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## **The Impacts of China's Policymaking and Legislation on Outbound Tourism – Perspectives from Long-haul Intermediaries**

### **Abstract**

This paper provides an overview of the development of tourism policy and legislation in China. Based on this historical background and on interviews with 21 intermediaries in China, the paper presents a qualitative investigation of the impact of policymaking and legislation on long haul China outbound travel. The study seeks insights into the top-of-mind issues experienced by the intermediaries in relation to Chinese tourism legislation and policy-making. It generates insights about the concerns (or in some cases the lack thereof) of these intermediaries, regarding Chinese tourism policy and legislation. Some intermediaries are largely oblivious to and unconcerned about tourism legislation, while others have been impelled to undertake substantial changes to their business operations because of it. The Tourism Law of the People's Republic of China was found to be of little importance. This is especially the case when it is compared with the anti-corruption campaign and its intended or unintended impacts on China outbound tourism. Finally, the study reveals that in addition to official policy and legislation, tourism intermediaries are also affected by unofficial politically motivated decrees issued by the Chinese government.

### **Keywords:**

China outbound tourism, Chinese tourism, tourism policy, tourism legislation, tourism intermediary, Approved Destination Status

## **Introduction**

Policy and legislation have played key roles in the development of China outbound tourism (Huang, 2010; Mak, 2013), as evidenced by the fact that China is one of the few countries to have enacted a policy on outbound tourism (Tse, 2011). Whereas outbound tourism in other markets is primarily market-driven, it is evident that market forces in China must accept and react to policies and legislation such as the Approved Destination Status (ADS) Scheme, the Travel Agency Act, and the recent Tourism Law of the People's Republic of China. Although such political measures play a continuing role in shaping and affecting Chinese outbound tourism, minimal relevant research has been conducted on this topic.

This paper presents a qualitative investigation of the impacts of policymaking and legislation on long haul outbound travel from China. The researchers interviewed 21 intermediaries, including representatives of Chinese tour operators, wholesalers, incoming bureaus, and tour leaders in China's long haul outbound tourism industry. The study seeks insights into the issues that tourism intermediaries experience relating to policy and legislation. The purpose of the paper is therefore not to present generalizable facts about certain aspects of Chinese legislation and policy making, but to exploratively investigate how it impacts long haul outbound tourism from China, according to the intermediaries who work with these issues on a daily basis. Within this exploratory frame, the present paper explores aspects that have received little attention in research and points to aspects that should merit further scrutiny from researchers.

The paper first provides an overview of the development of tourism relevant policy and legislation in China. This overview informs the reader about relevant aspects of policy and legislation in China outbound tourism, and provides important context for the analysis that was

undertaken by the researchers. The methodology is then presented, followed by the study findings. These are separated into four sections, each covering an aspect of policy and legislation in China outbound tourism that emerged from the data analysis. These aspects are respectively: the effects of general policy, the effects of tourism policy, the effects of the “Chinese Tourism Law” specifically, and, the effects of unofficial decrees made by the Chinese government. Finally, the study findings and directions for future research are presented in the conclusion.

### **Tourism Policy and Legislation in China**

Tsang and Hsu (2011) have described development of the Chinese tourism industry as happening over three main stages. The first stage paralleled the formation of the People’s Republic of China between 1949 and 1978. Through this period, China’s tourism primarily served political purposes, namely to advance the achievements of Socialist China and establish international understanding and friendship (Huang, 2010; Tsang & Hsu, 2011). The second stage, from 1978 to 1985 began with the adoption of economic reform policy in 1978. This extended the purpose and natures of tourism from an exclusive focus on the political to incorporate economical aspirations. This stage ended with China’s adherence to the United Nations World Tourism Organization (UNWTO) in 1983. The third stage from 1986 to the present day witnessed the inclusion of tourism within the Seventh Five-year National Plan as a key component of economic and social development. The interconnectedness between policymaking and development in the Chinese tourism sector becomes evident when these development stages are compared with Tang's (2017) account of the development of tourism policy in China from 1949 to 2013. Tang (2017) proposes a conceptualisation of China’s tourism policy development into four phases. The first phase preceded China’s reform and opening up. During this initial phase, tourism

