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Lessons Learned from Washington State's Sustainable Business Program

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Abstract

This paper presents key lessons learned during the development of the Washington State Department of Ecology's sustainable business program. The program targets small and medium-sized businesses and seeks to help participants adopt more sustainable business practices. The paper presents a case study of how Ecology developed a new, unified program that combined a compliance focus with a "beyond compliance" approach. The paper explains some of the significant problems and questions Ecology faced while designing the program and how those problems and questions were resolved. Finally, the paper presents the author's recommendations for regulators who are developing environmental and sustainability programs.

[Sustainability, SMEs, Beyond Compliance, Environmental Results Program]

Lessons Learned from Washington State's Sustainable Business Program

Fifty years ago, it was possible to own and operate a profitable business without giving any thought to sustainability. Fifty years from now, that will not be true anywhere in the world. Businesses today have started to pay attention to the connection between sustainable practices and their company's long-term health and profitability. To assist businesses in our state improve their environmental, economic, and social performance, the Washington State Department of Ecology (Ecology) spent considerable time, money, and staff resources to create the "Sustainable Washington" program.[1] This case study reviews the impetus for creating a new program, some of the program development challenges, and an explanation of how and why Ecology staff made some key decisions. This paper also provides recommendations for regulators who may be creating similar sustainability and environmental programs.

Background

Ecology is the state agency responsible for enforcing Washington's environmental laws. Beginning in 2001, Ecology adopted a new strategy for reducing hazardous and solid waste in Washington State. The agency's "30-Year Vision for Beyond Waste" states, "We can transition to a society where waste is viewed as inefficient, and where most wastes and toxic substances have been eliminated. This will contribute to economic, social and environmental vitality." (Ecology, 2004, p. 3). While Ecology understands that we can never truly eliminate waste from human society, the Beyond Waste Vision reminds us that significant reductions are possible.

Sustainability and Corporate Social Responsibility

"Sustainability" and "Corporate Social Responsibility" (CSR) are terms that are sometimes interchanged. However, we view them as slightly different concepts: CSR is a subset of sustainability and is the means by which we attempt to measure sustainable practices. The impacts of sustainable practices are expressed in terms of the "three legs of sustainability": environmental, economic, and social effects. CSR is the method by which those effects are quantified and reported.

The differences between sustainability and CSR might best be explained through an example. Say a land mine manufacturer stops using toxic chemicals in its manufacturing process and final product. The company writes and distributes the appropriate reports about that improvement. The company might "score" well from a CSR perspective: both the new manufacturing process and use of the final product will have a smaller effect on the environment. However, the production of land mines, toxic-free or not, is not a sustainable process because it has significant negative social and economic effects.

This is why we view CSR and sustainability as two sides of the same coin: related but not identical. A business can adopt sustainable practices but fail to quantify the effects of those practices through the appropriate CSR tools. A business can also fulfill all its CSR reporting obligations while still being involved in unsustainable practices. To date, our focus at Ecology has been on sustainability first and CSR second. While both are important, we believe changing behavior by encouraging sustainability is the most essential activity.

Development of a Sustainable Business Program

In 2004, Ecology adopted an extensive Beyond Waste plan that incorporated 64 specific waste reduction recommendations (Ecology, 2004). To implement part of this plan, Ecology's Hazardous Waste and Toxics Reduction Program began to develop a program to help businesses be more sustainable. The intent was to develop a program that would provide financial incentives and technical assistance to participating businesses. Ideally, the program would be equally attractive and helpful to all businesses in the state regardless of business size, industry, or location. A team of Ecology staff convened, assigned areas of responsibility, and engaged the assistance of environmental consultants.

Ecology's team members reviewed information on 35 environmental programs and research from across the United States and the European Union.[2] After reviewing the information collected by staff and contractors on each program, we realized programs fell into two categories: programs emphasizing regulatory compliance and programs focused on going beyond regulatory requirements. Both approaches have merit. A compliance-centered program would help keep the agency's focus on its primary purpose: to enforce the state's environmental regulations. In contrast, a "beyond compliance" approach might be more effective at protecting the environment. Getting businesses to do more than is legally required could help avoid future problems. However, this type of program would exceed the agency's legal authority and could only work on a voluntary basis. While environmental leaders might enroll in a voluntary program, those businesses with the highest environmental risk probably would not.

