Can MNCs promote more inclusive tourism? Apollo tour operator’s sustainability work

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**ABSTRACT**

Outbound tour operators are key actors in international mass tourism. However, their contribution to more sustainable and inclusive forms of tourism has been critically questioned. Drawing from new institutional theories in organization studies, and informed by the case of one of the largest Scandinavian tour operators, we examine the corporate social responsibility (CSR) and sustainability work in large tour operators and the challenges faced in being more inclusive. On the basis of in-depth interviews with corporate officers, document analysis and media reports, we show how top-down coercive and normative pressures, coming from the parent company and the host society shape the ability of the daughter corporation to elaborate a more inclusive agenda. However, daughter companies do not merely comply with these institutional pressures and policy is also developed from the ‘bottom-up’. We show how the tour operator’s sustainability work is also the result of organizational responses including buffering, bargaining, negotiating and influencing the parent organization. By creating intra and inter-sectoral learning and collaborative industry platforms, MNCs not only exchange and diffuse more inclusive practices among the industry, but also anticipate future normative pressures such as legislation and brand risk. Daughter organizations help shape their institutional arrangements through internal collaborative platforms and by incorporating local events and societal concerns into the multinational CSR policy, especially when flexible policy frameworks operate, and the corporate CSR agenda and organizational field are under formation. However, risks do exist, in the absence of institutional pressures, of perpetuating a superficial adoption of more inclusive practices in the mass tourism industry.

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Introduction

Outbound tour operators are major actors in the tourism industry (Alegre & Sard, 2015; Cvelbar, Dwyer, Koman, & Mihalič, 2016; Tveteraas, Asche, & Lien, 2014). Tour operators are one of the largest facilitators of information between suppliers and customers and, consequently, are significant influencers of how the travel market can evolve towards more inclusive and responsible tourism, affecting both suppliers and demand. Inclusiveness for major operators has historically been interpreted more in terms of packages for tourists rather than considering the groups and stakeholders that are excluded from the tourism system. For the purposes of this paper, inclusive tourism is regarded as the voluntary inclusion of otherwise marginalized interests in the consumption and production of tourism (also see Scheyvens & Biddulph, 2017). From this perspective inclusivity is identified as a relative and contested, rather than an absolute, concept, the interpretation of which belongs to the involved parties. The identification of inclusivity depends on the stakeholders involved and the nature of inclusion, with inclusivity defined either by one party or by both producers and marginalized interests (Figure 1). A tourism producer may seek to include marginal interests but such interests may not recognize their inclusivity despite producer efforts, leading to a staged inclusivity or non-inclusive practices. You may even have situations where producers and marginalized interests believe that the relationship is inclusive but tourists do not recognize it as such, thereby missing the opportunity to communicate more fully inclusive tourism practices and with them the chance to show alternative practices for a more inclusive tourism. Importantly, the notion of inclusion is one that varies over sociocultural contexts and that will change over time in response to shifts in the business.

| Nature of inclusion | Tourist’s perception of inclusivity of marginalised interests into tourism system |
|---------------------|--------------------------------------------------------------------------------|
|                     | Genuine | Inauthentic/staged                |
| Multi-party (both producers and marginalised interests see it as inclusive) | Fully inclusive | Denied inclusivity |
| Only one party (producer or marginalised group see it as inclusive) | Staged inclusivity | Non-inclusive / exploitative |

Figure 1. Types of inclusive tourism.
political and socio-economic environments; the composition of interests and stakeholders, and new interpretations of what constitutes inclusive and sustainable tourism.

Given their role in tourism, the practices of large tour operators can influence the wider industry in becoming more inclusive and sustainable (Bricker & Black, 2016; Erskine & Meyer, 2012). However, while there is significant academic interest in the role of tour operators with respect to sustainability, this has often been focussed more on niche tourism areas or specific environmental practices, such as emissions or waste reduction (Gössling, Hall, & Scott, 2015), rather than the equity and social dimensions of sustainability that may provide an operational and strategic focus for inclusive tourism (Hall, 2008).

Outbound tour operators are key actors in mass tourism and hold critical positions in the tourism value chain, especially for developing countries, where they can act as major gatekeepers of tourism flows and influence practices (de Sausmarez, 2013; Dieke, 2013). Therefore, any account of the extent to which international mass tourism can be made more inclusive must include assessment of the role of outbound tour operators and the way in which they develop particular practices that relate to inclusiveness. This paper draws from new institutional theories in organization studies to understand the practice of sustainability and social responsibility work in large tour operators. Specifically, it examines the challenges to transforming mass tourism into becoming more inclusive in terms of recognizing and incorporating new practices, as informed by the case of one of the largest Scandinavian operators, Apollo, and its corporate social responsibility (CSR) and sustainability work.

This paper draws from in-depth interviews with company officers, and document analysis of CSR and sustainability reports. In order to understand what the CSR agenda of a large tour operator looks like, how it is shaped and the challenges faced in being more inclusive, this paper is structured around two questions: how are the institutional pressures and the organizational characteristics of MNCs and subsidiaries shaping tour operators’ sustainability practices? and what are the firm’s organizational responses to these pressures?

In the next section, the literature on sustainability, inclusive tourism and the tour operators sector is presented, followed by the methods to collect and analyse the data. The case study of Apollo Sweden is then presented. Next, the theoretical framework used to analyse the case is explained. Thereafter, the empirical study is analysed and discussed. This paper closes with reflections on how large corporations can be encouraged to provide more inclusive tourism services.

**Sustainability, inclusive tourism and the tour operator sector**

The tour operator sector has become increasingly consolidated in recent decades. A few large tour operators dominate the sector and account for almost two-thirds of the European market (Schwartz, Tapper and Font, 2008). German and British large tour operators alone dominate more than 45% of the European market, with four companies estimated to control over 90% of the UK holiday market (Budeanu, 2009).

