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Trade associations as corporate social responsibility actors: an institutional theory analysis of animal welfare in tourism

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ABSTRACT

Most travel trade associations ignore their responsibility towards sustainable development broadly and animal welfare in particular. We analyse the development and implementation of animal welfare standards across 62 national and international associations using interviews, surveys, content analysis of published materials and websites. Only 21 associations mention sustainability in their websites, and only six refer to animal welfare. Of these, three associations have well-developed animal welfare activities (ABTA, ANVR and GSTC) [AQ1] and only one (lightly) monitors its members' sustainability and animal welfare standards (ANVR). ABTA's Animal Welfare Guidelines are the *de facto* industry standard, despite being designed for information (not auditing) purposes and lacking enforcement mechanisms. We examine jolts that prompt some associations to respond to external pressures and the institutional entrepreneurship process that triggers a process of reflexivity, theorisation and diffusion of a broader sense of responsibility. We examine the field-level conditions that lead to mostly mimetic pressures on large European tour operators (that compel them to act due to reputational risk management), with minimal normative pressures that would diffuse animal welfare practices across other association members. Change is not divergent, and the resources allocated to animal welfare protect trade associations' members from criticism without binding them to implementation.

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Animal welfare; membership; sustainability; tour operators; travel agents

Introduction

This study examines under which conditions trade associations (TAs) promote sustainability changes amongst their members with particular reference to how travel associations address captive wild animal welfare (AW) issues. Captive wild animal conservation and welfare standards, in tourist attractions across the world, are generally poor (Moorhouse, Dahlsjö, Baker, D'Cruze, & Macdonald, 2015). The only known in-depth field analysis of AW in tourist venues (in Thailand) shows severely inadequate conditions (Schmidt-Burbach, Ronfot, & Srisangiam, 2015). In elephant tourism, for example, the animals, mahouts and tourists are at risk because inexperienced private operators are driven by profits and not quality (Duffy, 2014). Customer feedback from "swim-with-dolphins" attractions evidences the staged nature of the experiences, the limited information provided to tourists and the AW concerns that are raised by customers (Curtin & Wilkes,

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2007). Tourists underplay the cognitive dissonance associated with acknowledging the harm these experiences have on the wildlife involved (Campos, Mendes, do Valle, & Scott, 2017; Curtin, 2009), but this does not mean they are happy about it. On the one hand, tourists are unable to identify AW and conservation infringements by themselves: over 80% of the visitors to wildlife tourist attractions do not share concern for AW in their online reviews and any concern shown in visitor feedback is insufficient to force regulation on wildlife tourism attractions (Moorhouse et al., 2015). On the other hand, Western consumers would welcome transparent market information about AW conditions, and would generally change their behaviour accordingly, while in China consumers expect that licensed businesses will already be adhering to welfare standards (Moorhouse, D'Cruze, & Macdonald, 2017).

However, tourism codes of ethics rarely consider AW (Cousquer & Allison, 2012; Fennell, 2014). Regulation (in wild cetacean tourism) is fragmented (Garrod & Fennell, 2004) and (in elephant tourism) is driven by stakeholders from the global North without sufficient understanding of local realities (Duffy & Moore, 2011). Stakeholders distance themselves from any AW responsibility and well-intentioned, but ill-executed, actions from donors do not address the root causes of poor AW (Cousquer, 2018). This is arguably the result of tourism stakeholders not engaging in a genuine meeting, attentive listening and dialogue (Scharmer, 2009; Scharmer & Kaufer, 2013). TAs are industry bodies created to represent the interests of their members. They provide a series of services according to their members' perceived collective needs and willingness to fund them, which can include advertising, publishing, lobbying, training and standard setting. TAs have the opportunity, and arguably the responsibility, to facilitate such sectoral dialogues to professionalise and protect the reputation of a sector, and this includes taking a proactive stance towards corporate social responsibility (CSR) practices (Gupta & Brubaker, 1990; Marques, 2017).

As animals do not have a voice to represent their rights, it is important to study how institutional structures identify and act on behalf of animals (Cousquer, 2018; Duffy & Moore, 2011; Fennell, 2011), in order to understand how acceptable levels of AW are negotiated (Fennell, 2012). This article studies the role that TAs have in promoting CSR from the perspective of Institutional Theory (IT), which acknowledges that the ways in which organisations respond to stakeholders' demands depend on the institutions they operate within. IT allows us to see AW as both a scientific and a moral question (Buller & Morris, 2003; Fennell, 2013, 2018), while a focus on AW (instead of broader CSR issues) limits ambiguity and reduces co-opting (van Wijk, Stam, Elfring, Zietsma, & Den Hond, 2013).

Literature review

Institutional Theory helps explain how the boundaries between organisations and society are constructed and negotiated and helps us understand the diversity and the dynamics of CSR (Brammer, Jackson, & Matten, 2012). The institutions that an organisation comes in contact with provide incentives and pressures to behave more responsibly (Campbell, 2007). By seeking explanations for the underlying organisational structures, IT provides more nuanced accounts of the phenomena under study than other theoretical lenses and more accurately describes how to support sustainable change. IT provides a framework to understand how organisations within an "organisational field" move towards homogenisation from an initial position of diversity in approach and form (DiMaggio & Powell, 1983), for example, in relation to CSR (Greenwood, Hinings, & Jennings, 2015). An organisational field is "a community of organizations that partakes of a common meaning system and whose participants interact more frequently and fatefully with one another than with actors outside the field" (Scott, 1995, p. 56). These highly interconnected organisations "constitute a recognised area of institutional life: key suppliers, resource and product consumers, regulatory agencies and other organizations that produce similar services or products" (DiMaggio & Powell, 1983, p.148). The CSR literature has only recently taken an

IT approach (Brammer et al., 2012) and research on the role of TAs is limited (Barnett, 2013; Marques, 2017; Rajwani, Lawton, & Phillips, 2015).

Organisational fields have well developed norms that respond to each field's institutional logic. Change can occur when this logic is challenged, providing opportunities for reflexivity that can prompt the theorisation of new logics (Battilana, Leca, & Boxenbaum, 2009; DiMaggio & Powell, 1983). Such disruption within a field results from externally occurring "jolts" that disturb field consensus, and from evolving tensions from incompatible values that undermine the field's homogeneity (Barnett, 2013; Tucker, 2008). Sometimes, jolts take the form of adverse publicity resulting from an accident or because of uncertainty created when fields start to change. At other times, change is prompted by regulations or pressure exerted by social movements that push normative expectations in new directions (Higgins & Larrinaga, 2014). By paying attention to the mechanisms that cause disruptions to resonate, IT helps us study the process of disruption and subsequent homogenisation based on the principle that an organisational field is socially constructed and dynamic. The relevance of a particular disruption does not depend on objective measures but on how actors evaluate the industry's accountability with respect to it and the potential impact of such an event on their reputation and image (Hoffman & Ocasio, 2001).

