1 **Title: CONSULTING ON THE EUROPEAN UNION'S 2050 TOURISM POLICIES:**
2 **An appreciative inquiry materiality assessment**

3 **Authors:**
4 Mireia Guix, Business School, The University of Queensland, Brisbane Qld 4072, Australia.
5 m.guix@uq.edu.au Telephone +34603521988. Corresponding author.
6 Xavier Font, School of Hospitality and Tourism Management, University of Surrey, GU2
7 7HX, UK, and Department of business and economics, UiT The Arctic University of Norway,
8 Tromsø, Norway. x.font@surrey.ac.uk Telephone +44 (0) 1483 684290
9

10 **Abstract**
11 Stakeholder consultations serve as powerful legitimising devices. However, issues of access
12 and the balance of participants, and the quality of the process and its effective results,
13 undermine consultation efforts. We propose a deliberative digital stakeholder consultation
14 methodology based on an appreciative inquiry approach to materiality assessment. We
15 illustrate its application in a four-month consultation for the European Commission, as part of
16 the 2020 European Tourism Convention, towards a European Agenda for Tourism 2050. An
17 interactive, online consultation (a necessity due to COVID-19) enabled dynamism and co-
18 creation. Appreciative enquiry introduced a human element of ownership and legitimacy
19 towards policy, and informed the input legitimacy. The choice of topics, language and attitude
20 reframed problems into opportunities with shared responsibilities. Technology allowed us to
21 explore new forms of open, democratic and inclusive stakeholder engagement, and materiality
22 analysis provided structure and transparency that legitimises the process.
23
24

25 **Keywords:** Tourism policy, Stakeholder engagement, Sustainable tourism, European
26 Commission, Legitimacy, Materiality assessment.
27
28 **Highlights**
29 • A digital consultation articulates a European tourism COVID-19 recovery agenda
30 • Online stakeholder consultation is fast, free, effective, efficient and democratic
31 • Deliberative stakeholder consultation enhances input, throughput and output
32 legitimacy
33 • Appreciative inquiry facilitates dialogic, transparent materiality assessment
34 • Dialogic materiality assessment is effective in agenda-setting for public policy
35
36

37 **Short author bios**: Dr. Mireia Guix is Lecturer in Tourism at the University of Queensland,
38 Australia. Her research focuses on sustainability accounting and corporate social responsibility
39 for the tourism industry. Prof. Xavier Font is Professor of Sustainability Marketing at the
40 University of Surrey, UK, and Professor II at the UiT The Arctic University of Norway,
41 Norway. His research typically focuses on understanding reasons for pro-sustainability
42 behaviour and market-based mechanisms to encourage sustainable production and
43 consumption.
44

45 **1. INTRODUCTION**

46 Stakeholder consultations are common practice in the formulation of policies (Bunea, 2017;
47 Dunlop et al., 2020). Policy decisions are seen as a social construct dependent on: i) the

48 stakeholders' various interests, values, ideologies, and relationships (Hall and Jenkins. 1995);
49 and ii) the policymaking process of communication and negotiation between public and private
50 sectors in the context of broader change (Stevenson et al., 2008). In tourism, attention moved
51 towards understanding the inclusiveness and effectiveness of stakeholder engagement
52 processes in policy (Hall, 1994), identifying uneven access and capacity to participate (Jamal
53 & Getz, 1999). Attention turned to stakeholders' claims, roles and responsibilities and their
54 individual perspectives and attitudes towards tourism development (Hardy & Pearson, 2018).
55 Understanding policy as a result of a social process focused attention to how stakeholder
56 relationships enable constructing a shared meaning of the social issues becoming policy
57 problems (Dredge & Jamal, 2015). Stakeholder engagement, while complex, is thus seen as
58 central to collaboratively identifying, understanding and problematising what constitutes a
59 policy issue. At the supranational level, where tourism policy is rather weak, little empirical
60 evidence exists on how stakeholders are involved in policy-making (Anastasiadou, 2008a).

61 Stakeholder policy consultations can take an open, closed or hybrid approach, and may all
62 choose from various: tools, stakeholder inclusiveness approaches and opportunities for
63 stakeholders to deliberate with one another. Open consultations aim to acquire input from a
64 broad and diverse array of stakeholders who are invited to submit their opinions through tools
65 like online questionnaires and open calls (Fraussen et al., 2020). Open consultations thus rely
66 on the bottom-up mobilisation of stakeholders and are usually processed via website portals,
67 while closed consultations have traditionally required stakeholders to be physically present,
68 while open (online) consultations facilitate participation across geographical locations
69 (Binderkrantz et al., 2021), and hybrid formats combine both and, thus, have important
70 implications for stakeholder involvement.
71
72 COVID-19 has forced actors into an (online) conversation about the tourism industry's change
73 towards more resilient and sustainable tourism, which arguably can provide opportunities for
74 consultations that are more participatory, inclusive and effective (Rasmussen, 2020; Fraussen
75 et al., 2020) that strengthens the legitimacy of its organisers (Bayers & Arras, 2021). However,
76 much of the stakeholder consultation conducted during COVID-19 has shifted from open to
77 closed consultations, with most interactions being governmental (Rasmussen, 2020). The
78 increase in digital legislative consultation since COVID-19 has been found to be more suitable
79 for managing existing contacts rather than for engaging new stakeholders (Rasmussen, 2020).
80 The insider/outsider distinction is particularly relevant when considering consultation as an
81 instrument of participatory and deliberative democratic governance (Bunea, 2017).
82
83 In this article, we aim to contribute to the literature on stakeholder consultation in public policy
84 by proposing a methodology that builds on the participatory action research (appreciative
85 inquiry) and corporate social responsibility (materiality assessment) literature. We adopt
86 materiality assessment because of its strength at providing a structured process to stakeholder
87 consultation and we modify its traditional approach by framing it in an appreciative inquiry.
88 Our contribution is the demonstration of how adopting appreciative inquiry can transform
89 materiality assessments into an open and deliberative stakeholder engagement and, thus, the
90 potential to advance systematic and legitimate consultation in public policy. Empirically, the
91 study illustrates this novel methodology in the context of EU tourism governance and, through
92 that, provides insights into one of the few accounts of tourism stakeholder consultation at a
93 supranational level (Dimitrovski et al., 2021; Stevenson et al., 2008). Theoretically, the study
94 applies the political science literature on participatory and deliberative democratic governance
95 (Powley et al., 2004; Dryzek, 2011) and dwells on process legitimacy (Schmidt, 2013; Schmidt
96 & Wood, 2019).
97

2

2. LITERATURE REVIEW

Stakeholder consultation serves to anticipate support or opposition to policies (Hardy & Pearson, 2018), to contribute to the success of plans (Soulard et al., 2018) and ensure the legitimacy of interventions (Anastasiadou 2011; Waligo et al., 2015). In Europe, the EU institutions have faced persistent questions about their legitimacy (Schmidt, 2013; Bayers & Arras, 2021). Institutions engage in activities to justify and secure acceptance of authority and of the exercise of power. The EC has increasingly emphasised stakeholder participation to legitimise policy proposals (Bunea & Thomson, 2015; Binderkrantz et al., 2021) and their self-legitimacy, namely their self-belief in their entitlement to govern (Bunea et al., 2014). In transnational tourism governance, where the EC has limited competence, stakeholder consultations become even more relevant. Legitimacy rests upon the EC's ability to coordinate national, regional and local governments and tourism providers to collaborate together (Estol et al., 2018).

Legitimacy of the EU institutions is tied to questions regarding the balance in access and influence among participants (input), the quality of the process (throughput), and the effectiveness of resulting policies (output) (Schmidt, 2013). First, input legitimacy provides equal participation opportunities (Fraussen et al., 2020). Different levels of governance seek input legitimacy (Dunlop et al., 2020; Binderkrantz et al., 2021); for example, the EC generally seeks to alleviate bias by consulting with a diverse range of external actors. Second, throughput legitimacy concerns the quality of the process, judged by accountability, transparency, inclusiveness, openness and efficacy (Schmidt & Wood, 2019). Throughput legitimacy presumes that the possibility for deliberation among stakeholders and the overall transparency of how decisions were made lead to more widely accepted policies (Schmidt, 2013). Thus, more so than in consensus generation, the opportunity for deliberation among stakeholders with different views and the prevention of dominance by any single stakeholder (or stakeholder group) are cornerstones for throughput legitimacy. In tourism, the heterogeneity of stakeholder objectives suggests that legitimate consensus generation can be hard to achieve (Amore & Hall, 2016), with effective stakeholder participation in practice remaining a challenge (Stevenson et al., 2008; Dimitrovski et al., 2021). Third, output legitimacy is a performance criterion for establishing effective policies, where stakeholder consultation is a means to an end (Schmidt, 2013).