Large tour operators draw together thousands of employees in travel agencies, hotels, airlines and other tourism firms in hundreds of destinations around the world. However, inclusiveness in terms of the participation of marginalized actors in the consumption and production of tourism has not historically been a priority. The concentration of power in
the hands of a few global operators has led to conflicts between operators, suppliers and destinations. Large tour operators have often been seen more as agents of exclusion than inclusion, with this often being combined with related environmental degradation, socio-cultural ignorance or disruption, limited returns to local economies, human rights abuse and other negative impacts (Hall & Brown, 2006). In general, mass-market operators offering mainstream packages (i.e. all-inclusive – where a single price covers includes all charges for lodging, meals and soft drinks, most alcoholic drinks, gratuities, and possibly other services, such as sports and other activities), and have not traditionally considered sustainability in business processes in the same way as specialist operators selling ‘more sustainable products’ (Bricker & Black, 2016; Bruni, Cassia, & Magno, 2017; Gössling et al., 2015; Hall, Gössling & Scott, 2015). Yet, the critical role of tour operators in the mass tourism market value chain means that they must become a focal point of any initiative that seeks to make tourism more inclusive of otherwise marginalized groups and issues. For example, via their role as employers of marginalized groups in local destinations in which the notion of inclusiveness includes aspects of decent work and fair salaries as well as more socially and environmentally inclusive procurement policies (Saarinen, Rogerson, & Hall, 2017), such as purchasing from local food suppliers (Hall & Gössling, 2016).

Given how strategic priorities are set in tourism corporations, CSR and sustainability policies, codes of conduct and certification systems are likely to be the main practices through which corporations would approach inclusive tourism. Therefore, improvements in our understanding of these areas (e.g. decent work, procurement policies and monitoring strategies), and recognition of any initiatives that bear the hallmarks of inclusive tourism, can help shed light on the mechanisms by which greater inclusiveness can be encouraged and achieved.

The factors shaping the adoption of sustainability practices by tour operators show how sustainability strategies, practices and standards, to which we would potentially add inclusive tourism, are likely conceived primarily as a means of risk management (to buffer or prevent negative public image), as a competitive advantage (e.g. brand value and reputation), and as a regulation avoidance strategy (Schwartz et al., 2008), rather than as a means to provide improved services to customers, cost savings or business opportunities (Budeanu, 2007), or inclusion. Compared to other sectors, such as accommodation, the tour operator sector arguably lags behind in the integration of sustainability in business practices due to a combination of reasons: tour operators do not always take a long-term view of destination development, as their operations are more spatially flexible and easier to move between destinations compared to suppliers such as hotels; and they may claim a lack of control over impacts in destinations. Operators operate on small profit margins and the resultant pressure on suppliers to reduce prices can limit supplier capacity to invest in quality improvements (Alegre & Said, 2015) or other strategies that do not have a relatively immediate return. The industry also works with a multitude of suppliers operating under different national regulations and interests which can make it more difficult to develop consistent sustainability and CSR programs. On the demand side, customers’ interest in responsible tourism services and products, and willingness to pay extra for inclusive practices in general, appears significantly lower compared to, for example, specific elements such as local food (Hall & Gössling, 2016). In relation to the regulatory environment, most of the tour package legislation is quality, health and safety related, and
there is usually very little specific regulatory pressure for improved environmental or social performance in tour operator’s operations. In addition, cost savings from adopting practices are not so clearly identified for tour operators as, for example, for hotels (Budeanu, 2007; Gössling et al., 2015; Tepelus, 2005).

**Methods**

Scandinavia is routinely cited as a global leader in CSR and sustainability (Strand, Freeman, & Hockerts, 2015). Apollo is one of the three largest tour operators in Sweden and one of the Nordic pioneers of proactively adopting CSR and sustainability practices in tourism (Schyst Resande, 2008). This paper adopts a ‘critical case’ approach (Flyvbjerg, 2001). Informed by this approach we have selected as favourable a setting as possible, one of the top leading Swedish tour operators working proactively with sustainability, for examining the integration of sustainability in large tour operators. A critical case approach provides the opportunity to draw valid insights from a single case that has strategic importance for a general problem, such as the challenges that large operators face in making mass tourism a more inclusive activity.

Data collection involved analysis of documents such as ethical guidelines, policies, standards, sustainability and assessment reports, voluntary performance schemes, and codes of conduct (Supplemental data). The websites of the parent (Kuoni) and daughter company (Apollo) as well as those of CSR-related stakeholders and collaboration partners were also reviewed. Semi-structured interviews were carried out with officials at Apollo and Kuoni. The interviews served to complement and triangulate the information coming from documents and electronic sources. All interviews were recorded and transcribed. The number of interviews conducted and the positions of those interviewed at Apollo and Kuoni is not stated here as this would potentially publicly identify participants.

The documents, websites and interviews were analysed through qualitative content analysis, structured by the two research questions and guided by the concepts stemming from the institutional theories used in the analysis (presented later after the case): coercive, normative and mimetic isomorphism as well as the organizational responses (strategies and tactics) of the firm to these pressures. The data coming from the personal interviews with employees at Apollo is triangulated with text documents, interview material from the parent company (Kuoni) and electronic sources. Combining methods helps to overcome the limitations of using a single case with limited interview opportunities. Interviews were conducted during spring 2015. The Apollo Nordic division was acquired by the German REWE-travel group in summer 2015. No significant changes have been observed in terms of sustainability work since then, although this new situation has not been the focus of this study.

**Apollo Sweden, sustainability strategy and work**

In this section we present the case of Apollo Sweden and its sustainability work, informed by corporate documents, websites, news, reports and interviews. After we present our analytical framework, the empirical data will be analysed and discussed.
Apollo Sweden

In Sweden three large tour operators (Ving, Apollo and Fritidsresor) account for 80% of the outbound tour operator market (SwedWatch and Fair Action, 2015). Apollo was founded by Fotios Costoulas in 1986 and ran as a family business providing travel from Sweden to Greece. In 2001 it was bought by Kuoni Holding Ltd, a Switzerland-based provider of services to the international travel industry and governments. Its activities are centred on global travel, travel services distribution, visa provision and tour operating, including hotel, accommodation, and land and transportation services, tours and activities. Apollo Sweden, together with its Finnish, Norwegian and Danish counterparts, and the airline Novair, belongs to the Apollo Travel Group. With approximately 900 employees and one million international travellers annually, Apollo Travel Group has an annual turnover of over US$ 590 million (Apollo, 2016a). In mid-2015 Apollo was sold to the German REWE-group and became part of the DER Touristik travel division as DER Touristik Nordic AB including Apollo Sweden, Denmark, Norway and Finland. Apollo offers travel to 20 countries in Europe, 10 in Asia, 5 in Africa, 5 in the Americas and 1 in Oceania. Among the most popular tourist destinations are Greece, Turkey, Spain, Cyprus, Thailand, Jordan, Tobago and Cuba.