Trade associations have been analysed as organisational fields, holding the features of connectedness and structural equivalence (DiMaggio & Powell, 1983), which promote field homogeneity and therefore make them relatively resilient to jolts. Connectedness is related to operations that tie actors together. It is reflected in the myriad opportunities offered by TAs to their members and the latter's participation in them. Connectedness embeds normative or cultural values amongst TA members (including CSR) although TAs are typically voluntary membership, non-profit organisations that represent the interests, and attend to the needs, of their members (Campbell, 2007; Gunningham & Rees, 1997). TAs also enjoy structural equivalence as members have similar positions in the network, although with more or less prominence. The greater the homogeneity, the greater the structuration of the field. And yet, even within such homogeneity, there will be actors that are more aware of incompatible demands, who are the most likely to perceive an opportunity (or feel a need) for change; this is a process called reflexivity (Greenwood et al., 2015; Strang & Meyer, 1993).

Trade associations are normative institutions so any innovation is the result of competition between emerging and established values. Institutional entrepreneurs are actors that initiate, and actively participate in, implementing divergent change that breaks the institutional logic of a field because of having a motivation and resources to implement changes (Battilana et al., 2009). Divergent change can also be created unwittingly, by introducing actions meant to protect an institution's behaviour from being questioned (Deephouse & Suchman, 2008) that may unchain events that ultimately shift the TA's logic and become unintentionally divergent (Battilana et al., 2009; Garud, Hardy, & Maguire, 2007).

Reflexivity is a precursor of the theorisation of divergent change, that is, the framing of ideas into formats that make them acceptable and adopted (Greenwood, Hinning, & Suddaby, 2002). Battilana et al. (2009) argue that divergent change is implemented through: (i) the development of a vision, (ii) the mobilisation of actors to support that vision, and (iii) the sustained motivation of these actors. First, the vision spells out the failings of the current system and the superiority of the new actions (Tolbert & Zucker, 1983). The institutional entrepreneur must frame this vision as supporting the current institutional logic to achieve normative legitimacy (Strang & Meyer, 1993). Non-threatening framing seeks moral acceptability and increases institutional legitimacy of the new actions through a discourse that: (i) uses the language of the incumbents to increase familiarity, (ii) emphasises the business case for the actions, and (iii) enhances the self-efficacy of actors (Suddaby & Greenwood, 2005). Second, the mobilisation of allies relies on redefining the identity of the institution by coalescing likeminded allies by speaking to the shared values; creating visibility of new alliances and demonstrating the benefits of adopting this new vision (Battilana et al., 2009). Battilana et al.'s work shows that this is achieved with both discursive and

resource mobilisation strategies, since change is costly and potentially risky, and is best introduced by actors who are skilled at using their social position to influence change, be it through formal authority or social capital, both of which are available to TAs. Third, the sustained motivation of these actors will be achieved through the mechanisms used (by the TA) to change the institutional logic following a combination of mimetic, normative and coercive pressures (DiMaggio & Powell, 1983; Suchman, 1995).

Mimetic pressure is the result of actors modelling themselves against the examples of other actors to provide themselves with institutional legitimacy. Mimetic behaviour is a low-risk strategy applied in situations of uncertainty amongst organisations with network ties and trust, for the purpose of legitimacy more than the objective of efficiency (Galaskiewicz & Wasserman, 1989). Mimetic forces occur, in particular, when actors learn how to adopt practices that both benefit the actor and society at the same time, for example through TAs organising events that show how to implement best and innovative peer practices through conferences, publications or workshops (DiMaggio & Powell, 1983; King & Lenox, 2000). Over time, CSR becomes institutionalised with its own set of values, beliefs and norms about how firms should act (DiMaggio & Powell, 1983). However, mimetic diffusion is slow because it results from self-centred theorisation more concerned with vogues than with rationalisation.

Normative pressure generates a sense of obligation towards "the right thing to do" making actors follow perceived expectations (Suchman, 1995). A normative framework is the result of an evolving process because "trust, cooperation and technical consensus" (Gunningham & Rees, 1997, p. 376) are all required; these will develop into more detailed rules as consensus grows. TAs will direct a discourse through industry guidelines and codes of practice and spread a set of values through training workshops, publications, etc. Participation in TA activities, and benefitting from services provided by the TAs, will embed members in a common understanding of industry challenges and expected responses from them.

Coercive pressure refers to the use of power to get actors to act in accordance with a new institutional logic. Coercive or regulative mechanisms are based on rules, monitoring and sanctions (or recompense) (Gunningham & Rees, 1997). Industrial self-regulation will be affected by stakeholder monitoring when actors publicly endorse the values and rules of the TAs without setting up the management systems to address these rules, or meeting the performance expectations that can be assumed by the field (Campbell, 2007; Rasche, De Bakker, & Moon, 2013). The level of effort placed on monitoring, by the TAs, speaks to the importance they place on the rules and on the trust they have in their members to comply with them. Coercive forces are based on the interest of the organisation on maintaining or acquiring resources provided by membership such as reputation or other selected benefits (Marques, 2017), avoiding social sanctions for underperforming or sharing the performance of members either in public or behind closed doors (DiMaggio & Powell, 1983; King & Lenox, 2000). Industry self-regulation of CSR is difficult to achieve without the explicit threat of some sanctions (King & Lenox, 2000); voluntary programmes with no sanctions create adverse selection or free riders problems (Lenox & Nash, 2003).

It is clear that different pressures, and their related theorisation and diffusion mechanisms, are intertwined. Mimetic mechanisms are sometimes reinforced by social or political pressures that raise the acceptance of expectations as the way to address challenges (Buchanan & Marques, 2018). Awards (a mimetic mechanism) will require the elaboration of an award scheme that might, in turn, provide a forum for the establishment of norms about which expected behaviours are rewarded (Higgins & Larrinaga, 2014). Changes in membership decisions and codes of conduct (albeit coercive mechanisms) will only be possible as a result of earlier normative forces (DiMaggio & Powell, 1983; King & Lenox, 2000). Now that we have a better understanding of the process of institutionalising CSR change in TAs, we move on to applying this theory to the study of travel TAs in relation to AW.

Study methods

Selection of travel associations

We sampled national TAs representing both outbound and inbound tourism interests. The outbound associations selected represented the 30 largest outbound markets in the world as measured by national outbound spend data (WTTC, 2018). Countries from which inbound associations were selected were chosen based on the prominence of captive animal wildlife attractions, with a particular focus on high-profile species like dolphins, elephants and tigers. This process, along with expert opinion about countries of note, allowed us to develop a list of 31 inbound countries of interest, with nine countries appearing on both the outbound and inbound country lists. For each country, we identified the primary national travel TA associated with either outbound or inbound tourism. We selected associations that serve a large segment of mainstream tourism in their country (as opposed to specialist eco-tourism associations), that were privately operated and that engaged in significant capacity building, networking and/or lobbying efforts. With the exception of Brazil, for those countries that appeared on both lists, we located separate inbound and outbound TAs. In addition, we also surveyed a selection of international and regional TAs to assess the importance given to AW in international, sustainable tourism standards and guidelines. In total, we solicited participation from 62 travel associations.

Scoping travel TAs' salience and influence, animal welfare theorisation and standards

For this study, the research required an iterative approach to sampling and data collection where each stage of data analysis determined the subsequent means of data collection (Palinkas et al., 2015), following established research guidelines for the analysis of process-based data (Langley, 1999). Initially, all 62 TAs' websites were reviewed for sustainability and AW content, and for the use of animal imagery. For websites without an English-language version, we recruited speakers of the national language to review the sites for key content and, where possible, used the Google Translate service to validate their findings.