policies aimed to standardise and promote domestic travel by foreign immigrants and to support the exit and entry of foreigners. In the second phase, the focus changed to generation of foreign exchange through international tourism. As part of this, various policy initiatives were carried out to facilitate issuing of visas and other travel related services. In the third phase, domestic tourism was recognized for its ability to help boost internal demand for goods and services; policies were therefore centred on the domestic aspect of tourism. The fourth phase began with the 12<sup>th</sup> Five Year Plan in 2009, which ushered the embrace of a more holistic view of society and the economy, with tourism regarded as an important part. China's tourism industry has subsequently been regarded as an important economic and social function.

### ***Policy and Legislation on Outbound Tourism***

China's first administrative legislation regarding outbound tourism The Travel Agency Act: Provisional Regulations on the Administration of Travel was promulgated by the State Council in 1985 (Huang, 2010). Permission was granted for some outbound travel to certain Asian countries in 1990 and extended in 1995 (Guo, Seongseop Kim, & Timothy, 2007). The act was revised and renamed Regulations on the Administration of Travel Agencies in 1996. This act defined two types of travel agency: International travel agencies, which could operate inbound, outbound and domestic tourism; and domestic travel agencies, which were confined to the domestic tourism arena (Huang, 2010). Further revisions to the act came about in 2001 following China's accession to the World Trade Organization (2000). One of the most important changes was the permission for foreign travel agencies to establish joint venture travel agencies in Beijing, Shanghai, Guangzhou and Xian under conditions which were progressively softened and finally eliminated in 2005 (Zhang, 2004). Only one condition remained - joint-venture companies were still not allowed to engage in Chinese outbound tourism (See Kristensen (2017)

in this issue). Outbound tourism was instead controlled through the Approved Destination Status (ADS) scheme, which was initiated in 1997 and remains in place.

#### *Approved Destination Status (ADS)*

The first outbound tourism from China that was self-funded by participants was allowed through the ADS Scheme in 1997. The purpose of ADS was to establish a control mechanism for domestic travel agencies and international tour operators (Tse, 2011). Under the ADS scheme, certain Chinese operators were designated to arrange, promote and sell travel to specified destinations in collaboration with approved overseas partners, with the latter providing arrangements within the destination (Pan & Laws, 2003). The scheme was later softened, and Chinese travellers may now travel independently, though still only to ADS approved destinations. The Mainland Chinese government has outlined seven guidelines that a country must accept to receive ADS.

- The country should also generate outbound tourists to China.
- The country should have favourable political relations with China.
- The country should have attractive tourism resources and suitable facilities for Chinese travellers.
- The safety of and freedom from discrimination for Chinese travellers should be guaranteed.
- The destination country should be easily accessible by transportation.
- A balance must exist in terms of arrivals and expenditures of visitors from the ADS destination in China and Chinese people's expenditures in the ADS country.
- The market share of tourists from foreign countries to China, along with tourists from China to the ADS countries should be reciprocally increased.

(Guo et al., 2007)

Over time, an increasing number of countries received ADS. The first Western countries were Australia and New Zealand (in 1999). A proliferation of other Western countries were granted

ADS between 2004 and 2006 (Du & Dai, 2005; Keating, 2009). By 2013, a total of 146 countries and territories had received ADS (China Contact, 2013), indicative of a massive future potential for China outbound tourism. It is expected that the ADS scheme will be progressively loosened and consequently phased out in the future (ETC & UNWTO, 2013).