Managing and strategizing sustainability at Apollo

CSR and sustainability management are integrated with the communication management department in Apollo. There were two employees working directly with sustainability at management level: one responsible for sustainability and communication; and another who worked part-time mostly on the Travelife system (a business-to-business sustainability certification program implemented by Apollo, explained below) with their suppliers. Plans, strategies, and practices that fall under the category of sustainability, CSR and ethics have existed at Apollo since it became part of the Kuoni group in 2001. However, CSR and sustainability ‘was not the highest prioritized issue by the former manager of the firm’ (Apollo employee).

Kuoni’s Group CSR Strategy was the framework within which all work with sustainability matters at group level was assembled from 2001 until 2015. The Kuoni CSR agenda was reviewed every three years and was formulated by the central board of directors at Kuoni’s headquarters in Zurich. The strategy consisted of six core areas: employees, human rights, sustainable products, natural environment, stakeholder management and sustainable supply chain management. The mapping and priority setting of sustainability topics was based on stakeholder dialogues carried out in wider and inner stakeholder consultation circles (Kuoni, 2014). Inner stakeholders were members and employees at all levels within the Kuoni Group, including the central board of directors and CSR officials from business units. Apollo participated in the stakeholder consultations for the development of Kuoni’s Group CSR strategy as an internal stakeholder. External stakeholders include international, national and local non-governmental organizations (NGOs), investors, experts, suppliers, consultants, and international organizations. The strategy was also built on a range of international conventions, codes of conduct and sustainability charters including the UN Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational...
Enterprises and ECPAT’s Code of Conduct. Significantly, from an inclusive tourism perspective, even though such agreements are often held up as cornerstones of CSR practice, local communities had only a limited role in such dialogues.

Internally, Kuoni had a ‘CSR steering group’, in which Apollo participated, that met twice a year (Kuoni, 2016). This group consisted of representatives from Kuoni’s business units, core corporate functions and external CSR specialists. The purpose of the committee was to plan CSR strategies and activities for the entire group, as well as review performance and ensure that the Group CSR strategy was aligned between business units. This was also a platform where Apollo exchanged experiences with other participants, provided inputs to the board of directors and contributed to central CSR objectives.

**Apollo’s sustainability strategy**

Kuoni’s Group CSR strategy served as the guiding framework for Apollo’s work but they were encouraged to design their own corporate strategy for sustainability by taking a point of departure in the core areas of this agenda (Kuoni interview). How the Kuoni’s Group CSR strategy was implemented by Apollo was neither strictly stipulated nor regulated. Apollo’s CSR agenda did not need the approval of the central board of Kuoni (Kuoni Interview). Apollo’s sustainability/CSR strategy has been divided into four areas: human rights, climate change, sustainable supply chain management and sustainable products (Apollo, 2016b). The following projects, dealing with the social dimension of sustainability and integrated in Apollo’s human rights and supply chain areas (Table 1), are described below before subsequent analysis.

**ECPAT – the code**

ECPAT is an international NGO working against sexual exploitation of children since 1992 in Thailand and other South Asian countries. ECPAT Sweden was created after the World Congress against Commercial Sexual Exploitation of Children was hosted by the Swedish Government in 1996. The Code, which is a guideline consisting of six measures aimed at helping tourism businesses to protect children, was the result of this congress. Apollo states on its website that the protection of children is one of the most prioritized issues in Apollo’s work with sustainability. An Apollo officer emphasizes the focus on children due to the empathy showed by travellers and employees when they come in contact with suffering children in destinations, as also observed via customer evaluation forms. Concerns raised in Sweden regarding the harmful impacts of tourism on children in South-East Asia destinations are also behind this prioritization. In the words of an Apollo official regarding ratification of the Code:

> It reaches a point where we understand that we neither can nor want to be held accountable for certain things, for which we feel that we must act and take on our responsibility (...) The

| Human rights                  | Sustainable supply chain management |
|-------------------------------|------------------------------------|
| • Suppliers’ Code of Conduct, 2008 | • Suppliers’ Code of Conduct, 2008 |
| • Statement of Commitment on Human Rights, 2012 | • Travelife Sustainability System, 2009 |
| • ECPACT – The Code, 2001     |                                    |
| • Collaboration with SOS Children’s Villages, 2004 |                                    |
risks of not doing anything is that we acquire a bad reputation. In the end, caring for the corporate image and the reputation is a strong driving force.

In order to prevent their services being misused for exploitative purposes, Apollo joined forces with fellow signatories such as the Swedish government, ECPAT, industry partners and tour operators such as Fritidsresor and Ving. This collaborative strategy was motivated by the ‘pleasant feeling of being united and not having to stand alone, and to be able to show a united front’ (Apollo officer). The signatories to The Code in Sweden meet twice a year to discuss topics and strategies related to child trafficking. The Code was ratified independently by Apollo in 2001. Apollo and Nordic partners also encouraged Kuoni to ratify this policy.

**SOS children’s villages**

Apollo’s ratification of the ECPAT Code led to the collaboration in Sweden with SOS Children’s Villages in 2004. SOS Children’s Villages is an international organization giving family-based childcare to children without families in order to allow them to grow up in safety. Apollo donates one million SEK per year to a SOS village in Phuket. This money funds a kindergarten and three SOS families in the village. Since 2015 Apollo is partner to SOS Children’s Villages at the Nordic Kuoni level, and funds an emergency help program for families in Syria. An Apollo officer states that such cooperation is a good way to show their commitment to children’s right issues in a concrete way. The NGO’s good reputation is also important to choosing the partner: ‘Since SOS Children’s Villages is a very well-known organization with a credible image it is a way for us to use their brand together with our own, which has a positive effect’ (Apollo officer).

