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**DOES BUSINESS INFLUENCE GOVERNMENT REGULATIONS? NEW
EVIDENCE FROM CANADIAN IMPACT ASSESSMENTS**

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Abstract

Regulatory impact assessments frequently embed stakeholder consultations in their design. Canada was one of the early adopters of such an approach and therefore has systematic documentation on the actors taking part in these consultations. This article asks whether these consultations have an influence on regulatory change and whether business disproportionately benefits from them. After converting the documentation into data, we find that these consultations do in fact matter: the more diversified the stakeholders taking part, the more stringent the changed regulations. But we also found that for a subset of regulatory changes, those likely to carry high economic stakes, business takes advantage of the consultation, often obtaining some reduction in regulatory stringency. These reductions, however, are conditioned on the relative absence of opposing views expressed during the consultations.

Keywords: business influence, Canada, impact assessments, public consultation, rulemaking

Introduction

Since the 1980s, the Organization for Economic Co-operation and Development (OECD) has been advising governments to seek stakeholder participation before amending existing regulations or elaborating new ones (OECD 1997). Several countries have followed the advice, adopting legislations that mandate extensive consultation in processes of regulatory impact assessment before any significant regulatory change can be approved (Radaelli et al. 2013, Fritsch et al. 2017). The fact that these countries have years of experience with regulatory impact assessments makes it surprising to note the many unanswered questions on the extent to which these assessments have transformed rulemaking: do stakeholder consultations really make a difference in processes of regulatory change? If so, to what extent can non-economic actors make a real contribution to regulatory change? Is it possible that business benefits disproportionately from stakeholder consultation, providing it with an additional opportunity to invest abundant lobbying resources in the pursuit of its interests? This article seeks answers to these questions.

Questions regarding the influence of various stakeholders in regulatory change echo major questions on the power of interest groups—notably business—that have been studied for decades by political scientists (Truman 1951; Dahl 2005; Lindblom 1977; Gray & Lowery 2000, Berry 2010; Baumgartner & Leech 1998). Regulatory impact assessments provide new and rich material to re-visit these important questions, and Canadian governmental regulations are particularly conducive to this undertaking. In fact, rulemaking features prominently in all government activities in Canada. This is due to the fact that the country's parliamentary system allows for the adoption of framework laws, leaving significant discretion to regulatory agencies that are accountable to government ministers (Harrison &

Hoberg 1994, 10-13). Moreover, the country has been a leader in the development of regulatory impact assessments and in the publication of statements that detail all consultations undertaken by regulatory authorities in the years preceding the formal adoption of a change in the country's regulations (OECD 1997). Together with the text of regulatory changes, these Regulatory Impact Assessment Statements (RIASs) are a source of abundant information on stakeholder participation in the process of regulatory change since the 1990s. Moreover, recent methodologies make it easier to transform a large corpus of text into data amenable to statistical treatment, making it all the more relevant to revisit old questions about the influence of interest groups on government.

Our analysis of all amendments and additions to the Canadian regulatory body and all RIASs documenting stakeholder consultations between 1998 and 2018 yields support to the pluralist thesis. That is, when diverse interests participate in regulatory consultations, the resulting regulatory change tends to add stringency. Moreover, non-economic interests, when they prefer less stringency, are generally more efficient than business at obtaining it. However, we do not entirely discard the hypothesis that business interests hold sway over the regulatory adoption process. In fact, we find that regulators are responsive when business expresses uneasiness over new regulations, which generally are associated with higher levels of stringency than regulatory amendments. However, even on new regulations that carry high economic stakes, non-economic interests can restrain the power of business.

The article is organised in four sections. First, we provide some background information on Canadian RIASs and the information that they provide on stakeholder consultation. Second, we review the literature on the influence of stakeholders in the context of regulatory change, which echoes current research on the influence of interest groups on

government. Third, we present our method, which enables the transformation of text into data. Fourth, we present and discuss the results of our statistical analysis.

