Examining governance and collaboration for enforcement of hotel greening in Gauteng, South Africa: Towards a network governance structure

Greening is an effective way for hotels to minimise their impact on the environment. Studies have shown that many South African hotels have not adopted greening practices because governance and guidance from the South African government are poor. There is also limited academic literature exploring stakeholder relationships and enforcement of greening regulations. This study will provide empirical evidence (via semi-structured interviews) as to the current state of enforcement, focusing on the government, private, non-governmental and public-private sectors. Results show limited collaboration, poor policy direction and inconsistent certification criteria that restrict greening. Implementing network governance will improve collaboration and in turn hotel greening.

Keywords: Hotel Greening, Enforcement, Regulation, Governance, South Africa

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**Introduction**

The world’s largest service sector is tourism and hospitality, contributing five percent to worldwide Gross Domestic Product and employing approximately 234 million people globally (Koc & Boz, 2014 & Sloan, Legrand, & Chen, 2013). Accommodation is the largest sub-sector within tourism, with the second most significant impact on the environment in this industry (Mensah & Blankson, 2013) with more information on this environmental impact listed below:

- Tourism sector contributes nearly five percent of the global carbon dioxide emissions (World Tourism Organisation, 2009).
- On average, 3.51kg of waste is produced per guest room per day (Singh, Cranage, & Lee, 2014).
- Hotel rooms can account for approximately 40 to 80 percent of the hotel’s energy consumption (Raber, 2015).

The excessive use of natural resources has emphasised the importance of sustainable hospitality development (Saarinen, Becker, Manwa, & Wilson, 2009). Font and Haris (2004) and Sharpley (2009) note that it is difficult to convert the theoretical principles of sustainable development into practical, achievable policies and procedures relevant to the real world of tourism. The hospitality industry can, however, minimise their impact on the environment by greening hotels (Lee, & Rahman, Reynolds & Svaren, 2012). In this study, a green hotel will be described as a hotel that intends to use products and services that reduce the use of water and energy, and minimise the production of waste (Green Hotels Association, 2015). It is important to note that the aim of this paper is not to explore in detail the controversies and definitions of sustainable development (Ihlen & Roper, 2014), but rather to focus on the
environmental development dimension of sustainable development that forms part of hotel
greening (Department of Environmental Affairs and Tourism, 2002).

Despite the environmental benefits of hotel greening, it is apparent from the academic
studies available that many hotels in South Africa are not implementing greening initiatives
(Musavengane & Steyn, 2013; Rogerson & Sims, 2012 & Van der Merwe & Wöcke, 2007).
It is suggested that implementing efficient and effective environmental governance,
government policies, regulations, and tourism certification programs, should have an
influence on the implementation of greening initiatives (Fakier, Stephens, Tholin, & Kapelus,
2005; Lund-Thomsen, 2005 & Mahony, 2007). Limited South African literature highlights
that the local, provincial and national government have insufficient enforcement capacity,
while legally binding structures are absent, with weak environmental governance (Lund-
Thomsen, 2005). Furthermore, relatively few tourism organisations become members of
green certification programs due to the high costs involved (Mahony, 2007 & Van der Merwe
and Wöcke, 2007). Despite these limited findings, the studies have not fully elaborated the
key underlying challenges facing various stakeholders in regulating and enforcing hotel
greening in Gauteng, South Africa. This underlines the appropriateness of this research,
which specifically concentrates on improved governance for collaboration between these
stakeholders to enforce and regulate hotel greening in South Africa by using qualitative
research methods. This research, therefore, presents viewpoints from various stakeholders
(i.e., government, non-government, public-private and private sectors) to examine the
underlying challenges towards hotel greening in Gauteng.

Despite being the smallest province, Gauteng was used as the study location due to
the province’s significantly higher tourism revenue generation of R30 billion ($10 billion)
(Gauteng Tourism Authority Annual Report 2012) and second largest share of graded
accommodation in South Africa (Treasury, 2012). Figure 1 shows a map of the study location.