When faced with the question of which type of program to create, the Ecology team came up with what we believe is a new approach: do both. Ecology's program would use existing authority to establish a new compliance-based program. As a business successfully completes the compliance portion of the program, it can easily transition into the "beyond compliance" portion of the program, the initial stage of which would require just a little more work than is already required by law. The second stage would also offer incentives for doing that extra work.

To create this new combined program, Ecology originally decided to follow an existing compliance-based model known as the "Environmental Results Program" (ERP). The state of Massachusetts developed ERP to address industry sectors that are low enforcement priorities: industries with large numbers of small businesses, each producing a relatively small amount of waste (such as dry cleaners or photo processors). Following this model, Ecology would develop and mail informational materials to all businesses in a selected industry. The materials would explain (in plain English) what the law requires and how the business can implement "Best Management Practices" (BMPs). Each business would review the materials and either (1) certify that it is "in compliance" with the applicable environmental regulations, or (2) submit a "Return to Compliance" plan explaining how and when it will fix its problems. Instead of visiting—or attempting to visit—all businesses in a given sector, regulators would choose a statistically significant sample for random spot checks. This approach has seen impressive results and has expanded to 15 other states addressing 17 different industrial sectors (Dyke-Redmond, 2006). Although ERP addresses the needs of small businesses, we hoped it could be adapted to meet the requirements of large businesses as well.

For the beyond compliance portion of the program, we felt none of the programs currently in existence addressed our specific vision for the program. One voluntary program we looked at closely was "EnviroStars." Started in King County, Washington in 1995, this program has since expanded and is currently active in five counties surrounding Puget Sound (EnviroStars, 2008). The program has over 600 participating business in a variety of industries, each recognized for their environmental performance using a rating system of two to five stars. The EnviroStars program has been successful, but some aspects of the program made it inadequate for Ecology's purposes. Of primary concern was that the EnviroStars program is only available to businesses that generate hazardous waste. We specifically wanted to design a program that would be available to all businesses, not just those that use toxic chemicals.[3] Another concern was that the EnviroStars model requires an on-site inspection prior to a business being enrolled in the program—a requirement far beyond Ecology's workload constraints, even with significant additional funding and legislative authority. Finally, we were concerned that the various EnviroStars recognition levels did not have many associated incentives. To a large extent, doing well in the EnviroStars program must be reward enough because there are few if any financial incentives. Given these limitations, we kept the EnviroStars model in mind, but began to develop a new program instead.

Because the Beyond Waste plan heavily emphasized financial incentives, we knew that had to be a significant focus of the program. However, we were consistently challenged by the question, "Incentives for what?" In other words, how do we logically tie a specific financial incentive to a corresponding environmental outcome? Other important questions we asked included, "How do we know we aren't rewarding businesses for taking actions they would take

even if there were no incentive? And how do we ensure participating businesses continue to make environmental progress?" The last thing we want to do is inadvertently create a negative inducement—that is, making an incentive so attractive that a business will allow its environmental performance to worsen in order to later "improve" and receive a reward for that improvement.

To address these issues, the team designed a voluntary program containing five leadership "tiers." Each tier requires an increasing level of environmental performance but offers more financial incentives. The exact nature of the environmental improvements we were seeking was relatively vague at this point, but we hoped our stakeholders would help us refine the program.

Stakeholder Involvement

After the team finished an initial draft of the program, the next step was to convene a stakeholder advisory group. The group contained representatives from environmental advocacy groups; business advocates; local, state, and federal government entities; and representatives from small, medium, and large businesses. The advisory group initially recommended reducing the number of leadership tiers from five to three, suggested Ecology look to the EnviroStars program as a possible program model, and encouraged Ecology to consider that a single program would be unable to meet the differing interests and needs of both large businesses and small businesses.

After the first meeting of the stakeholder advisory group, the Ecology team worked with contractor staff to conduct additional research. Two of these research activities proved to be the most informative: a survey of Washington residents regarding hazardous substances and a

series of small focus group meetings. Both of these investigations provided tremendously valuable information.