Background on RIAs

As advocated by organizations such as the Organisation for Economic Co-operation and Development (OECD 2002) and the European Union Commission (EU commission 2001), rulemaking best practices include significant stakeholder participation. The early work of Ayres and Braithwaite (1992) and the subsequent literature on “smart regulation” and “responsive regulation” (Gunningham & Grabosky 1998; Grabosky 2013; Parker 2013; Baldwin & Black 2008) also call for governments to leave behind their command-and-control approach and work toward the development of collaborative relationships between regulators and the targets of regulation. Collaborative approaches would prevent the formulation of ill-informed regulation and problems of compliance. Stakeholders often have unique perspectives on the problems that regulations seek to redress, as well as on the impact that any regulatory change might have on targeted and non-targeted interests. Even though consultations might occasionally fail to generate information that regulators did not already have, it always contributes to strengthening the legitimacy of regulatory authorities (OECD 2005, 2012). The Canadian government understood early on that it had little to lose in requiring its regulators to consult business, non-economic stakeholders and other interested citizens before deciding on a new regulation or amending existing ones (Government of Canada 2004, 2007a, 2012, 2014).

These consultations in Canada take place in the context of strictly controlled regulatory impact assessments, which also require that regulators produce a plain-language

rationale for the change and a cost/benefit analysis, as well as assessments of alternatives to regulations, of the coordination requirements with provincial governments and of the impact of the change on small businesses. Each element of the regulatory impact assessment is the object of a specific section of the RIAS, which is published in the *Canada Gazette* prior to the governmental decision to approve the change. The *Canada Gazette* is an official document that enables the public to react to some governmental decisions, including regulatory changes, before they are made final.

The first Canadian document resembling a RIAS was published in 1978 (OECD 1997, 35); they have systematically appeared in the *Canada Gazette* ever since. However, only RIASs going back to 1998 are available in readable PDF format. The consultation section of a RIAS indicates when the consultation was held and summarizes the views of stakeholders. The section does not specifically mention the names of the consulted individuals, and generic group appellations are frequently preferred over specific group names. The section also reports general opinions about the regulatory change rather than specific arguments. A typical example would be that “environmentalists were supportive of the proposed amendments which would allow for better enforcement of mitigation measures”. Prepared by the competent regulatory authority, the content of all RIASs is closely monitored by the Treasury Board of Canada Secretariat, which enforces compliance with Canadian law and secures a minimum of writing consistency across the various regulatory authorities.

RIASs have become important tools in Canada. Although not formally part of the regulations, scholars have noticed that some judges use them to inform their decisions in technical domains (Houle 2006). Owing to their plain language, they are also seen as

“layman’s guides” to the regulation and are frequently used by groups targeted by the regulation (Salembier & Bernhardt 2002, 15). However, little is known about the extent to which impact assessments in Canada influence rulemaking. Moreover, the international literature offers mixed evidence about impact assessments. While the early literature on “smart” and “responsive” regulation was enthusiastic about stakeholder consultation, empirical research has failed to support its prescriptions (Balla 1998; West 2004, 2009). In addition, Radaelli (2005) has shown that impact assessments are more frequently used to legitimize regulations than they are to improve them. Some scholars suggest that opening up regulatory processes to stakeholders leaves officials more vulnerable to regulatory capture by the most resourceful groups (Yackee & Yackee 2006).

Given the accessibility of Canadian RIAs and the information they provide, Canada offers an excellent opportunity to examine the extent to which impact assessments shape regulatory change. In this paper, we focus on built-in stakeholder consultation and examine the extent to which business and non-economic interests influence the stringency of regulatory decisions.