Figure 1: Map of Gauteng, South Africa

Source: Rooms for Africa (2017)

The following section will explore the current landscape of the various stakeholders involved in hotel greening (i.e., government, non-government, public-private and private sectors) before proceeding to outline the methodology used. The results of the study will then be discussed followed by the discussion and conclusion.

The current landscape – South African greening regulations

The South African government has two main policies that pertain to greening the hospitality industry: the White Paper on Environmental Management Policy, Government Gazette. (Vol. 395, No. 18894), and the White Paper on Integrated Pollution and Waste Management (2000). Furthermore, the National Responsible Tourism Development
Guidelines for South Africa (DEAT, 2002), and the Responsible Tourism Manual for South Africa (Spenceley et al., 2002), are in place. Despite the above, South Africa does not have a single, consolidated national minimum standard for responsible tourism. Subsequently, various sets of criteria are used to certify tourism organizations, making it difficult to evaluate the trustworthiness of certification systems (South African National Standards, 2011). In 2015 the former Minister of Tourism announced an investment of R557 million ($42.9 million) in a series of new incentive programs to assist organizations with improved sustainability. Two relevant goals were to assist organizations in becoming graded by the Tourism Grading Council of South Africa (TGCSA), and improve sustainability through the implementation of renewable energy sources (Department: Tourism Republic of South Africa, 2015).

Contrary to the current efforts of the South African government, internationally, government regulations and laws place more pressure on hotels to implement sustainable changes (Mensah, 2004). Mensah (2004) further explains that in Europe, Australia, North America and New Zealand, failure to comply with the environmental regulations could result in a large fine. This highlights a possible shortcoming of the South African government’s lack of enforcement of hotel greening. The International Hotels Environmental Initiative (IHEI), set up by 11 of the world’s most well-known hotel groups, has encouraged environmental improvements within the hospitality industry globally (Chen, Legrand, & Sloan, 2005). Various international hotel groups have collaborated with the IHEI to improve the implementation of environmental initiatives (Chen et al., 2005). This shows the success of the collaboration between international stakeholders to improve the implementation of environmental initiatives; such collaboration seems to be missing in the South African context.
South African Grading and Green Certification Programs

South Africa has a few organisations that provide either some form of recognition, certification or rating programs to tourism companies implementing sustainable changes. Businesses in the tourism and hospitality industry can be nominated to receive awards, or choose to become members of the programs including the Fair Trade Tourism (FTT), The Heritage Environmental Management Company and the Federated Hospitality Association of South Africa (FEDHASA) (Fair Trade Tourism, 2015; FEDHASA, 2013 & The Heritage Environmental Management Company, 2014). All the above programs make use of their criteria when certifying establishments, confirming previous statements regarding the lack of set minimum standards for responsible tourism in South Africa (South African National Standards, 2011). A North American study indicated that due to inconsistencies in certification criteria, hotels could make false claims regarding their green status (Rahman et al., 2012 & Sharpley 2009). This highlights the need for collaboration between stakeholders to accurately label green hotels using a consistent set of standards; and the need for successful regulation and enforcement of such standards.

It is understood that certification programs, internationally, can increase sustainable development. However, studies have indicated that relatively few tourism organisations make use of green certification programs due to the high costs involved, (Mahony, 2007 & Van der Merwe and Wöcke, 2007). Font and Harris (2004) further state that certification has both advantages such as displaying good practice and promoting voluntary advancements and disadvantages such as not being efficient or impartial. The TGCSA was established in 2000 and operates as a business unit of South African Tourism (SAT) (Tourism Grading Council of South Africa, 2014). The TGCSA is the only internationally recognised tourism grading body in South Africa with thousands of accommodation institutions making use of their grading services. The TGCSA has 11 categories according to which establishments are
graded (TGCSA, 2014). Being graded by the TGCSA is a voluntary process with an annual fee that is payable. In 2014 approximately 60% of the market was graded by the TGCSA (Parliamentary Monitoring group, 2014).