It is argued that decision-making in the EC has long relied on throughput and output legitimacy, while lacking input legitimacy (Schmidt & Wood, 2019), hence more work is needed to engage in stakeholder participation. To do so, it is worth looking at consultations as a form of deliberative democracy that puts the throughput procedures at the centre of a virtuous circle between the balance of participants (input) and the effectiveness of resulting decisions (output) (Schmidt, 2013; Smidt & Wood, 2019). What warrants legitimacy is not just decision-making but deliberation, enabling participants' judgment and preference formation "within an informed, respectful and competent dialogue" (Dryzek, 2011, p. 3). Concerns are focused on introducing more deliberation spaces. Open, transparent and reflexive processes can permit issue-dependent, legitimate stakeholder inputs to produce more legitimate outputs.

To our knowledge, there are still gaps in the literature, with limited studies of stakeholder consultation in the area of tourism policy, that by its nature of highly fragmented, heterogeneous, and diverse stakeholders makes it for a particular case to study. In particular, there are limited explorations of new models of stakeholder consultation, those that can tackle the legitimacy need in the tourism transnational policy context. To conduct such an exploration, we draw from the literature on stakeholder consultation in the private sector.

3

2.1. Materiality assessment: An alternative stakeholder consultation process from the private sector

147 Stakeholder consultations are on the rise worldwide as governments and businesses seek to
148 address the needs of their diverse stakeholders. Transparent sustainability reporting nowadays
149 pivots on the concept of materiality assessment, which is the process that industry needs to
150 follow to identify and respond to stakeholder expectations. We argue that materiality
151 assessment can assist tourism policy in addressing the "political debate about what the agenda
152 is, what the issues are and who is involved or affected" (Bramwell & Lane, 2011, p. 411). By
153 engaging in materiality assessment, tourism organisations have enhanced and formalised their
154 engagement with stakeholders (Guix et al., 2019). Businesses have adopted a technical-rational
155 approach to materiality that involves: i) a comprehensive analysis of the sustainability issues
156 based on stakeholder consultation; followed by: ii) a balanced analysis of data to identify 'what
157 matters' (Puroila & Mäkelä, 2019). Materiality has brought systematic and methodological
158 rigour to identifying and assessing the relevant issues, framed within stakeholder dialogue.

159 Materiality provides legitimacy to organisations in justifying their sustainability agenda.
160 However, the legitimacy of the results from materiality (output legitimacy) is dependent on the
161 balance of stakeholder participation (input legitimacy) and the consultation process (throughput
162 legitimacy). Thus, the stakeholders that are identified directly affect the results of materiality
163 (Mio et al., 2020). In practice, as businesses tend to engage in conversation with a narrow set
164 of stakeholders (Guix, et al., 2018; Bellucci et al., 2019), input legitimacy is a concern, which
165 is similar to the calls for broad involvement of tourism stakeholders in public policy (Hall,
166 1994; Waligo et al., 2013).

167 Materiality results are also dependent on high-quality engagement (Mio et al., 2020), i.e., on
168 throughput legitimacy. In the private sector, materiality assessments have relied extensively on
169 open consultation tools like one-way surveys (Guix et al., 2018; Bellucci et al., 2019), without
170 providing any deliberative space. In-depth consultation with a wide range of stakeholders has
171 been considered time-consuming and expensive both in the private (Mio et al., 2020) and public
172 sectors (Bramwell & Lane, 2011). The same has occurred in the EU tourism context
173 (Anastasiadou, 2011). Such stakeholder consultations have taken a technical-rational approach
174 to materiality, portraying the identification of what is relevant as neutral and value-free (Puroila
175 & Mäkelä, 2019). This, together with low transparency of the methods used to identify
176 stakeholders and issues (Guix et al., 2019; Beske et al., 2020) has raised concerns about the
177 legitimacy of the process (throughput).

178 The practical limitations of materiality assessment have led to concerns about the organisations'
179 reliability of their materiality output (legitimacy). Materiality assessment can strategically be
180 misused without considering the interest of legitimised stakeholders (Maniora, 2018; Guix et
181 al., 2019; Beske et al., 2020). Businesses use the materiality results as a discourse to construct
182 a "legitimate closure" of the relevant sustainability issues. They fail to acknowledge the
183 differences and contradictions between stakeholders and the temporary and situatedness of the
184 output (Puroila & Mäkelä, 2019). The output of materiality is subjective, upon the choice of
185 stakeholders engaged, and temporal and context-specific. For example, this stakeholder
186 consultation during COVID-19 may trigger different priorities than in the pre-crisis or post-
187 crisis stage.

188 Critical dialogic accounting literature provides an avenue to explore alternatives to narrow the
189 limitations of existing practices. Materiality assessment should enable a dialog that allows
190 stakeholders to be involved in decision-making processes (Bellucci et al., 2019).
191 AccountAbility (2018) acknowledges the need to address conflicts that arise from contrasting
192 stakeholder expectations. As a dialogic approach, materiality is a socio-political phenomenon;

193 relevant issues result from negotiating the differences and contradictions between the
194 stakeholders' subjective values and judgments of what is important to be addressed (Puroila &
195 Mäkelä, 2019). Academics call for more deliberative stakeholder consultations (Mio et al.,
196 2020). Yet, critical dialogic accounting is an emergent field of research (Manetti et al., 2021)
197 and it remains in a conceptual stage with regards to materiality (e.g., Puroila & Mäkelä, 2019).
198 A practical proposal on moving towards this direction is lacking.

199 Despite the shortcomings of how materiality is being practiced, materiality has merit in its
200 ability to assist stakeholder consultation in the private sector to evolve from loose, unstructured
201 dialogue to more formalised and structured practice during agenda-setting. A materiality
202 assessment can collate the multiple, divergent stakeholder values and perspectives into a single
203 understanding of what is considered relevant. However, there would be advantages to having a
204 more collaborative approach to materiality with greater evidence of transparency than currently
205 exists in the practices of the private sector. A materiality assessment that builds on in-depth
206 stakeholder engagement would respond to the call for transparency and involvement of plural
207 stakeholders in the policy decision-making (Laws, 2011) and would lead to a politically
208 legitimate output (Hardy & Pearson, 2018). Materiality holds potential to give stakeholders a
209 voice in influencing policy, and it could become an instrument to generate much-needed
210 engagement in long-term collective action (Reed, 1999). Therefore, we propose that materiality
211 can be applied in a policy context during agenda-setting and policy-formulation exercises.

212 Thus, how could a new stakeholder consultation methodology be designed, based on materiality
213 assessment, in such a way that it would uphold the broader discourses of deliberative
214 governance and the assumptions of input, throughput, and output legitimacy; that is, a
215 stakeholder consultation methodology that would fully embrace stakeholder participation, the
216 consultation process, and the practical results? To answer the question, we turn to appreciative
217 inquiry.

3. METHODOLOGY: AN APPRECIATIVE INQUIRY APPROACH TO MATERIALITY ASSESSMENT

220 This section explores appreciative inquiry as a viable, practical and transparent method to
221 engage stakeholders for materiality determination in tourism agenda-setting and policy.
222 Appreciative inquiry is a participatory method based on positive psychology that puts theory
223 and practice together to find practical solutions to pressing real-world problems (Reed, 2006).
224 We selected appreciative inquiry for its suitability to explore a dialogic materiality assessment
225 due to: i) its characteristics of being participatory, dialogic, and interactive, i.e., understanding
226 the importance of bringing all stakeholders together; ii) its positive approach to change that
227 focuses on creating a change agenda; and iii) its process, which is highly dynamic and adaptive
228 to the context of each study.