**Travelife sustainability system**

Travelife is a business-to-business sustainability certification programme supported by the European Union and the European Industry Association Tour Operator Initiative. It consists of an accreditation body directed towards tourism industry enterprises to make operations more sustainable. Businesses can purchase a subscription to the system and have their performance level independently assessed via an audit and the top performers in terms of these verified audits receive a Travelife award. Major UK and German tour operators, such as First Choice, Thompson, TUI, Thomas Cook, have subscribed to the Travelife Sustainability System as their preferred means of assessing their accommodation providers against environmental, social and economic criteria. Kuoni group was a founding member and has been involved in its development since 2004. Apollo achieved the status of being Travelife Certified as a tour operator in 2014 and they have been using the certification for hotel and accommodations among suppliers since 2009. Around 100 Apollo hotels are Travelife members and have achieved this certification. However, the certification, unlike the Suppliers’ code of conduct, is not required of all suppliers.

The Travelife Sustainability system was one of the standards applicable to all Kuoni group members. A CSR official states that the creation of Travelife by a group of European tour operators reflected how ‘the entire branch felt a need to use a standardized and simple way of ordering their hotels’. Among the many different alternatives such as ISO and other standards, the official states that ‘Travelife stood out as a recognized standardized way of classifying hotels which made it possible to easily communicate to customers that
this is the way we look at these questions’. Thus, the adoption of these standards was also driven by the need to promote to customers that the company had embraced sustainability practices in its operations, while their implementation has also resulted in modifications in standard operating procedures and the generation of new standards. The new owner group DER Turistik was already a member of Travelife.

**Suppliers’ code of conduct**

The suppliers’ code of conduct was first developed in 2008 by the Kuoni group in collaboration with external stakeholders such as experts, consultants and NGOs. It consists of six areas of sustainability (compliance with applicable law, environment, human rights and labour conditions, sexual exploitation of children and adolescents, local sourcing and benefiting communities, and monitoring and enforcement) and ratification of the policy was required by all Apollo’s suppliers and monitored through the Travelife system. Apollo also contributed to the content of the *Suppliers’ Code of Conduct* via the inner consultation circles for sustainability strategy making and, more actively, by Apollo’s petition to add a clause on animals’ rights issues in 2014. Apollo lobbied to include this topic as they perceived increasing customer and employee concern for animal welfare. According to Apollo officials, the concern was detected via customer feedback but it was also regarded as an issue raised by society at large in Sweden, and mobilized by NGOs. At the time of writing (February, 2017) the suppliers’ code of conduct continued to operate under the new owner.

**Statement of commitment on human rights**

The *Statement of Commitment on Human Rights* establishes that the group will respect and promote human rights through leading by example in areas as labour rights (e.g. following international and national law, forbidding all forms of forced labour, freedom to terminate employment, freedom of association and right to collective bargaining), the rights of the child and due diligence. The standard is automatically transferred to Apollo’s suppliers when a contract is confirmed and compliance is monitored with assistance from Travelife. The creation of the *Statement of Commitment on Human Rights* was an initiative of Apollo and Nordic partners. Apollo urged the creation of a policy document on human rights within Kuoni’s steering committee, leading to the Statement being passed by Kuoni’s board of directors in 2012.

Despite considerable progress in terms of the improvement of human and labour rights, Swedish NGOs reported during Autumn 2015 illegal labour conditions for hotel employees in properties used by the three largest Swedish tour operators (Apollo, Fritidsresor and Ving) in Dubai (*SwedWatch and Fair Action, 2015*) and Turkey (*Fair Traveller, 2015*). The report reveals how housekeepers, room attendants and other migrant workers at hotels used by the three tour operators in Dubai worked days as long as twelve hours with little or no overtime pay. Workers also stated that they paid for employment as well as employers holding their passports, which according to the International Labour Organization is a sign of forced labour. These practices violate local labour law and international conventions, as well as the human rights policies of the Swedish tour operators themselves.

The three Swedish tour operators replied in a joint communication stating they did not have knowledge about rights violations at the hotels where their customers were staying.
Nevertheless, according to an Apollo officer, the company had performed a risk analysis regarding human rights in Dubai which shows that it is a high-risk destination, especially with regard to migrant workers (SwedWatch and Fair Action, 2015). The company also argued that the staff responsible for the contact with the hotels has instructions to report any breach of the code, and that no breach had been reported.

In a collective response to the publication of this report, the three tour operators acknowledge the violation of labour rights and communicated that together with the Travelife certification system (see below for further details about the certification system) they will start monitoring more hotels in Dubai (SwedWatch, 2015). They also argued that this is an issue affecting more than these three tour operators and it, therefore, requires a collective response. Furthermore, Apollo acknowledges that despite increasing public awareness and company concern over labour issues, consumer pressure for more sustainable and inclusive travel is not so significant (Swedish Radio A, 13/10/2015; Swedish Radio B, 13/10/2015).

Within the Kuoni Group the Travelife Sustainability system and the Kuoni Suppliers Code of Conduct were the only two standards applicable to all members and served as minimum requirements for the business units’ work with sustainability issues. Apollo was encouraged by Kuoni to implement these policies, and Kuoni’s CSR department regularly provide information and learning tools aiming to facilitate their implementation. However, according to Kuoni’s CSR department, they struggled to achieve a ‘consistent image’ between members of the group in terms of sustainability. Kuoni did not monitor units such as Apollo and had no enforcement mechanism exerting punishment for non-compliance. Yet, Apollo’s reliance upon Kuoni as a daughter unit means that they felt required to address these sustainability issues: ‘it is not as if something would happen if we wouldn’t work with sustainability and implement these standards, since they are informal requirements. However, disregarding these issues is not an alternative, it simply would not be possible’ (Apollo officer).

Aware of the requirement to respond to the mother company’s demands on sustainability strategy, an official stated: ‘The central board of Kuoni have certain targets which they want the units to fulfil, so it is a matter of complying with their desire’ (Apollo). Apollo also considered it was important to fulfil the expectations of Kuoni as Apollo also ‘want to be able to impact the direction of the work that is centrally managed at Kuoni’. According to the Apollo official, the implementation of these standards has led to a steady development of awareness around issues of sustainability among Apollo employees. However, field participation of representatives from Apollo’s destination areas in the strategizing of Apollo’s sustainability is less visible. Local regulations as well as ideas picked up from destination personnel are mediated to Apollo’s central board. Yet there are no established mechanisms to channel the flow of local demands. In the following the theoretical framework used to analyse the case is introduced.