Next, we sent a scoping survey to all 62 associations. Where no personal contact information was available, we sent a message to the TA's general contact address to solicit the contact information for appropriate staff member within the organisation. If we received no response to our first contact attempt, at least one additional solicitation was sent. Associations were also offered the opportunity to complete the survey via oral interview. Data were only analysed for the associations that answered our survey. One particular association, DRV (Germany), was not included in the survey because they declined to participate. However, it is worth noting that in 2016 they developed a two-page elephant riding handout for their members which stated that "in almost all cases the keeping of elephants for touristic purposes is not species-appropriate" and that "DRV members should critically examine the touristic offers containing elephant activities" (DRV, 2016).

The scoping survey had four short sections (see online supplement for the complete text). Section one generated a field profile of TAs according to their size, types of members and association *penetration*, defined as the share of potential membership recruited (Perry, 2009). These data were pertinent because homogenisation is considered a positive field feature that levers diffusion (DiMaggio & Powell, 1983; Strang & Meyer, 1993). Section two collected data on the role of TAs as networks, by asking about TA activities and levels of participation, as a proxy for membership *interconnectedness* (Gruen, Summers, & Acito, 2000; Perry, 2012). Interconnectedness highlights the importance of TA activities to drive membership relationships and diffuse organisational values and practices (Buchanan & Marques, 2018; Campbell, 2007; Casile & Davis-Blake, 2002; DiMaggio & Powell, 1983; Marques, 2017). Together, interconnectedness and penetration measure TA salience and influence. Section three explored the TAs' theorisation of AW, as the

level of awareness of an issue reveals the recognition of a rule failing and is a precedent of the logic for action (Casile & Davis-Blake, 2002; Greenwood et al., 2002; Strang & Meyer, 1993). *Knowledge* about an issue is central to developing awareness; this fact was assessed by asking the TAs to recognise primary AW needs in relation to Webster's Five Freedoms of Animal Welfare (Webster, 2008). *Motivation* to act on AW concerns was analysed by asking the level of concern about AW (Kokkinen, 2013). *Reasoning maturity*, which is the logic for action, was assessed by asking the TAs to justify their actions (Suchman, 1995). Finally, section four asked more specific questions about the TAs' familiarity with, and responsiveness to, AW standards and guidelines. The questions were designed to appraise the TAs' efforts to seek AW information and their subsequent policies, as per Casile and Davis-Blake (2002).

To better understand patterns in the survey data, we conducted a hierarchical cluster analysis to obtain the constructs related with AW importance, knowledge, concern and use of standards. We followed Ward's method (Ward, 1963), using a squared Euclidean distance, which is a common procedure in social science research. Data from 12 of the 18 associations were useable for our cluster analysis, as six were excluded because they were only partly completed. One TA, for example, declared "AW is not a focus of our TA" while another considered AW an important issue, but not relevant to them because, they stated, animals were well protected under national legislation and therefore they saw no need for a tourism-specific system. Some TAs had invited relevant speakers about the issue to attend their annual general meetings and provided some insights about their position on AW but they did not specifically answer the survey questions and were therefore excluded from the study.

Travel TAs' animal welfare theorisation and diffusion mechanisms

Following analysis of the scoping survey data, we conducted 25 interviews to better understand the vision, theorisation and diffusion mechanisms of the most proactive TAs with respect to captive wild animals in tourist attractions (see supplementary online materials for the complete set of interview questions), and complemented it with data from public presentations, publicly available data on TAs' websites and the ABTA Animal Welfare Guidelines. We interviewed personnel from *travel associations* (coded TA1 to TA10), *industry representatives* from companies engaged in AW (IR1 to IR5), and AW *auditors*/experts (A1 to A10). Data were not collected from interviews with ABTA staff, and the findings do not represent the views of ABTA or their employees, but those of stakeholders working closely with them.

We performed a thematic analysis of the interview data (Braun & Clarke, 2006) to collate a complete picture of the activities of TAs. Each interviewee was asked those questions from the main body of the interview guidance that were most relevant to their expertise, creating a rich mosaic of answers that allowed the validation of results across stakeholders with different experiences and positions. The overall set of questions is divided in five sections, disaggregated into a set of management system items as briefly described below. Subsequently, a scoring system was applied to allow for numerical comparison and categorisation following the convention in CSR studies (Bonilla-Priego, Font, & Pacheco, 2014; Clarkson, Li, Richardson, & Vasvari, 2008).

Section one of the survey assessed whether the TAs had defined a set of *rules or basic principles* to guide their AW decisions; the questions assessed the scope and context of these rules or principles and their accessibility to members. Section two asked about the TAs' *planning and resource allocations* towards AW to understand their levels of commitment to engaging stakeholders in the identification of AW activities and to identify how objectives and targets were set (Rasche et al., 2013). The third section asked about the *implementation* of TA activities (informing, training and assessing members on AW) to achieve set objectives. The questions asked about the types of mechanisms adopted to diffuse the AW principles, ranging from information provision in newsletters or meetings to the exertion of pressure on members (Lenox & Nash, 2003).

Also, the interviews appraised the likelihood of symbolic adoption of these rules (Behnam & MacLean, 2011) by querying the specific positions of the TAs (withdrawal, discouragement, no position, acceptance, etc.) with respect to a series of animal tourism activities (most) commonly offered by tour operators as part of their excursions and for which the literature has demonstrated negative AW and conservation impact (Moorhouse et al., 2015). In the fourth section on *checking and corrective action,* the survey evaluated how the TAs measured and monitored performance against their planned activities and how they communicated the results: (i) internally, to improve their systems, and (ii) externally, to give an account of their commitments. The fifth *revision* section addressed how the TAs assessed: (i) the suitability of the core elements of their AW systems to ensure continuous improvement, (ii) the impact of their planned activities on their members' performance, and (iii) the inputs, or changing circumstances, that led to revisions in the TAs' AW systems and the frequencies of these. [AQ2]

Results

In total, 18 of the 62 associations we targeted provided responses to our scoping survey. A one-tailed *t*-test of national-level indicators revealed significant or marginally significant differences between respondent and non-respondent countries that provided a certain degree of validity to our scoping survey. On average, respondent countries had signed a significantly greater number of environmental treaties ($t = 3.51$, $p < 0.001$) than non-respondent countries. Also, respondent countries tended to score higher than non-respondent countries on the World Economic Forum's (WEF, 2015) tourism and travel competitiveness index score ($t = 1.59$, $p < 0.10$). Similarly, respondent countries scored, on average, higher on the Environmental Protection Index (EPI, 2018) for "environmental performance" ($t = 1.36$, $p < 0.10$) and higher on Hofstede's (2018) measure of cultural individualism ($t = 1.45$, $p < 0.10$).

Our content analysis found that 21 of the 62 TAs under study had at least one page, or substantial portion thereof, dedicated to sustainability topics including salient environmental issues for the industry or country, standards or expectations for association members and/or suggestions for improving the environmental impacts of travellers themselves. Across all organisations, six had website space dedicated to the association's AW values, standards and/or guidance (Table 1). Of all 62 associations considered, 16 associations (14 inbound and 2 outbound) had websites that featured pictures of animals on publicly accessible pages, acknowledging their importance as tourist attractions. Among these 16 associations, 7 associations (all for inbound tourism) also featured substantive sustainability and/or AW information on their website.