### *Policy and Legislation as a Response*

The rapid increase in Chinese tourism as a result of the aforementioned policy changes and opening of the market, has also created problems (Mak, Wong, & Chang, 2011). The most prominent has been zero-fare tours (Chen, Mak, & Guo, 2011) (also dubbed zero-dollar tours (Arlt, 2006) and zero-commission tours (Zhang, Heung, & Yan, 2009)). Described by Zhang et al. (2009) as a parasitic phenomenon, zero-commission tours are sold to tourists at a price that is the equivalent of, or lower than the basic expenses of the actual trips. The profit is then generated at the destination through commission by luring, cheating, or even forcing tourists into paying extra expenses and fees or in most cases through shopping (King, Dwyer, & Prideaux, 2006; Zhang et al., 2009). The tourist is initially attracted by the cheap price of the tour and then tricked into paying the equivalent of, or in many cases, more than the normal price at the destination. Seemingly acknowledging these problems of malpractice, the Travel Agency Act was revised (and renamed the Regulation on Travel Agencies) in 2009. This time the act specifically addressed the previously noted issues, by introducing rules specifying that travel agencies "... should not solicit tourists through a quoted price below the cost level"; "... not provide any other services than those specified in the contract"; and "... not request tour guides to receive package tour groups without a due fee payment or with a lower-than-cost payment" (Huang, 2010, p. 158). Despite the attempts to minimise or stop the malicious practices through legislation, they have persisted through different means. Chen et al. (2011) highlighted examples

of incidents of forced shopping that were reported in the media throughout 2010. Such incidents spurred continuous and strengthened public debate on the subject in the public media. This debate may have been influential in prompting the introduction of the Tourism Law of the People's Republic of China in 2013 (Ma, Qu, Hsiao, & Jin, 2015).

### *The Chinese Tourism Law*

The Tourism Law of the People's Republic of China (CNTA, 2013) was passed by the National People's Congress Standing Committee and came into effect on October 1<sup>st</sup>, 2013. It sets out tourists' rights, safety standard requirements, dos and don'ts for tour operators, and guidelines for the handling of complaints. The law requires travel agencies to sign a contract with tourists and to provide a travel itinerary before the tour embarks (ibid, 2013 Chapter V, Articles 57 & 59). The tourist now has the right to require that this contract is followed, that the products and services set forth in the contract are provided and that the information on the tourism products and services they buy are correct (ibid Chapter II, Article 9). A full chapter of the law is dedicated to the process of settling disputes between travel agents and tourists (ibid Chapter VIII). Many of the malicious practices are also addressed more directly, for example in article 35, which reads as follows:

“Travel agencies are prohibited from organizing tourism activities and luring tourists with unreasonably low prices, or getting illegitimate gains such as rebates by arranging shopping or providing tourism services that requires additional payment. When organizing and receiving tourists, travel agencies shall not designate specific shopping places, or provide tourism services that require additional payment. However, it does not include circumstances where both sides have agreed or the tourists have requested for such arrangements and no influence is caused on the itinerary of other tourists.”

(ibid 2013 Chapter IV, Article 35)



Stipulations that give rights to tourists as well as tour guides are also included to remove malicious guiding practices. These state that travel agencies should sign labour contracts with the tour guides, which include remuneration and social insurance premiums (ibid, Article 38) and that tour guides:

“... shall strictly follow the itinerary, shall not alter it or stop the services they are providing without permission or to ask for tips from tourists or lure, cheat, compel or force tourists in a disguised form to make purchases or participate in tourism activities that require additional payment.”

(ibid, Article 41)

The law has been hailed as a milestone, since it is the first time that tourists have explicitly been given the right to complain and seek redress (South China Morning Post, 2013). Academic researchers have predicted that the tourism law will have lasting effects and that it may usher in a new phase of China outbound tourism (Ma et al., 2015; Tang, 2017). Three years after its implementation, academic literature on the law and its effects is still scarce. Only one explorative study based on secondary sources was found, while no empirical research has been published at the time of writing. It is thus premature to say whether the predictions about the law's impacts were correct.