Hypotheses about the Influence of Stakeholders in Rulemaking

Business is the most common target of government regulations. Whether regulations aim to protect the environment or consumers, to set tariffs or quality standards for traded goods or to improve transportation, work or food safety, regulatory obligations most often fall upon businesses. It is therefore in the interest of business that government makes its regulations as lenient as possible. To be sure, the existence of government regulation is often in the interest of business, if only for the legal protection provided to business operations by a regulated

environment. However, business normally benefits from regulations that impose upon them as little expense as possible (Ryan 2012; Viscusi 1983). The extent to which they succeed in obtaining less stringent regulations, however, is still subject to debate (Binderkrantz, et al. 2014; Nixon et al. 2002). Vogel (2018) even argues that some businesses can use stringent regulations as a commercial strategy, as stringency may disadvantage competitors likely to have more difficulty affording the costs associated with such stringency.

While in some cases non-economic interests demand less stringent regulations, overall, they remain more likely to favour stringency (Caldwell et al. 1976; Beierle & Crayford 2002; Dryzek 2013). Environmentalists are inclined to believe that the environment is best protected when businesses are prevented from emitting pollutants and are constrained to using components that have limited impact on the environment. Consumer protection groups are likely to believe that consumers are best protected when government imposes strict quality standards on products while controlling prices charged to consumers. Depositors are reassured when banks are required to be fully transparent about their fees and limited in the types of risk that they can take with their savings. The literature, however, provides conflicting evidence on the capacity of non-economic groups to convince government to adopt stringent regulations. Some authors argue that, given some conditions, their participation in rulemaking could make regulations more stringent (Woods 2015; Cropper et al. 1992), while others argue that their impact on regulation is insignificant (West 2004; Hallstrom 2004; Balla 1998). Some research has shown that non-economic interests are most likely to succeed in their effort to influence policy output when they are able to mobilize business interests to their side (Vogel 2018).

From this literature, we draw four hypotheses on the extent to which stakeholder participation influences regulatory stringency. A first stream of literature examines the effect of a general opening of rulemaking to stakeholders. Inspired by pluralist theory, it suggests that the sheer inclusion of a diversity of actors suffices to counter-balance the influence that well-organized interests might otherwise have on policy decisions. New actors come with new ideas and perspectives, generating debates that would not have occurred had the discussion been left to business interests (Kerwin & Furlong 2018; Dryzek et al. 2003). As these new ideas, perspectives and debates become known to the public, regulators face severe criticism and eventually political pressure if they ignore them (Montpetit 2016). Therefore, truly open consultations with a diversity of actors may lead to regulatory decisions that do not always please business. Empirical evidence that supports this pluralistic view can be found in Woods (2009, 2015) and Dür and Mateo (2014). Woods (2009, 2015) argues that public consultation improves the responsiveness of policy-makers to a wide range of stakeholders. He notably shows instances of successful challenges of corporate actors by non-economic actors that led to stringent regulations.

Pluralist hypothesis (H1): The more diverse the interests taking part in consultation, the more stringent the changed regulation.

Convinced by research going back to the 1960s (e.g. Bachrach & Baratz 1962; Olson 1965) supporting the claim that business exerts significant influence on government, several scholars are highly skeptical of the pluralist hypothesis. In fact, empirical studies from Europe and North America suggest that, owing to their abundant resources, business stakeholders are more successful in their lobbying efforts than any other interest groups (Coleman 1988; Chubb 1983; McKay & Yackee 2007; Yackee 2006; Golden 1998; Page &

Gilens 2017). Rasmussen et al. (2014) argue that public consultations on government regulations are vastly dominated by business interests and therefore regulators tend to favour weak government controls of economic activities (Yackee & Yackee 2006). This stream of literature suggests that opening rulemaking to non-governmental actors has had asymmetrical effects, benefiting business interests far more than any other interests.