Telephone Survey

In February and March 2007, a research firm conducted a telephone survey of Washington State residents about their knowledge about toxic chemicals. Respondents were asked a series of questions about their attitudes, beliefs, and awareness of toxic chemicals. We found the following results surprising:

1. When asked, "What kinds of concerns (about toxic chemicals) have you had?" the most popular response was "Animals/pets ingesting; getting sick" at 21 percent of respondents; the second most popular response was "Children ingesting; getting sick" with 18 percent (Jull, et. al., 2007). While we were unable to reach any conclusion about why more respondents were concerned about their pets than their children, the concerns about accidental exposure and poisoning were clear. We believe this information could help us find new ways to motivate business owners to change their behavior by emphasizing the health aspects of pollution, instead of just the environmental effects.

2. When asked where they might find information about hazards related to lead (especially lead-based paint), there were clear economic and social differences. Respondents who classified themselves as "white" and those reporting high incomes were more likely to rely on the internet for information or not seek information at all about lead-based paint. In contrast, respondents who did not classify themselves as "white" or who reported lower incomes favored talking with a store clerk or asking a government agency for information (Jull, et. al., 2007). These differences between social and economic groups helped team members

understand that we might need to adopt a variety of communication techniques in order to reach everyone in our target audience.

3. While we expected to see some differences between cultural groups, we were surprised by some of the survey's findings.

> Latinos and Spanish-speaking respondents were much more likely to agree that "concerns about the dangers of toxic products are exaggerated." In fact, 67% of Spanish-speaking respondents and 48% of Latino respondents *somewhat* or *strongly* agreed with the statement. By comparison, 15% of non-Latino respondents agreed with the statement, as did 25% of non-Spanish-speaking respondents" (Jull, et. al., 2007, p. 32).

This result further confirmed that there are sometimes significant differences between social, economic, and ethnic groups. In order for a new statewide environmental program to be successful, it must include strategies for reaching all potential program members and communicating with them in a way that speaks to their concerns in a culturally sensitive manner. It must also incorporate research about cultural beliefs and attitudes in the program design phase.

Focus Groups

The focus group data also proved unexpected and informative. Participants were selected from auto body shops, cabinetmakers, and painters—industries that use large quantities of spray paint. Participants were randomly chosen from a list of businesses and assigned in groups of approximately six people. Unlike previous stakeholder outreach efforts, the focus groups took place without Ecology staff present. Only the consultants knew who

participated and what each responded said. There was no direct link to any participant, so they would feel free to discuss their true opinions (including any environmental problems they have) without fear of inspections or penalties from Ecology. The contractor paid each participant $100 for their time.

The most common concern expressed by focus group participants was about exposure injuries to themselves, their workers, and their family members. More than one participant shared a personal story about how they were injured by toxic chemicals. Each of the focus groups expressed a consensus that avoiding injuries to their workers was of primary importance. This was very helpful information for Ecology to have and confirmed the results of the telephone survey.

The contractors were also pleased with an unexpected outcome of these focus group meetings. They observed industry competitors discussing their mutual problems and concerns. With no direction from the group facilitator, participants would share information and discuss various products and techniques. Many participants expressed their need for these types of discussions with others in their industry in order to learn about better products and techniques. To paraphrase the message that emerged from multiple focus groups: “I’d use the best product for the environment if I knew what it was. But I don’t have time to figure that out. Just tell me what I should use and I’ll use it.”

In addition to information about specific environmental programs, contractor staff also researched various possible financial incentives and, to a lesser extent, noneconomic incentives. The list of possible incentives that Ecology might offer includes:

- Reduced or refunded fees

- Reduced regulatory requirements
- An expedited permitting process
- Being assigned a single contact person at Ecology (instead of separate contacts in each program area)
- A grant or low-interest loan program
- Training
- Networking opportunities
- Reduced insurance premiums
- Employee discount incentives (such as membership fee waivers at a local gym).

It is important to remember that even "non-economic" incentives are inherently financial. Training, networking opportunities, and research into environmentally preferred products are services that can be provided by government for a relatively small investment. If a small business tries to obtain those same services in the private sector, they will likely find them cost prohibitive. While we may not traditionally think of training or a networking breakfast as an "economic incentive," it may prove invaluable to participating business owners.