229 Appreciative inquiry is a highly adaptable method (Cooperrider & Whitney, 2005) that allowed
230 us to meet the unique challenges of an EU-wide, virtual, multi-stakeholder engagement process
231 to set the agenda for the recovery of the tourism industry post COVID-19. The challenge was
232 to transcend the immediate effects of COVID-19 and compel collaborative action. The DG
233 GROW.F.4 Tourism Unit from the European Commission selected the affirmative topics that
234 provided the focus of the appreciative inquiry, ensuring that these would align its output with
235 the EU policy framework. The scope was to propose a set of actions for a roadmap towards
236 sustainable, innovative and resilient European tourism. Appreciative inquiry enabled the EC to
237 transform the dialogue on the post-pandemic recovery from a problem-oriented, deficit
238 discourse to a strength-oriented, affirmative discourse. The methodology used was based on the
239 4-D cycle of appreciative inquiry (Discovery, Dream, Design, and Destiny) adapted to fit the

240 study context, the limited time available, the diversity of stakeholders, their geographical
241 location and the heterogeneity of participants (Table 1).

242 Table 1: Materiality assessment for tourism policy underpinned by appreciative inquiry

Appreciative inquiry phases	Methodology and analysis	Materiality assessment steps and key insights	Outputs informing the next phase
Getting started	- Meetings with D.G. Grow Unit and regular correspondence.	- Understand the stakeholder engagement boundary by defining the purpose of materiality, the audience and the scope of the engagement.	- Clearer agenda with affirmative topics, call for expressions of interest, and workshop delivery design.
Discovery	- Call for expressions of interest - Qualitative online survey to EU tourism stakeholders. - Thematic qualitative analysis using MAXQDA© to research the priority issues. - Quantitative data analysis to research stakeholder attitudes towards EU tourism.	- Select participants transparently and distribute roles for the workshop. - Identify material issues to stakeholders. - Filter and consolidate issues into priorities. - Identify stakeholder attitudes towards EU tourism.	- Increased commitment and ownership of the output. - Identified priority areas and potential actions. - Raised awareness on the need for all stakeholders to take responsibility for shaping the future of EU tourism.
Dream	- Qualitative online survey and thematic qualitative analysis.	- Create an ideal image of a preferred future. - Distribute a discussion paper that describes the inquiry's purpose, the engagement step by step, and the Discovery and Dream phase's output.	- Raised sense of collective vision for EU tourism of tomorrow. - Encourage to adopt a positive mindset to discuss solutions.
Design	- Three-hour parallel online workshops, divided into three thematic breakout rooms. - Deliberation and voting on importance and feasibility.	- Identify additional actions. - Set priority actions by ranking them based on importance and feasibility. - Discuss and develop collaboratively four actions per breakout room.	- Increased contribution of stakeholders. - Negotiated differences and contradictions between stakeholders' subjective judgments of what constitutes relevant issues. - Reached an agreement on priority actions. - Co-developed and agreed details of the priority actions on: SMART targets,

			action duration, key performance indicator to measure progress, lead stakeholder and other actors involved.
	- Consolidate output of the breakout rooms.	- Presentation of the detailed actions per breakout room.	- Wider view on the priority actions for each workshop.
	- Voting on level of agreement.	- Validate consensus, with transparent voting, to gain agreement on top-10 highest scoring actions per workshop.	- Reaching consensus on the ten actions defined as material for each thematic workshop.
	- Consolidate output of the workshops.		
Destiny	- Live, on-line survey on levels of agreement with the material actions per workshop at the European Tourism Convention.	- Results presented in the Plenary Session of the European Tourism Convention by the workshop rapporteurs. - Ratified importance of actions by European Tourism Convention participants.	Endorsed and legitimized output of the stakeholder consultation.

243

First, the *Discovery* phase is about appreciating and valuing the best of 'what is'. An inquiry strategy was developed, which identified the steps to ensure a project's success (Whitney & Trosten-Bloom, 2010). The inquiry strategy took a hybrid approach. First, a short, online, mass-mobilised, appreciative inquiry, based on a qualitative survey (Discovery and Dream phases). This was followed by three parallel, three-hour, online workshops (Design and Delivery phases); these were selected due to time and travel constraints. The first round of consultation took an open approach and utilised a web-based survey, which provided unlimited "self-selected" involvement to everybody who wished to contribute and enabled input to be gathered from a broad range of stakeholders (Fraussen et al., 2020). The second round of consultation took a closed approach with workshops that targeted invited stakeholders. The hybrid approach enabled to broaden access and, in doing so, prevented excessive dependence on any one stakeholder group (Beyers & Arras, 2021).

The first round of consultation, using a survey via Google forms, aimed to identify the positive forces in tourism going forward, by asking: 'What are the three highest priorities for European tourism for tomorrow in the contexts of Safe and Seamless Tourism Experience / Greener Holidays / Tourism Powered by Data, and who will be the relevant actors?' The stakeholder identification and selection criteria aimed to achieve participation of senior managers and experts by sector, geography and gender. A call for expressions of interest was distributed in September 2020 to over 2,000 EU tourism stakeholders using the database of the Tourism Unit. After a reminder, 220 responses were received, each identifying priority areas, opportunities/challenges, relevant stakeholders, and a vision for the future. The response rate was deemed acceptable, considering that a coordinated official response to the survey and participation by a senior manager in the 3-hour workshop is a considerable commitment. While small in size, the sample is varied (see Table 2). Four of the responses were eliminated for being duplicate. All participation was acknowledged on the event website, https://tourism-convention.eu/workshops, by naming the organisations represented by the participants.

270   Table 2: Sample composition for the survey and workshops broken down by the three themes.

	Safe and Seamless Tourism Experience		Greener Holidays		Tourism Powered by Data		Total	
	Survey	Workshop	Survey	Workshop	Survey	Workshop	Survey	Workshop
Participants	61	28	88	35	67	29	216	92
Gender								
Female	28	12	47	15	21	9	96	36
Male	33	16	41	20	46	20	120	56
European Union								
EU Country	59	27	74	26	64	28	197	81
Non-EU country	2	1	14	9	3	1	19	11
Region								
Western Europe	22	14	37	13	24	13	83	40
Southern Europe	22	8	26	7	27	11	75	26
Northern Europe	6	2	11	7	8	3	25	12
Eastern Europe	8	2	4	1	5	0	17	3
Operations in EU	3	2	10	7	3	2	16	11
Stakeholder type								
Public	21	7	31	12	24	10	76	29
Private	19	12	30	14	24	13	73	39
NGO	13	5	21	8	8	3	42	16
Public-private partnerships	8	4	6	1	11	3	25	8
Stakeholder group								
International organisation	7	2	12	6	6	4	25	12
EC and other EU institutions	1	0	1	1	2	1	4	2
National authority	11	5	7	1	6	3	24	9
Regional and local authority	5	3	7	0	4	2	16	5
Destination Management and Marketing Organisation	9	0	9	5	14	4	32	9
European Sectoral Association	15	12	18	6	7	3	40	21
Accommodation sector	2	1	4	1	3	3	9	5
Transport sector	3	1	4	2	2	0	9	3
Tour operator/Travel agency	5	2	7	3	4	2	16	7
Education/Research centre	1	0	8	3	11	1	20	4
Multi-stakeholder coalition	2	2	11	7	8	6	21	15

271
272   We analysed the Discovery phase results through quantitative and qualitative analyses. First,
273   we checked for differences in attitudes among, and within, stakeholder groups with one-way
274   analysis of variance using Stata software. One-way analysis of variance (ANOVA) with a post
275   hoc multiple comparison test (Tukey) enabled us to explore differences by gender, type of actor,
276   stakeholder group, region and workshops, on how the participants' actions varied in: i) their
277   time orientation (short versus long term), ii) coherence with EU policy, and iii) self-
278   responsibility for leading the actions. Then, we used a qualitative word frequency and thematic
279   analysis with MAXQDA© to identify the Affirmative topics on an Opportunity map, from
280   which priorities were drafted. Three priorities per workshop were the provocative propositions,
281   in that they were 'statements which bridge the best of 'what is' and 'what might be' (Whitney
282   & Trosten-Bloom, 2010). The Discovery output identified those issues that were relevant
283   (material) to the stakeholders and provided an understanding of their attitudes towards the
284   recovery of EU tourism.

