Can Anyone Be an Environmental Manager?

Over the course of my career, I have met thousands of truly talented environmental professionals: bright, eager, dynamic, and courageous people who are willing to face the daily challenges of protecting the planet. Our communities—not to mention our fauna and flora—are blessed by their devotion and competence.

And that is why I am so very distressed over the state of the environmental, health, and safety (EHS) profession today. The problems were summed up in a headline I saw recently saying, “The EHS profession has skidded down the food chain.”

This column explores the current condition of the EHS profession—and raises a number of troubling questions that have yet to be openly addressed within our professional ranks.

Life at the Bottom: The Lot of the EHS Manager

In a remarkable expression of candor and humor, Stephen Evanoff, vice president for global EHS at Danaher Corporation, made the following prediction at a recent forum of the National Association of EHS Management (NAEM): “EHS is never going to be a core business process.”

Then he offered a list outlining the “facts of life for EHS managers” when dealing with “elephants” (i.e., top executives who wield the real power):

1. If an issue has the word “environment” in it, you will ultimately be held accountable.
2. You will never have authority to match your responsibility.
3. To the elephants, you will always be a “pocket protector guy.”
4. The elephant takes the credit, you get the blame.
5. One mistake offsets (at least) ten good deeds.
6. Truth tellers are shot.

Your initial reaction to this list may be amusement. But upon reflection, senior environmental managers recognize the basis for each of these career certitudes.

The Good (or at Least Better) Old Days

This harsh state of affairs was not always the case. I certainly did not feel this way back in the 1970s, when I first entered the environmental profession as a newly minted chemical engineer.

Later, as we moved into the 1980s, the environmental profession seemed like a growth field. It was a heady period: The list of regulations was rapidly expanding, and there was increasing demand for the skills of engineers and scientists,
who designed and built the infrastructure needed to protect the environment.

The United States set the pace for the rest of the world in those days. I was off jet-setting to Berlin, Paris, Tokyo, and Vienna to explain how company environmental organizations were leading the way. Engineers were becoming managers, and directors were becoming EHS vice presidents.

**Glory Wanes — But the Need for Professionalism Remains**

In writing this column, I had to keep on reminding myself not to fall into the trap of sounding like Al Bundy on the old TV sitcom *Married . . . with Children*, reminiscing over his glory days as a football player at Polk High.

Yes, there were glory days back then. But beginning in the mid-1990s, irreversible changes occurred in rapid succession, driven by events totally outside of anyone’s control. There was no turning back.

But even after this tectonic shift, two elements remain absolutely constant: (1) the core environmental challenges are complex and will only become more so, and (2) the need for competency and professionalism is every bit as critical today as it was in the past.

**The Transition to a Different Work Environment**

In previous writings, I have described the evolution of the environmental movement. Indeed, books have been written on the subject by numerous authors. So there’s no need to go off on a tangent regarding the evolution of the movement itself. But it is worthwhile to reflect on those elements that have transformed the environmental profession.

**Exhibit 1** contains a list of factors that altered our profession. Most are undeniably positive and welcome transitions. Note that these

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**Exhibit 1. Transition Milestones in the Environmental Profession**

- Completing the retrofit of existing processes to add “end-of-pipe” controls and other costly environmental infrastructures
- Transitioning from internal, environmental department-led pollution control and prevention projects to the integration of these functions into internal and external engineering departments
- Slowing introduction of new environmental laws and regulations
- Growing familiarity by business managers with environmental requirements and the consequences of noncompliance; threats of “you will go to jail” now ring hollow
- Transitioning from specific, regulatory-driven limits to a broader and more imprecise concept of sustainable development
- Growing sophistication of communications departments in delivering company environmental messages
- Public reporting of company policies and detailed performance data, particularly on the Internet
- Numerous economic downturns; environmental professionals are now treated the same as other employees during layoffs
- Dispersing environmental matters into business processes
- In the United States, transitioning from a manufacturing-based economy to a service-based economy
- Systemization and standardization of environmental management systems and processes
- Growth in outsourcing of environmental technical support
- Integrating environmental concerns into new process and facility design engineering
- Advances in computer technology; adoption of sophisticated checklists for audits, permit deadlines, and other routine processes
- Growing management interest in the “green product” development and marketing
- Evolution of a new generation of business managers who have never been exposed to, or had to deal with, a major environmental crisis
- Controversy in the media over issues such as climate change—while other, potentially more immediate and pressing issues are underreported
factors are not necessarily related to the events that drove the environmental movement. In many cases, they are outgrowths of business decisions that aimed to manage change in a cost-effective way. No single factor dominates all others, but the net cumulative effect has created a fundamentally different work venue for EHS professionals today—especially in the United States.