After all this research and analysis and two more stakeholder advisory group meetings, Ecology finally had a basic program design. The program would have two phases: an ERP phase focused on compliance and an EnviroStars phase based on leadership. Both the ERP and EnviroStars models would be adapted to fit Washington's needs. Training, technical assistance, and other "non-economic" benefits would be offered for the ERP phase of the program, while financial incentives would be reserved for businesses going beyond compliance. The program

would be open to all businesses but would be tailored to the needs of small and medium-sized businesses.

Key Challenges

All organizations face limitations on available resources, trouble gaining support for new ideas, and unexpected setbacks. The Ecology team experienced all of these challenges when it began to implement the Sustainable Washington program. We believe the following challenges were the most significant and informative.

The first challenge the development team encountered was resistance to setting up the stakeholder advisory group. Ecology usually tends to make decisions based on consensus, but some people involved in the process were uncomfortable relying on outsiders to achieve that consensus. The team took two steps to overcome this discomfort. First, we emphasized that this group was an "advisory" group. The fact that the group only had the authority to recommend—not make binding decisions—helped alleviate fears that Ecology was abdicating too much control over the development process. Second, we recruited a wide range of stakeholders to be part of the advisory group, including many members who were personally known to Ecology. The team made sure that environmental groups, business advocates, business owners, and government officials all had a seat at the table and were equal members of the advisory group. The inclusion of strong environmental advocates helped alleviate concerns that business representatives would design a program that would do little other than reward participating businesses.

The second key challenge encountered during the development process was identifying which industry sector or sectors would be best for testing the new program. This was especially

challenging because there were competing priorities for which sector deserved attention first. The team considered the following options:

1. *Should we focus on a sector with a large number of facilities or a small number of facilities?* Picking a sector with a large "universe" might make it easier to detect environmental changes due to program participation, but picking a sector with a small universe would make it easier to involve stakeholders and provide personal assistance to program participants. A smaller universe might have a better chance of producing positive results, but it might be harder to prove those results. Unfortunately, without substantial evidence of the program's worth, it would likely be discontinued.

2. *Should we focus on a sector that is a significant contributor to environmental problems?* It would be ideal if we could determine which chemicals are polluting Puget Sound so we could focus our attention on the sector or sectors that use those chemicals. Unfortunately, we found that the data regarding which chemicals are present in our ecosystem are either not available or are insufficient for decision-making purposes. We also found that regulators generally lack knowledge about which industries use which types of chemicals.

3. *Should we focus on a sector that has already been addressed in another state?* Dry cleaners, photo processors, and auto body shops are all examples of industry sectors where similar program materials already exist. It would require minimal work to customize the materials produced by other state governments and make them applicable to businesses in Washington State. However, many of the sectors where materials already exist are those with large numbers of facilities (like dry cleaners and photo processors) or those where Ecology has already done extensive outreach (like auto body shops).

Finally, the third key challenge encountered during the development process was gaining sufficient internal support. This was of special concern when beginning the site visit process for the ERP phase of the project. Many Ecology stakeholders were adamantly opposed to the original inspection methodology. The original method would have required more than 400 random baseline site visits and a second round of 400 random visits approximately a year later, after the facilities have returned their certification forms.[4] Even though Ecology staff members weren't performing the inspections, managers expressed significant concerns related to workloads. The managers asked the program development team to make sufficient alterations to the program to result in 150 site visits in each round of inspections.[5]

Eventually, we decided to focus on auto body shops for our pilot project. This gave us a universe of approximately 831 facilities in the pilot project, an industry with a pre-existing level of trust, good connections with trade groups, and a direct impact on the environment. This sector also gave us an excellent opportunity to evaluate worker health issues. Auto body shops have high numbers of workers injured due to isocyanates exposure. "Isocyanates are the raw materials that make up all polyurethane products" and are a cause of occupational asthma and other exposure disorders (OSHA, 2006). Implementation of BMPs at participating auto body shops should not only reduce the environmental harm from these chemicals, but should also result in fewer workers being injured by these chemicals.

Program Evaluation

The ultimate success or failure of the pilot project may lie with the final program evaluation. Ecology is not unique in its need to prioritize budgets and workloads based on which programs produce demonstrable results. When making decisions about which programs

will receive priority, real outcomes are only as good as the proof they rely on. Ecology needs to measure the "real world" success of the pilot. To determine what data could be used to evaluate whether the program was successful, we asked two questions: "If I am a small business owner, what sort of data do I have easy access to?" and "If I am a legislator, what questions do I want answered before I agree to fund this program?" Data that did not answer one or both of those questions did not receive further consideration.

