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Environmental Responsibility and Business Regulation: the case of sustainable tourism

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This paper adds to the growing literature within geography on environmental regulation of business activities. The adoption of voluntary practices of environmental responsibility is discussed as a form of environmental regulation, and then applied to tourism using a survey of 69 companies and institutions in the UK outgoing tourism industry. Results indicate that business has adopted a wide range of practices, but considers them to be weak regulatory instruments because ultimate responsibility for change lies with host governments via legislation. However, environmental protection may enhance business performance if voluntary practices could differentiate mass-market holiday packages and allow companies to compete on more than price alone. This paper, therefore, supports research from other industries which states that environmental practices may lead to commercial advantage if adopted proactively rather than in response to market demand for ethical or 'green' products. However, change may be accelerated by labelling 'green' or 'sustainable' tourism as 'quality' tourism, and by acknowledging that populist market demand may lead to stereotypical approaches to minorities or ecotourism not helpful to equitable development. Future debate should focus on common ground between regulators and business, and on shared responsibility for excluding 'free-rider' companies not willing to adopt practices.

KEY WORDS: business and environment, sustainable tourism, environmental responsibility, marketing, self-regulation.

AT A RECENT CONFERENCE on tourism, a delegate was overheard to say that regulating tourism was like shackling Santa Claus: a killjoy interference with people's recreation. Yet as evidence mounts that unrestricted tourism growth may create unwanted social and environmental impacts at destinations, there is a growing call to develop environmental regulation which reduces these impacts, but allows the industry to continue. The complex nature of tourism, dependent on elaborate images and consumer trends, may allow companies and regulators to devise new and creative techniques to achieve this.

This paper discusses approaches taken to regulate tourism by companies and institutions involved with sending UK tourists overseas. As such, it contributes to existing literature on new forms of regulation. However, in particular, it assesses the role of self-regulation, or voluntary practices of environmental regulation, as a regulatory form acceptable to both business and environmentalists. Self-regulation has been described as preferable to traditional command-and-control forms of regulation because it allows companies to use environmentally-responsible

practices to increase competitive advantage (see Smith, 1990; Eden, 1993). However, critics have suggested such measures may be too shallow to produce effective regulation, or that the full commercial advantage of these measures has yet to be utilized (Cairncross, 1995; FOE, 1995).

Much has already been written on the direct, physical impacts of tourism on ecosystems and host communities (Matthieson and Wall, 1982; Jenner and Smith, 1992; Price, 1995). Yet so far, only a few researchers have attempted to explore ways in which industry may be involved creatively in regulation (Poon, 1993; Goodall, 1995; Eaton, 1996). This paper seeks to expand on this research by discussing the nature of self-regulation and how this relates to tourism. It then uses a survey of businesses and institutions to assess the current adoption of voluntary practices, and suggestions from business leaders as to how these may be better implemented. Throughout the paper, 'sustainable tourism' refers to the improved social and environmental impact of all forms of tourism including mass tourism. As such, this survey considers more than just 'ecotourism', or niche holiday products focusing specifically on nature or remote cultures.

Voluntary environmental regulation and business

Researchers of business regulation are increasingly seeking an acceptable middle ground between *laissez-faire* allocation of resources by the market, and draconian command-and-control measures through state legislation. Many have now proposed that a proactive response to environmental responsibility may actually result in environmental regulation plus competitive advantage in business (Elkington *et al.*, 1991; Schmidheiny, 1992; Gladwin, 1993; Cairncross, 1995; Porter and van der Linde, 1995). Table I shows a spectrum of regulatory devices which may be used by both business and government with varying intervention to reliance on market forces.

Practices of environmental responsibility by businesses may make good business sense by reducing harmful impacts of industry before the introduction of restrictive legislation. It may also provide marketing tools to add value to products, or improve the corporate image with the public. For example, the UK Chemical Industries Association adopted a responsible care programme in 1989 (Simmons and Wynne, 1993), and in 1994 the packaging industry created the Producer Responsibility Group, aiming to reduce wasted packaging paper by 58 per cent of its value by the year 2000 (FOE, 1995; Eden, 1996). Such voluntary practices have increased rapidly in the UK during the 1980s and 1990s (Eden, 1993).