285   Second, the *Dream* phase was about envisioning 'what might be,' with a view to offering a
286   positive, guiding image of the future (Cooperrider & Whitney, 2005). A question was included
287   in the qualitative survey, as follows: "Provide your vision for the future of the EU tourism
288   sector in the next 10-20 years concerning Safe and Seamless Tourism Experience / Greener
289   Holidays / Tourism Powered by Data." The Dream phase output was a high-level, values-based
290   visionary statement that aimed to reflect the highest collective dreams of the EU stakeholders.
291   The wording adopted was as close as possible to the participants' original voices.

292   The researchers prepared the discussion paper with the DG GROW.F.4 Tourism Unit to provide
293   an effective agenda, set clear expectations, and help participants prepare with background
294   information. The report described the inquiry's purpose, the engagement step by step, and the
295   Discovery and Dream phase's output, including a state-of-the-art list of affirmative topics, lists
296   of priorities and actions, and a vision for each workshop.

297   Third, the *Design* phase required three on-line, parallel workshops, with participants agreeing
298   on, and proposing, ten actions for EU tourism recovery and the 2050 agenda. While previous
299   European Tourism Conventions that aim to provide a space for dialogue among EU tourism
300   stakeholders had taken place at the European Parliament in person, we saw the travel
301   restrictions as an opportunity for more inclusive consultation of stakeholders by easing
302   geographical and financial constraints through an online consultation exercise. Participants
303   were allocated to the three thematic workshops based on stakeholder expertise and interest, as
304   expressed on their survey responses in the Discovery phase. Within their workshop, they were
305   allocated to one of three breakout rooms (with 7 to 13 participants in each). Particular attention
306   was paid to framing questions: i) as being appreciative, to shift participants' attention from
307   short term challenges to conversations about the potential for renewed EU tourism - the Design
308   phase is about dialoguing and co-constructing 'what should be'; and ii) to create an inclusive
309   and supportive environment that encouraged dialogue on how to achieve ideals and find
310   common ground (Whitney & Trosten-Bloom, 2010). The Design went on to develop a list of
311   actions from the provocative propositions (priorities) that set out how the propositions could be
312   met.

313   Three specific roles were appointed among the workshop participants in each breakout room:
314   facilitator, note-taker and workshop rapporteur. The breakout room facilitators (nine in total
315   across the three workshops) steered the inquiry processes in the right direction, encouraged
316   participation in each session, and shared the outputs of their session in the main workshop. The
317   facilitators were briefed on the aim and methodology for the workshops, and the complexity of
318   managing existing tensions among stakeholders to avoid the dominance of one group over
319   another. The note-takers captured the discussion's outputs in predefined online templates that
320   could be seen and edited live by all breakout room participants. Finally, the workshop
321   rapporteurs presented the outputs at the afternoon plenary session of the European Tourism
322   Convention.

323   After a brief introduction by the workshop moderators, the participants went to their breakout
324   rooms. The subsequent approach of co-creating a Google sheet in each breakout room in
325   English, then consolidating the results at workshop level, proved to be highly efficient, effective
326   and democratic. The first activity identified alternative courses of action to tackle material
327   priority areas identified in the Discovery stage. Participants brainstormed additional priorities
328   and then, individually, ranked those priorities based on their importance and feasibility using a
329   Likert scale. All voting within the workshop was open and visible to other participants through
330   a shared Google sheet, while participants discussed the rationale for their choices in Zoom. The
331   four priorities with the highest aggregate scores were carried forward as action points to the
332   second activity. For each action point, the participants allocated enough time to reach a shared
333   meaning of what that action constituted and its boundaries, by defining a SMART goal, action

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334 duration and key performance indicators to measure its progress. This phase also included the
335 identification of leading and supporting stakeholders to operationalise such actions, aiming to
336 embed a sense of co-responsibility for EU tourism recovery. The participants of the nine
337 breakroom rooms returned to their three main workshop rooms to build further consensus in a
338 third and final task. Breakout room facilitators presented the action points developed, and the
339 participants scored their agreement with their breakout room's actions on a Likert scale.

340 Finally, the *Destiny* phase was about sustaining 'what will be,' thus including ever-broadening
341 circles of participation to construct the future (Whitney & Trosten-Bloom, 2010). Destiny,
342 associated with sustaining a positive output, was beyond the scope of the contractual boundaries
343 of this project. Yet, the desirability of reaching consensus in public dialogue for agenda-setting
344 for prospective policies was paramount (Innes, 2004). The reporting and polling at the Plenary
345 session of the European Tourism Convention sought endorsement to workshop results. The
346 polling collected the perceived importance of the action points from high-level EU tourism
347 stakeholders who could not participate in the morning sessions due to size limits or time
348 restrictions. Results were emailed to each participant and the final report was made available
349 online.

350 Throughout the consultation exercise, the researchers' position was fluid, in line with
351 researchers occupying shifting and ambiguous positions during an appreciative inquiry cycle
352 (Reed, 2006). The researchers had long-standing knowledge and experience of the researched
353 world (EU tourism), with one of them being familiar with EU politics and actors' power
354 relations. Such familiarity positioned them as insider actors influencing the framing of the
355 thematic workshops and the questions asked in the design of the inquiry strategy. Familiarity
356 positively shaped the interpretation of results, as the effective use of appreciative inquiry as a
357 research tool heavily relies upon the facilitators' understanding of participants during both the
358 data collection and data analysis phases (Raymond & Hall, 2008b; Nyaupane & Poudel, 2012).
359 The researchers acted as outsider observers for the workshop discussions to distance themselves
360 from the consultation results and to avoid imposing their views on participants. A steering
361 committee was also formed to prepare, deliver and assess the consultation, which strengthened
362 the objectivity of the process, following appreciative inquiry convention (Reed, 2006). The
363 committee included Tourism Unit representatives as the client, the researchers as external
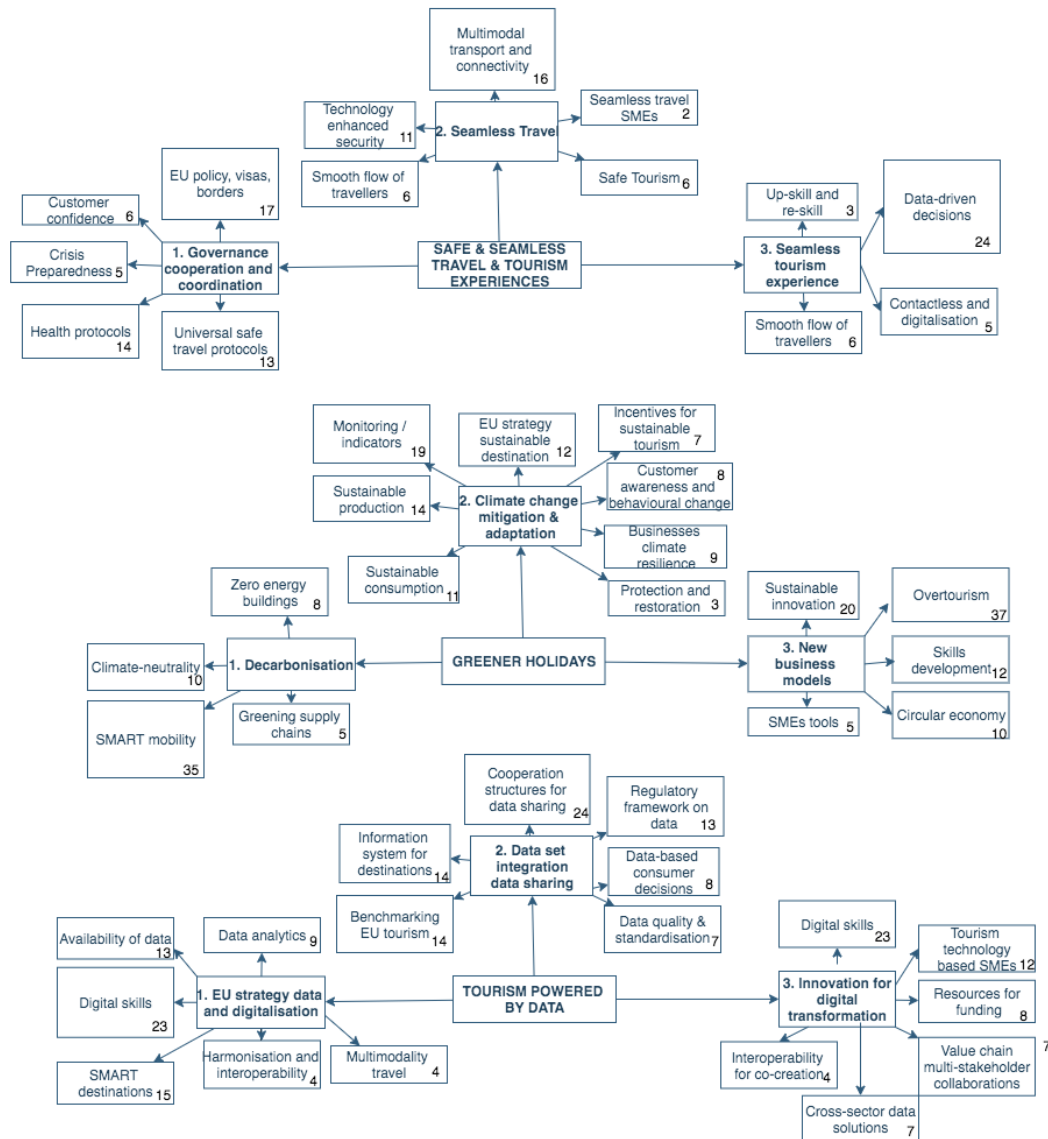364 expert consultants, and three workshop moderators.