Some business leaders might see the new environment as mission accomplished: “We met the challenge and things are under control; our management systems are certified.” Others might view the situation myopically: “The important considerations about the environment revolve around climate change.” A few might be complacent: “We are in compliance. Next subject, please.” Yet others might view it as a new world of business opportunities: “It’s now about brand, eco-friendly products, and getting our green messaging right.”

Whatever the case, if there are concerns and a sense of urgency on the part of business executives today, they are often in areas other than those that drove their interest in the past. Executives put their energy and resources where there are the greatest threats as well as opportunities.

**Competencies for the Future**

Over the past decade, positions with titles such as “vice president of sustainability” have been created. I have met many individuals in these positions, and they often are very talented and capable. But they possess a dramatically different set of skills from those held by the environmental professionals I dealt with early in my career.

This new generation is focused on green markets, branding, community relationships, and external and internal communications. They possess what are sometimes called the “softer” skills (to distinguish them from the “nuts and bolts” skills of scientists and engineers or the “analytical regulatory” skills of lawyers). In many companies, marketing and communications specialists now oversee departments staffed with what Evanoff calls “pocket protector guys.”

This skill set may well be the right business choice for today’s corporation. Indeed, I have witnessed far too many “old school” environmental managers who could never initiate substantive changes within their businesses because they lacked the competencies that this new generation demonstrates routinely. The skills needed in today’s environment are different in large part because the challenges are different—particularly in the United States, as the economy shifts away from mining and manufacturing to service-oriented business.

*A New Set of Challenges*

Today’s challenges are in fact far more subtle than those faced by earlier generations of environmental professionals. These days, some of the major issues involve trying to bridge the gap between “green messaging” and reality.

Dealing with this disconnect on a day-to-day basis can be disheartening for environmental professionals. These days, some of the major issues involve trying to bridge the gap between “green messaging” and reality.

Alex Pollock, formally EHS director at Dow Chemical Company, and currently with Equipping You LLC, sums up the problem well:

> [A]s we bring our bodies and brains to work each day we often shake our heads with frustration and bewilderment as we observe high sounding corporate principles that bear no resemblance to day-to-day management practices. I read a statement recently that said it better than I could:
“There is something going on today in our companies that depletes the natural resilience and creativity of human beings.”

The challenge he describes is clearly not for those who lack skills in interpersonal relationships.

Which brings me to the real subject of this column.

**Can Anyone Be an EHS Manager?**

Under the leadership of Jim Leemann, the Center for Environmental Innovation completed a survey of EHS professionals to test the “pulse of the profession.” As part of the survey, respondents were asked to report their professional certifications, choosing from a checklist (see Exhibit 2).

**A Simple Experiment**

Now, to gain some quick insight into one of the central problems facing environmental professionals, I would invite readers to try this experiment:

- make a copy of Exhibit 2;
- cut out the column that contains just the acronyms;
- show this list to a handful of strangers who are not associated with the environmental profession; and
- ask if they recognize any of these professional certifications.

I guarantee that every single individual will recognize MD and RN. A few may even recognize JD (Juris Doctor, the degree held by attorneys) or PE (Professional Engineer). Almost no one will recognize any of the other acronyms.

**No Brand, No Brawn**

What is the lesson learned? In the jargon of marketing, the environmental profession has no identifiable brand.

Moreover, while the certifications listed in Exhibit 2 are associated with EHS, people are not actually required to hold any of them (or any certification at all) in order to call themselves environmental professionals. This means that the “price of entry” to the environmental profession

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**Exhibit 2. Professional Certifications in Environment, Health, and Safety**