However, critics have questioned how far these practices have been adopted because they are considered to be genuinely good for environment and business, or instead simply a marketing tool responding to perceived short-term demand for environmental protection in the market place (FOE, 1995). Market interest for goods seeking to avoid environmentally or socially-negative impacts has been called 'ethical consumerism' and has been dated to the early 1970s (Anderson and Cunningham, 1972). However, 'green consumerism', or the specific association of ethical goods with environmental impacts, grew rapidly in the 1980s. This accompanied public concern about pollution, global warming and the ozone layer, and provided commercial incentives for companies to respond to this by producing goods overtly associated with environmental protection (Peattie, 1995).

Campaigners have argued that public demand for 'environmentally-friendly' goods may put consumer pressure onto producers to supply goods that consume less resources, or are manufactured in an ethically more acceptable way (e.g. Elkington and Hailes, 1988; Stone *et al.*, 1995). However, others have claimed that market-based responses to environmental concerns reflect only populist definitions of environment, and are susceptible to short-term changes in public taste, and belt-tightening under economic recession. For example, between 1990 and 1992 in the UK, the average 'green premium' paid for environmental retail goods fell from 6.6 per cent to 4.5 per cent apparently because of these two factors (McKinsey and Company, in Cairncross, 1995).

Furthermore, critics have also claimed that voluntary practices of environmental responsibility may seek only to pre-empt imposed regulation, or to legitimize business activities which degrade the environment (Baker and Miner, 1993; Brophy *et al.*, 1995). In addition, some companies' practices of sustainable development have run counter to the advice of environmental campaigners. For example, the presentation of indigenous rainforest people by The Body Shop has been called degrading and stereotypical by the campaigning group, Survival International (Corry, 1994).

Yet research by business theorists has indicated many companies are reluctant to adopt self-regulation because they fear their position may be undermined by companies that do not comply with codes of conduct – or so-called 'free riders'. Such companies may be able to operate at lower costs than more ethical companies and, therefore, gain competitive standing in the marketplace. This problem was noted during the introduction of the Producer Responsibility Group of the packaging industry, resulting in the apparent paradox of industry representatives calling on the government to pass legislation to enforce compliance to the voluntary regulation measures (FOE, 1995; Eden, 1996).

As a result of this, voluntary practices of environmental responsibility may be seen as a commercial opportunity. Yet genuine change to business practices to protect the environment may require some government intervention, or legislation to prevent

TABLE I

Environmental policy instruments available to business and government

<i>Government</i>	←—————→	<i>Market forces</i>
<i>indirect</i> ↑ ↓ <i>direct</i>	1 providing education and information to consumers 2 market-based instruments, e.g. subsidies/taxes/pricing (e.g. PPP) 3 legislation	4 providing infrastructure, but no market intervention 5 agreements or partnerships between government and industry 6 permissions quota 7 free market allocation of resources 8 niche or 'green' marketing 9 long-term investments in market

Source: Adapted from Janssen *et al.*, 1995: 75

'free riders'. Such combinations of limited legislation and innovation by companies is increasingly urged by business theorists who see the need to overcome organizational inertia in companies, or who seek regulation of activities where the costs of protection are higher than likely financial benefits (Gladwin, 1993; Porter and van der Linde, 1995).

Sustainable tourism and regulation

The term, 'sustainable tourism' emerged in geographical debate in the 1990s to describe tourism development without such negative environmental or social impacts (e.g. Nelson *et al.*, 1993; Burns and Holden, 1995; Coccossis and Nijkamp, 1995). In an ideal form it addresses all forms of tourism, both mass and niche markets, and also aims to provide sustainable profits to industry. Table II shows a list of principles identified by the World Wide Fund for Nature and the UK campaigning group, Tourism Concern.

As such, sustainable tourism must not be confused with the related term of 'ecotourism'. Ecotourism generally refers specifically to recreation in natural landscapes or threatened ecosystems such as rainforests or coral reefs. However, studies have suggested ecotourism may actually accelerate land degradation, or not represent local communities in development (Cater, 1993; 1995). In addition, ecotourism is generally a niche product appealing only to a small proportion of the market. Wheeler (1994) has labelled ecotourism 'egotourism'.

However, there is still debate about the meaning and purpose of sustainable tourism. Few now deny the need to protect destinations against the kind of deterioration experienced in locations such as the Mediterranean coast of Spain. However, campaigning

groups such as the Bangkok-based Ecumenical Coalition for Third World Tourism, or the UK-based Tourism Concern also urge the banning of sex tourism, or the boycott of tourism to Burma because of its attitude to human rights. Such moralistic attitudes have led critics to say such groups do not understand business. As a result, an increasing number of researchers argue that discourse should abandon the term 'sustainable tourism', and instead seek to define practical environmental and social standards for business which may indicate progress towards sustainable development (Goodall, 1995; Goodall and Stabler, 1996; MacGillivray and Zadek, 1995).