It seems that the new tourism law has been largely well received, since it is believed that it will heighten the quality of tourism to and from China and limit malicious business practices (Global Blue Briefings, 2013). However, issues relating to the new law have also been reported. Most notable was a drastic rise in prices on trips, accompanied by a drop in tourist numbers (Forbes, 2014; People's Daily, 2013; Skift, 2013). This was particularly the case in the short-haul package market, where prices have increased by far more than their long-haul equivalents. According to a report by Global Blue (2013), the price of regular tours to Thailand, Singapore,

and Malaysia have for example increased on average from EUR 496 to 1,365 (almost triple) per person; whereas tours to Europe increased from EUR 1,613 to 1,985 (20% – 30%). Different sources, however, highlight how these falling numbers should not be taken at face value, since they may be a symptom of a growing preference towards independent travel and longer stays at each destination, which may have been accelerated by the introduction of the tourism law. As pointed out by Wolfgang Arlt, the director of the China Outbound Tourism Research Institute, in a report on Forbes Magazine's website :

“This does not necessarily have to be a negative development, as after all the tourism industry, unlike government officials, is more interested in counting dollars than counting heads and the reductions can be expected to be found for the most part at the lower end of the market.”

(Forbes, 2014)

## **Method**

The various laws and policies mentioned in the review above have all impacted China's tourism industry. However, the extent of such impacts and of which laws and policies that have been most influential is difficult to access. In particular, it is difficult to establish a cause effect relationship between policy implementation and change, since the change may often be delayed and since it may well be a result of other factors. In the case of the Chinese Tourism Law, there was an immediate impact on outbound tourist numbers. However, as tourists and tour operators became accustomed to the law and in some cases found ways around it, the numbers have stabilised to a degree that it is now difficult to determine, whether the law has made any significant change. In order to gain deeper insights into the policies and legislation that are affecting long haul China outbound tourism, the present paper therefore adopts a qualitative approach.

Representatives of different intermediaries working with long haul China outbound tourism were asked directly or indirectly about the policies and legislation that affect their business. To avoid bias, the interviewer's questioning did not mention or ask about any specific policies, but kept the questions completely open. The advantage of this approach is that the respondents provided in-depth feedback on the policies and legislation that are top of mind. Omissions and non-answers can also provide important information as they may indicate that the interviewee is less concerned with certain policies. An obvious limitation of this approach is that it is explorative and qualitative, meaning that the results are subjective indications about some intermediaries' opinions, rather than generalizable facts.

Twenty one intermediaries working with long haul China outbound tourism responded to the study, through semi-structured interviews. The interviewees have been anonymised, but a description of each is provided in Table 1. For the purposes of the study, the researchers view intermediaries as actors who provide a link between producers of tourism services and their customers (Gartner & Bachri, 1994). Based on this definition, the researchers' aim was to interview representatives of a variety of intermediaries, including both big and small actors, as well as tour operators, OTAs, wholesalers, incoming operators and tour leaders. A mix of convenience and purposeful sampling was applied. The interviews were conducted in Beijing in the fall of 2015 and were undertaken face to face wherever possible. In the two cases where this was not feasible, they were conducted via WeChat call. An interpreter accompanied the interviewer to the interviews, although she was used actively in only four interviews, since most interviewees had good English speaking ability. For these four interviews, the researcher transcribed the translations made by the interpreter, hired an outsider to transcribe and translate the Chinese content and then compared the two English versions (the interpreters and the

translators). This approach ensured that the translations were undertaken correctly, as well as the retrieval of content and meaning from the interviews. The interviews were recorded and transcribed verbatim and then analysed manually.

[Table 1 near here]

## **Findings**

### ***The Overall Effects of Policy and Legislation***

A general finding from the interviews was that compared with more practical challenges, many respondents did not mention policy and legislation as a primary concern. When asked about challenges generally, most mentioned practical matters such as:

"The travel season is a little bit short because of the weather. So it means in the summer sometimes the coach is not so cheap and it is not easy to get some resources, I mean accommodation, overnight cruise or something like that, you have to pay more for it. But nobody can change it."