We acknowledge the work done by the Expedition Provider's Association and the standards for safe adventures (BS8848) to introduce safety standards as part of organised adventure travel. We do not include them in our analysis because AW is an extension of customer protection, but not an integral part of the requirement for the tour operator members. We further acknowledge the Adventure Travel Trade Association (ATTA), which has in its manual "Guide Qualifications & Performance Standard" a section highlighting the role that adventure tour guides can play in safeguarding AW. This manual was not considered for the purposes of this study to be ATTA providing AW information because the standard is voluntary and it does not relate to either the association's values or the expectations for its member organisations. We also do not include the World Travel and Tourism Council (WTTC) because their campaign to fight illegal wildlife trade activities differs from a broader AW agenda.

Our results showed a low consciousness of AW amongst TAs. Whilst TAs responded that it is important or very important to keep captive wild animals in good conditions (12 out of 13), when asked to rate the quality of conditions for animals that are a part of members' tourist offer, only one raised concern over current conditions. More commonly, TAs answered that they "don't know" or in some cases "don't ask [their] members". Two of the three TAs that scored current

Table 1. A list of inbound and outbound tourism associations examined for this study.

Inbound associations

			Website		
Geographic coverage	*Association acronym*	*Responded/ valid first survey*	*Sustainability page*	*Animal welfare information*	*Wild animal pictures*
Asia Pacific	PATA	YES/YES	YES	YES	NO
Australia	TTF	NO	YES	NO	YES
Botswana	HATAB	NO	NO	NO	YES
Brazil	BRAZTOA*	NO	YES	NO	NO
Cambodia	CATA	NO	NO	NO	NO
China	CTA	NO	NO	NO	NO
Costa Rica	ACOT	NO	YES	NO	YES
Dominican Republic	ASONAHORES	NO	NO	NO	YES
Ecuador	OPTUR	YES/YES	NO	NO	YES
Greece	HATTA	NO	NO	NO	YES
India	IATO	NO	NO	NO	YES
Indonesia	ASITA	NO	NO	NO	NO
Japan	JATA	NO	YES	NO	NO
Kenya	KATO	NO	YES	NO	YES
Laos	LATA	NO	NO	NO	NO
Malaysia	MITA	NO	NO	NO	NO
Myanmar	UMTA	YES/NO	NO	NO	NO
Namibia	FENATA	NO	NO	NO	NO
Nepal	NTB	NO	NO	NO	NO
New Zealand	TIA	YES/NO	YES	NO	NO
Portugal	APAVT	YES/YES	NO	NO	NO
Russia	RATA	NO	NO	NO	YES
Rwanda	RTTA	NO	YES	NO	YES
South Africa	SATSA	YES/YES	NO	NO	YES
Sri Lanka	SLAITO	NO	NO	NO	NO
Tanzania	TATO	NO	NO	NO	YES
Thailand	ATTA**	NO	NO	NO	YES
Turkey	TURSAB	NO	NO	NO	NO
Uganda	AUTO	NO	NO	NO	YES
UK	UK Inbound	NO	NO	NO	NO
USA	USTA	NO	NO	NO	NO
Zimbabwe	AZTA	NO	NO	NO	NO

Outbound associations

			Website		
Geographic coverage	*Assoc. name*	*Responded/ valid first survey*	*Sustainability page*	*Animal welfare information*	*Wild animal pictures*
Australia	CATO	NO	NO	NO	NO
Austria	ORV	NO	YES	NO	NO
Belgium	ABTO	NO	NO	NO	NO
Brazil	BRAZTOA*	NO	YES	NO	NO
Canada	CATO	NO	YES	NO	NO
China	CATS	YES/YES	YES	NO	NO
Denmark	DRF	YES/YES	NO	NO	NO
Europe	ECTAA	YES/NO	NO	NO	NO
France	SETO	YES/NO	NO	NO	NO
Germany	DRV	NO	YES	YES	NO
Global	WTTC	YES/NO	YES	NO	NO
Global	GSTC	YES/YES	YES	YES	NO
Global	ATTA**	YES/YES	YES	NO	NO
Global	CLIA	NO	YES	NO	NO
Hong Kong	OTOA	NO	NO	NO	NO
India	OTOAI	NO	NO	NO	NO
Italy	ASTOI	NO	NO	NO	NO
Japan	OTOA	NO	NO	NO	NO
Kuwait	KTTAA	NO	NO	NO	NO
Malaysia	MATTA	NO	NO	NO	NO
Mexico	AMAV	NO	NO	NO	NO

(*continued*)

Table 1. Continued.

Inbound associations

Geographic coverage	*Association acronym*	*Responded/ valid first survey*	Website: *Sustainability page*	Website: *Animal welfare information*	Website: *Wild animal pictures*
Netherlands	ANVR	YES/YES	YES	YES	NO
Norway	Virke	YES/YES	NO	NO	NO
Russia	ATOR	NO	NO	NO	NO
Singapore	SOTAA	NO	NO	NO	NO
South Korea	KATA	NO	NO	NO	NO
Spain	ACAVe***	YES/YES	NO	NO	NO
Sweden	SRF	NO	YES	YES	YES
Switzerland	SRV	YES/NO	YES	NO	NO
UK	ABTA	YES/YES	YES	YES	NO
USA	USTOA	NO	NO	NO	YES

For each association, information about their responsiveness to the first survey, as well as the sustainability and animal welfare information contained on their official websites, is given. We were unable to identify a suitable organisation for the United Arab Emirates, Saudi Arabia or Taiwan (outbound), or for Mexico or Cuba (inbound). *Brazil has one TA representing both inbound and outbound markets. ** The acronym ATTA is used for two different associations in this table: the Adventure Travel Trade Association, and the Association of Thai Travel Agencies in this table. All ATTA references in the text of this report refer to the Adventure Travel Trade Association. ***No national organisation was identified for Spain so the only regional association represented in the European Travel Agents and Tour Operators Association (ECTAA) was selected.

AW conditions as "very good" had the lowest scores on AW knowledge, while the third TA stated "very good" but clarified that "few of our members engage in captive wild animals activities", despite substantial evidence from that TA's members' websites of the contrary. One TA returned the survey blank, except for "AW is not a focus issue of our TA", despite wild animals being a key source of tourist revenue in their country. These results may be explained by the limited knowledge of the importance of animals in the supply chain of their members, despite evidence that one in four people come in contact with animals during their holiday with an ABTA member (Jenkinson & Felton, 2018), which is a statistic likely to be similar for other countries (Moorhouse et al., 2015).

Cluster analysis

The cluster analysis of scoping surveys allowed us to identify four groups (Table 2) and to better understand the attitude-behaviour progression in TAs towards AW. We caution against passing judgment on any of these respondents, who have at least acknowledged the importance of AW enough to participate in this survey.

The first group acknowledged *importance*: two national TAs that rated AW as highly important, stating AW as "very good", and yet they demonstrated very poor AW knowledge. One TA was reviewing guidelines and the possibility of assessing its members, while the other did not consider such actions to be necessary as AW is "not a shared problem in the industry". Members of the second group had four TAs (three national, one international) had gained some *knowledge* about AW, as they scored high on both importance of AW conditions and knowledge of their essential needs, shared information and cases of good practice (mimetic isomorphism), but they did not require their members either to be assessed or to endorse a standard.