365 The interpretation of the legitimacy of the consultation is subject to several limitations of the
366 consultation design. Such limitations arose from a need to adapt appreciative inquiry, and its
367 in-depth stakeholder consultation process, to the time, resources and capabilities available, as
368 with prior interventions (Raymond & Hall, 2008b; Nyaupane & Poudel, 2012). The
369 consultation design did not employ formal interviews to explore the discovery and dream
370 phases, meaning that stakeholder participation was constrained to those who expressed their
371 interest in participating through the open consultation survey. While the EU has 24 official
372 languages, the consultation ran in English due to practical considerations such as limited
373 resources for simultaneous translation of three parallel, online events. Input legitimacy may
374 also be affected as critical stakeholder groups as consumer and citizen group representatives
375 were not targeted and had limited participation, a shortfall shared with other European
376 Commission consultations in other fields (Fraussen et al., 2020). While the European
377 Commission seeks European citizens' opinions through specialised channels, engaging those in
378 future industry-wide consultations can enrich the discussions. Several limitations also affected
379 throughput legitimacy. While the steering committee discussed registering participants'
380 dynamics during the workshops, this could have conditioned the participants' negotiations and
381 biased opinions. Thus, guaranteeing a confidential and safe space for open discussions in an
382 EU cross-jurisdictional setting was favoured in detriment to the ability to study the deliberative

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383 interactions involved for consensus-building. Also, feedback on the consultation process was
384 not sought as it was outside the scope of the consultation project. Finally, the one limitation
385 that affected output legitimacy was common with consultations in public settings whereby
386 multiple stakeholder groups reach a consensus up to the point of recommending actions
387 (Whitney & Trosten-Bloom, 2010). The ultimate jurisdiction of decision-making lies with the
388 European Commission. A mitigating action introduced three rounds of voting for up to 500
389 stakeholders to endorse and legitimise the actions. While we acknowledge the consultation
390 design presents us with limitations in input, throughput, and output legitimacy, including
391 materiality grounded in appreciative inquiry can diminish but not eliminate the legitimacy
392 threats of prior transnational stakeholder consultations (see Section 5).

393 **4. RESULTS**

394 A summary of the results illustrates, in practice, the ability of an appreciative inquiry approach
395 to materiality to lead to effective stakeholder consultation; for further details on the output of
396 the consultation see results publicly available online (European Commission, 2020). We
397 visually display the material issues for recovery, arising from the *Discovery phase,* in Figure 1.
398 This includes the number of contributions made by stakeholders coded in the three priority
399 areas for each workshop (in bold). For example, on *Greener Holidays workshop*, concern for
400 innovation on sustainable business models, and action for climate change mitigation and
401 adaptation were the most pressing issues. Despite the EU Circular Economic Action Plan
402 (European Commission, 2015), most applicants did not prioritise circular approaches. Climate
403 change mitigation and adaptation priority issues were agreed as: defining indicators, sustainable
404 production, and customer awareness for sustainable consumption. Finally, a transition to
405 Greener Holidays was strongly linked to decarbonisation, in line with the European Green Deal
406 (European Commission, 2019). Smart mobility focused on resource-efficient transport, aligned
407 with Directive 2014/94/EU for alternative fuels infrastructure (European Commission, 2014),
408 and the Zero Energy accommodation was in line with the Energy Performance of Buildings
409 Directive (European Commission, 2018).

410 Figure 1: Discovery phase - Opportunity map

11

Multimodal transport and connectivity 16

Technology enhanced security 11

Seamless travel SMEs 2

2. Seamless Travel

Smooth flow of travellers 6

Safe Tourism 6

EU policy, visas, borders 17

Customer confidence 6

Crisis Preparedness 5

1. Governance cooperation and coordination

SAFE & SEAMLESS TRAVEL & TOURISM EXPERIENCES

Health protocols 14

Universal safe travel protocols 13

Up-skill and re-skill 3

Data-driven decisions 24

3. Seamless tourism experience

Smooth flow of travellers 6

Contactless and digitalisation 5

Monitoring / indicators 19

EU strategy sustainable destination 12

Incentives for sustainable tourism 7

Sustainable production 14

2. Climate change mitigation & adaptation

Customer awareness and behavioural change 8

Businesses climate resilience 9

Sustainable consumption 11

Protection and restoration 3

Zero energy buildings 8

Sustainable innovation 20

Overtourism 37

Climate-neutrality 10

1. Decarbonisation

GREENER HOLIDAYS

3. New business models

Skills development 12

SMART mobility 35

Greening supply chains 5

SMEs tools 5

Circular economy 10

Cooperation structures for data sharing 24

Regulatory framework on data 13

Information system for destinations 14

2. Data set integration data sharing

Data-based consumer decisions 8

Benchmarking EU tourism 14

Data quality & standardisation 7

Availability of data 13

Data analytics 9

Digital skills 23

Tourism technology based SMEs 12

Digital skills 23

1. EU strategy data and digitalisation

TOURISM POWERED BY DATA

3. Innovation for digital transformation

Resources for funding 8

SMART destinations 15

Harmonisation and interoperability 4

Multimodality travel 4

Interoperability for co-creation 4

Value chain multi-stakeholder collaborations 7

Cross-sector data solutions 7

Source: Authors, 2021. Note: Numbers indicate the frequencies of each topic.

The results illustrated the importance of bringing diverse stakeholder perspectives into the discussion of material issues (Bellucci et al., 2019). The findings showed insights from stakeholder pluralism, evidenced by the heterogeneity of stakeholder attitudes (including diversity in: gender, type of actor, stakeholder group and region) that affected the proposed actions. The one-way ANOVA tests showed a significant difference between applicants to workshops (Table 1 in the online appendix). The variability of coherence between the stakeholders' proposed actions and current EU policy echoes complexity in understanding the multiple intervening policies in tourism (Estol & Font, 2016; Wanner et al., 2020) with female applicants and private actors providing statistically more coherent actions with EU policy, and Eastern Europe applicants suggesting actions less coherent with EU policies. Also, the stakeholders' attributions to lead actors, of responsibility for the EU tourism recovery, showed that public authorities (national and regional) are seen as the lead actors, both by themselves and by others.

