protection Agency's (EPA)²³ requirement for third-party verification of environmentally friendly products and also meets "the criteria for bona fide ecolabeling bodies of the Global Ecolabeling Network."²⁴

EPA's criteria for a credible third-party verifier includes:²⁵

- an open, public process that involves key stakeholders (businesses, environmental and consumer groups, states etc.) in developing its criteria or standards.
- award criteria, assumptions, methods and data used to evaluate the product or product categories that are transparent (i.e., they are publicly available, easily accessed and understandable to the lay person).
- a system of data verification and data quality.
- a peer review process (with representation of all stakeholders) for developing standards or criteria.

²¹ Green Seal: <http://www.greenseal.org/about/index.cfm>

²² Green Seal: <http://www.greenseal.org/about/partners.cfm>

²³ See Appendix 1 for the EPA's full criteria for third-party verification.

²⁴ Green Seal: <http://www.greenseal.org/certification/international.cfm>

²⁵ Ibid

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Green Seal asserts that of great importance to their credibility is the “avoidance of financial conflict-of-interest, use of sound scientific methods and accepted test procedures, and openness and transparency in the setting of standards.”²⁶

B. Staff

Green Seal has 12 staff members and several consultants. 10 people are on the board of directors with a background in many areas of expertise that includes science, engineering, environment, waste management, energy, environmental law, policy and academic. President and CEO of Green Seal is Arthur B. Weissman. His experience comes from over 25 years of working in environmental policy, standards and regulation.²⁷ His education includes a bachelors degree from Harvard University, a PhD from Johns Hopkins University in physical geography and environmental science, a masters in natural resource management from Yale School of Forestry and Environmental Studies.

The background of the board members gives confidence that they can serve as an authority on standards for conservation and sustainability. This is also highlighted by the fact that some of the board members have been working in their specific area for several years and have published books, reports and articles on topics related to preservation and standards. In addition, board members demonstrate high education in their area of expertise and teach in universities related to their field such as environmental law.

²⁶ Ibid

²⁷ Specific staff information and background is not available on Green Seal’s website but was available per request.

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C. Funding

Green Seal is funded by donations, grants, foundations, and fees they collect for evaluation and monitoring. From 2001 to 2003, gifts, grants and contributions received totaled \$605,866.²⁸ For the same time period, “gross receipts from admissions...or services performed, or furnishings of facilities in any activity that is related to the organization’s charitable, etc, purpose,” totaled \$807,457.²⁹

D. The Standard: GS-33

A hotel seeking to gain certification from Green Seal must comply with their Environmental Standard for Lodging Properties called GS-33. The standard specifies requirements under 6 main areas that include:

- Waste minimization, reuse and recycling
- Energy efficiency, conservation and management
- Management of fresh water resources
- Waste Water Management
- Hazardous substances
- Environmentally and Socially Sensitive Purchasing Policy

Included in these guidelines are using recycled fibers with a specific minimum post-consumer content for toilet tissue (20%), facial tissue (10%), napkins and paper towels (40%). As well, preference is given to product and service suppliers that demonstrate environmental responsibility. Avoidance of architectural paint with specific heavy metals or toxic substances is also included.

²⁸ Green Seal 2005 income tax statement, Form 990.

²⁹ Ibid

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Lodging properties must also install energy efficient windows, water saving fixtures, sensors for lighting, energy efficient equipment such as lighting, office supplies and kitchen equipment. Use of refillable amenity dispensers instead of individual containers for soap, shampoo, lotion, etc, is required. As well, the property must maintain a recycling program and a composting program for food waste and yard waste. Food waste is also decreased with the requirement for donating leftover food to a local shelter or food bank where programs are available. Not included under these standards are swimming pools, golf courses or restaurants.

Green Seal is able to measure results of their standards to show benefits of cost savings. For example, installing an energy efficient system can reduce significant energy costs. Green Seal states that “a 120 room hotel at 85% occupancy paying 8 cents per kilo watt hour could save \$5,360 annually.” Another example includes a composting program implemented at the Hilton San Francisco. The hotel was able to reduce the number of dumpster usage that required emptying it only two times a week instead of the past seven a week.³⁰ In addition, “a 300-room hotel switching to a bath tissue with 100% post-consumer content would save approximately 4 tons of virgin paper, 48 trees, 16,400 kwh of electricity, 28,000 gallons of water and 240 pounds of air pollutants annually.”³¹

E. Certification Process and Fees

A company that wants to get their product or service certified starts out by filling a short preliminary application online. Once that is complete, a staff member will contact the company and provide a formal application with a confidentiality agreement. Green Seal will also sign the confidentiality agreement. When the application process is complete, a staff member contacts

³⁰ Green Seal document: “Environmental Pollution Prevention and Savings Opportunities for the Hospitality Industry,” June 1, 2007.