(TO/TA3)

When asked directly about whether laws and policies were a challenge; some simply answered “no” (e.g. TO/TA4 and DMC2). China is a country under strict government control; therefore, there is a risk that the respondents did not want to discuss subjects that could be perceived as critical to the government. A sign that this might not have been the case for all, was that some respondents were, surprisingly, willing to discuss other sensitive subjects related to the government (examples of these will be presented later). On this basis, it may be assumed that while some interviewees might not want to discuss such issues in order to avoid repercussions from the Chinese government, others simply considered policy and legislation as less important than more operational issues. Parts of the interviews that did not directly relate to policy and

legislation indicated that another reason for the lack of importance attributed to issues of policy and legislation was that some laws and policies were no longer considered to be significant. The most commonly cited example was the ADS. This scheme was implemented relatively early in the history of China outbound tourism. Some interviewees appeared to consider ADS as an integrated condition, rather than a piece of legislation. This was evident in the ways that the respondents had adopted the term to describe a certain kind of group package tourist: "... we got involved in some of the ADS groups, for the common Chinese people." (DMC2). "It is a lucky thing that a lot of Chinese families some middle and rich people, they will not join the ADS groups." (NicheTO/TA). It seems that for these interviewees, ADS was thought as a type of tourism/tourist (in this case group tourists travelling under the ADS scheme), rather than as an imposed policy.

### ***The Effects of the Chinese Tourism Law***

Surprisingly, the recent Tourism Law of the People's Republic of China (CNTA, 2013), which was hailed as a game changer in various media and also by academics was not mentioned by interviewees as being important. As noted in the literature review, the impact of the Chinese tourism law was stronger in short haul destinations, than in their long haul equivalents. This may be why the law seem to have little impact on the interviewees. A suggested outcome of the tourism law is that it increases the attractiveness of independent travel, since the price difference between group tours and independent tours diminishes (Ma et al., 2015). Another reason why the Chinese tourism law was not mentioned by respondents could be that the law has less effect on long haul travel because the trips already have a certain cost and because independent travel is more widespread among long haul travellers.

### ***The Effects of General Policy and Legislation on China Outbound Tourism***

The policies and legislation that most respondents mentioned as important were those relating to President Xi Jinping's anti-corruption campaign. The campaign started after the 18<sup>th</sup> National Congress in 2012 and has since enforced, updated and added to existing legislation to combat bribery and corruption in China (Chang, Gan, & Zhao, 2015). A number of interviewees explained how the campaign had forced them to change the focus of their company entirely. One interviewee shared that:

"Before our company only focused on business travel, when Chinese government travel to Scandinavia to have meetings with different companies or city hall. Before it was things like that. (...) But now, that is very difficult, because China has very tight rules about that kind of group travel outside China. (...) we have been forced to change our focus to leisure groups"

(DMC1)

Another interviewee supported this view and added that the increase in Chinese families travelling semi-independently is a main reason that their company has been able to stay afloat, as it has allowed them to pivot their business towards this market.

"The government regulations. I think, that is the more serious problem, and it is really like the earthquake of the travelling market, the tourist market. (...) It is a lucky thing that a lot of Chinese families, some middle and rich people, they will not join the ADS groups."

(NicheTO/TA)

According to some interviewees, the anti-corruption laws have also rubbed off on the general conduct of private companies, who are now attempting to avoid blatant extravagance.

"... now we got harder and harder controls on the government visits and stuff like that. Even the big companies, they try to reduce the cost. All the expensive things, so we do have less profit on that of course. (...) you know we have these medicine groups who invite doctors to different seminars and stuff like that, but nowadays, it is very strict, that we can only use the bus to the

conference venue, the hotel and the restaurant. No tour visits should be included. And also they try not to spend as much money, so it looks good...”

(DMC/wholesaler).

Tour leaders also felt the effects of the anti-corruption campaign. One of them explained that:

“... before 2013, most groups they are from companies, they are businessmen and they are governors from China. But since 2013, less and less this kind of people, but more and more normal people. The reason is, before 2013, you know China, it was a typical corrupted country, so you know, higher posted governors or businessmen, they spend the government or companies’ money to go abroad as a tourist, they don’t pay by themselves. It is always the company that pays or the that government pays. But since 2013, you know. It is a big change in China, so it is not allowed to go abroad using the government’s money or company’s money.”