**Institutional theory**

Institutional theory provides a useful framework to analyse the extent of integration of sustainability practices into corporations. While use of this theory is relatively limited in tourism (Adu-Ampong, 2017; Zapata & Hall, 2012), it has been valuable in examining
sustainable practices (Van Wijk, Van der Duim, Lamers, & Sumba, 2015), including CSR reporting (de Grosbois, 2016). The following elaborates the concepts of institutional isomorphic pressures, organizational responses to institutional pressures and processes of organizational learning that are then used to frame our case under the prism of the concept of inclusive tourism.

Institutional theories focus on the pursuit of legitimacy aside from economic efficiency, with the resulting organizational conformity arising due to social norms and rituals (Meyer & Rowan, 1977). In their pursuit of legitimacy, organizations modify themselves to be compatible with the characteristics (organizational structures, beliefs and discourses) of their institutional environments. As a consequence, organizations from the same field will often be structurally similar as they respond to similar institutional pressures (cognitive, normative and coercive), resulting in a process of isomorphism (Scott, 2008).

Coercive isomorphism refers to the conformity to certain practices as a result of rules, laws or other coercive mechanisms, economic and regulatory sanctions. Yet, under conditions of uncertainty in a relatively unregulated organizational field, as in the case of sustainability in the travel industry (Gössling et al., 2015), normative and cognitive aspects of the institutional environment become more salient. Normative isomorphism comes, for example, from unquestioned adherence to industry standards but also prevalent values and preferences in a market or a community. While, cognitive isomorphism (or mimesis) refers to the unconscious reproduction of standards, practices or structures following those who appear to be successful in the organizational field.

However, organizations within the same field do not always show similar sustainability strategies and practices (Hall et al., 2016; Scott, 2008; Zapata & Hall, 2012) despite being exposed to common institutional pressures. More recent developments in institutional theory show how institutional forces can also lead to heterogeneity in a sector rather than isomorphic homogeneity, given that organizations differ in their receptivity to pressures (Hoffman, 2001). For example, the power of the department or individual promoting CSR and sustainability practices is an internal aspect that may explain different responses. Delmas and Toffel (2008) also showed how organizations channel institutional pressures through different sub-units, which frame pressures according to their routines. For example, legal departments frame them in terms of risk and liability, while financial departments do it in terms of costs and revenue. The consequence being that sustainability could be differentially framed within the same organization as a competitiveness strategy, as regulatory pressure, or as an ethical responsibility (Bansal & Roth, 2000). Other internal organizational features such as the role of leadership values (Egri & Herman, 2000), managerial attitudes (Cordano & Frieze, 2000; Sharma, 2000), and historical environmental performance can also influence how managers perceive stakeholder pressures and their response (Prakash, 2000), and the visibility of the firm. Therefore, differences in adoption of sustainability tourism practices reflect not only different levels of institutional pressures but also differences in organizational characteristics, since internal organizational dynamics act as moderating factors that magnify or diminish the influence of institutional pressures.

Oliver (1991) also suggests that organizations respond to their institutional environments in different ways, varying from compliance, compromise, avoidance, defiance and manipulation (Table 2). One of the possible responses is what has been termed as ‘decoupling’ (Meyer & Rowan, 1977), which refers to the process whereby
organizations ‘that adopt particular structures or procedures may opt to respond in a ceremonial manner, making changes in their formal structures to signal conformity but then buffering internal units, allowing them to operate independent of these pressures’ (Scott, 2008: 171). The term has been used to refer to implementation gaps in sustainability standards (Bromley & Powell, 2012; Jamali, 2010). Yet, beyond the decoupling explanation, CSR and sustainability reports and codes of conduct, although taken initially as ceremonial conformity, can turn performative and become real (Barley & Zhang, 2012). Ceremonially adopted rules can lead to change over time and recouple formal and informal structures (Egels-Zandén, 2014); as a result of reflection and negotiations that convince internal organizational actors of their appropriateness independent of instrumental considerations (Dashwood, 2012). Internal and external debates of sustainability and responsibility may, therefore, also create conditions for future change through organizational learning (Dashwood, 2012, 2014), an issue that may be critical for inclusion of inclusive tourism in CSR discourses.

Discussion

In this section, we will analyse and discuss the case of Apollo Sweden and its sustainability work informed by the theoretical framework presented above with the aim to understand what mass tourism corporations do in practice for an inclusive tourism, why their CSR and sustainability agenda is shaped as it is and the challenges they face in being more inclusive. In order to do that, we explain how institutional pressures (mimetic, coercive and normative isomorphism) shape tour operators’ sustainability practices and the organizational responses to these pressures.

Institutional pressures for a more inclusive tourism

Mimetic isomorphism

In terms of mimetic isomorphism, Apollo’s sustainability work follows international conventions, standards and codes of conduct promoted by international agencies such as UN Global Compact, Universal Declaration of Human Rights, and the UN Guiding Principles on...
Business and Human Rights. These standards and codes have turned into ‘rational myths’ (Meyer & Rowan, 1977), taken for granted and uncontested norms and solutions (Brunsson & Jacobsson, 2000) to the problem of integrating sustainability into business practices (Jamali, 2010). Unlike the diverse range of tourism industry codes and certification systems, these international standards have achieved worldwide recognition and are mimetically reproduced by large corporations. From that perspective, Travelife has turned into a norm for the certification of sustainability practices among European tour operators and their suppliers. Such initiatives help to harmonize the fragmented efforts of individual actors (Schwartz et al., 2008), and become uncontested norms as a taken for granted solution to problems of non-compliance with codes of conduct, as elaborated below.