In the *Dream phase*, the inclusion of digitalisation and data-driven innovation evidenced these new underpinning values, together with sustainability earlier recognised in the political framework for the sector's competitiveness (European Commission, 2010). The EU tourism

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429 under the Greener Holidays, "revolves around climate resilience, and sustainable production
430 and consumption for enhanced competitiveness and enjoyment of citizens and tourists alike."

431 In the *Design phase*, most of the time during the 3-hour parallel online workshops was devoted
432 to deliberation, whereby inquiry was purposefully directed to reach an agreement "about what
433 to do... the end to be achieved and the means to be used to achieve those ends" (Rorty, 1999, p.
434 25). The careful design of the workshops, the detailed tasks, and the experienced facilitators
435 ensured a process of divergence and convergence of opinions that, together with voting rounds,
436 clarified several issues' relative importance and collected the endorsement of the proposed
437 actions (Table 2 in the online appendix). Figure 2 gives an evaluation of the materiality of the
438 top ten actions proposed by the workshop participant stakeholders. We can see that stakeholders
439 typically considered the feasibility of acting on a given action to be one point lower than its
440 importance, while in some cases the difference was even greater. Most of the prioritised actions
441 for a transnational governance of tourism were of a short-term nature, to ensure immediate
442 recovery and secure the long-term competitiveness of EU tourism, echoing results in national
443 recovery dynamics (Collins-Kreiner & Ram, 2020). The time frame was issue-specific, with,
444 for example, 70% of actions in Safe and Seamless Tourism Experience being short-term. The
445 actions' nature and timeframe may vary in a pre-or post-crisis context, as materiality results are
446 context-specific and temporal instead of absolute, objective, and relatively unchangeable
447 (Puroila & Mäkelä, 2019). The responsibility of leading the actions fell on the public sector in
448 60% of the cases, confirming that a strong dependence on efforts from the public rather than
449 corporate governance (Amore & Hall, 2018).

450 Figure 2: Top-10 actions per workshop: Importance and feasibility, and percentage
451 endorsement by participants of the European Tourism Convention
452

453
454

13
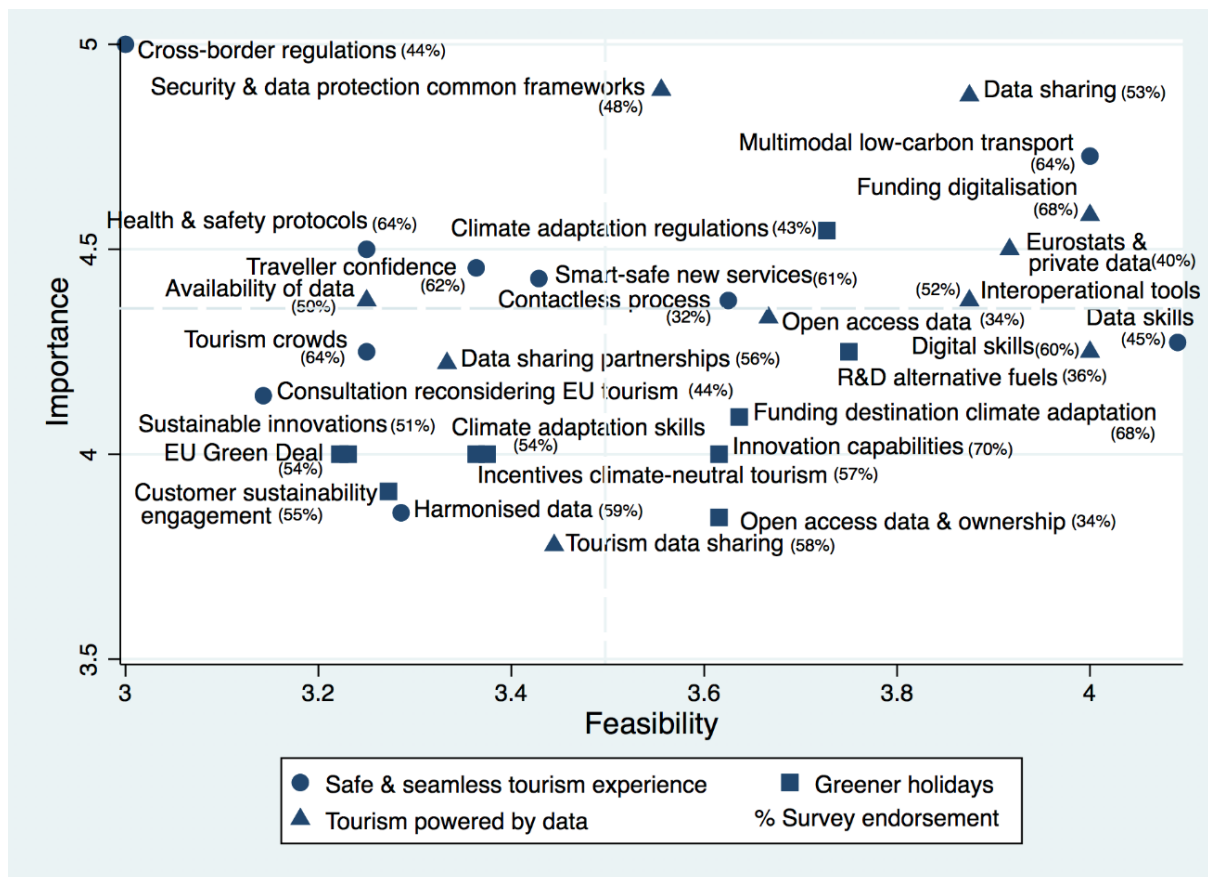
455 In the *Destiny phase*, further voting by the European Tourism Convention participants showed
456 the dynamics of diverse actors with fragmented agendas. More than half of the proposed actions
457 received above 50% endorsement as a priority (Figure 2), most likely because they were tapping
458 cross-sector needs and thus, echoed with the interest of diverse audiences. Stakeholders enter a
459 consultation process to serve their interests (Innes, 2004) and attempt to lobby EU tourism
460 efforts (Anastasiadou, 2008a; Estol & Font, 2016). The remaining actions were more sub-sector
461 or sub-actor specific and thus, received less endorsement. The workshops contributed to
462 achieving "social order within which differences can be discussed and addressed, and joint
463 action can be taken" (Innes, 2004, p. 14). Voting rounds gathered a sense of how workshop
464 results echoed with priority issues for other EU stakeholders, in search of wider legitimacy of
465 the output.

466 As the tourism landscape is rapidly changing, it is paramount to understand stakeholder
467 attitudes towards a sustainable recovery of tourism and their sense of collective responsibility
468 to engage in long-term joint action. The novel stakeholder consultation methodology of this
469 study, which integrates an appreciative inquiry approach with materiality assessment, was
470 successful in eliciting the key priority issues that concern tourism stakeholders about future
471 tourism development in the EU and the interrelationships of their agendas for placing tourism
472 in a seamless, sustainable and digital trajectory. Redefining tourism will require substantial
473 national and regional governmental interventions through access to EU-level frameworks and
474 regulation, financial support, and skills development programs from the EU coordination and
475 support of actions of member states. Results highlight the role of transnational governance
476 efforts to empower local actors across Europe to achieve shared goals, and thus, support the
477 much-needed localised tourism recovery (Rastegar et al., 2021). Results evidenced the
478 importance of public authority leadership roles across different levels of governance,
479 transnational, national and regional, with private entities taking a more passive part, while
480 acknowledging cross-sector development and collaboration are necessary to move forward.
481 Despite the diversity of interests and attitudes across EU stakeholders (Estol et al., 2018), an
482 appreciative inquiry approach to materiality assessment facilitates the acknowledgement of
483 diversity through conversation and negotiation between the public and private actors in the
484 context of broader change. It creates a deliberative space where contradictions and tensions can
485 be left behind for the higher purpose of reaching mutually acceptable solutions on the future of
486 EU tourism.