***Power of business hypothesis (H2):** The more uneasiness expressed by business during consultation, the less stringent the changed regulation.*

A recent stream of literature adds significant nuance to the power of business thesis. We brand this literature “strength-in-unity”. While strength-in-unity studies acknowledge that business tends to use public consultation as yet another venue to push for policies that serve its interests, they also show that business is not always successful. The success of business in exerting influence on government can in fact be mitigated by disunity. Business interests do not always agree on the appropriateness of government policy. When they disagree, their capacity to influence governmental decisions is reduced (Chalmers 2018; Young & Pagliari 2017). Studies have shown that business interests and corporations are aware of the importance of displaying a high level of unity, and that to do so they accept compromises and devote important resources to coordination (Holyoke 2011; Bunea 2015). Despite these efforts and invested resources, however, business does not always succeed at building unity, if only for the sheer difficulty of reconciling conflicting interests (Smith 2000). For example, a government might decide that regulation is needed to provide a framework for corporations that explore and extract natural gas. The gas industry will naturally advocate for regulations that are as lenient as possible, to avoid discouraging the exploration and extraction of natural gas. The tourism industry, however, might prefer

stringent regulations that will discourage the development of the gas industry, for fear that exploration and extraction infrastructures will harm the landscape and make the country less attractive to visitors. The gas and tourism industries may be aware that obtaining their preferred level of regulatory stringency from government depends on their like-mindedness, but coordination often fails at reconciling interests separated by a gap of this magnitude. And when business is not unified, its lobbying success is impaired.

Strength-in-unity hypothesis (H3): *The more unity in the uneasiness shown by business during consultation, the less stringent the changed regulation.*

Other studies have shown that it is not only business unity that matters, but the alignment of its position with that of non-economic actors. Rulemaking is a divisive act, and businesses are not always on the same side, as in the abovementioned gas industry example. When these types of divisions occur, the capacity of business interests to align with non-economic interests might have an effect on their combined influence. Looking at the European Union, Klüver (2013, 73) argues that while group resources matter, “how interest groups align in the policy space on any given policy issue” is crucial. And she further shows that the alignment of positions is not the result of actions by a few resourceful groups capable of co-opting the others; rather, it is a collective enterprise. The lobbying success of business depends on its capacity to participate in such an enterprise. Baumgartner et al. (2009, 213) make a similar argument. They write: “if a side were to consist only of [well endowed] organizations, it might well raise the eyebrows of others monitoring politics or the concerns of equally wealthy groups from a rival industry, so it is not certain even when the wealthy get together that they would prevail.” And in fact, Baumgartner et al. (2009) observe that business groups often find themselves with “strange bedfellows” when trying to influence

Congress. In short, the influence of business might depend on its unity, but in case of disunity, winning the influence battle might require the alignment of a business position with that of non-economic actors.

***Alignment hypothesis (H4):** The more closely a business expressing uneasiness is aligned with non-economic actors, the less stringent the changed regulation.*

Data and Methods

The systematic extraction and organization of text from the *Canada Gazette* using web scraping and text mining techniques allowed us to put together a dataset of every regulation created and amended between 1998 to 2018 and of every section of the accompanying RIAS. We thus collected 5985 sets of regulatory changes and RIAs. For this article, we use the text of the regulatory change (not the entire text of the changed regulation) and the consultation section of the RIAS. While the text of the regulatory change informs the outputs of the regulatory process, the consultation section documents the inputs.

Regulatory Stringency

Regulatory stringency, a key output of the regulatory process, is the dependant variable of this study. Specifically, we use a dictionary of n-gram expressions produced by the Canadian federal government to build a stringency index. The n-grams are markers of regulatory stringency and were identified by regulation experts at Justice and Industry Canada (Government of Canada 2017). Our index consists of a count of the n-grams found in the text of changed regulations. Other scholars have used different dictionaries to measure regulatory stringency. However, in a study on the “regulatory burden” in the United States and its impact

on economic productivity, both Al-Ubaydli and McLaughlin (2017) and Loughran and McDonald (2011) use dictionaries similar to the one we use. We tested these dictionaries and found no significant difference when comparing it to the results obtained with the dictionary of the Canadian federal government. In fact, there are significant overlaps between these dictionaries. The expressions included in the dictionary of the Canadian federal government, presented in Appendix I, has the advantage over the others of having been produced from a reading of Canadian regulations.