Coercive isomorphism
Despite sustainability in tourism destinations being under-regulated (Tepelus, 2005), there are a number of coercive forces that determine Apollo’s sustainability agenda. The Kuoni group has created a CSR system based on two compulsory components: the Kuoni Suppliers Code of Conduct and the Travelife certification system. These two components are the minimum requirement from the parent corporation, and are defined as ‘recipes’ by the Kuoni CSR manager with the flexibility to be translated into the different national contexts through strategies of compromise, such as negotiation (Oliver, 1991). These two components, therefore, provide consistency and cohesion to the group, helping to integrate the diversity of practices in different locations. Subsequently, the Supplier’s Code of Conduct turned into a compulsory commitment for Apollo’s suppliers. Yet in practice only 100 supplier hotels are monitored for some of the standards in the code by the Travelife certification system. In addition, these codes and conduct and certification systems rarely include local stakeholders in their design; which reflects in the poor inclusion of local voices and marginalized groups in their design.

Normative isomorphism
Apollo’s sustainability agenda is also shaped by shifts in societal debate and the emergence of salient issues (Bansal & Roth, 2000), many of them promoted by NGOs, while others proceed from customer suggestions. NGOs in Sweden such as Shyst Resande (2015) or SwedWatch (Fair Trade Center and SwedWatch, 2008; SwedWatch and Fair Action, 2015) have triggered changes via publicizing research reports and conferences, and have nudged tour operators to bring new practices into their operations. This reveals that, in the absence of stronger regulations in destinations, the existence of strong pressures and/or stakeholders act as institutional factors in generating situations that encourage operators to integrate new values and norms remains crucial. Marginalized groups at destinations that are the focus of inclusive initiatives may be disadvantaged as a stakeholder in the development of company CSR agendas because they do not have a strong direct or indirect presence in the process.

The clause on animal rights in the Suppliers’ Code of Conduct, the statement of commitment to human rights and the acknowledgement of ECPAT by the Apollo Nordic group illustrate how values and demands from stakeholders and what is perceived to exist in the generating markets travel to the daughter firm influencing the Apollo’s sustainability agenda (Van Huijstee & Glasbergen, 2010). Partnering with NGOs is also an example of normative pressures. The importance of brand and legitimacy, and the potential to use
this relationship to differentiate from competitors, is positively related to compliance in previous studies of CSR firms and NGOs (Hendry, 2006).

Industry associations such as the Tour Operator Initiative, to which Kuoni belongs to and which is responsible for the Travelife System; and other corporate collaborative platforms such as the one created by the three large tour operators in Sweden, also perform as a source of pressure by creating new standards, intensifying close scrutiny among competitors and transferring information about best practices. The high field cohesion (Bansal & Roth, 2000) in the tour operators’ field, sometimes sparked by NGOs as explained above, also served to pressure Apollo to introduce sustainability standards and practices. Standards and norms per se, such as the Travelife System, are also pressing other tour operator firms to adopt them via normative isomorphism. This normative pressure turns into a coercive pressure for many hotel suppliers that have to work with the certification systems if that is stipulated in their contracts (although currently only for a few), and into a cognitive pressure prompting others to imitate the behaviour of successful pioneers.

Filtering institutional pressures
There are a number of organizational features of Apollo that further explain how the institutional pressures presented above are filtered to the organization, shaping how these pressures are internally translated. Size is one of them. Apollo’s sustainability work only began after acquisition by Kuoni. Therefore, belonging to a large MNC can amplify the institutional pressures to work towards particular forms of tourism due to their visibility.

Another organizational feature is strategic positioning. In Apollo Sweden the CSR and Sustainability work is allocated within the Communication and PR department. As a result, CSR and sustainability work is often, although not only, framed in terms of brand management and risk management, reflecting Delmas and Toffel’s (2008) finding that the sub-unit through which institutional pressures are channelled will affect the framing of CSR and sustainability issues. The department has limited human resources, as is usually the case for sustainability in firms, and competes internally for resources. One could speculate that firm crises such as the Dubai report are actually ‘good’ for CSR units, since they show the critical nature of this organizational function in terms of firm legitimacy, and might work to attract resources (as when Apollo decided to put more resources into monitoring hotels through the Travelife system).

Finally, a firm’s historical sustainability performance influences how managers perceive stakeholders’ pressures and how to respond to them. This means that managers in firms whose reputation has suffered, such as in the case of the Dubai Report in 2015, may be more sensitive to sustainability issues than those in other companies (Prakash, 2000).

Organizational responses to institutional pressures for a more inclusive tourism
Compliance with institutional pressures coming from the parent company and the travel market are not, however, the only two organizational responses shown by Apollo in its sustainability work. Apollo’s sustainability work demonstrates how there is much room for buffering, bargaining, negotiation and influencing the parent organization, following Oliver’s (1991) organizational responses (Table 1).
Buffering/decoupling

As shown by the Dubai scandal, suppliers’ codes of conduct can be loosely coupled to changes in the hotel suppliers’ employment practices. This episode reveals how codes of conduct risk becoming a form of symbolic compliance since they are not necessarily monitored through independent audits, creating the illusion of a staged inclusivity (Figure 1). In their website Apollo invites travellers interested in sustainability to choose a Travelife certified hotel transferring the responsibility for more inclusive tourism to the consumer and to the hotelier. Even if Travelife has come to unify a diverse range of certification systems in the sector, and are based on web-based self-assessments, individual audits are still necessary to monitor compliance with standards (Schwartz et al., 2008). However, the certification of a given supplier is not necessarily a guarantee of total compliance and the risk of further loosely coupled structures remains, as demonstrated by the research conducted by Fair Travel in Travelife certified hotels used by Swedish tour operators in Turkey (Schyst Resande, 2015). By revealing to the public the violation of labour rights by these suppliers, the NGOs evidenced the exploitative character (Figure 1) of the tour operator’s sustainability work. Monitoring compliance with sustainability standards in order to move towards more fully inclusive practices may initially require the allocation of more resources. Yet given that the tour operator sector already operates with very low profit margins, experiences high competition, is budget oriented, and does not have customers motivated by sustainability preferences, this creates considerable challenges in absorbing the costs of monitoring performance (Schwartz et al., 2008). Business would, therefore, require a clear financial return to embark on such a course or face potential brand harm if they do not.