The third group publicly acknowledged *concern,* and consisted of three associations (two national, one international) that had no plans to assess their member's AW conditions but rather to identify or develop guidelines that members would be able to use in the short or medium term, which could be interpreted as steps towards normative isomorphism. Only the international organisation had initiated activities to inform its members about AW best practices and the interview respondents said they were working to develop standards for elephant camps (A3, A4, TA8). The most advanced group introduced *standards* to measure performance of members (coercive isomorphism). This group was composed of two national and one international

Table 2. TA clusters from scoping survey.

	Importance	Knowledge	Concern	Standards
Group 1	High	Low	Low	Low
Group 2	High	High	Low	Low
Group 3	High	High	Med	Med
Group 4	High	High	Med	High

association, which required their members to follow an AW standard. One TA followed ABTA's AW guidelines and complemented these with their own list of "unacceptable activities". The international association required members to follow broad guidelines for specific tourism activities involving captive wildlife. The third association is currently researching the feasibility of membership AW standards, the outcomes of which are not available at the time of publishing this article.

Travel TAs' animal welfare theorisation and diffusion mechanisms

At the time of the study, only three TAs were conducting sufficient AW activities to warrant a detailed study on AW theorisation and diffusion mechanisms: ABTA (UK), the Dutch Association of Travel Agents and Tour Operators - ANVR (Netherlands) and the Global Sustainable Tourism Council- GSTC (international). These TAs were therefore the centre of attention of most of our interviews. The other TAs either stated intentions, or were at early stages of developing their AW visions and theorisation practices. Their differing approaches, as summarised in Table 3 and explained in the following paragraphs, show how institutional change is dependent on the organisational fields' conditions. The purpose here is not to critique individual TAs, but to gain an understanding of the activities undertaken by TAs that have taken the risk of being leaders in what is a highly complex topic.

In 2013, ABTA and the international wildlife charity The Born Free Foundation collaborated to develop the first and only industry guide on AW: the comprehensive, seven-volume, 357-page "*Global Welfare Guidance for Animals in Tourism"* (commonly referred to as ABTA AW guidelines), with the titles Global Welfare Guidance for Animals in Tourism, Animals in Captive Environments, Dolphins in Captive Environments, Elephants in Captive Environments, Wildlife Viewing, Working Animals, and Unacceptable and Discouraged Practices. The guidelines were the result of substantial engagement with over 200 stakeholders (A1, A10, Jenkinson & Felton, 2018). ABTA is well positioned to develop these guidelines as it has more than 1200 members and a dedicated "Destinations and Sustainability" team (ABTA, 2018b). Hence, it has long cultivated a reputation for leadership and has developed a variety of tools, including the Travelife system, to audit sustainability in hotels. The guidelines have become the key institutional, entrepreneurship articles, acknowledged as *the* reference documents by most of the international and national associations interviewed in this study. The guidelines legitimise the vision of more ethical methods of engaging with animals as a commercially viable proposition, even though tour operators have substantial income from excursions that do not meet AW standards (A6, A7, A9, A10). Tour operators and auditors alike highly value the guidelines but they need consistent implementation tools and, at the time of this study, only pioneering companies were making the investment of developing their own (A1, A2, A5, A6, IR2, IR3, IR4, IR5). Additionally, the guidelines are being challenged by pressure groups as captive environments and direct human-animal interactions (allowed by the guidelines) have negative welfare effects for wild animals (A7, A8, A9, Baram, 2015; De Waal, 2016).

ABTA's "Animals in tourism" web page (2018a) recognises that "there is the potential that such attractions can jeopardise animal welfare or the customer experience". However, the recognition of responsibility is weak and expressed in passive form, saying that this can occur "where such attractions are not carefully managed or do not exhibit best practice". ABTA states that "by choosing to book a holiday with an ABTA Member, you're helping to raise and uphold

Table 3. AW management systems.

	ABTA (%) 42	ANVR (%) 60	GSTC (%) 30
A.AW BASIC PRINCIPLES	*80*	*100*	*60*
Existence of principles	100	100	100
Scope and context	60	100	20
B.PLANNING	*67*	*77*	*77*
Stakeholder identification and engagement	75	67	83
Legal requirements and standards	50	75	25
Process to identify relevant activities	50	100	88
Setting objectives and targets	83	67	83
C.IMPLEMENTATION	*31*	*67*	*2*
C.1.Informing	83	100	50
Information practices	100	100	100
Information content	71	100	14
C.2.Training	71	88	0
Raising members' capacities	29	71	0
Training practices	100	100	0
Training content	100	100	0
C.3.Assessing	10	0	90
Degree of requirement of assessment	33	0	100
Assessment method and standards used	0	0	86
C.4.Participation in other AW activities	100	33	0
C.5.Standard criteria	50	100	5
D. CHECKING AND CORRECTIVE ACTION	*50*	*42*	*0*
Monitoring outputs and outcomes of activities implemented	67	67	0
Monitoring impact	0	0	0
Reporting progress	67	50	0
E. MANAGEMENT REVISION	*28*	*0*	*80*
Frequency of the revision	25	0	50
Content of the revision: management's components	25	0	100
Content of the revision: activities provided to members	67	0	67
Inputs for the revision	75	0	100

animal welfare standards across the whole tourism industry", a misleading message when few members apply the guidelines and ABTA does not intend to monitor members' implementation. As ABTA does not punctuate the problem as important, the reasons to act are not imperative, but secondary as they clearly say in their website that "there is always room for improvement". Moreover, surprisingly, they use the same reasoning as those TAs that did not initiate any AW practices. However, ABTA does recognise a risk linked to market demands and punishments, and this is the theorisation used to encourage action. A motivational framing emphasises individual benefits linked to potential market demand in its website: "A 2017 ComRes survey found that 71% of respondents would be more likely to buy from a travel company that cares for animals".

Turning now to a different TA – ANVR (Netherlands) has about 200 members and has one member of staff that combines sustainability with their other duties, and yet they have made high-level CSR assessments a membership requirement since 2004. Some of its members were early adopters of AW standards, as was the case with TUI Netherlands, which banned elephant riding in 2010 and saw this action as an opportunity to influence their TAs and create a level playing field (IR1). ANVR has a long-standing cooperation with ABTA to coordinate CSR actions (TA2) although the actual implementation varies. ANVR leased ABTA's AW guidelines and adapted them as their own standard, while making participation compulsory. Following the advice of "knowledge-partner" NGOs in early 2016, ANVR launched an "Addendum of Unacceptable Practices Regarding Animals in Tourism", taking a more definitive position on certain ambiguities in ABTA's guidelines. ANVR categorised most captive wildlife tourist practices as unacceptable and developed operational documents to ease the implementation of this Addendum. ANVR's position is gaining influence amongst some tourism actors (Tourism Edition, 2018).