(Tour Guide)

Combined with the lack of attention paid to the Tourism Law of the People’s Republic of China, this finding provides an interesting perspective. Perhaps because the Chinese tourism law is aimed directly at the tourism industry, this law and its potential consequences received well-deserved attention from media and from tourism academics. Less academic attention has been given to the direct effects of the anti-corruption campaign on tourism, although the present study suggests it may have been be more impactful particularly for long haul travel. This underlines the importance of understanding how general policy and legislation affect tourism.

Another example of general legislation affecting outbound tourism is the Chinese labour law. Issues related to this were highlighted by a DMO respondent who stated that:

“... the central government has already reinforced the policy or the law that says that employees are entitled to paid holidays. However, even though it has been in the labour law in China for many years, this term has no teeth, that is why a lot of private companies or local organizations, they do not offer paid leave for their full-time employees. That is why the government is trying to reinforce

this in the law, in order to give more, try to push the market a bit. So that people have the time, and also the money to travel around."

(DMO1)

This example illustrates how policy and legislation not directly related to tourism may have substantial impact on the tourism industry and in this case on China outbound tourism. This suggests that researchers should be aware of such legislation and its intended and unintended consequences when trying to understand China outbound tourism and tourism in general.

### *The Presence and Effects of Unofficial Decrees*

The study reveals that in addition to official policy and legislation, tourism intermediaries are also affected by unofficial politically motivated decrees issued by the Chinese government. The most prominent example of this resulted from the issuance of the Nobel Peace Prize to Chinese dissident Liu Xiaobo in 2010. According to some interviewees, this resulted in unofficial decrees from the government to limit tourism to Norway:

"Interviewee: It is an intense political issue between China and Norway.

Interviewer: What does it mean?

Interviewee: Maybe some kind of government or something will say they do not want the Chinese to go to this country, but we still do the product. So, every year maybe we will have a special period for doing the product under the table. (...) The government will not forbid the clients to go there they will forbid us. So maybe the clients cannot search the products on the website or the advertisements.

Interviewer: So they have to come to you in person or via telephone?

Interviewee: Yes, yes, (...) but it won't influence the market. It won't"

(TO/TA4)

Another respondent explained:



“Interviewee: Because Norway gave the Nobel price, the Chinese government ask the company not to add Norway to their trips. But it is just in private. Not public. So it has not influenced very much. We were recommended to do it, but we did not.

Interviewer: Did any companies change because of this?

Interviewee: Maybe some companies changed, but ours did not.”

(Wholesaler2)

Both interviewees argue that they and their business did not change as a result of these decrees. However, they do not refute the possibility that other companies may have changed their approach. This finding illustrates the potential importance of unofficial decrees from the government in long haul China outbound tourism; although the continuous rise in China’s tourism to Norway since 2010 suggests that the effect has been limited in this specific case (Statistics Norway, n.d.). Such unofficial decrees are politically sensitive and consequently, company representatives may be reluctant to discuss them. This was also the case in the interviews conducted for this study. The fact that this study identified examples of such unofficial decrees, despite interviewee reluctance, suggests that more decrees like this may appear beneath the surface in China outbound tourism.

## **Conclusion**

This study has used an open exploratory approach to investigate top of mind issues of policy and legislation for intermediaries working with long haul China outbound tourism. This approach provided surprising insights about the concerns of these intermediaries, or lack thereof, relating to Chinese tourism policy and legislation. The study has shown that some intermediaries are scarcely concerned with tourism legislation, while others have been forced to make substantial changes their business operations as a consequence. It also indicates that in terms of long haul

travel, the Tourism Law of the People's Republic of China, which has drawn much consideration since its enactment in 2013, may be of little importance. This is especially the case when compared with the Chinese anti-corruption campaign and its intended or unintended impacts on China outbound tourism, as these were found to be significant. Finally, the study reveals that in addition to official policy and legislation, tourism intermediaries are also affected by unofficial politically motivated decrees issued by the Chinese government.