Regulation of tourism is difficult because of its characteristics. Firstly, tourism, or recreation, has no tangible lasting product but is based on image and presentation, often involving 'gazes' or stereotypical visions of foreign destinations (Urry, 1990; 1995). From a sales perspective, package holidays have 'time value', meaning that tour operators and travel agencies have the urgent task of selling holidays before the starting date or else they cease to exist (Middleton, 1994).

Secondly, there is no 'one' tourism industry, but instead a combination of many activities ranging from construction and transport, to tour and hotel management. Each activity has different markets and business objectives, plus varying environmental and social impacts. Therefore, not all environmental problems are the responsibility of the industry as a whole, and not all sectors can act together to overcome problems.

Thirdly, the UK tourism market is characterized by extreme price competition under oligopoly, and the trend to send more tourists further distances for decreasing profit. Companies are, therefore, very

TABLE II

Beyond the green horizon: principles for sustainable tourism

- 1 *Using resources sustainably* The conservation and sustainable use of resources – natural, social and cultural – is crucial and makes long-term business sense.
- 2 *Reducing over-consumption and waste* Reduction of over-consumption and waste avoids the costs of restoring long-term environmental damage and contributes to the quality of tourism.
- 3 *Maintaining diversity* Maintaining and promoting natural, social and cultural diversity is essential for long-term sustainable tourism, and creates a resilient base for the industry.
- 4 *Integrating tourism into planning* Tourism development which is integrated into a national and local strategic planning framework and which undertakes environmental impact assessments, increases the long-term viability of tourism.
- 5 *Supporting local economies* Tourism that supports a wide range of local economic activities and which takes environmental costs and values into account, both protects those economies and avoids environmental damage.
- 6 *Involving local communities* The full involvement of local communities in the tourism sector not only benefits them and the environment in general but also improves the quality of the tourism experience.
- 7 *Consulting stakeholders and the public* Consultation between the tourism industry and local communities, organizations and institutions is essential if they are to work alongside each other and resolve potential conflicts of interest.
- 8 *Training staff* Staff training which integrates sustainable tourism into work practices, along with recruitment of local personnel at all levels, improves the quality of the tourism product.
- 9 *Marketing tourism responsibly* Marketing that provides tourists with full and responsible information increases respect for the natural, social and cultural environments of destination areas and enhances customer satisfaction.
- 10 *Undertaking research* On-going research and monitoring by the industry using effective data collection and analysis is essential to help solve problems and to bring benefits to destinations, the industry and consumers.

resistant to any change in business practices which may increase costs. In particular, the three main mass-market competitors in the UK, of Thomson, Airtours and First Choice (previously Owners Abroad) comprise vertically-integrated sectors of travel agencies, charter-flight companies and resorts, and therefore may become bankrupt if charter-flight seats are not filled. Charter flights have been claimed to cause both overcrowding at destinations and dependency on price cutting as a form of competition (Josephides, 1994). However, given the collapse of the large company International Leisure Group in 1991 as a result of competition, it is not surprising that companies continue to focus on short-term profit horizons rather than on long-term environmental sustainability.

Such problems have usually been blamed for the so-called 'boom-and-bust' cycles of development in tourism destinations, where tourism has led to rapid overdevelopment and decline, and also the helplessness of individual companies to induce change by themselves.

Legislation to regulate tourism activities has included the *1988 Spanish Shores Act*, which banned construction near shorelines and allowed demolition of buildings without proper planning permission. In 1991, the Balearic Islands passed legislation to reduce building work and the numbers of tourists accommodated in apartments (Gamero, 1992). The 1992 EU draft policy on transport proposed to discourage short-term air travel in favour of trains in order to reduce emissions (Middleton, 1994).

Increasingly, self-regulation has been adopted either as independent action by large companies, or as collective action by companies united by professional bodies, or tourism associations. These, such as the 1993 International Hotels Environment Initiative have sought to educate tourists or increase environmental responsibility by recycling waste in hotels (Mason and Mowforth, 1995; UNEP, 1995). Liaison between tourism associations such as the International Federation of Tour Operators has done much to establish new ideas in planning-permission procedures, often with the cooperation of hotel chains (Goodall, 1996).