The effect of ineffective stakeholder collaboration on hotel greening

Rogerson and Sims’ (2012) study on the greening of urban hotels in South Africa found that respondents displayed a distorted image of the progress that had been made as a result of greening at their respective hotels. The authors added that the reason for this might be because greening is mostly done voluntarily. Hotel managers of the same hotel chain, generally had differing understandings regarding hotel greening (Rogerson & Sims, 2012), highlighting the possible lack of collaboration between stakeholders. In a recent study that included 100 hotels in Cape Town, Musavengane and Steyn (2013) investigated the effectiveness of the implementation of sustainable processes. The results showed that 64 percent of the hotels were not aware of the DEAT’s Responsible Tourism handbook. Of those aware, only 62.8 percent implemented some of the initiatives. This suggested a communication gap between the hotels in Cape Town and the DEAT, as most of the hotels were unaware of the responsible tourism guidelines available or did not practice responsible tourism since it is not legally required. Rossouw and Wiseman (2004) added that there is no definite link between national policy and local delivery.

Environmental Governance – Providing a possible framework for success

Governance represents a deviation from traditional hierarchies to a system of connected processes of correspondence and negotiations (Hall & Hultman, 2012). Hall (2011) differentiated between four governance structures often used in literature which include hierarchies, networks, markets, and communities. Hierarchical governance is often
seen as the highest level of public or state interference, whereas market governance appears to have the least level of public or state intervention. Community governance uses the approach that communities should find solutions to their everyday problems with the least involvement from the state (Hall, 2011).

Conversely, network governance has a shared reliance between the network and the state, because of the negotiations and bargaining that take place. Furthermore, network governance received noticeable consideration about tourism policy and planning due to the possibility of facilitating the alignment of private and public resources and interests (Hall, 2011). It is evident from the information above that different stakeholders can have varying degrees of power in decision-making when it comes to sustainable tourism governance.

Numerous studies have investigated the importance of environmental governance linked to the sustainable development of South Africa (Fakier et al., 2005; & Lund-Thomsen, 2005). Fakier et al. (2005) emphasize that a lack of good governance can result in improper decision making with disastrous environmental consequences. The authors note that although South Africa has a positively growing governance structure at the national level for environmental management, a barrier is the lack of enforcement of environmental policy and legislation, especially at provincial and local government levels. There is an urgent need for capacity development of local government personnel on sustainable environmental development approaches. It is clear from the literature that hierarchical governance does not prove to be effective for hotel greening in South Africa due to various challenges at the provincial and local government levels (Fakier et al., 2005 & Hall, 2011). It was also noted in the previous sections that improved collaboration between stakeholders is needed for effective greening enforcement and regulation (Musavengane & Steyn, 2013 & Rossouw & Wiseman, 2004). Unfortunately, existing South African governance studies have not explored
possible solutions for governance challenges, which is why this paper will explore this matter further.

Methodology

The type of qualitative research method used was grounded theory, which consists of systematic yet, adjustable processes and procedures for collecting and analysing qualitative data to formulate theories that are rooted in the data (Charmaz, 2006, Charmaz, 2008 & Parker & Myrick, 2011). Grounded theory as a research method is especially appropriate when little is known about the area of interest (Parker & Myrick, 2011). Grounded theories may be constructed with the use of various kinds of data including interviews, reports and field notes (Charmaz, 2006), as is the case in this study.

Fieldwork was undertaken from August 2015 to March 2016 to explore the relations between various stakeholders including government, non-government, public-private and the private sectors, with regards to enforcing and regulating hotel greening. This research was undertaken as part of a larger study, which explored the overall challenges towards greening hotels in Gauteng, South Africa. In total, 68 hotels were contacted to participate in the study; however, only 15 hotels responded positively which resulted in 20 semi-structured, in-depth interviews conducted with hotels. The hotel informants’ identities are anonymised. Table 1 below shows some background information of the 15 hotels that were part of the interviews.