Stakeholder Mood

The consultation section of a RIAS documents inputs from stakeholders prior to the adoption of the regulatory change by the government. The section compiles all information, questions and comments presented by stakeholders during all consultations that took place prior to the adoption of the regulatory change. Typically, each RIAS covers a period of about two years. From the content of the consultation sections of the RIAs, we built two stakeholder mood indexes. We opted for a measure of mood because the consultation section rarely presents the specific positions and arguments put forth by stakeholders. Specifically, we measure two moods with our indexes: uneasiness and comfort with the regulatory change. The mood indexes were built following a three-step procedure.

First, a random sample of 1000 RIAs was divided into segments that were three sentences long. While it forced us to deal with a margin of error, this sampling prevented us from having to use the large number of coders that would have been necessary to code the entire body of text. The fewer the coders (in this article, only the two first authors participated in the coding), the lesser the problem of coding reliability and the smaller the overall error.

The three-sentence length of each segment was to enable the isolation of a statement each time a stakeholder was mentioned, while keeping a sufficient number of words to capture the mood. Each segment was then coded to identify the category to which the stakeholder belongs: business or non-economic interests. Non-economic interests included a wide variety of advocacy groups, but also officials from municipal and provincial governments and various individual experts from scholarly institutions, professional associations and even international organizations. Business included various groups representing economic interests as well as corporations.

Second, we produced dictionaries of stakeholder statement polarity. The production of these dictionaries required the random reading of consultation sections and the extraction of every term expressing uneasiness toward the regulatory change, as well as of every term expressing comfort with the regulatory change. We reached saturation (that is, the same terms were coming back) after reading and extracting terms from 250 consultation sections. As explained above, RIAS writing is a systematic and standardized process supervised by the Treasury Board of Canada Secretariat. The terms used are relatively formal and the lexicon limited to specific and redundant expressions. The n-grams included in the dictionaries of comfort and uneasiness are presented in Appendix II.

Third, we lemmatized both the text segments and the dictionaries, a process that involved turning verbs to their infinitive form and nouns into their masculine singular. The lemmatized segments were then processed by computer to obtain an exact count of uneasiness and comfort n-grams per segment. We used these counts as measures of mood toward the regulatory change per stakeholder category. These measures of moods are key to our tests of H2, H3 and H4.

When regulators record in a RIAS the fact that consultations revealed business comfort, they're likely reporting a reaction to the proposed change that does not require any responsiveness on their part. In contrast, when regulators record in a RIAS that business expressed uneasiness during consultations, they refer to an input to which business expects a response. In other words, uneasiness and comfort are not the opposite of each other and require careful interpretation. Given our research questions and hypothesis, uneasiness is far more important to our analysis than comfort.

Diversity of Stakeholders

To test H1, we rely on the Shannon Diversity Index, which enables estimations of the diversity and relative importance of each type of stakeholder associated with text segments in the consultation section. The Shannon Diversity Index is a mathematical measure of informational entropy and redundancy (Shannon & Weaver 1998) commonly used in political science (Baumgartner & Jones 2015; Boydston et al. 2014; Boydston 2013; Epp 2018; Workman 2015). The logic is as follows: if every statement reported in a given RIAS's consultation section is associated with a single stakeholder category, the Shannon score takes the value of zero, indicating a lack of diversity. Conversely, the more evenly the distribution of statements among stakeholder categories, the higher the score.