487 **5. DISCUSSION**

488 In 2020, the pandemic hit the tourism industry hard and triggered a debate over how tourism
489 might change after the pandemic is over. The debate spawned an interest in exploring digital
490 stakeholder consultation methods (Rasmussen, 2020). In this study, we propose a novel
491 stakeholder consultation methodology and illustrate it in the EU transnational tourism
492 governance setting. Below, we discuss the eight principles of appreciative inquiry and the three
493 characteristics of dialogic democratic organising; we explore how those transform materiality
494 assessment towards a deliberative, dialogic and legitimate exercise. The novel methodology
495 offers possibilities to respond to the call for reflexive and participatory stakeholder engagement
496 (Hardy & Pearson, 2018) and the need to secure political legitimacy in tourism (Hall, 2008).
497 The empirical application offers opportunities to understand the process and legitimacy of
498 stakeholder consultation at the EU level (Schmidt & Wood, 2019).
499
500 Input legitimacy, concerned with equal participation opportunities for all interested actors, is
501 critical, albeit complex to realise in practice (Hall, 1994; Schmidt & Wood, 2019; Bellucci et
502 al., 2019). The 'Wholeness Principle' from appreciative inquiry guided the identification and

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503 selection of participants for the materiality assessment. Applications were filtered by: i) the
504 respondent's expertise on the subject matter and contribution to the field, ii) the respondent's
505 level of managerial position at the organisation, and iii) the organisation's geographical
506 location. Demonstrated statistically, the analysis of differences in attitudes among stakeholder
507 groups responds to the call for broad perspectives of what is material (Puroila & Mäkelä, 2019)
508 and the need for substantially more inclusive forms of stakeholder engagement (Manetti et al.,
509 2021). Empirically, engaging with eleven stakeholder groups that, collectively, offer
510 comprehensive geographical coverage of EU countries, provides a more inclusive perspective
511 on EU tourism than previous studies have offered (Fraussen et al., 2020). Thus, the
512 methodology's application recognises, and facilitates, the importance of input legitimacy, i.e.,
513 of accommodating a diverse stakeholder group with a cross-section of participants by gender,
514 region, and stakeholder type and group, for public agenda-setting.
515
516 Several principles from appreciative inquiry assisted in setting the direction and content for the
517 materiality assessment. The 'Poetic principle,' recognised that the choice of topics under study
518 makes a difference to the end results (Whitney & Trosten-Bloom, 2010). The affirmative topics
519 guided the materiality assessment and the scope of the consultation towards a proposed
520 recovery of tourism within i) Safe and seamless tourism experiences, ii) Greener holidays, and
521 iii) Tourism powered by data. The 'Positive principle' acknowledges that language matters, and
522 from a dialogic materiality approach, assessing issues is context-specific and dependent on
523 framing (Puroila & Mäkelä, 2019). Thus, difficulties were approached positively across the
524 workshops, reframing problems as opportunities (Reed, 2006). Careful thought was given to
525 crafting positive questions in the open consultation survey as accordance with the 'Simultaneity
526 Principle,' that the seeds of change are implicit in the first questions we ask (Cooperrider &
527 Whitney, 2005). Since 2020 was a time of acute disruption, we aimed to create a shared sense
528 of confidence and responsibility for the future of EU tourism. The 'Enactment Principle'
529 suggests that transformation occurs by acting questions 'as if' the desired future was already in
530 the present (Reed, 2006). Asking participants about their vision for EU tourism, in advance of
531 the workshop, aimed to encourage them to take actions in the present to recover EU tourism.
532 The 'Anticipatory Principle', which suggests that the future image is a guiding force for present-
533 day actions (Whitney & Trosten-Bloom, 2010), informed how the collaborative workshop was
534 designed to transform the individual visions into a collective pathway towards the recovery of
535 EU tourism.

536 Similarly, several principles from appreciative inquiry shaped the (online) 'dialogic space.'
537 Dialogic democracy refers to using "inquiry and dialogue as primary processes to promote
538 participation and engage all levels of the organisation" (Powley et al., 2004, p. 68). Deliberation
539 about what matters under an appreciative inquiry approach is necessarily about opportunities
540 for positive change. Closed consultation through the workshops was guided by the
541 Constructionist, the Free-Choice, and the Positive principles. According to the 'Constructionist
542 Principle,' reality is socially created through language and conversation (Cooperrider &
543 Whitney, 2005). The workshops opened up space for individuals to actively co-construct an
544 understanding of EU tourism's future reality by considering different types of knowledge
545 throughout the process (Steurer, 2010). Three specific roles assigned to individual workshop
546 participants increased ownership of the results, following the 'Free-Choice Principle' that
547 assumes people's commitment increases with their freedom to choose how and what to
548 contribute (Reed, 2006). Through the workshop interactions, participants engaged freely in
549 dialogic conversations about significant issues.
550
551 The online workshop and its material were carefully designed to promote open, democratic
552 engagement rather than managerial, narrow engagement, as involving many people in

553 deliberation is a challenge (Dryzek, 2011). The breakout rooms, in particular, were 'dialogic
554 spaces' in which visible and negotiated responsibilities for the future of EU tourism could
555 emerge from participants, in line with the need for collective responsibility for long-term
556 tourism development (Reed, 1999). The design of the online environment aimed to raise holistic
557 congeniality, which is the awareness on the deeply connected interaction between the parts and
558 the whole system when people shared knowledge and ideas (Srivastva & Cooperrider, 1987).
559 The final issues identified as material resulted from a negotiation of the differences and
560 contradictions between the stakeholders' subjective values and judgements of relevant issues
561 at the outset. In line with a dialogic approach to materiality (Puroila & Mäkelä, 2019), the issues
562 remained open to contestation throughout the first section of the workshop and time was
563 allocated to recording differences between stakeholders.
564
565 The design of the workshops sought normative consciousness from dialogic democratic
566 organising, which refers to "practical awareness of oneself in relation to others that enables
567 people to engage in conversations about common issues" (Powley et al., 2004, p. 74). Breakout
568 rooms were designed to encourage cross-border, cross-disciplinary and cross-stakeholder group
569 perspectives to capitalise on participants' diversity. Titles and ranks that are traditional symbols
570 of authority, hierarchy and status were not included in the workshop, thus facilitating cross-
571 level conversations of people operating within the tourism industry equally. Different
572 viewpoints were sought to avoid the dominance that is often found in policy consultations
573 (Fraussen et al., 2020). The workshops provided space for pluralism and contradictions in
574 values and goals, where antagonistic opinions could be expressed and recorded in the
575 worksheet. Participants co-developed the Google sheet through listening and working together
576 to reflect the intrinsic links among actors and the need to shift from individual concerns to that
577 of the holistic system of EU tourism.
578
579 The integration of appreciative inquiry principles to the materiality assessment enhanced the
580 throughput legitimacy, which is the deliberative process that promotes accountability,
581 transparency, openness and inclusiveness, and efficacy. Accountability refers to giving account
582 to, and/or being held to account for, the output of the stakeholder consultation. This was
583 achieved by presenting the workshops' output to 870 participants to the Plenary session and
584 over 4,000 web streaming viewers. The Plenary session of the European Tourism Convention
585 was an exercise of giving account to what had been discussed and agreed during the stakeholder
586 consultation. Making the results public to scrutiny and enabling the viewers to vote (online) on
587 the actions further ratified the output of the consultation process and enabled an assessment of
588 how such actions resonated with the tourism industry at large. Also, workshop participants
589 could hold each other accountable for their decisions. Following deliberative democracy
590 (Schmidt & Wood, 2019), they could assess whether the deliberation met specific standards of
591 proceedings without significant inequalities in the exercise of power or voices, i.e., without any
592 participants feeling disadvantaged.
593
594 Transparency, in this case, means providing information about the consultation processes and
595 the resulting decisions on the internet. While agencies are often reluctant to release information
596 for privacy reasons (Schmidt & Wood, 2019), the open and deliberative dialogue, with
597 transparent voting, enabled visible decision-making on the output of the materiality assessment.
598 The use of technical instruments, such as an online platform for the event (zoom.us) and a
599 platform to support the co-development of outputs (Google Sheets), enabled more democratic
600 and transparent decision-making than if the event had been conducted face-to-face. The visual
601 registering of votes allowed each individual to see that their contribution influenced the event's
602 outputs, thus, empowering diverse stakeholders to take part in the decision-making (Steurer,

16

603 2010). This practice can arguably contribute to communal conviction by building "a sense of
604 commitment to the organization and its future well-being" (Powley et al., 2004, p. 76). We
605 exemplify how technology can enable to explore new forms of open, democratic and inclusive
606 stakeholder engagement, called to require greater attention (Manetti et al., 2021).