<table>
<thead>
<tr>
<th>Hotel</th>
<th>Star rating</th>
<th>Age of building</th>
<th>Number of rooms</th>
<th>Part of hotel group</th>
<th>International or South African hotel brand</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>1</td>
<td>7 years</td>
<td>118</td>
<td>Yes</td>
<td>South African</td>
</tr>
<tr>
<td>B</td>
<td>1</td>
<td>18 years</td>
<td>98</td>
<td>Yes</td>
<td>South African</td>
</tr>
<tr>
<td>C</td>
<td>2</td>
<td>19 years</td>
<td>213</td>
<td>Yes</td>
<td>South African</td>
</tr>
<tr>
<td>D</td>
<td>2</td>
<td>21 years</td>
<td>118</td>
<td>Yes</td>
<td>South African</td>
</tr>
<tr>
<td>E</td>
<td>2</td>
<td>9 years</td>
<td>106</td>
<td>Yes</td>
<td>South African</td>
</tr>
</tbody>
</table>
The focus of this study was further extended to the national government, non-government, public-private and private sectors to determine the collaboration between these stakeholders which relate to the greening of hotels. Interviews were furthermore conducted with the following non-hoteliers who have given permission to use their names:

- N. Makamu at the National Department of Tourism (NDT) (i.e. National government),
- T. Ravele at the FTT (i.e. Private sector),
- N. Glen at the Sustainable Tourism Partnership Programme (STPP) (i.e. Non-governmental sector) and,
- D. Erasmus at the TGCSA (i.e. Public-private sector)

Furthermore, secondary data was collected, and observations conducted. Content analysis was used in order to explain the main attributes of the documents and interview content (Vaismoradi, Turunen, & Bondas, 2013:400). Content analysis was the most suitable as it is a systematic coding and classification process, especially suitable for extensive amounts of textual information to identify word patterns, trends, and relationships (Vaismoradi et al., 2013:400). The interview responses were coded to allow for theme
development before being analysed and compared to the secondary data and observations made. The credibility of this study was assured by means of data source triangulation (Suryani, 2008:120; Yin, 2013:324).

Results

The overall results of the study highlighted four main themes outlined below:

1. Overview of the current landscape of hotel greening in South Africa
2. Government regulations and support provided by the NDT
3. The role of the TGCSA with regard to enforcement of greening initiatives
4. The role of FTT in greening hotels

Although these four themes are discussed separately, it must be noted that there are links and overlaps between these themes.

Overview of the current landscape of hotel greening in South Africa

The graph below represents a synopsis of the hotels interviewed and their efforts to reduce their water and energy usage, whilst improving waste management initiatives.

![Image](http://ertr.tamu.edu)

**Figure 2: Hotels that have taken steps towards greening**
Although previous studies by Van der Merwe and Wöcke (2007) identified that a limited number of hotels in South Africa had implemented greening initiatives, no statistics were kept on these by the TGCSA, NDT, STPP or FTT. It is possible that there was an increase in the implementation of greening initiatives since Van der Merwe and Wöcke’s (2007) study and the importance of making sustainable changes were noted by the Assistant General Manager at Hotel E (personal communication, September 1, 2015):

“We [hotels] use a lot [of resources] because of the large scale that we work on... and a hotel can waste a lot. There are some guests who will let the water run for ten minutes before actually showering and therefore for us [hotels] to go greener it will impact the environment on a larger scale.”

**Government regulations and support provided by the NDT**

According to N. Makamu (personal communication, March 15, 2016), Deputy Director of Tourism Greening and Climate Change at the NDT, the NDT has the responsibility to develop legislation that guides the tourism sector, while providing policy support for sustainable tourism. Furthermore, the National Minimum Standards for Responsible Tourism SANS1162 was developed by the government, although the majority of the hotel respondents stated that they were not aware of these guidelines and added that their head office would inform them of any regulations as noted by the Maintenance Manager from Hotel J (personal communication, August 14, 2015):

“Our head office will [deal] with it [government regulations and guidelines]. If it is an important thing they [the head office] will send it to me and I will discuss it with the staff.”

N. Glen (personal communication, February 8, 2016), the Program Director of the STPP agreed and opined that owing to the guidelines being voluntary, people don’t think it
applies to them. This was owing to a possible lack of communication, between the NDT and
the hospitality industry, confirming findings from previous studies (Musavengane & Steyn,
2013).

Unfortunately, it was stated that there was no government legislation enforcing the
implementation of green initiatives in the South African hospitality and tourism industry. It
was however stated that such legislation would have a predominantly positive impact on the
industry if reasonable timeframes and financial support were given to assist, particularly
smaller establishments. The Maintenance Manager at Hotel J (personal communication,
August 14, 2015) noted the following in this regard:

“I would say it [making the implementation of green initiatives mandatory] would be
a good thing. The really bad hotels will fall out and you will sit with much better
quality hotels [across] the country...”