In addition, the WTTC (World Travel and Tourism Council) has established the WTTTC (World Travel and Tourism Research Council) and the Green Globe Program as worldwide environmental management and public awareness programmes for tourism companies, including advice on integrating *Agenda 21* into business management (WTTC *et al.*, 1995).

However, campaigners have claimed such groups offer legitimization for damaging activities. For example, Green Globe has praised Kandalama Hotel in Sri Lanka and the Phuket Yacht Club of Thailand for their environmental achievements

(Green Globe, 1996). However, both of these have been targets for international campaigns: the Kandalama Hotel for allegedly damaging local water supplies and victimization of local communities, causing a protest of about 50 000 people in 1992 (Mihikatha Institute and Perera, 1994); and the Yacht Club for allegedly closing access to public land (Kanjananavit, 1992). Green Globe has also been criticized for a conflict of interest in being financially supported by the same companies it assesses, and for keeping assessments secret from public scrutiny (Epler Wood, 1994).

In contrast to this kind of approach, some smaller companies have responded by marketing niche products offering 'green' or environmentally-conscious holidays. In the book, *Holidays that don't cost the Earth*, Elkington and Hailes (1992) attempted to create consumer interest by evaluating the environmental performance of different holiday products. However, public understanding has often confused good environmental practice by companies sending tourists on a variety of holidays, with other companies that simply specialize in ecotourism. In such cases, practices such as careful consultation with host communities before development may not be as visibly environmental as companies featuring tours of rainforests (see Desforges, 1997). In addition, public interest in the environmental impact of tourism has generally been lower in the UK than other major European countries. In 1991, a survey suggested that 33 per cent of UK holidaymakers considered mass tourism to offer no threat at all to environment, compared with 10 per cent of Germans and 21 per cent of French people (The Henley Centre, in Bywater, 1992).

The study: self-regulation in the UK outgoing tourism industry
A survey was conducted of senior staff in tourism companies in 1993, to assess industry's own perceptions of sustainable tourism and regulation. The survey sought to identify:

- which self-regulatory practices had been adopted;
- what might prevent the achievement of sustainable tourism; and
- what measures should be introduced and by whom.

In addition, a one-day seminar was held with industry members in June 1996, to discuss these issues and monitor developments since the findings of 1993. Full empirical details of research, including a list of participants, are described in Forsyth (1996).

The survey was restricted to institutions involved in sending UK tourists overseas only. This was to assess the problems of achieving environmental regulation with diverse partners around the world. Domestic tourism in the UK was not addressed, although this may also require regulation.

The survey divided the tourism industry into seven sectors. These were:

- tour operators;
- travel agents;
- hotels;
- passenger carriers (airlines and cruise liners);
- tourism associations;
- national tourist offices; and
- consultancies offering advice to companies sending tourists overseas.

It was originally intended to have a survey of at least 80 companies, but limited time and resources meant only 69 could be approached. Companies were selected in advance for their representativeness of each sector, and interviews sought only with senior, decision-making staff. The survey paid particular attention to tour operators because these are most closely involved with sending UK tourists overseas.

Research was sponsored by the World Wide Fund for Nature (UK) and Tourism Concern. Before interviews, each company was sent a copy of the publication, *Beyond the green horizon: a discussion paper on principles for sustainable tourism* (Tourism Concern and WWF, 1992). The book was sent to provide a working definition of sustainable tourism to guide discussions (see Table II), and also to publicize it to people who may not have read it. Reviews of *Beyond the green horizon* have either praised it for urging badly-needed revisions to industry practice (Leslie, 1993; Singh, 1993), or criticized it for lacking practical business advice (Ashcroft, 1993; *Interpretation Journal*, 1993).

Information was gathered by a combination of 28 face-to-face interviews with so-called key informants considered particularly representative or important, and 41 telephone interviews with other institutions conducted by a team of researchers. Face-to-face interviews lasted between one and two hours, and aimed to let respondents describe their responses to *Beyond the green horizon*, and how they saw the problems of sustainable tourism. The telephone interviews lasted 20–30 minutes and used a semi-structured checklist in order to provide further information about industry practices. All interviews were transcribed and analysed later. Consistency between answers gained in interviews was achieved through careful discussion of concepts and questions with the team before and after interviews, and by the reliance on the longer interviews for analysis.