Business Unity and Alignment with other Stakeholders

H3 requires a measure of unity in the mood of business toward the proposed regulatory change. We estimate business unity indirectly by introducing an interactive term in our statistical model between the uneasiness and comfort of business. The main term of business uneasiness then provides an estimate of unity as the interactive term maintains at zero the value of business comfort. In fact, the main term measures the effect of business uneasiness when no one among business stakeholders is comfortable with the regulatory change. We also use an interactive term to estimate the alignment of the business mood with that of other stakeholders (H4), but here we interpret the interaction rather than the main term. That is, we interact the uneasiness of business with that of non-economic actors. The interactive term thus enables the estimation of the effect of business uneasiness at different levels of uneasiness of the other stakeholders, independently of whether or not business is united.

Controls

The stringency of regulations can vary according to factors that might also be related to diversity, business power, business unity and the alignment of positions. We therefore devised control strategies to account for this possibility.

Regulatory changes come in many shapes and sizes. They can be technical formalities or minor adjustments, or they can reshape an entire economic activity. It is reasonable to assume that when government contemplates major regulatory changes, stakeholder mobilization will be larger, and possibly more diversified. However, when we measure the mood of various stakeholders, we are after an input, a signal to which regulators are expected to be responsive by making the regulation more or less stringent. Our goal is not to capture

stakeholder reaction to a regulatory change contemplated by the government; rather it is to estimate government responsiveness to stakeholder inputs. Without an adequate control for the scope of the regulatory change, we risk facing a problem of endogeneity whereby we would infer that stakeholder inputs cause a regulatory output while in fact causality would run in the other direction, with the expected output explaining stakeholder behavior. Therefore, we use a count of the number of words contained in the consultation section as a proxy for scope. The logic is as follows: the larger the scope of the change, the larger the mobilization and reaction of stakeholders and the more words required to summarize the consultation.

We rely on dummy variables to control for the sponsoring department. Twenty-five departments and agencies sponsored regulatory changes between 1998 and 2018. It is possible that both the stringency of the regulatory change and the mood of business may vary according to the sponsoring department. We therefore included in our statistical models the dummies of the five departments responsible for most regulatory activity. These five departments are known as the “big five” among federal regulators. We also control for possible temporal variations in all variables using yearly fixed effects.

RIASs are required for new regulations and amendments to existing ones. It is possible that stakes are generally higher for business when the change takes the form of new regulations. Amendments might bring marginal changes to the regulatory status quo, while an entirely new regulation potentially adds significant regulatory stringency that may be very costly to business. Business might therefore concentrate its lobbying efforts on new regulations, where it matters most. To test this serious possibility, we run separate models for new regulations, in addition to running them on the entire sample.

Descriptive statistics

Table 1 reports summary statistics for all 1000 regulatory changes from our random sample. On average, the text of a regulatory change contains 8.22 regulatory stringency expressions. The measure is skewed, with a standard deviation of 30.14. The distribution is similar to that of the complete dataset (mean=9.229, SD=32.998). This kind of distributional structure is common when studying policy change (Baumgartner & Jones 1993; Jones & Baumgartner 2005; Breunig & Jones 2011, Epp 2018). Diversity scores vary between 0 and 1.61, with a mean of 0.2. The number of zeros explains why the mean is so low. In a relatively large number of regulatory changes, consultations fail to attract participants (449/1000). In many other cases, only business (145/1000) or another type of actor (205/1000) shows up. The descriptive statistics of mood indicate that, all categories considered, uneasiness among stakeholders prevails over comfort. Specifically, the average uneasiness for business is 0.68 versus 0.24 for comfort. For the other stakeholders, the uneasiness score is 0.74 versus 0.36 for comfort. These scores are not surprising, as government consultations generally attract more criticism than praise from participants.

The bottom portion of Table 1 presents the statistics for the control variables. Regulatory changes in our sample are respectively sponsored by Finance (17.1%), the Environment (12.2%), Transport (11.2%), Health (9.1%), and Agriculture (5.5%). These departments, known as “the big five”, collectively sponsor 55.1% of the regulatory changes in our sample. This percentage is comparable to the percentage for the complete dataset. Lastly, 290 regulatory changes are new regulations, against 710 amendments.