The team determined there were three criteria for program measures. First, data must be easy to obtain, either for a business owner or for Ecology staff to gather directly from the source. Second, measures must provide meaningful information about the "real world"; theoretical and extrapolated data should be kept to a minimum and actual measures should be used whenever possible. Finally, measures must be requested in just a few questions. Ecology will use the information provided by firms and collected by project staff to evaluate whether the program's achievements are sufficient to justify the expense involved with implementation. The specific categories of data to be analyzed include:

1. *Workers' compensation rates.* Usually referred to as "workers' comp," this state-run insurance program covers workers injured during the course of their employment, irrespective of whether they have other health insurance coverage. To verify that BMPs have a beneficial effect on worker health, we plan to review accident rates and workers' compensation premium ratings for the auto body industry in Washington State. To date, we have been unable to find any similar environmental program that uses worker injuries as a performance measure. We believe this will be a powerful evaluation tool and is well worth the effort needed to obtain

the data. It will be very persuasive to decision-makers and stakeholders, telling us about both the economic and human effects of the program in very real terms.

2. *Pollution released to the environment.* Like other environmental programs, the primary focus of the Sustainable Washington program is the amount of pollution discharged to the environment. Firms participating at higher levels of the program will report which BMPs they implement and the amount of wastewater and stormwater runoff they discharge each year. From this information, Ecology will estimate the firm's reduction in air and water pollution. Firms may also be required to report expenses for mitigation and conservation activities (such as the cost of installing low-flow restroom fixtures). While extrapolating program effects is a less-desirable method than direct measurement, we believe it will be too onerous for businesses to try to measure their contribution to water pollution. In this case, we placed a higher priority on information that businesses could easily obtain. Avoiding extrapolation was less important.

3. *Waste generated.* Washington law requires Ecology to work to reduce the production of both solid and hazardous waste in the state. The Sustainable Washington team believed reducing the amount of waste generated was a logical extension of that requirement. Both solid and hazardous waste are of significant concern to the long-term health of our environment. Hazardous waste requires special handling and treatment and poses a significant danger to the environment and to human health. Solid waste not only requires careful long-term management, it is also resource-intensive. We are rapidly running out of landfill space, and incinerators are not always a safe option.

Participants in the Sustainable Washington program will be required to report the amount of solid and hazardous waste they generate each year. We expect that businesses implementing BMPs will report decreases in both types of waste because BMPs should help participating companies be more efficient. However, it is possible that we will see participating firms actually *increase* the amount of solid waste generated. Depending on the specific BMPs implemented, participants may initially reduce their generation of hazardous waste by changing products or methods to eliminate toxins, but not reducing the waste generated during the business activity in question. While the total amount of waste generated may be similar, we may initially see a transfer from the "hazardous waste" category to the "solid waste" category. Our data analysis techniques will need to consider this possibility and, if it occurs, we will need to carefully and clearly explain why an increase in solid waste generation actually demonstrates program success.

4. *Resources consumed.* Today, more than ever, it is vital that each of us be aware of the amount of resources we consume. This is especially important in the United States with its disproportionately high rate of resource consumption. Current state law does not restrict any company's use of natural resources, including energy. As is typical in the United States, resource consumption is controlled by the market. However, there is a growing understanding that we live in a world of finite resources which must be managed and used efficiently. We believe it is important that Ecology take the lead in emphasizing the need to use less, utilize wisely, and recycle what's left. In the leadership portion of the program, we plan to examine consumption rates for raw materials (especially energy), recycling rates for wastes generated,

and business expenses for mitigation, such as installation of low-flow bathroom fixtures, biofuel conversion costs, or purchase of carbon offset credits.

5. *Facility compliance.* While the Sustainable Washington pilot program is voluntary, its initial focus is on regulatory compliance. Even if the final program is unable to demonstrate a direct benefit to the environment, it might still be successful if it helps businesses achieve regulatory compliance. A firm that properly manages its hazardous waste, minimizes its stormwater runoff, and installs the proper equipment on its air emissions equipment is less likely to have a serious environmental accident. Compliance rates are also a "hard" number that agency decision-makers and legislators can quickly understand and evaluate. It is important to not view compliance rates as the sole important measure but instead to remember that compliance rates are an indirect measure of environmental performance.