Interviews were kept anonymous in order to get frank, honest responses. The aim of the survey was to be representative, rather than exhaustive, and consequently for some sectors (such as cruise liners) responses came from only one or a few companies considered especially representative. One possible source of bias in this survey is that results come only from companies willing to contribute. This therefore

meant that results reflected companies interested in sustainable tourism – from a commercial or philanthropic perspective. However, the survey included all major operators in the UK travel market, and is the largest such survey of tourism companies in the UK to date.

Results and discussion

The results of the survey are presented in Tables III to VII. These show the self-regulatory practices currently adopted; the perceived obstacles to adopting practices; and priorities, responsibilities and practical actions available to the industry.

Four main types of practice were identified: cost-cutting (such as recycling paper or waste products); value-adding (such as providing information about destinations, sometimes known as ‘sympathy booklets’); long-term investment (such as staff training); and legislation (such as tourist taxes, or controls on tourism development by host governments).

Tour operators were most active with value-adding practices such as providing ‘ecotips’ in brochures, or promoting specialist ‘green’ holidays. Hotels and passenger carriers, however, carried out few duties other than simple cost-cutting, as encouraged by programmes such as the *International Hotels Environment Initiative*. Travel agents adopted very few practices, and generally saw themselves as powerless to achieve change.

However, companies generally saw themselves as powerless to introduce change. This was partly because of the fear of ‘free riders’, or the commercial threat from companies not willing to undertake regulation, and because they saw regulation as ultimately the responsibility of governments. Nearly 64 per cent of those questioned said they saw responsibility as lying with governments (Table VI), but the words of one interviewee from a major operator indicated the problem of introducing change without legislation: ‘If the Gambia allows operators to trash the environment, then why should we be blamed if we do? . . . OK, so we *do* put more people into apartments in Majorca than they were originally built for. But then so does everyone else!’

These kinds of findings indicate that self-regulation may not produce effective regulation of tourism destinations, and that companies themselves do not believe in the ability to produce long-term change without legislation. However, some respondents argued that effective regulation could be achieved by presenting practices of environmental responsibility as ‘quality’, rather than ‘environmental’, because this may appeal more to tourists’ wishes.

This use of ‘quality’ as an umbrella term for notions of ethical practice has already been proposed in tourism (Middleton, 1994), and has been generally used in business theory as a means to add value to products, and gain reputation in the market place. In

TABLE III

*Practices of sustainable tourism currently adopted**Direct interventions (influencing practices of the sector)**Indirect interventions (influencing practices of other sectors)**Tour operators (n = 36)*

- Donating to local charities and schools (13)
- Promoting specialist 'green' holidays (8)
- Recycling brochures (8)
- Selecting tour guides from local communities (7)

- Providing 'ecotips' and advice in brochures (13)
- Sponsoring research into impact/management of tourism (9)
- Lobbying of destinations to improve infrastructure, etc. (8)
- Providing tourists with 'sympathy leaflets' (6)
- Forging partnerships with local groups over waste management (6)

Travel agents (n = 6)

- Recycling paper and brochures (2)

- Providing specialist knowledge about responsible tourism (2)

Hotels (n = 3)

- Abiding to the International Hotels Environment Initiative (recycling, waste management, etc.) (3)

- Liaising with local governments about sustainable tourism (1)

Carriers (n = 5)

- Monitoring fuel emissions, noise, sea waste management (5)

- Providing tourists with 'ecotips' and information in magazines (2)

Tourism associations (n = 6)

- 'Ecolabelling' – using Green Flag International / Green Globe logo to indicate quality (1)

- Educating tourists for selected, 'fragile' cruise destinations (1)
- Advising members on sustainable tourism (6)
- Developing links with research and charities (5)
- Raising awareness of governments (3)
- Requesting members to contract only with suppliers of specified quality (2)

National tourism offices (n = 5)

- Diversifying tourist attractions throughout country (3)
- Avoiding charter flights (1)
- Enforcing operators to work with local charities and groups (1)

- Researching the impact and management of tourism (5)
- Supporting legislation to control tourists and tourist development (4)
- Lobbying to provide adequate infrastructure (3)

Consultancies (n = 8)

- Advising companies in the long and short term (8)
- Training or briefing industry representatives (6)
- Conducting research (6)
- Writing 'sympathy leaflets' (2)
- Establishing awards for sustainable practice (1)

Note: the number of responses from the survey is included in brackets.

tourism, it has been supported by market research. A 1993 survey indicated that 49 per cent of UK consumers would pay an extra £20 on a £300 holiday if they were guaranteed a clean beach and sea, with an additional 26 per cent saying they would pay £40 more (MORI, in TPR, 1993). In such cases, there is a clear overlap between sustainable tourism practice and what tourists may perceive to be desirable. However, this may also work for different types of tourism development.