Modeling Strategy

The dependent variable is a count of regulatory stringency expressions found in the text of the changed regulation, as published in the *Canada Gazette*. The observations take non-negative integer values that do not reflect any kind of ranking. The count of regulatory stringency expressions is characterized by significant kurtosis ($k=303.16$). Given that tests of overdispersion were significant, we employ negative binomial regression estimates with fixed effects for years rather than Poisson estimates. No evidence of multicollinearity was found in the models, but we nevertheless employ robust standard errors since tests for heteroscedasticity were positive.

Results and Discussion

Table 2 presents four model specifications, one for each hypothesis. To simplify interpretation, regression coefficients are transformed into incidence rate ratios (IRR). An IRR of 1 means that the expected count will be the same if one adds one unit to the independent variable, while an IRR of 0.5 (1.5) means the expected count will be multiplied by a factor of 0.5 (1.5). An IRR cannot have a value below zero. All models include the scope of consultations, the five departments, and year dummies (yearly fixed-effect coefficients are not shown in the table). In models 1 to 4, we predict the level of stringency for all 1000 regulatory changes of our sample.

Taken together, the four equations show that regulators respond with stringent regulations when exposed to a diversity of stakeholders during consultations. They also show that they respond with less stringency not when business expresses uneasiness, but when non-economic interests do so. In fact, regulators appear largely unresponsive to business mood.

The first model estimates the effect of the diversity of interests involved in regulatory consultation on the stringency of the changed regulation. As hypothesized in H1, the diversity of interests participating in federal regulatory consultations should be positively correlated with regulatory stringency. And in fact, we find that the count of regulatory stringency markers is multiplied by a factor of 1.538 when the Shannon index score increases by one unit ($p=0.061$). Figure 1 shows the effect with confidence intervals. At low levels of diversity, the confidence intervals are relatively narrow and, as to be expected, they become wider at higher levels. In fact, relatively few consultations are characterized by high diversity. Of the 551 consultation sections that mention at least one participant, 87 have a Shannon index score above 0.8. Consistent with the pluralist hypothesis, the presence of diverse stakeholders has an effect on the results of a consultation, but diversity is low in several of them. We revisit this issue in a moment.

Model 2 is our test of the power of business hypothesis (H2) and shows that the expression of uneasiness by business during consultation is not associated with less regulatory stringency. Model 3 tests whether unity in uneasiness helps business obtain its desired regulatory output. We introduced an interactive term in the model allowing an estimation of the effect of business uneasiness on regulatory stringency while business comfort is maintained at zero. In other words, the main term measures the effect of business uneasiness in conditions of perfect unity. Just as in Model 2, business uneasiness is not statistically significant, suggesting that unity does not increase the power of business. In Model 4, we test the effect of an alignment in uneasiness between business and other stakeholders. The results showed this interaction to be statistically insignificant, indicating that having non-economic actors in its camp does not increase the power of business. Table

2 fails to provide evidence that business successfully uses consultations in the process of regulatory impact assessment to reduce regulatory stringency.

The story, however, does not end here. A regulatory change might slightly modify tariffs on a traded good or add a chemical to a list of toxic substances. Without denying the importance of such regulatory amendments for a given business, the stakes may be much higher when a regulatory change comes through the adoption of an entirely new regulation. For example, Canada passed a law legalizing the sale and consumption of cannabis for recreational purposes in 2018, potentially offering enormous business opportunities to entrepreneurs already growing the plant for medicinal purposes or owning suitable agricultural land, facilities and equipment to grow it for recreational purposes. Many of these opportunities, however, depend not so much on the law itself, but on new regulations specifying their dispositions. The ease with which business and entrepreneurs can grow and sell cannabis—and develop that product as a viable industry—depends on the stringency of these new regulations. It might therefore be possible that influential business groups concentrate their lobbying efforts on new regulations, leaving less important amendments in the hands of less influential individual corporations and other stakeholders. Descriptive statistics suggest that, in general, the stakes are higher when new regulations are involved. The average stringency for amendments is 5.5, against 15 for new regulations. Unsurprisingly, business interests participate in 31% of consultations about new regulations versus 24.8% of those about amendments to existing ones.