Finally, although not part of the initial pilot program, Ecology hopes to collect data in the future that demonstrate the relationship between sustainable practices and profitability. Many businesses, both small and large, are interested in the "triple bottom line" approach to accounting. We believe that we may be able to incorporate this type of program measure in the future, after we have substantiated the program's worth through other metrics.

Recommendations

Based on the research and work done over the last two years, I would make the following final recommendations to anyone developing an environmental or CSR program for small businesses:

1. *Human health effects may be the most effective motivation for behavior change.* Business owners who are unconcerned about sustainability and CSR issues might alter their behavior in order to prevent illness or injury to themselves, their employees, their family members, or their pets. As noted above, the primary concern of both survey respondents and focus group participants was avoiding injury. Although information about human health effects is not typically part of environmental programs, it may be this information that will persuade a business owner to change their behavior when other information fails to persuade them.

2. *Programs to change behavior must be appropriate and relevant to the target audience.* Regulators and other organizations must give special consideration to ethnicity, socioeconomic status, business size, and typical industry practices. It is vitally important to remember that not all audience members are concerned about the same things or will be persuaded by the same arguments. For a program to be successful, it has to communicate to its audience in a way that the audience is predisposed to understand. This might require preparing materials and conducting workshops in multiple language or defining problems and solutions very broadly so that many cultures and socioeconomic groups can find common ground.

3. *Sustainability and CSR tools currently available are practical only for larger businesses.* There are a number of CSR and sustainability programs currently in existence that are designed to meet the needs of large businesses. Ecology spent substantial time reviewing programs like USEPA's Performance Track, various private-sector programs, and the Global Reporting Initiative and Facilities Reporting Project. Unfortunately, we found that all of these programs fell short when it came to addressing the needs of small and medium-sized businesses. Small and medium-sized businesses do not possess the time, resources, or expertise

to utilize these tools and programs. Small business owners may be experts in their field, but very few of them are in the field of environmental consulting. Firms that are large enough to have dedicated environmental and CSR staff typically don't need government assistance in these areas. The type of businesses Ecology specifically tried to target is those firms that might like to improve their sustainability and be better corporate citizens: the businesses that can't use the tools currently available. The owner who is struggling to make ends meet and is spending each night after supper at the kitchen table trying to pay bills is a person who does not have time to develop an Environmental Management System. In many respects, it is that well-meaning small business owner who may pose the greatest environmental risk because they lack the planning and resources on-hand to deal with an unexpected crisis.

4. *Internal communication and consensus is vital to program success.* While this may seem like an obvious point, it should not be underestimated. Any program of similar magnitude will undoubtedly involve numerous staff members, possibly from different sections or units of an organization. It is easy for details to "fall through the cracks" and for misunderstandings to arise. Establish a clear communication plan from the very beginning and make sure you follow it.

Conclusion

If I could give environmental regulators just one lesson about the businesses they regulate, it would be that businesses aren't *trying* to pollute our environment. Pollution is an unintended byproduct of the system in which we live. Business owners are just like everyone else. They breathe the same air, drink the same water, and want the best for their children. They don't get up in the morning trying to think of new ways to poison our ecosystem.

What they do think of when they get up in the morning is, “How am I going to make payroll this week?” If you can’t help them answer that question, they probably don’t have time to deal with you. If you want them to do something or change their behavior, make it fast and easy to understand what you want and why it’s important. Sometimes that means doing some of the work for them up front; but in the end, you’ll spend less time fixing the mess.

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Footnotes

1 “Sustainable Washington” is a working title for the program. A final name will be chosen after the pilot program is complete.

2 Ecology staff performed the EU research and focused on academic research and papers related to small businesses and corporate social responsibility issues.

3 In fact, the Bill & Melinda Gates Foundation at one time inquired about EnviroStars certification, but was turned away because it did not meet the program’s requirement of being a generator of hazardous waste.

4 At a 95 percent confidence level and margin of error of five percent.

5 The team will accomplish this by reducing the confidence level and increasing the margin of error.