ANVR's recognition of the need to improve AW conditions is more evident than ABTA's, as it acknowledges that in some cases "attractions have emerged which are known to be detrimental to the welfare of animals, exploitative and present risks to customers". ANVR's diagnostic framing (ANVR, 2013) acknowledges its responsibility towards sustainability: "we must try…". Its solutions and strategies mainly come from an inclusion of AW in its CSR policy, plus making ABTA's guidelines available to all its members and putting the guidelines into workable actions and trainings. ANVR also emphasises ethical reasons in their framing: "members are familiar with every aspect of running a sustainable tourism company", which highlights its values as a "travel trade association with strong commitments to sustainability…"

GSTC manages the global standards for sustainable tourism and acts as the international accreditation body for sustainable tourism certification. In 2016, GSTC introduced three criteria on wildlife interactions, AW and wildlife harvesting and trade within their much broader Global Sustainable Tourism criteria. Such changes have a cascade effect on the organisations that they certify (standard owners and certification bodies), but GSTC does not specify how the changes should be implemented (TA5, TA9, TA10). GSTC does not have a rationale for their approach to AW specified on their website (GSTC, 2018). However, it does recognise the generally poor conditions in which animals are held in touristic attractions and provides a diagnosis of the situation that was developed in collaboration with different actors, including big industry players, and refers to the state of public awareness on AW. Their statement makes suggestions on conditions that require improvement. GSTC considers its members to be in a "good starting position" as they already have "a sense of care" and AW standards are included in the TAs criteria, but those standards are still very non-specific (e.g. "housing, care and handling… meets the highest standards of animal welfare").

Our work indicates that ABTA's AW guidelines are a substantial collective effort ahead of other TAs and most tour operators, but are less advanced than the expectations or practices of NGOs and certain industry leaders (IR1, IR4, A6, A7, A8, A10). In order to achieve industry consensus, the guidelines themselves are a necessary compromise, which has however led to language open to interpretation (A1, A2, A3, A4, A6) and without enforcement within ABTA's membership (IR2, IR3, IR5, A1, A2, A3, A6, A10). Hence, ABTA scores high on items that relate to development of the guidelines (Table 3.A: AW basic principles) and engagement of stakeholders (Table 3.B: Planning); engagement has historically been a strength of the organisation (IR2, IR3, IR5, A10). However, ABTA's total score is low because its guidelines are voluntary for members (Table 3.A. AW Basic Principles) and the guidelines do not lend themselves to continuous improvement (Table 3.A) nor do they incorporate AW legislation (Table 3.B: Planning). ABTA was keen to emphasise that these are *good practice guidelines* and not *standards* (Jenkinson, 2018). Also, that they were developed for information purposes, as part of its support role for its members, and not for auditing purposes (A10), which is consistent with ABTA's position in other sustainability issues such as volunteer tourism (A1, A2, A5). In contrast to ABTA, and to the best of our knowledge, ANVR is the only mainstream national tourism association in the world that makes some form of CSR reporting (including reporting on AW considerations) a mandatory membership requirement (IR1, TA2). Finally, GSTC has substantially lower AW criteria than the other two TAs discussed (for example, it does not have any site or species specific criteria) but it does have systems in place to ensure that stakeholder consensus on the standards is transparent and robust (Table 3.A: AW basic principles and Table 3.B: Planning).

All three TAs score high on information practices. ABTA and ANVR score similarly on information content (ANVR mostly uses ABTA's information, plus additional tools to recognise acceptable practices) while GSTC has limited information (Table 3.C1: Informing). ABTA's training is voluntary and requires payment, while ANVR's is less detailed but compulsory and free, and GSTC does not provide any AW specific training (Table 3.C2: Training). ABTA recommends (but does not enforce) that their members develop a system to measure AW in their supply chain and AVNR is, temporarily, using feedback provided by NGOs about the AW practices of its members (hence the zero

score, despite high level CSR reporting practices), while GSTC has a robust system of ensuring that (minimal) AW criteria are included in sustainability standards used by certification bodies (Table 3.C3: Assessing). Because of issuing the guidelines, ABTA has a broader reach in AW activities than ANVR or GSTC (Table 3.C4: Participation in other AW activities).

The main differences between these three TAs stem from the actual content of their standards when applied in relation to captive wild animal attractions (Table 3.C5: Standard criteria). One of ABTA's seven AW guidance manuals specifically articulates which activities are termed *Unacceptable* and *Discouraged*; it states that "animal performances based on unnatural behaviours and shows where training methods compromise welfare" are *unacceptable* (ABTA, 2013c, p. 6). However, its definition of "unnatural behaviour" is contestable, for example, dolphins jump in the wild, but this is not equivalent to jumping in a show (A6, A8). In another example of the detail included, it states that contact sessions with whales and dolphins are allowed but "should be limited to 30 mins, with a maximum of four sessions per day per animal, with at least one hour of rest" (ABTA, 2013a, p. 27). Physical interactions with elephants are *discouraged* due to risks to the health and safety of the public and the animals (ABTA, 2013b, p. 24). In contrast, ANVR takes the position that if something is to be *discouraged* then it ought to be *unacceptable*; a moral, as well as a pragmatic, decision made in part due to their limited resources to identify the boundary between the two categories. For its part, GSTC only specifically mentions elephant interactions as *discouraged*.

Different theorisation on AW is clear in the narratives behind Table 3.C5 *Standard criteria*. Interviewees emphasised the need for evidence-based AW guidelines, but disagreed on what is real and what is made-up evidence. Further analysis is required to identify the scientific proof behind guidelines and standards. All TAs rely on expert consultations, which can be influenced by those stakeholders with lobbying interests and resources. This is evident in how interviewees anchored their answers to their preconceived ideas, including comments such as "animals need to earn their keep" (TA8), "these are cultural activities, we cannot have a bunch of Caucasian guys telling them what to do" (TA6), "elephants in Asia can no longer live in the wild" (TA6), "there is no harm to elephants from being ridden when this is done properly" (A3, A4) and "all wild animals ought to be free" (IR1, IR3, IR4, TA2, TA4, A6). There are accusations of industry profiteering from endangered animals (TA4, A6, A10) and NGOs fundraising on spurious campaigns (A3, A4, A10), which show the complexity involved in reaching consensus, let alone developing auditable standards. At present, only a handful of tour operators have devised methods to audit their supply chains and these differ in their interpretation of the guidelines and their audit processes (IR1, IR2, IR3, IR4, A1, A2, A3, A4, A5, A10).

Finally, the last two sections of the analysis focused on the TAs' management systems for *Checking and corrective action* and *Management revision* (Table 3.D and 3.E, respectively). Both ABTA and ANVR record data on the types of activities implemented and members taking part. Both broadly report on progress. ABTA, for example, shares cases of good practice from seven of its members on its website (ABTA, 2018a); a practice that was criticised during the interviews as trying to attribute progress to the TA instead of to the tour operators, which claim to engage in these practices on their own initiative (IR2, IR3, IR4, IR5). GSTC will only be able to start recording progress against its updated criteria (including AW) towards the end of 2018.

In terms of *Management revision* (Table 3.E), ABTA has some systems in place to update its guidelines, but has chosen to prioritise its efforts on implementation of the current version and updating its position about AW issues "when knowledge about species shows new evidence" (Jenkinson, 2018). However, they have been criticised by stakeholders demanding more regular and transparent updates (A6, A7, A8). Born Free states that their involvement with ABTA in developing the AW guidelines was on the basis of an understanding that this was a first (very low) step to achieve broad industry engagement that would lead to quick progression in industry performance and standards, and subsequent revisions of the guidance provided (A7). Progress in this regard has been slow, and Born Free considers that, in their current form, the

AW guidelines do not align sufficiently with the organisation's priorities for animals. At the point that progress is demonstrated, Born Free remains willing to re-engage (A7). With regard to ABTA's consultations for the development of AW auditing checklists, both Born Free and World Animal Protection have declined an invitation to take part (A7, A8). Finally, for the other two TAs, ANVR relies entirely on ABTA to update its AW guidelines and, therefore, scores low but GSTC scores high as it has well developed systems in place to review its principles and criteria, its organisational structure and the information that it provides to its members (despite their limited AW content).