Since the risk for buffering is high in a lowly regulated sector with few specific resources allocated to monitoring gaps between voluntary standards and practices, the role of NGOs and the media in exposing non-implementation or fulfilment of standards is crucial. When the incongruences between the suppliers’ code of conduct and the labour conditions of the hotels in Dubai were publicly revealed by the SwedWatch and Fair Travel report, the Swedish tour operators’ reaction was to act together, making use of the collaborative platform they have created in Sweden to discuss issues of sustainability and social responsibility, to manage the reputation crisis collectively (Prakash & Potoski, 2007). Such an approach aims to ‘pacify’ (Oliver, 1991) institutional pressure and helps to manage brand crisis and regain lost legitimacy. Furthermore, as certification systems have gained credibility in the organizational field they have become a ‘rational myth’ (Meyer & Rowan, 1977) with respect to sustainable tourism, and recognized as the most trustful means to restate legitimacy.

Negotiating and influencing central CSR and sustainability work

Beyond decoupling, the Apollo case shows how the process of creation and implementation of CSR and sustainability is far from simple compliance to top-down policies. Negotiating, influencing, balancing, pacifying and co-opting tactics (Oliver, 1991) were displayed by Apollo and help explain why its sustainability agenda looks the way it does. Negotiations were ongoing for the design and implementation of the various components of Apollo’s CSR policy. The statements on human rights and the ECPAT Code were introduced to the Kuoni group’s CSR strategy via the Nordic partners (as a result of normative pressures as elaborated previously), and then turned into the norm and spread out to the
rest of the group via Kuoni. Even in the case of the two components coming top-down from Kuoni (suppliers’ code of conduct and Travelife) Apollo included new standards (Travelife) and added a clause on animals’ rights issues in 2014 (also stemming from normative societal pressures as previously explained), which were incorporated into the general standards applied to all Kuoni daughter firms. This shows how firms in MNCs can also contribute to create new rules (Dashwood, 2012) and have the ability to influence (Oliver, 1991) the CSR agenda. CSR policy making in MNCs can, therefore, be a negotiated process influenced by subsidiaries’ local practices. The case at hand represents a transition between unilateral inclusive policies towards a broader participation of stakeholders and institutional constituents. These windows of opportunity for subsidiaries to shape central CSR agendas are especially significant during agenda formation. Corporate CSR and sustainability work are the result of the history of a given organization and practices accumulate historically in layers when some of them fade away but others remain, even if the original pressure to introduce them has ceased (D’Aummo, Succi, & Alexander, 2000). However, the extent to which Apollo’s CSR agenda will remain under their new owners remains to be seen.

The firm’s efforts to anticipate sustainability standards and create new ones within the parent company also represent an organizational strategy to translate these standards locally (Sweden) (what Oliver (1991) refers to as balancing and pacifying the expectations of multiple constituents) by introducing measures, such as the animals’ rights clause, that are perceived as relevant by the local market, but which may then be regarded as appropriate by the wider organization. Finally, partnering with NGOs with a good reputation such as SOS Children’s Villages responds to a manipulative strategy whereby the firm intents to co-opt the NGO (Oliver, 1991), importing this influential constituent and thereby gaining social legitimacy; while the NGO also tries to influence and manage the firm’s social responsibility agenda and gain necessary economic resources for their operations. This relationship may also offer insights as to how issues and mechanisms related to inclusivity may arise in company CSR agendas.

**Organizational learning: collaborative platforms, compromise and sense-making**

The creation of collaborative platforms can be interpreted in different ways. Partnership is a classical strategy to influence institutional constituents: manage crisis and reputation (Prakash & Potoski, 2007), negotiate with NGOs and governments, anticipate future regulation and influence public opinion. Yet, there is also an interesting aspect of organizational learning attached to these collaborations. These platforms turn into spaces for external dialogue and the scanning of best practices. Since Apollo is one of the largest and more visible firms in Sweden, they help define social responsibility and are a role model (Dashwood, 2014). Such firms, therefore, potentially contribute to creation and dissemination of norms, standards and rules about how a more inclusive tourism could be performed by mass tourism corporations.

Internally, debate around issues of sustainability also generates opportunities for ‘sense-making’ (Weick, 1995), finding a compromise between the institutional pressures and the internal practices within the firm. Apollo, by including a new clause into Kuoni’s suppliers’ code of conduct or modifying some of the Travelife’s standards, tried to make sense and contextualize these general standards, coming from a top-down CSR policy, into Swedish society. Similarly, the creation within Kuoni of the inner CSR circles can be
interpreted in terms of a strategy to enrol both external and internal actors (NGOs, governmental organizations, subsidiaries, employees, trade unions and different departments) into the sustainability work of the firm. In a context of scarce resources characteristic of the tour operator sector, internal and external collaborative strategies seem to be crucial both to convince or ‘influence’ (Oliver, 1991) external and internal actors of the criticality of CSR work and to gain the necessary resources and legitimacy to act. However, these collaborative networks, as often occurs with sustainability work, perform multiple roles: they can be used by NGOs and others to introduce changes in industry operations to facilitate sustainable tourism and they can also be a platform to define new norms and standards to be followed by others; but they can also be used by the industry to gain legitimacy and manage brand risk more effectively.

Operating in complex organizational fields, balancing interests

Tour operators operate in complex institutional environments, made of a multitude of constituents (parent corporations, generating markets, destination authorities, employees and NGOs) in changing, sometimes volatile, contexts with high levels of uncertainty. Apollo turned into a definer of social responsibility in tourism in Sweden. Its sustainability work reflects internal negotiations with the parent company to shape the CSR agenda and adapt it, although sometimes superficially, to the local context. It reflects how Apollo had to balance (Oliver, 1991) the interests, values and practices both in the society where its operations are embedded as a generating market, and the parent company’s demands. It also shows how societal values and expectations travel from the customers to the MNC headquarters via national firms.

Yet, local voices from the destinations appear underrepresented in the internal processes for defining the CSR agenda leading towards staged inclusivity rather than fully inclusive practices, as often is the case in the planning process of certification systems (Haaland & Aas, 2010). In practice, their relative exclusion from the CSR organization charter means that there are no institutional elements for destination actors to shape a tour operator’s agenda outside of the immediate local tourism industry suppliers and NGOs. Hence, other than coercive forces stemming from (often weak) regulations and laws as well as observing initiatives by destination partners, there is no formal mechanism for the flow of ideas from local actors back to Apollo. Thus, despite various sustainability measures taken by Kuoni and Apollo, these large tour operators remain far off from practicing fully inclusive tourism, since marginalized groups engaged in the production of services, as shown by the Dubai scandal, are excluded from the CSR agenda making. This latter aspect reinforces that the gap between the MNC headquarters and their shareholders and the destinations and the suppliers’ employees is large since the interests of local production actors are not represented in the definition of rules that are centrally defined but locally implemented (Medina, 2005).