³¹ Ibid

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the company to explain the evaluation process and provide a check sheet of required information. From then on, a staff member assigned to manage the evaluation maintains contact and alerts the client of additional information required, further testing or product samples needed.

According to Green Seal, the process takes about three months and only when the service or product meets all the requirement for certification is when the company is awarded the Green Seal Certification Mark. Use of the logo must comply with specific requirements as well. If the product or service fails to meet the requirements for certification, reasons will be provided. All tests results and products or services submitted for evaluation are kept confidential. Green Seal states that “in many cases, companies are able to modify their original submission in order to achieve certification.”

Companies pay an evaluation fee and a monitoring fee. The first monitoring fee is required 12 months after certification. Fees for certification are based on the number of rooms broken down into three tiers.³²

Certification Fee Schedule	
Tier I (300 rooms or more)	
Evaluation Fee:	\$3,000
Monitoring Fee:	\$3,000
Tier II (75 - 299 rooms)	
Evaluation Fee:	\$2,500
Monitoring Fee:	\$2,500
Tier III (fewer than 75 rooms)	
Evaluation Fee:	\$1,950

³² Fee schedule is not provided on Green Seal’s website but was made available per request.

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Monitoring Fee:	\$1,950
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IV. Case 1: Lake Powell Resorts and Marinas

Lake Powell Resort and Marinas in Arizona was certified by Green Seal in 2003 and was the first property of the Aramark Harrison Lodging group to gain the seal. In total, there are seven certified lodging properties and a national conference center spread through out various states. Aramark Harrison Lodging properties are typically set in scenic areas and natural surroundings such as national parks or forests. Currently, there are three more Aramark resorts in the process of gaining certification.

Vice President of Operations, Dean Crane, over saw the certification process for all the Aramark resorts and worked with VP of Certification for Green Seal for all the property audits. Crane stated their incentives for getting certification is to have a third-party organization that was unbiased and could properly ensure implementation of an effective environmental program. He also said they have confidence in Green Seal because they have “a long track record of being an unbiased non-profit organization that utilizes a scientific basis for its standards that can be measured to show environmental impacts.”³³

Lake Powell Resort has 400 rooms and offers a getaway for those who enjoy the outdoors and fishing. The process for certification for the resort took about nine months. Green Seal scheduled a property audit after reviewing their GS-33 application form. Based on the property audit, deficiencies were identified and certification was still pending.

³³ From interview with Dean Crane on November 28, 2007.

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“Once we provided documentation to them that the deficiencies had been corrected, we received the certification,” Crane said. “The deficiencies were primarily related to the amount of post-consumer recycled content in the paper products we were purchasing, so a second site visit was not required after we provided documentation that we purchased the correct products,” he stated.³⁴

Upgrades averaged about \$150 per guest room in which majority of the equipment purchases had already been completed. Most significant in terms of cost were the installation of bulk amenity dispensers and retrofitting all toilets to 1.6 gallons per flush. These items cost about \$100 per guest room.

By choosing to seek certification a few years earlier, the resort benefited from cheaper fees. Crane stated that the cost for the initial site audit was about \$2000 followed by \$500 annual certification fees. He also said annual renewal is contingent on required documents proving compliance. “The documentation has to be submitted prior to receiving the certification, it is not an automatic renewal as you would find with other organizations such as the Green Hotels Association who renew as soon as your annual membership dues are paid,” Crane stated.

In addition, follow up on-site inspections take place every two to three years depending on Green Seal’s staff availability, Crane said. He also stated that Green Seal makes every effort to schedule around their busy demands and peak periods to minimize disruption by giving a 30 day advance notice.

In terms of providing information about staff background, Crane said Green Seal was very open about sharing staff information. A background sheet on the auditor listing education, certifications and experience was provided to Crane prior to site visits. He also knew that the

³⁴ Ibid

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Green Seal staff were very educated and had degrees relating to environmental sciences and chemistry as well as PhDs.

Overall, Crane believes that Green Seal has helped business and customer perceptions of the hotel. Part of this comes from their ability to advertise that they have a third party verifying their environmental program is comprehensive and effective, he said. They receive many positive comments from guests and receive a number of bookings from guests who locate their property on the Green Seal's website.