For example, one tour operator gave an example of a location in Corfu which had been spoilt in the 1980s by the business practice known as 'allocation-on arrival'. This is a practice by charter-flight operators to ensure that flights and hotels are full by offering holidays at discounts on the basis that tourists would not know the final destination of the holiday until the day of arrival. In the example, some tourists only interested in beach holidays were sent

on this scheme to Neohorio, a hill resort popular with walkers and bird watchers. As a result, the tourists were bored and local entrepreneurs converted buildings into cheap bars, which effectively spoilt the location for hill-walking tourists, yet also never satisfied the beach tourists because the site was over a mile from the coast. Thus potential high earnings from specialist holidays such as hill walking were lost for the sake of short-term allocations, whereas keeping it at a higher quality would have maintained its high-earning status.

Without this redefinition of 'sustainable' as 'quality', companies were generally pessimistic about market demand for sustainable tourism. This is possibly because, in the mass market, practices of environmental responsibility are not always obvious or attractive to tourists. In 1992, Elkington and Hailes wrote, 'It is perfectly possible for consumer pressure to turn the tourism industry around' (1992: 17).

TABLE IV

*Perceived obstacles to adopting practices of sustainable tourism**Tour operators (n = 36)*

- 1 The belief that others are responsible, especially governments (18)
- 2 The fear of taking steps not matched by competitors (12)
Difficulties in educating tourists (12)
- 3 The belief that operators are powerless to produce change (8)
Apparent lack of demand for sustainable tourism in the UK market (8)
Perceived intransigence and corruption amongst host authorities (8)
- 4 The need to fill seats on charter flights (7)
Confusion over which practices of recycling to use, etc. (7)
- 5 The perception of sustainable tourism as academic and irrelevant (4)
- 6 The rapid movement of staff prevents adequate training (2)

Travel agents (n = 6)

- 1 The belief that travel agents are powerless to produce change (6)
- 2 The apparent lack of demand from the UK market (3)
The fear that introducing new measures may upset the fragile balance of business (3)
- 3 The desire not to undermine quality image by responding to short-term 'green' fad (1)

Hotels (n = 3)

- 1 The belief that hotels are powerless to produce sustainable tourism (3)
- 2 The desire not to preach to high-spending guests (2)

Carriers (n = 5)

- 1 The belief that carriers are marginal to the main tourism industry, and hence powerless to change it (4)
- 2 The lack of power resulting from owning no land or resorts in destinations (2)
- 3 The lack of interest in environmental issues from the cruise liners' main market of elderly people (1)

Tourism associations (n = 6)

- 1 The widely-held view that holidays have to be cheap (5)
- 2 The low margins and high fragility of profits amongst tour operators (4)
- 3 The belief that governments will not listen to tourism companies (3)
- 4 The likely opposition to trade restrictions from the UK Government Office of Fair Trading (1)

National tourism offices (n = 5)

- 1 The tendency for governments to see mass tourism as the only tourism (4)
- 2 The belief that large tour operators do not listen to governments or national tourism offices (3)
- 3 The problems of making long-term agreements with tour operators because of the likelihood they will become bankrupt (2)

Consultancies (n = 8)

- 1 The simplistic marketing of holidays to promote only one aspect of holiday locations (7)
- 2 The false idea that sustainable tourism must be a niche product (6)
- 3 The lack of respect for environmentalists by the tourism industry (4)
- 4 The incorrect image of desirable tourism held by host governments (3)
The reluctance of large operators to deal with small indigenous companies (3)
The lack of mechanisms to force reinvestment into destinations by tour operators (3)
- 5 The availability of a new, large market from Eastern Europe to fill degraded resorts (1)

Note: responses are ranked according to frequency, given in brackets.

However, this survey suggests that a rise in ethical consumerism related to tourism products may not take place because of a lack of clarity about what represents ethical tourism, and also because tourism is associated with relaxation rather than altruism.