However, concerns regarding the ability of the NDT to effectively regulate such
legislation were not only raised by all the respondents, excluding the NDT, but also by
authors from previous studies (Lund-Thomsen, 2005; & Musavengane & Steyn, 2013)
suggesting that alternative enforcement structures should be considered. The findings
suggested that the NDT is not actively cooperating with other stakeholders to implement
greening. Furthermore, it appears that the NDT is not successfully enforcing hotel greening
which suggests that a hierarchal governance approach towards hotel greening was not
proving successful. Therefore, an alternative governance structure, such as network
governance, should be considered for improved collaboration and the successful regulation
and enforcement of hotel greening.

The role of the TGCSA with regard to enforcement of greening initiatives
D. Erasmus, (personal communication, January 25, 2016), explained that the TGCSA’s main function is to provide a quality experience for all travellers and to provide SAT with the credibility and reassurance to market South Africa as a quality destination. The TGCSA had not included the implementation of green initiatives as part of their grading criteria. It was noted that if greening was identified during the three yearly review processes as necessary, it could be included in the criteria. Being graded is voluntary and the cost to become graded was determined by the number of rooms and the average room rate. N. Makamu (personal communication, March 15, 2016), further stated that although grading was voluntary, graded establishments were preferred by government. The respondent added that including greening initiatives in the grading criteria could ensure that more businesses would implement green initiatives in order to obtain their preferred star rating. Furthermore, financial support from the NDT for establishments to be graded would encourage the implementation of hotel greening initiatives through the inclusion of green initiatives in the TGCSA’s criteria. This latter point was supported by N. Glen (personal communication, February 8, 2016), and T. Ravele (personal communication, February 18, 2016). Various reasons were identified why this would be a feasible option as listed below:

- Respondents stated that the TGCSA is a well-known, reputable grading establishment, already used and trusted by the accommodation sector.
- Graded establishments are preferred by government.
- The TGCSA’s fees are substantially lower than that of certification companies.
- Incentives to be graded by the TGCSA are available.

This would also prove to be a possible solution to the concerns regarding the ability of the NDT to regulate and enforce green initiatives. Using the TGCSA as a vehicle to enforce and regulate the implementation of greening initiatives in accommodation was seen as an achievable long-term solution.
The role of FTT in greening hotels

Fair Trade Tourism is a green certification company available in South Africa that ensures that establishments operate sustainably. Many hotel respondents and N. Glen (personal communication, February 8, 2016), indicated that they did not see any benefit in being certified by such a company as noted by the Maintenance Manager at Hotel I (personal communication, August 11, 2015):

“It [being certified] was a lot of work, the files that you had to get into operation… it [the administration] took months, [and] to be honest it was a pain. I don’t think it [certification] had any benefit to the hotel.”

Respondents stated that the lack of customer awareness and demand was one of the reasons why being certified might not have been successful in South Africa. Previous international and local studies confirmed this, indicating that few customers are aware of certification programs and added that certification was not a deciding factor for customers when choosing a hotel (Mahony, 2007 & Tzschentke, Kirk, & Lynch, 2008). Rahman et al.’s (2012) concern regarding false green advertising was confirmed by this study’s findings revealing that inconsistent certification criteria in South Africa made comparisons difficult. A possible solution was identified through the future aim of the NDT to provide a set national minimum standard for greening to be used and included by all certification bodies in South Africa. N. Makamu (personal communication, March 15, 2016), stated:

“We [the NDT] thought maybe there is a need to co-ordinate and harmonise the standards into one standard. The other issue that we are promoting now is that businesses should be certified in accordance with SANS 1162. FTT, Green Leaf, Heritage Environmental Management Company, those certification bodies should use those standards to certify businesses.”
In Table 2 below the cost of being graded by the TGCSA is compared to the cost of being certified by FTT. An exchange rate of R12.97 to the U.S. Dollar as of 29 August 2017 was used to calculate the figures below.