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Certification</th>
</tr>
</thead>
<tbody>
<tr>
<td>AEP</td>
<td>Associate Environmental Professional</td>
</tr>
<tr>
<td>ASHM</td>
<td>Associate Safety and Health Manager</td>
</tr>
<tr>
<td>ASP</td>
<td>Associate Safety Professional</td>
</tr>
<tr>
<td>CAIH</td>
<td>Certified Associate Industrial Hygienist</td>
</tr>
<tr>
<td>CCHO</td>
<td>Certified Chemical Hygiene Officer</td>
</tr>
<tr>
<td>CEA</td>
<td>Certified Environmental Auditor</td>
</tr>
<tr>
<td>CEP</td>
<td>Certified Environmental Professional</td>
</tr>
<tr>
<td>CESM</td>
<td>Certified Environmental Systems Manager</td>
</tr>
<tr>
<td>CET</td>
<td>Certified Environmental Trainer</td>
</tr>
<tr>
<td>CHMM</td>
<td>Certified Hazardous Materials Manager</td>
</tr>
<tr>
<td>CHP</td>
<td>Certified Health Physicist</td>
</tr>
<tr>
<td>CHSP</td>
<td>Certified Hospital Safety Professional</td>
</tr>
<tr>
<td>CHST</td>
<td>Construction Health and Safety Technician</td>
</tr>
<tr>
<td>CIAQM</td>
<td>Certified Indoor Air Quality Manager</td>
</tr>
<tr>
<td>CIET</td>
<td>Certified Industrial Environmental Toxicologist</td>
</tr>
<tr>
<td>CIH</td>
<td>Certified Industrial Hygienist</td>
</tr>
<tr>
<td>COHN</td>
<td>Certified Occupational Health Nurse</td>
</tr>
<tr>
<td>COHN-S</td>
<td>Certified Occupational Health Nurse Specialist</td>
</tr>
<tr>
<td>CPCU</td>
<td>Chartered Property Casualty Underwriter</td>
</tr>
<tr>
<td>CPEA</td>
<td>Certified Professional Environmental Auditor</td>
</tr>
<tr>
<td>CSHM</td>
<td>Certified Safety and Health Manager</td>
</tr>
<tr>
<td>CSP</td>
<td>Certified Safety Professional</td>
</tr>
<tr>
<td>DEE</td>
<td>Diplomat Environmental Engineering</td>
</tr>
<tr>
<td>JD</td>
<td>Juris Doctor (Attorney)</td>
</tr>
<tr>
<td>MD</td>
<td>Medical Doctor</td>
</tr>
<tr>
<td>OHST</td>
<td>Occupational Health and Safety Technologist</td>
</tr>
<tr>
<td>PE</td>
<td>Professional Engineer</td>
</tr>
<tr>
<td>QEP</td>
<td>Qualified Environmental Professional</td>
</tr>
<tr>
<td>REHS</td>
<td>Registered Environmental Health Specialist</td>
</tr>
<tr>
<td>RELT</td>
<td>Registered Environmental Laboratory Technologist</td>
</tr>
<tr>
<td>REM</td>
<td>Registered Environmental Manager</td>
</tr>
<tr>
<td>REP</td>
<td>Registered Environmental Professional</td>
</tr>
<tr>
<td>REPA</td>
<td>Registered Environmental Property Assessor</td>
</tr>
<tr>
<td>RES</td>
<td>Registered Environmental Scientist</td>
</tr>
<tr>
<td>RHCMM</td>
<td>Registered Hazardous and Chemical Materials Manager</td>
</tr>
<tr>
<td>RN</td>
<td>Registered Nurse</td>
</tr>
<tr>
<td>RS</td>
<td>Registered Sanitarian</td>
</tr>
</tbody>
</table>
is effectively zero—as evidenced by the fact that, according to the survey, nearly 20 percent (out of 5,000 individuals occupying EHS positions) had no certifications whatsoever.

Contrast this situation with the licensing requirements imposed on physicians, nurses, and attorneys—or the strict, challenging educational and licensing requirements for Professional Engineers, who put their “chops” on buildings and bridges that could collapse.

Of course, many environmental professionals do possess some type of certification—often multiple certifications, in fact. There are scores of extremely well-educated environmental professionals who have an alphabet-soup list of credentials after their names (even doctoral degrees from prestigious universities), and who ooze competency. But as the saying goes, that and five dollars will get you a café latte venti.

These individuals may take pride in their undisputed technical skills and earn bragging rights among fellow professionals. But to top business executives, how much do their credentials and skills matter when it comes to deciding who gets hired or who gets promoted?

And perhaps the most crucial question: Does lacking this skill set prevent someone from practicing our profession? The answer clearly is no.