In addition to this, other research in tourism suggests that mass-market demand may reinforce the perception that sustainable tourism has to be a niche product focusing on specific aspects of environment or culture, rather than an improvement in mass tourism. For example, ecotourism, or the 'othering' and commodification of remote landscapes and people, has been claimed to lead to the stereotypical presentation of such places according to the wishes of tourists rather than what may create equi-

table development (Silver, 1993; Hughes, 1995; King and Steward, 1996). As such, this indicates that allowing market interest to define business responses to sustainable tourism may not result in the development or environmental management defined by campaigning organizations such as Tourism Concern.

Consequently, the adoption of practices of sustainable tourism may be in the commercial interests of companies if these are presented as 'quality', rather than 'environmental'. Furthermore, these should be done proactively rather than in response to consumers overtly interested in ecotourism or holidays featuring remote cultures. Some respondents in the survey suggested using such techniques may reduce

TABLE V

*Perceived priorities for all tourism, by sector**Tour operators (n = 36)*

- 1 Increase awareness of sustainable tourism amongst tourists (13)
Increase awareness amongst host governments (13)
- 2 Increase the quality, and therefore value, of holidays (9)
- 3 Train staff in tour operators, hotels and travel agents (7)
Enforce government controls on tourists and tourism development (7)
- 4 Increase gifts from tourists to charities (5)
Increase leadership for sustainable tourism by major companies (5)
- 5 Introduce a sustainable tourism guidebook for companies to use in the contracting process (4)
Introduce tourist tax at destinations by governments (4)
- 6 Introduce and enforce waste management at destinations (2)

Travel agents (n = 6)

- 1 Increase the awareness of tourists, therefore increasing the range of holidays currently valued by the market (6)

Hotels (n = 3)

- 1 Introduce new designs for hotels (3)
- 2 Increase public awareness of sustainable tourism (2)

Carriers (n = 5)

- 1 Educate tourists about the cultural and environmental diversity of destinations (4)
- 2 Put pressure on suppliers for quality products (3)

Tourism associations (n = 6)

- 1 Increase awareness of tourists (6)
Increase awareness of governments (6)
- 2 Provide guidelines for operators to use for contracting (3)
- 3 Promote enclave tourism to control negative effects of tourism, and allow positive marketing (2)

National tourism offices (n = 5)

- 1 Maintain the quality of resorts so visitors will spend more and revisit (5)
- 2 Introduce land zonation to allow the coexistence of enclave tourism and protected areas (4)
- 3 Educate tourists about diversity and sensitivity of cultures and environment (3)
- 4 Research ways in which different forms of tourism can coexist (2)
- 5 Maintain the quality of tourism and destinations by aiming for high margins rather than large numbers of tourists (1)

Consultancies (n = 8)

- 1 Increase awareness of tourists (8)
Increase awareness of governments (8)
- 2 Long-term marketing to achieve a differentiation in the standard holiday package to allow competition on more than price (7)
- 3 Develop mechanisms to attract reinvestment in destinations by tour operators (5)
- 4 Introduce land zonation to allow the coexistence of enclave tourism and protected areas (4)

Note: responses are ranked in order of frequency, given in brackets.

TABLE VI

Who should be responsible for implementing sustainable tourism?

<i>Sector questioned:</i>	<i>Host governments</i>	<i>Operators and host governments</i>	<i>Operators alone</i>	<i>Associations</i>
Tour operators (n = 36)	21	12	–	3
Travel agents (n = 6)	6	–	–	–
Hotels (n = 3)	3	–	–	–
Carriers (n = 5)	5	–	–	–
Tourism associations (n = 6)	1	4	1	–
Tourism offices (n = 5)	3	2	–	–
Consultancies (n = 8)	5	3	–	–
Total responses	44	21	1	3
% of total survey (n = 69)	63.8	30.4	1.4	4.4

price competition in the mass market by allowing companies to differentiate between products, rather than all relying on the same combination of sun and sand. Table VII shows the practices proposed in the

survey which could be adopted now by different industry sectors. This may be compared with Table I, showing the theoretical range of regulatory instruments available to government and business.