Discussion

The media coverage of the killing of Cecil the lion (Macdonald, Jacobsen, Burnham, Johnson, & Loveridge, 2016) or the documentary Blackfish about a SeaWorld orca (Burford & Schutten, 2017) are jolts that reflect the increasing importance of animal welfare and conservation to the public (van Eeden, Dickman, Ritchie, & Newsome, 2017). Consequently, there has been greater scrutiny of the tourism industry, created by NGO campaigns that have raised consumer awareness of AW concerns and targeted big travel companies (A1, A2, IR1, IR2, IR5), because the media latches on to the worst cases, and makes it look representative of all cases (TA6, A10). The firms that were targeted felt they had a reputational risk from not having evidence about AW in their supply chain and therefore requested their TAs to develop a collective response (A9, IR2). However, pragmatically, TAs prefer to work on topics for which there are clear win-win solutions (TA6), which is not the case for here as selling activities with poor AW is highly profitable (A10).

Despite these jolts, the current institutional logic continues to be that wild animals can be used for human entertainment (A9, Fennell, 2013). The low level of engagement in AW by tourism TAs suggests that NGOs are not sufficiently coordinated to make their demands salient and indicates that most TAs are well organised to withstand criticisms to their institutional logic (Barnett, 2006). This section contributes to the development of IT by responding to the call for comparative analyses in institutional entrepreneurial change (Battilana et al., 2009), in four ways. We study (i) the intentionality of institutional entrepreneurs, (ii) and how they mobilise resources to gain acceptance for their visions, (iii) the process of theorisation and diffusion deployed with these resources, and (iv) the feasibility of industry self-regulation.

Institutional entrepreneurship and intentionality

As "new institutions arise when organized actors with sufficient resources see in them an opportunity to realize interests that they value highly" (DiMaggio, 1988, p.14), it is important to understand reasoning maturity (DiMaggio & Powell, 1983; Suchman, 1995) and, consequentially, *intentionality* (Battilana et al., 2009). The introduction of voluntary, and low, requirements makes these TAs unintentional institutional entrepreneurs, since the changes that they initiate, and actively participate in promoting, are not divergent (Battilana et al., 2009). Academics have problematised the institutions' acting based on a reputational risk management and business case logic (Carr & Broom, 2018), yet TAs will naturally follow non-threatening approaches to promote change (Battilana et al., 2009; Strang & Meyer, 1993). Jolts precipitate efforts by TAs (for example, ABTA and PATA, albeit in different ways) to maintain their legitimacy within their members (Campbell, 2007; Gunningham & Rees, 1997), which can be used to protect the status quo (Gunderson, 2003; in Fennell, Plummer, & Marschke, 2008).[AQ3] ABTA introduced voluntary and ambiguous guidelines that were not intended to be standards (A1, A2, A5, A10), while PATA's planned certification standards in responsible elephant riding will have lower standards than ABTA's AW guidelines recommend and, moreover, will contravene ANVR's ban on elephant riding (TA2). IT literature would say that current AW engagement is deliberately posturing to stall

progress and allow the industry to adjust at its own pace (Bertels & Peloza, 2008; Deephouse & Suchman, 2008).

By emphasising intentionality, IT gives little attention to the unintended consequences of actions, which are important components of the reproduction of institutions (Garud et al., 2007) and should not be overlooked. The larger tour operators have become "institutional intermediaries" after: (i) becoming the target of campaigns by NGOs, (ii) co-opting the NGO's language, and, in so doing, (iii) theorising AW behaviour for others (A3, A4, Strang & Meyer, 1993). We see evidence of how ABTA's AW guidelines are now informing the position of other European TAs (in particular in source markets dominated by TUI and Thomas Cook) that are aiming for consistent operating procedures, as reported by Buchanan and Marques (2018) in the chemical sector. As TAs are normative institutions, the eventual result can be that TA mechanisms legitimise the approaches of their larger members (Barnett, 2013).

Mobilisation of resources

We reflect on how TAs operationalise their vision for change by mobilising their *resources,* particularly their financial and social positions (Battilana et al., 2009). Our findings confirm that the level of penetration of an association (Perry, 2009), and the interconnectedness of its members (Gruen et al., 2000; Perry, 2012), are both factors that influence its ability to introduce institutional changes. ABTA, ANVR and DRV, for example, all have high levels of tour operator membership and levels of participation that enable them to affect changes. The experience of ECTAA and some of the TAs of surveyed Nordic European countries is consistent with the corollary proposition that TAs with low membership struggle to introduce sustainability agendas. Also, international voluntary organisations, such as WTTC and PATA, have publicly visible, but loosely defined, AW approaches that celebrate good practice (IR3, TA8, A9). These findings confirm how the different governance structures of each TA result in different sustainability practices that are designed to preserve the institution's order (Dacin, Goodstein, & Scott, 2002), best exemplified below in our analysis of ABTA, ANVR and GSTC.

ABTA (2018b) has the membership mandate, and has allocated the funds, to act; it has staff allocated to sustainability activities and experience in developing sustainable supply chain tools. This goes far beyond what we have seen in other travel TAs elsewhere. Its former strategic alliance with Born Free was both a source of knowledge and technical AW expertise and a source of legitimacy within conservationists, AW groups and the tourism industry alike. However, ABTA shows that their established values prevail in: (i) their voluntary approach to introducing AW practices, (ii) the lack of specificity of their guidance, which has an emphasis on informational guidelines not auditable standards, and (iii) the vagueness of their language, for example, framing the issue as "where such attractions are not carefully managed or do not exhibit best practice", "there is always room for improvement", and limiting TAs' responsibility with words like "we can help… tourism should…". This approach could be interpreted as a use of uncertainty to protect the status quo and influence policy (Gunderson, 2003; in Fennell, Plummer, & Marschke, 2008), arguably because the sale of animal excursions is highly profitable for tour operators, and travel TAs do not see themselves as able to enforce AW standards (A6, A7, A10). We therefore find that the allocation of resources to AW diffusion is in keeping with the resources dedicated to, and the organisational strengths and weaknesses of, their own institutional arrangements for other aspects of sustainability (Deephouse & Suchman, 2008; Lenox & Nash, 2003).

Theorisation and diffusion

We compare how different forms of *theorisation* provide new rules with legitimacy, before these rules can be diffused (Tolbert & Zucker, 1983). We find that most AW actions are not divergent

and that the theorisation is designed to protect members from external reputational risks, without undermining their core businesses (A5, A9, A10, Fennell, 2013). For example, WTTC mimics the airline industry as part of its efforts to fight illegal wildlife trade (IATA, 2018), PATA protects the interests of its major members in elephant tourism (A3, A4, A9, TA8), and SATSA responds to public backlash generated, for example, by the film Blood Lions (T7). In highly structured fields, TAs can control the rhetoric of change and direct it to manoeuvre members towards subtle, but progressive, change that maintains the legitimacy of the TA (Barnett, 2006; Suddaby & Greenwood, 2005) because actors have seriously limited self-efficacy about their ability to do things differently (Battilana et al., 2009). However, fields with distributed brokerage, where campaigners and incumbents co-opt each other, generate greater levels of self-efficacy and, with it, innovation (van Wijk et al., 2013).