V. Case 2: Doubletree Hotel & Executive Meeting Center – Lloyd Center

The Doubletree Hotel & Executive Meeting Center in Portland Oregon is part of the Hilton chain and is the largest hotel west of the Mississippi River to be certified by Green Seal. The hotel has 476 rooms and was certified in 2006. According to General Manager of Doubletree, Steve Faulstick,³⁵ Green Seal was chosen as the preferred certifier because it is the most relevant organization related to hotels. Faulstick stated that the organization gives credibility in an environment where a definition for a "green hotel" is hazy and undefined. His confidence in Green Seal is also attributed to knowing that their staff members have a background in science and other related areas that show expertise.

The process took about six months and total costs for upgrades and changes totaled from \$10,000 to \$15,000. Most significant in terms of cost required retrofitting a composting system that cost about \$4000. With all the changes and upgrades combined, Faulstick said the hotel has been able to reduce their overall landfill waste from 10 percent to 70 percent. Savings is also

³⁵ From interview with Steve Faulstick on November 30, 2007.

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shown by the replacements of 300 older toilets with 1.6 gallons per flush, reducing water usage by 308,000 gallons of water and saving \$1,163.³⁶

The hotel has also been able to reduce its energy consumption by 32% and water usage by 15%.³⁷ As well, the hotel engages in a food purchase policy where 65% of food purchased originates within a 500 mile radius. The hotel makes sure that all employees work together to reduce waste and contribute to sustainability. For example, an employee paper-saving program has cut paper usage by 20% a year.³⁸ Also, staff members are active in separating their left over food and waste into compost bins and recyclables.

Overall, Crane states that Green Seal serves a good purpose financially and morally. The organization is able to help the hotel create and implement a strong environmentally sensitive program. Although the hotel chooses not to increase their rates, Faulstick believes the investment is worth it when looking at the overall savings and accomplishments they have achieved. The hotel has earned about \$2 million in extra revenue from new businesses looking for green hotels for rooms and events.³⁹ Also especially important are customers' perceptions of the Green Seal. Faulstick stated that customers do notice the Green Seal which is displayed in the lobby and have received positive comments regarding their environmental practices.

VI. Program Assessment

Overall, Green Seal stands to serve as a legitimate third-party organization for

³⁶ Green Seal document: "Environmental Pollution Prevention and Savings Opportunities for the Hospitality Industry," June 1, 2007.

³⁷ Doubletree Hotel Portland: <http://www.doubletreeportlandgreen.com/>

³⁸ Ibid

³⁹ Green Seal document: "Environmental Pollution Prevention and Savings Opportunities for the Hospitality Industry," June 1, 2007.

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lodging properties that want to engage in good environmental practices and need help with defining and implementing a program. Savings and reduction in waste, energy use and water use can be measured to prove that the program is effective. The process for certification has a clear set of standards that must be met in order to obtain the seal and companies are given the opportunity to correct deficiencies in order to satisfy necessary criteria under GS-33. Monitoring appears to be strong based on required documentation of compliance before certification of renewal is given.

However, there are areas that are weak. The fact that certification and monitoring fees comes directly from the target means there is always a possibility for unethical agreements. The target must also pay out-of-pocket cost for audits such as travel.⁴⁰ These cost guidelines calls into question of how money factors into making decisions. Can Green Seal be truly independent when significant revenue comes directly from the targets? Some organizations avoid this possible conflict of interest by contracting a separate third-party organization to do the auditing.

As well, although monitoring is annual through documented proof, on-site inspection is not. This may not be possible due to limited resources and staff. However, an on-site audit that takes place 2-3 years following certification leaves open the possibility for some cheating to occur. In addition, all documentation relating to application, certification and testing are not available for public review and are kept confidential. Allowing for public access to evaluation documents would make the certification process more transparent and credible.

⁴⁰ Out-of-pocket cost requirement stated in Green Seal's documented fee schedule provided per request.

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VII. Organizational Credibility

Overall, Green Seal can be viewed as a credible third-party verifier for the lodging industry. Consumers looking for a hotel that engages in good environmental practices can rely on properties certified by the organization. However, there are areas for some concern.

An area that calls into question of accountability is the fact that no information on staff background and structure is provided on Green Seal's website. Although information on the board of directors was provided upon request and was extensive, the website's lack of this important information for the public view gives them less credibility. The website did not have specific names of key staff members. Green Seal uses strong word to describe themselves. These include "reliable, fair, integrity" and "without conflicts of interests." If this is the case, than Green Seal should stand by their word and allow the public to easily view staff information and make their own judgment. Based on a background review of the board of directors provided by Green Seal, it is determined that conflicts of interests could not be identified. It also shows that the board of directors are very knowledgeable, educated and experienced in areas related to sustainability, science, law and environment in addition to many other related areas. Including staff background on their website would help to increase accountability and credibility.