Certain issues are also more significant or salient than others (Bansal & Roth, 2000) for different organizational constituents. For example, as a result of the work of NGOs and government agencies, sexual and child abuse are salient issues in Swedish society, while issues relative to labour conditions, as in the case of Dubai, are not so controversial. In other words, the issues that become integrated with notions of inclusivity on CSR agendas depend on what is significant for constituents. In their specific spatial and institutional
context and from the operator’s perspective, the most significant constituent is the consumer.

A positive interpretation could be that not all salient issues can turn salient at once. As noted in the garment and footwear industry (Egels-Zandén, 2014), issues of child and forced labour (considered in Western societies as unacceptable) have been the first ones to be complied with. However, perhaps more realistically is the need to recognize that corporations usually interpret or argue that they have a legal responsibility to maximize returns to shareholders (Bakan, 2005; Stout, 2013), otherwise referred to as shareholder value exclusivity or primacy. While this approach does not preclude the adoption of more inclusive approaches to tourism, it does make it more difficult if such measures are not perceived as contributing towards a business bottom line. This is especially problematic for marginalized groups with tour operators who have the capacity to shift capacity between destinations when their activities are not generating sufficient return on investment or when they are subject to pressures that will affect returns in the future.

**Conclusions**

MNCs and daughter firms play a major role in sustainability work, as was the case of Apollo after their acquisition by Kuoni, including inclusive tourism which can be regarded as a significant element of the social and equity dimensions of sustainability. Although Apollo may be regarded as ‘inclusive tourism light’, it should be noted that in international terms their adoption of standards, compacts and codes with respect to human rights, children’s rights and responsible business actions put them at the forefront of what many tourism corporations actually do with respect to inclusivity.

Notions of inclusive tourism are usually framed as part of CSR strategies and activities. This case study, therefore, sheds significant light on the processes by which inclusive tourism issues may become part of the CSR and sustainability agenda of large transnational tourism businesses. Critically, this research also suggests that the incorporation of inclusive tourism concerns within the CSR agenda-setting process is primarily a response to customer concerns, the activities of NGOs, or because of negative publicity. Regardless, these may affect brand reputation and consumer behaviour.

As the case illustrates, despite top-down coercive and normative pressures affecting tour operators within large international businesses, sub-units such as Apollo are not passive receivers of these pressures. Instead, issues of agency, negotiation and institutional entrepreneurship (Hardy & Maguire, 2008) have to be taken into consideration (Oliver, 1991; Suddaby, 2010), especially when flexible CSR and sustainability frameworks operate, and the agenda and organizational field is being shaped under structuration. In this vein, this paper calls attention towards the opportunities that daughter organizations within multinational corporations and their constituents have in shaping institutional arrangements through internal collaborative platforms and bringing concerns of inclusivity into the multinational CSR policy. This may be particularly significant in the absence of strong CSR regulatory frameworks in destinations. Yet, importantly, and not sufficiently recognized in the tourism literature, the complex set of transnational corporate and sub-contractual arrangements that typify large tour operators, provide substantial difficulties in achieving inclusivity given that the operational supply chain may mean contract businesses are several times removed from head office decision-making. In such situations, it
is much easier for tour operators to engage with NGOs and governmental stakeholders rather than the actual communities that their customers visit. To gain further inclusivity, otherwise marginalized groups, therefore, need effective stakeholder representation so as to gain a ‘voice’ in the set of constituent relationships of large tourism operators. Furthermore, as possibly the case for some Apollo customers, concerns over animal rights may actually be more important than labour rights in a foreign destination. Nevertheless, suppliers’ decoupling of codes of conduct from labour conditions and environmental footprints would pose a huge brand risk for tour operators given that they operate with very low profit margins, and compete in complex and price sensitive markets. A requirement for regular monitoring and increased surveillance (Lund-Thomsen & Nadvi, 2011), and the unification of disparate certification and codes of conduct are some actions that might help contribute to re-coupling sustainability policies, including inclusive tourism concerns, with tour operators and supplier practices (Egels-Zandén, 2014).

This paper highlights how sustainability policies and standards, can be loosely coupled, or decoupled, from internal practices, and have the potential to trigger further engagement with CSR (Vilanova, Lozano, & Arenas, 2009), and, therefore, potentially some aspects of inclusive tourism, by stimulating both intra- and inter-firm learning through collaborative processes among corporate competitors. These collaborative platforms are used to exchange and diffuse industry practices, and may also anticipate potential future normative pressures towards aspects of inclusive tourism through legislation, i.e. changes to corporate CSR law, or management of brand risks, i.e. breaches of human rights. Furthermore, in a context of scarce resources, internal and external collaborative arrangements serve to enrol, co-opt and influence both internal (employees, management boards, subsidiaries and different departments), and external stakeholders to access necessary knowledge, resources and legitimacy. The gaining of access to such arrangements by marginalized groups, for example via NGO activities, would greatly increase the likelihood of the adoption of inclusive tourism measures. Similarly, more collaborative relationships between tour operators and their suppliers could also potentially contribute to couple tighter sustainability policies and suppliers’ practices (Egels-Zandén, 2014; Locke, Kochan, Romis, & Qin, 2007), for example by working together in the local translation of global standards and their application (Haaland & Aas, 2010).

Yet, none of these efforts can lead to profound changes in the sustainability practices of the mass tourism industry, including inclusive tourism, if the field remains underinstitutionalized. Previous research has shown how sustainability standards compliance is improved in countries with strong labour regulation (Locke et al., 2007; Toffel, Short, & Ouellet, 2015). Powerful players in the industry, such as large tour operators, have the ability to enable greater sustainability and more inclusive forms of tourism. But if more coercive institutional pressures, in the form of laws, regulations and incentives, are not enacted to accelerate this process, it risks perpetuating a limited adoption of inclusive practices in the mass tourism industry.

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