The TAs showcase the achievements of frontrunners as if they were: (i) attributable to the TA not the individual member, and (ii) representative of all of the TA's membership. In the case of ABTA, this is beginning to unravel; it is believed that only the seven (large) companies (out of 1200 members) highlighted in the ABTA website are active in AW (A1, A2, A6, IR1, IR2, IR3, IR5), despite language suggesting that these members are illustrative of all members: "See some great examples below of how ABTA members are helping to safeguard animal welfare" (ABTA, 2018a). Born Free had expected that the collaboration with ABTA would mean an acceleration of the pace of implementation that would make up for a temporary dilution of the radicalness of the innovation (A8, van Wijk et al., 2013).

A TA's stance to protect its incumbents or to engage with AW challengers will depend on the level of institutionalisation of its other dimensions of sustainability (Deephouse & Suchman, 2008; Greenwood et al., 2002). TAs develop sustainability identities that resonate with their memberships (Barnett, 2006; Battilana et al., 2009; Strang & Meyer, 1993). ABTA adopts a pragmatic legitimisation discourse of market rewards in response to engaging with their AW guidelines, whereas ANVR and GSTC adopt discourses that normalise AW. It is worth remembering that most of the TAs approached at the start of this study simply ignored the need to engage in AW altogether. Importantly, diffusion that is only based on mimetic isomorphism is slow (as in the case of ABTA, WTTC, PATA and any of the associations that do not require minimum standards), especially considering the generally low understanding of AW by tourists (Moorhouse et al., 2015).

Industry self-regulation

This study contributes to understanding what conditions must arise for an industrial morality to develop in a self-regulated industry (Gunningham & Rees, 1997). We find that mimetic, cognitive and normative pressures, coupled with self-regulation, have a greater ability to affect changes than coercive mechanisms alone (Buchanan & Marques, 2018; Dacin et al., 2002) because these result in a greater shared understanding and sense of purpose (Campbell, 2007; Scharmer, 2009). However, industry self-regulation is unlikely without the explicit threat of some sanctions (A10, King & Lenox, 2000). Actors prefer "well-organized and effective industrial self-regulation in place to ensure such behaviour, particularly if it is based on the perceived threat of state intervention or broader industrial crisis and if the state provides support for this form of industrial governance" (Campbell, 2007, p. 956). This is because corporations are predisposed to follow deontological ethics, that is following rules or principles (in our case AW guidelines and standards) that remove uncertainty from decision making (Fennell, 2018; Fennell et al., 2008). This way corporations avoid having to wrestle with the ethics of their actions, as the compliance with guidelines and standards externally set gives them the comfort of certainty (Fennell, 2018; Saul, 2001). ANVR showed that the creation of a flexible, but compulsory, CSR reporting framework provided a balance of threat and solution to engage incumbents (van Wijk et al., 2013). The urgency of

protecting captive wild animals, and the impact this has towards the survival of endangered species (Fennell, 2011), makes it poignant to identify methods of industry wide transparency and comparability to ratchet up standards (Bertels & Peloza, 2008).

The TAs studied show how the journey from reflexivity to theorisation is complex. Also, that travel companies that have made public statements about AW often lack resources to implement them consistently throughout their supply chain (Which? Travel, 2018). ABTA, for example, faces reputational risks from the bulk of its members not engaging with its own guidelines (A7, A10). On the one hand, it is expected that those that promote a standard most likely already comply with it and, as a result of this, automatically gain legitimacy advantages and enhancement of their institutions (Smets & Reihlen, 2012). On the other hand, public acknowledgement of norms may be seen as posturing, or it may be argued that making such public statements is part of a developmental process of change towards internalising new values (Gunningham & Rees, 1997; Scharmer & Kaufer, 2013; van Wijk et al., 2013).

Conclusions

Trade associations have both the technical capacity and moral responsibility to: (i) develop industry consensus in relation to social responsibility issues, (ii) inform and raise their members' capacities in this area and (iii) enforce scientifically rigorous standards without hindering competition (Marques, 2017). TAs argue that, even with the best intentions for positive action, they have limited resources for CSR, which need to be spread across a wide range of topics, and that they ought to start with those for which there is membership buy-in (TA4, TA6, TA8). A progressive adoption of AW practices will result in cognitive legitimacy and the development of supporting infrastructure, such as codified knowledge and evaluation systems that articulate (and then enforce) social prescriptions (Greenwood et al., 2015). However, as our study shows, because of the inherent difficulties in improving performance, TAs often choose instead to manage stakeholder perceptions, develop lobbying strategies and co-opt threatening stakeholders, often to introduce considerably lower industry requirements (Fennell, 2018; King, Lenox, & Barnett, 2002). Our comparative analysis confirms that the meaning of welfare is utilitarian and context-specific, and that an acceptance of responsibility towards sustainability and AW is still rare (Fennell, 2012).

We illustrate how institutions have shared cognitive frames that respond to agency, interests and power, and we corroborate that IT is an appropriate framework to study contested issues such as AW (Buller & Morris, 2003; Cousquer, 2018; Fennell, 2013). We reflect on multiple mimetic, normative and coercive pressures that influence the uptake of AW practices. We agree with Buchanan and Marques (2018) that the most powerful (but also slowest) pressure that TAs can place on their members is cognitive, that is, influencing their world-views about the importance of different issues in society, typically through normative and regulative nudging. Only after these normative pressures are applied, is it possible for TAs to successfully introduce regulatory pressure. There is a compromise between speed and depth of CSR structural changes at an industry level, as seen in the analysis of ANVR (van Wijk et al., 2013). There needs to be a balance between allowing suppliers of animal tourism facilities time to upgrade their infrastructures (Carr & Broom, 2018) and introducing TA mechanisms for public relations (Bertels & Peloza, 2008; King & Lenox, 2000).

The limitations of this study could be addressed through further research. The use of a single theory (IT) and an exploratory comparative analysis of multiple TAs is only a starting point that leaves most questions unanswered. First, further research ought to delve deeper into individual TAs, to understand the contextual conditions that have led to the current detachment between tourism stakeholders, and to promote meaningful stakeholder collaboration (Cousquer, 2018). Second, the study of specialist TAs that define themselves by CSR values is likely to generate

alternative institutional entrepreneurship and theorisation approaches, as well as institutionalisation mechanisms. Third, it is also worth studying the introduction of CSR as a by-product of health and safety, consumer protection and quality arguments, particularly in relation to BS8848, the Expedition Providers Association and ATTA. Fourth, while IT has facilitated an understanding of the current situation, it is necessary to consider how academics can be more active promoters of sustainability change (Melissen & Koens, 2016), including the ethics of animal tourism (Fennell, 2013). Finally, academics ought to consider theories, tools and techniques that lend themselves to create change (Cameron & Green, 2015), of which we highlight the potential of Theory U to allow tourism stakeholders to engage in a genuine meeting, attentive listening and dialogue.

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No potential conflict of interest was reported by the authors.

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