Who Is Getting the Top EHS and Sustainability Jobs These Days? Hint: It’s Not EHS Professionals

Anyone can be placed into a top environmental or sustainability slot. In fact, many high-profile jobs in these areas now go to individuals with no background or experience in EHS.

For example, Alcoa recently chose an accountant as the company’s “chief sustainability officer,” a position in which he will be “responsible for developing a comprehensive strategy.” 7 Around the same time, NYSE Euronext chose as “vice president and head of corporate responsibil-

ity” a lawyer who previously served as deputy assistant secretary for financial education and financial access at the US Department of the Treasury.8

Some may say, “It doesn’t matter, since managerial experience is what counts.” And yes, it’s true that managers, directors, and vice presidents should be well skilled in management. After all, CEOs come from a wide variety of backgrounds but still manage to lead the entire organization, hiring the technical expertise they need.

But contrast this situation with the top positions in finance, law, medical, or even information technology departments. In my entire career, I cannot recall these departments being led by anyone other than professionals with considerable experience in these specific areas and the requisite credentials.

There is a difference between a career and a profession. CEOs have careers leading corporations, but have you ever heard of the “CEO profession”?

Is EHS Management Really a Profession?

Can we really call EHS management a “profession” in the same way that law, medicine, engineering, and nursing clearly are professions? We may consider ourselves genuine professionals and respect those individuals who pass muster with our list of certifying organizations. In the grand scheme of things, however, the way “pocket protector guys” are treated within organizations reflects little acknowledgment of what it takes to do a truly professional job.

I have talked to dozens of technically talented individuals who are bitter that someone who previously could not spell “environment” is now in charge. Some have gone so far as to characterize themselves as “janitors in suits.”
We may consider ourselves professionals, but there is a vast chasm separating us from the professionals that are universally recognized. Why?

**No Unified Professional Association**

For one thing, we lack the unifying cohesion provided by having a professional association like those that represent the interests of doctors (the American Medical Association) or lawyers (the American Bar Association [ABA]). We have numerous professional organizations, of course, such as the Air and Waste Management Association (A&WMA), one of the nation’s largest. These organizations focus on keeping us technically competent. But we have no organization that focuses on watching out for our personal career interests—our backs, so to speak.

Our profession is scattered among the many certification areas listed in Exhibit 2. And our representation is fragmented among dozens of trade associations and societies.

**No Mandatory Credentialing**

More importantly, there is no universally required or acknowledged threshold of competency or experience for environmental professionals. There is no mandatory certification or licensing process.

The real-world implications are plain to see. Lawyers and doctors practice their professions. We practice survival skills. Pretend to be a medical doctor and go to jail. Pretend to be an environmental manager and face possible promotion.

**Skills Don’t Translate Into Compensation or Job Security**

The financial and job-security implications are also obvious. Just take a look at the salaries of doctors or lawyers, and then compare them to the salaries of EHS professionals.

I recently had occasion to hire an attorney at an hourly rate of $420. In the United States, there are approximately 1,800 hours in a work year. That means an attorney can earn nearly $800,000 annually at this rate (ignoring overhead and expenses). I eventually fired my lawyer—in part because I was so used to dealing with incredibly competent professionals in EHS, including attorneys who bill out at a fraction of this rate.

To be sure, there is a gaping disconnect between skill sets and compensation in many fields. A few skilled actors make millions for a single film, while others (possibly more skilled) make next to nothing. It’s the same for top sports figures. Entertainment and sports tend to be “winner-take-all” industries.

In general, however, most “true” professionals, like lawyers and medical doctors, can command salaries that are at least highly respectable—while also enjoying the protection of knowing that noncredentialed individuals cannot simply walk into their jobs. The public recognizes the importance of the professionals who protect their health and take care of their legal problems, and we compensate them accordingly.

Fields that people associate with “important” functions tend to provide their practitioners with earning power and job security. Even financial planners—who may have only a fraction of the training possessed by the typical EHS professional I encounter—often receive sizable compensation. Police and emergency-response personnel typically have generous retirement benefits and can count on public support when officials threaten to cut back on public spending.

Contrast this with the situation of EHS professionals. We are also on the front lines, protecting communities, workers, and the planet from harm. But our compensation is continually squeezed, and our job security is virtually nonexistent.
Something seems amiss in all this. Would the public want someone who does not know which end of a scalpel to hold performing surgery, or someone who doesn’t know which end of a hose to point fighting fires?