Other information that was not available relate to specifics of staff training. How are the auditors trained? How long is the process? How does Green Seal ensure the auditor is always fair but stringent in their work? What is the work code of conduct? The answers to these questions are not known.

As well, information on whether any property has failed certification or lost renewal of certification is not available. Green Seal allows for the target to make necessary corrections when a criteria has not been met. This system may mean that all properties get certified given they are willing to make all the necessary improvements. In addition, information on whether

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there are any sanctions for non-compliance was not provided. It is assumed that a sanction means the lost of certification only.

Information also not available relate to specific percentages in terms of funding. Their Form 990 income tax gives a good idea of how much money is free and how much comes from their services. However, specifics of funding sources would help to give a better idea of how Green Seal operates and whether if in fact there are no financial conflicts of interests.

Overall, despite unanswered questions, Green Seal stands to serve as a legitimate and credible organization to turn to for verification. They have worked with state and city governments such as California and Pennsylvania in helping develop appropriate standards for greening the lodging industry. In addition, Green Seal is currently helping Los Angeles County to develop a green purchasing policy.

VIII. Conclusion

Overall, Green Seal is an effective third-party organization to verify that a lodging property is engaging in good environmental practices. Although there are some areas for concern, Green Seal has become a legitimate verifier for the lodging industry, governments and consumers. Standards are very transparent in that they are open to the public, are clear and subject to a peer review process. Credibility is an area that can be increased by providing information related to specific funding sources, staff background and certification to the public.

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IX. Suggested Items for Further Research

1. Exploration of the certification process for other products such as cleaners and paper.
2. Exploration of Green Seal's work with various governments (CA, LA County, PA) and accomplishments achieved. Why do the governments have confidence in Green Seal and why were they chosen to serve as the benchmark?

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X. Discussion Questions

1. What areas of Green Seal give it credibility or lesson it?
2. What part of the certification process is strong and what may be weak?
3. How can consumers and the lodging industry have confidence in Green Seal?
4. What information was not available about Green Seal and how does this affect its credibility?
5. How are the standards created and are they transparent?
6. What are the benefits for having a “Green Seal?”
7. What are the costs and savings involved for meeting GS-33 requirements? Is it worth it?
8. Green Seal suffers from an array of transparency issues, yet it is claimed to be an effective third party organization in this case. Do you agree with the author’s claim? Can Green Seal be safely considered an effective third party-organization because their work generates increased profits for its clients?
9. What value proposition does Green Seal offer to the lodging industry? Why can’t hotels just adopt ISO 14020-14024 standards and the EPA’s requirements for third-party verification? What value proposition do Green Seal-certified facilities offer to its guests (if any)?
10. With a staff of ten people, Green Seal certifies lodging facilities an array of consumer products. Can certification be safely assured given its staff size and resources?

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XII. Appendix

Appendix 1

Income Tax Form 990, 2005

	2001	2002	2003	Total
Gifts, grants, contributions	\$316,483	\$269,383	\$20,000	\$605,866
Services performed, furnishings of facilities	\$163,167	\$141,501	\$502,789	\$807,457

Appendix 2

Environmental Protection Agency's criteria for a third-party certifier

(Quoted from Green Seal's website)

- an open, public process that involves key stakeholders (businesses, environmental and consumer groups, states etc.) in developing its criteria or standards.
- award criteria, assumptions, methods and data used to evaluate the product or product categories that are transparent (i.e., they are publicly available, easily accessed and understandable to the lay person).
- a system of data verification and data quality.
- a peer review process (with representation of all stakeholders) for developing the standards or criteria.
- criteria which are developed based on a "systems" or life cycle approach (i.e., "cradle to grave").
- an outreach program to educate the consumer, which includes clear communications to consumers that provide key information concerning environmental impacts associated with the product.
- an established goal of updating standards or criteria as technology and scientific knowledge advance.
- authority to inspect the facility whose product is certified to ensure compliance with the standards or criteria.
- testing protocols for the products that are certified which ensure testing is conducted by a credible institution.

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- access to obtaining the seal by small and medium sized companies (e.g., the cost of the seal is not so high as to prevent access by companies).
- compliance with the Federal Trade Commission's (FTC) Guides for the Use of Environmental Marketing Claims.

Appendix 3

Lake Powell Resort and Marinas, Arizona



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Appendix 4

Doubletree Hotel & Executive Meeting Center Portland – Lloyd Center



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Appendix 5

GS-33 Green Seal Environmental Standard for Lodging Properties.

Third Edition, August 19, 2002.

PLEASE SEE SEPARATE PDF DOCUMENT: [Appendix5_lodgingproperties.pdf](#)

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