608 The hybrid consultation approach, combining open tools (mass-mobilised survey) and closed
609 tools (workshop), contributed to enhancing openness and inclusiveness criteria for throughput
610 legitimacy. Despite increasingly good intentions by the European Commission, EU openness
611 and inclusiveness remain limited (Rasmussen, 2020), especially because of the difficulties of
612 transnational mobilisation (Schmidt & Wood, 2019). Openness means stakeholders have access
613 to policy-making consultations regarding the matters in which they are most interested; in this
614 case, the call for expressions of interest was open to all EU tourism actors. Inclusiveness refers
615 to engaging those stakeholders that should have a say in decisions that impact them, which, in
616 this case, was sought through careful selection of workshop participants for a balanced sample
617 by stakeholder sector and group, geography, gender and levels of tourism governance (see
618 Table 2).

620 Efficacy, the fifth principle of throughput legitimacy, is primarily technical but is important for
621 evaluating the quality of a consultation process. To our knowledge, this is the first study to
622 conduct a materiality assessment live and online. This is a substantial methodological
623 contribution, as we demonstrate the benefits of an online stakeholder consultation methodology
624 that is fast, free, effective, efficient and democratic. We present a methodology that offers an
625 alternative to the traditional, time-consuming and expensive approach to stakeholder
626 consultation in public policy (Bramwell & Lane, 2011), and that increases public and private
627 actors' interactions (Arbolino et al., 2020) while delivering tangible outputs.

629 Finally, consistent with the fact that people "react to decision outcomes in terms of the
630 procedures by which those outcomes were arrived at" (Kim & Mauborgne, 1991, p. 126), the
631 integration of appreciative inquiry into materiality assessment enabled participatory
632 engagement in identifying, understanding and reaching a consensus set of stakeholder actions
633 from a range of potentially exclusive views on the future of EU tourism. In any consultation
634 under deliberative governance, high-quality throughput processes can only complement, not
635 substitute for, good policy output and adequate input. The workshop focused on moving the
636 discussion towards consensus, not as an ultimate goal, but establishing a relative order of
637 priorities for joint action. The situation of uncertainty where stakeholders had incentives to
638 come to the table facilitated discussion and agreement on the bigger picture. The need for shared
639 objectives towards the recovery (Collins-Kreiner & Ram, 2020) for rethinking tourism post-
640 pandemic (Rastegar et al., 2021) arguably contributed to mutual reciprocity in their interests
641 (Innes, 2004). Effort was spent on framing the actions in a way that would call for a
642 transformation of tourism, rather than a return to 'business as usual' (Hall et al., 2020). This,
643 combined with the three rounds of voting, ensured a much-needed politically legitimate output
644 (Hardy & Pearson, 2018), namely, a consultation that warrants the right and acceptance of the
645 European Commission as an authority in EU tourism governance. Formal consultations in
646 policy and planning tend to engage with the consensus-building process to end with an
647 agreement (Innes, 2004). Such agreements are a conversation starter rather than a legitimate
648 closure of all the issues and priorities, and serve to guide future work and cooperation on
649 tourism. The European Tourism Convention "launched a dialogue on sustainable recovery and
650 the strategic orientations for the tourism of tomorrow" (European Commission, 2020). The
651 ability of the proposed actions at informing the development of the EU agenda for tourism 2050
652 remains too soon to be assessed.

17

6. CONCLUSION

The main contribution of this study is to propose, deliver and then reflect on a new, systematic, and transparent stakeholder consultation methodology. In our view, an appreciative inquiry approach to materiality assessment is valuable because it allows us to illustrate, and simultaneously reflect on, the complexity involved in attempting to consult with stakeholders online and across borders as part of a self-legitimisation process. This article illustrates the usefulness of such an approach to stakeholder consultation in providing a platform for the European Commission to legitimise its mandate to govern tourism in the EU, which is critical to sustaining audience legitimacy. This methodology is diverse enough to provide room for a range of academics interested in the quality of stakeholder consultations in public and private sectors. It is also specific enough to connect with substantive theoretical work such as deliberative governance and legitimacy as well as empirical work on materiality assessments as part of stakeholder engagement exercises. Learnings from this case can be transferred to both public and private sectors.

For public sector agenda-setting and policymaking consultations, and in light of raising questions about the legitimacy of public authorities (Schmidt, 2013; Schmidt & Wood, 2019; Bayers & Arras, 2021), the methodology answers the call for improved stakeholder consultation exercises in the EU and tourism, in terms of inclusiveness of multiple stakeholder groups (Hall, 2008; Waligo et al., 2013), participation (Soulard et al., 2018), transparency and accountability (Laws, 2011; Schmidt & Wood, 2019) and efficiency (Bunea, 2017). We exemplify the complexity of stakeholder consultations in practice and encourage further research on stakeholder interactions during negotiations and consensus generation in tourism by using effective methods in EU policy literature as recordings of open consultations, post-negotiation surveys, and databases on inherent lobbying efforts in the EU. We also show the potential of appreciative inquiry in public consultations, thus extending the limited tourism research on appreciative inquiry that remains confined to volunteer and community tourism (Raymond & Hall, 2008b; Nyaupane & Poudel, 2012). Public authorities can use dialogic democratic processes, like the appreciative inquiry, to engage stakeholder groups across countries, to include as many perspectives as possible and, thus, reach a broad base of legitimate stakeholders (Hall, 1994) in a more time-effective manner than is possible using traditional face-to-face approaches as meetings, seminars or workshops (Bramwell & Lane, 2011). We contribute to the policy literature by showing how appreciative inquiry delivers value in stakeholder consultation by increasing the reflexivity, democracy and participation of multiple stakeholder groups (up to eleven in this case), effectively and transparently, to ensure a politically legitimate output. This article is also the first attempt to apply materiality assessment in the public sector; further research might wish to explore other action research methods in the quest to adapt materiality assessment to the needs of the public policy context.

For the private sector, an appreciative inquiry approach to materiality assessment can transform narrow and opaque corporate consultations towards a transparent dialogue that responds to multinationals' accountability concerns. The stakeholder consultation methodology proposed presents a response to the call for deliberative accounting and dialogic materiality in practice (Puroila & Mäkelä, 2019; Bellucci et al., 2019; Manetti et al., 2021). Considering that appreciative inquiry has been successful in organisational change processes (Reed, 2006), scholars may explore an appreciative inquiry approach to materiality to advance accountability in the sustainability reporting of multinationals in their progress towards open, democratic and inclusive stakeholder engagements.

While we should be aware of the limits of this novel stakeholder methodology, the article provides reasoned and empirical evidence that shows a possible route towards deliberative digital consultations with, admittedly, incremental and partial improvements in stakeholder

engagement. The value in taking account of the proposed stakeholder consultation lies in allowing us to improve our exploration of all aspects of legitimacy under deliberative governance within the messiness of stakeholder consultations, illustrated through this study in the European, multi-level consultation of tourism. The empirical results contribute to narrowing the knowledge gap in existing stakeholder engagement processes for transnational tourism policy-making (Dimitrovski et al., 2021; Stevenson et al., 2008) by empirically exploring an action from the Tourism Unit of the European Commission, which has seldom been explored (Anastasiadou, 2008a, 2008b). As such, the study contributes to the nascent studies that aim to understand stakeholder attitudes post-pandemic; an area most often explored from the residents' (Qiu et al., 2020) and tourists' perspectives (Kock et al., 2020). Also, by testing the stakeholder consultation methodology online, we demonstrate the possibility to engage in deliberation across a wide range of divergent stakeholders in a way that responds to the difficulties of transnational mobilisation that seriously hamper access and inclusiveness in the public (Schmidt & Wood, 2019) and private sectors (Bellucci et al., 2019) while at the same time addressing the social distancing required during the COVID-19 pandemic (Rasmussen, 2020).

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