TABLE VII

Sustainable tourism practices and responsibilities as identified by the tourism industry

<i>Sector responsible:</i>	<i>Cost-cutting</i>	<i>Value-adding</i>	<i>Long-term investment</i>	<i>Legislation</i>
Tour operators	Recycle brochures Rely less on luxury resorts	Sympathy booklets Clean beaches, etc. Pressurize suppliers Diversify product (i.e. supply more varied holidays)	Staff training Research Lobby governments to provide infrastructure	Lobby governments to ensure satisfactory laws
Travel agents	Recycle brochures	Provide specialist advice	Staff training	
Hotels	Recycle waste Reduce fuel use	Information packs Sympathy booklets Pressurize suppliers	Staff training	
Carriers	Reduce fuel use	In-flight videos Sympathy booklets	Research Staff training	
Tourism associations	Urge recycling and reduced consumption	Information packs Sympathy booklets	Research Lobby governments to provide infrastructure Staff training	Lobby governments to ensure satisfactory legislation
Government tourist offices	Waste management	Education of tourists	Provide adequate infrastructure Research Staff training	Controls on tourists and development Land-use zoning Tourist tax

In addition to this, some respondents suggested large companies such as Thomson, First Choice and Airtours should seek to make such practices the industry standard, by adopting them and marketing holidays on this basis. Such action may be opposed by the UK government's Office of Fair Trading, which opposes practices that may produce barriers to market entry. However, the announcement in July 1996 that ferry companies in the English Channel would be allowed to merge and therefore end price cutting has shown that such opposition need not always exist (Harper and Gow, 1996).

Similarly, consumer groups may oppose actions which lead to price increases. However, a common theme in environmental policy debates is the need to internalize environmental costings through direct or indirect taxes or pricing, and consequently this may have to be accepted. Many interviewees stated how UK holidaymakers generally pay less for holidays than abroad. One said: 'the insistence that cheap is beautiful has been an illness in the British tourism industry for too long'.

Conclusion

Tourism, like other industries, has environmental impacts. However, the ability to achieve effective environmental regulation in tourism is difficult because its main product of recreation is varied, and experienced differently by each customer. In addition, tourism is not one industry but many. It also depends on consumer perceptions of landscape and culture which may not support domestic develop-

ment objectives. This paper has used a survey of 69 companies and institutions in the UK outgoing tourism industry to assess how far regulation may be achieved by voluntary practices of environmental responsibility.

Results indicated that companies had adopted a wide range of practices, and that most companies perceived the need for environmental regulation of tourism development. However, all commercial sectors of the industry interviewed saw ultimate responsibility for change as lying with host governments via legislation. This indicated that current practices of voluntary environmental responsibility were considered to be ineffective by the industry itself. In addition, many companies wanted regulation in order to prevent environmental degradation, and abuse of the market by 'free-riding' companies which act irresponsibly in environmental or financial terms.

However, this did not mean that self-regulation was ineffective in all forms. A small number of informants believed that self-regulation could result in environmental protection plus competitive advantage if it was presented as 'quality' rather than 'environmental' to consumers, and adopted proactively rather than in response to perceived consumer wishes. This would enable sustainable tourism to be more readily applied to the mass market, and also demonstrate that such practices do not require an increase in consumer demand before they make commercial sense (see also Eaton, 1996). It also supports arguments from other researchers that sustainable tourism needs to be defined more closely in

terms of achievable targets of social and environmental performance for business (Goodall, 1995; Goodall and Stabler, 1996).

Furthermore, a proactive approach to sustainable tourism may also allow the redefinition of tourism away from stereotypical images which are not helpful to equitable development (e.g. Silver, 1993). Market-led demands for ecotourism or ethnic tourism may reinforce such unhelpful images, yet also be considered to be 'environmental' by misinformed companies and consumers.

Hence, the achievement of sustainable tourism may therefore depend on a change in discourse of both campaigners and industry in order to identify common ground more easily, and to communicate this more effectively to the marketplace. However, to wait for overt market demand for 'sustainable tourism' may result in losing opportunities to implement commercially attractive practices in the short term, and also risk reflecting populist demands for 'environment' which may not achieve sustainable development or allow business to deal proactively with competition and environmental damage in the mass market.

Such progress may not be made without protection against 'free riders' from legislation or coordinated industry action. Similarly to other industries, environmental regulation of tourism may therefore depend on shared responsibilities between governments and business, and on the establishment of legislation which allows companies to develop their own flexible responses to environmental problems and market opportunities without fear of losing competitive advantage (Porter and van der Linde, 1995). Future research may focus on participatory regulation involving business, governments, host communities and campaigners with a greater view to common ground.

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