It is difficult and more likely impossible for practitioners to affect or change the various policies and legislation that are discussed in this paper. This means that practitioners must know about and react to the effects of such policies and legislation, if they wish to succeed in dealing with the China outbound tourism market. For tourism practitioners, this study may therefore be relevant, as it provides an overview of the development of policy and legislation in China. The findings may have specific relevance to companies that are considering entering the Chinese market, or companies or DMOs, which are strategizing to attract China outbound tourists. The findings provide such companies or organisations with insights, based on the experiences and challenges of other similar companies and organisations in dealing with China outbound tourism.

The findings of this study have important implications for future research on policy and legislation about China outbound tourism. They suggest that scholars should adopt a broad scope when investigating policy and legislation, since laws that are not tourism specific may have significant impact on tourism. Existing investigations of the Tourism Law of the People's Republic of China should therefore be supplemented with studies of the impact of legislation that is not immediately tourism related. Specifically, the impacts of the anti-corruption campaign initiated in 2012 by President Xi Jinping to China outbound tourism, would benefit from further scrutiny. Studies about the impacts of unofficial politically motivated decrees would also help

deepen scholarly knowledge about how government initiatives may affect outbound tourism from China.

This study applied an open and explorative approach to uncovering top-of-mind issues of policy and legislation. This was done to avoid the potential bias that may appear if respondents are probed on specific issues of policy and legislation. The limitations of such an approach are a dependence on context, that respondents may not mention some policies , and that the interviewees were not prompted to provide more detailed explanations about specific policies. Future studies could broaden scholarly knowledge about the importance of policy and legislation in China outbound tourism by applying the research design of this study in other contexts. This would reveal whether similar policies appeared as important and whether these policies had similar effects in other contexts. Alternatively the present study could form the basis for a subsequent investigation that probed the interviewees further on specific policies selected by the researchers. This would deepen scholarly knowledge about the importance of policy and legislation in China outbound tourism to Europe specifically.

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Table 1: Interviewees

Number	Abbreviation	Type of company	Representative role in the company	Information	Interview method
1	TO/TA1	Tour operator - Travel agent	Manager of Hotel Management Dept.	One of the biggest TO/TA in China	Face to face
2	TO/TA2	Tour operator - Travel agent	Vice President for Beijing Branch	One of the biggest TO/TA in China	Face to face
3	TO/TA3	Tour operator - Travel agent	Deputy General Manager	One of the biggest TO/TA in China	Face to face
4	TO/TA4	Tour operator- Travel agent	Business Manager Europe Travel Center	One of the biggest TO/TA in China	Face to face
5	TO/TA5	Tour operator- Travel Agent	Manager of outbound business	Smaller TO/TA	Face to face
6	NicheTO/TA	Tour operator- Niche Travel Agent	Owner	Niche TO/TA	Face to face
7	Wholesaler1	Wholesaler	Europe Director	Focused on Scandinavia	Face to face
8	Wholesaler2	Wholesaler	Product Operation Manager	Wholesaler	Face to face
9	Niche_wholesaler	Niche Wholesaler	Director	Focused on in-depth travel	Face to face
10	OTA	OTA	International Market Manager	One of the biggest Chinese OTAs	WeChat Call
11	DMC1	DMC	General Manager	Focused on in-depth travel	Face to face
12	DMC2	DMC	Destination Manager	Large European DMC's	Face to face
13	DMC/Wholesaler	DMC/Wholesaler	Inbound Tour Consultant	Focused on Northern Europe	Face to face
14	DMO1	DMO	Chief Representative	China Office of European DMO	Face to face
15	DMO2	DMO	Travel Trade Manager	China Office of European DMO	Face to face
16	Tour Leader 1	Tour Leader	Tour Leader	Focused on Europe	Face to face
17	Tour Leader 2	Tour Leader	Tour Leader	Focused on Europe	Face to face
18	Tour Leader 3	Tour Leader	Tour Leader	Focused on Europe	Face to face
19	Tour Leader 4	Tour Leader	Tour Leader	Focused on Europe	Face to face
20	Tour Leader 5	Tour Leader	Tour Leader	Focused on Europe	Face to face
21	Tour Guide	Europe based tour guide	Tour Guide	Focused on Europe	WeChat Call