### Table 2: Cost Comparison of FTT and TGCSA

<table>
<thead>
<tr>
<th>Cost of FTT over three years</th>
<th>Cost of TGCSA over three years</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small Enterprise</td>
<td>$1,017.73</td>
</tr>
<tr>
<td>Medium Enterprise</td>
<td>$4,202.00</td>
</tr>
<tr>
<td>Large Enterprise</td>
<td>$8,627.60</td>
</tr>
</tbody>
</table>


It is not at all suggested that FTT and the TGCSA perform the same duties. However, it can be deduced from these figures that being certified by FTT is at least twice as expensive as being graded by the TGCSA. Interestingly all the hotel respondents stated that the TGCSA graded them at the time; however, only three of the fifteen hotels stated that a certification body certified them. T. Ravele (personal communication, February 18, 2016), explained the reason for hotels not being certified or renewing their certification was mainly owing to the high costs involved. This statement was confirmed as noted by the owner of Hotel K (personal communication, August 5, 2015):

“We were a member of Heritage Environmental Management Company but we didn’t really see much of a benefit or exposure from it. We did consider Fair Trade Tourism but it’s R35 000.00 for joining and that’s a tall order.”

Furthermore, N. Glen (personal communication, February 8, 2016), D. Erasmus, (personal communication, January 25, 2016) and N. Makamu (personal communication, March 15, 2016), agreed that the TGCSA might be a successful means of implementing green initiatives through incorporating it in the grading criteria, with the advantage of having an
incentive program available by the NDT to become graded. Using the TGCSA as a vehicle to enforce the implementation of green initiatives does seem like a feasible option to increase and regulate hotel greening and keep statistics on hotels and other accommodation sectors across South Africa.

Discussion and conclusion

The literature indicated that the various stakeholders involved in hotel greening (i.e. government, non-government, public-private and private sectors) had various shortfalls with regards to successful hotel greening in South Africa and that collaboration between these stakeholders were lacking due to poor environmental governance. This study confirmed findings from previous studies regarding a lack of national minimum standards for greening, with differing criteria used by green certification bodies making comparisons difficult. The NDT, however, had proposed a possible solution through providing the National Minimum Standards for Responsible Tourism SANS1162 for use by all certification bodies in South Africa; although collaboration between stakeholders would be necessary for this to be successful. This would minimise confusion and possible false advertising owing to inconsistent criteria that were used.

Furthermore, the South African government did not actively enforce greening initiatives in the accommodation sector, and legally binding structures were absent along with a lack of cooperation with other stakeholders. The findings were consistent with the literature, indicating that environmental governance is weak in South Africa (Fakier et al., 2005 & Lund-Thomsen, 2005). The results indicated that the enforcement of green initiatives would positively impact the industry. However, concerns regarding the NDT’s capability to regulate such enforcement were raised. A possible solution was identified through the use of the TGCSA. Subsequently, the implementation of green initiatives would be enforced and
regulated in all South African accommodation establishments that choose to be graded by the TGCSA. Furthermore, the TGCSA’s fees are substantially lower than that of green certification bodies, with the NDT providing incentives for establishments to be graded by the TGCSA. This solution points to the use of network governance to implement greening, allowing for interdependency and collaboration between the public and private sector (see Figure 3 below). Network governance would mean that the power, or lack thereof, would not only be at the government level but that various sectors (i.e. government, non-governmental, public-private and the private sector) would have power in decision making about greening hotels. It is evident that improved collaboration between the NDT, TGCSA and South African hotels is needed for successful hotel greening.

Figure 3: Improved collaboration between stakeholders for successful hotel greening

Source: First Author

The following recommendations are proposed:
• Firstly, national minimum standards for greening should be created to ensure consistency with green certification and grading;

• Secondly, greening initiatives should be included in the TGCSA’s grading criteria; improving the enforcement and regulation of greening in accommodation establishments;

• Lastly, it is recommended that improved coordination and communication should be implemented through the use of network governance by all stakeholders that are involved in enforcing and regulating hotel greening. This will minimise miscommunication amongst stakeholders for effective implementation of greening initiatives.
References