**What If There Were a Different Future?**

What if we had an American Environmental Association (AEA) or some such unifying organization with an office in Washington, D.C.? What if the AEA had power to accredit EHS certification programs, the same way the American Bar Association accredits law schools?

What if the US Environmental Protection Agency, the Occupational Safety and Health Administration, and state authorities issued minimum standards for EHS professionals (perhaps varying depending on the size and nature of the business)? What if, in order to meet those standards, the individual seeking certification had to complete a program accredited by the AEA (just as prospective attorneys must graduate from an ABA-accredited law school in order to take the bar exam in most US jurisdictions)?

And what if, in order to be on the Dow Jones Sustainability Index, a primary requirement was that a company had to have a vice president of sustainability with very specific credentials and experience?

For that matter, why can’t there be a universally recognized advanced degree and certification process for EHS professionals, equivalent to that of an MD? Why can’t US EPA and other authorities mandate that only individuals with the appropriate degree and certification will be allowed to sit at the table and “practice sustainable development,” just as those who practice environmental law are required to hold JD degrees and pass the bar exam?

What if professionals with specific qualifications were required to “certify the health” of company manufacturing processes, the same way that an MD is required to conduct certain procedures and “certify the health” of employees?

**Moving Out of Pocket-Protector Territory: Necessary, But Not Easy**

I could go on and on, but you get the point. There is something fundamentally wrong with the environmental profession and how it is valued—or not valued—by the public, governments, and business management.

To understand how skewed the situation has become, try the following thought experiment: Think about all the business managers you know who proudly proclaim, “Safety is our number-one priority” and “Protection of the environment is one of our core principles.” Now think about how many of these same individuals would protest any effort to strictly regulate the EHS profession, arguing that it is just more unnecessary bureaucracy.

The disconnect is glaringly obvious. Would these individuals ever go to a “doctor” who got his or her “license” from an Internet-based training curriculum?

Could it be that we EHS practitioners are living in a fantasyland of self-delusion regarding our importance to communities and businesses? Could it be that EHS is not even a profession at all? Are we less regulated and controlled than licensed plumbers and electricians?

Denial carries career risks. Even as we continue to become more experienced and “professional,” are we being replaced (or incompetently managed) by people who know next to nothing about the essential technical, regulatory, scientific, communications, and systems concepts of our profession?

People can learn on the job, of course. But understanding the EHS fundamentals takes significant time and training. MDs must graduate
from medical school and complete a residency before they are licensed to make life-or-death decisions. Why do we put individuals into EHS management positions when they know none of the environmental basics—and then hope they pick it up as they go along?

Why are bright-eyed Ivy League MBAs in prestigious consulting firms making EHS staffing-level and organizational recommendations to company CEOs when they have never so much as filled out a permit or conducted a compliance inspection? (Of course, as a consultant, I have to say, “Keep this up.” I have made a profitable career out of going into these companies to repair the damage inflicted by all those bright young MBAs.)

The current state of the EHS profession did not happen overnight, as the stages outlined in Exhibit 1 make clear. But if we hope to maintain any real level of “professionalism,” we need a vision for our future to move toward. We need to face reality.

One important question we need to ask is: What are our many professional organizations planning to do about the situation? And why can’t all these various organizations form a more cohesive, unified front for representing the profession?

I am aware of at least one attempt to unify the EHS professional organizations nearly a decade ago that went nowhere. Could it be that some who hold influential positions in our professional organizations view unification the same way they view company mergers—as carrying the risk that they will lose power, prestige, and control if their “fiefdoms” are rolled into a larger entity? In effect, have our professional groups become a series of businesses run by CEOs and boards of directors who would view unification as a hostile takeover, even though it might be in the best interest of the “shareholders”?  

Gaining Respect

Finally, what are we going to do about how our profession is viewed and valued? As for myself, I am in the early stages of writing a book about excellence in our profession. I really believe that it is on an equal par with all the other professions (such as medicine and law) that the public and business leaders know and respect.

I am now in the process of interviewing top EHS professionals and exploring the tools, techniques, and skills required to achieve excellence and sustain an outstanding career. If you believe that you are one of the best of the best, please contact me and become one of the key case studies in this book.

Notes

6. For more information about this project, visit http://www.enviro-innovate.org/investigation.html.

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