Table 3 presents the results for the same models as those in Table 2, but with the sample limited to the 290 new regulations. When regulators are exposed to a diversity of stakeholders, they respond with new regulations that, on average, score higher on our

measure of stringency. In model 1 of Table 3, the degree of confidence with regard to the effect of diversity is slightly above the 10% mark, but given the relatively low number of cases, we are confident that results provide as much support to the pluralist hypothesis as our tests on all types of regulatory changes. What is new in Table 3 is the support that model 2 provides to the power of business hypothesis. In fact, as business expresses more uneasiness during consultation, regulators tend to respond with less stringent new regulations. Business unity helps a little (business uneasiness main term in model 3), but the alignment of uneasy business with other uneasy stakeholders does not seem to make a difference (interactive term in model 4). In short, the expression of uneasiness by business during consultation suffices for obtaining less stringent new regulations, suggesting that regulators are responsive to business when regulatory stakes are high.

Regulators thus respond with stringent new regulations when exposed to a diversity of stakeholders and with less stringent regulations when business expresses uneasiness. In the face of these contradictory effects, one might ask what regulators do when business expresses uneasiness in a consultation that also attracts several and diverse stakeholders? Before answering the question, it is important to underline that new regulations represent only 29% of all regulatory changes and while these may be particularly significant, all changes that come with a RIAS are considered potentially impactful. When all changes are considered, business uneasiness does not have a significant effect (Table 2). Of the 290 new regulations included in our sample, we find only 65 consultations in which business expressed at least a little uneasiness. Did this uneasiness curtail the effect of diversity in cases where at least some diversity existed among the stakeholders taking part in the consultation? Figure 2 shows the marginal effect of business uneasiness at different levels of diversity. At

high levels of diversity, the effect of business uneasiness is not significantly different from zero. In short, business exerts most influence over new regulations when the diversity of stakeholders in consultation is low.

Conclusion

We have shown that regulators tend to respond to stakeholder diversity during consultations with more stringent regulatory change. Plurality generates debates between actors who favor more and less stringent regulations and in the face of such debates regulators would risk a political crisis if they were to systematically deliver permissive regulations. They therefore tend to produce regulatory changes that are, on average, more stringent than the changes produced when the diversity of actors participating in the consultation is lower. Furthermore, while they are responsive to a diversity of interests, regulators are also responsive to business, but only in particular conditions. And interestingly, the two conditions that we identified in the literature—unity of business and alignment of positions—are not the most significant. In fact, business uneasiness expressed during consultations is associated with lower average levels of stringency on new regulations only (after excluding amendments), and only when stakeholder diversity is relatively low. Business unity further reduces the level of stringency, but only by a small margin. And it seems that business having allies among non-economic actors is not a significant factor in regulation stringency.

While our analysis strongly supports the pluralist hypothesis, thereby showing that opening up regulatory consultations shapes regulatory processes in significant ways, we cannot entirely discard the possibility that business sometimes disproportionately benefits from these consultations. When economic stakes are high, business shows up in consultations

and succeeds at obtaining less stringent changes, especially when non-economic interests in favor of stringency fail to show up in numbers.

Before discussing the implications of our findings, we first underline two limitations, both of which will be addressed in future research. First, our data only covers federal regulations, but Canada is a decentralized federation in which the provinces also have considerable regulatory jurisdiction. And unfortunately, each province has its own requirements for regulatory impact assessment, each differing from those of the federal government. More generally, differences in how governments report their regulatory impact assessments create a considerable challenge for the use of these documents as data in comparative research. Undeterred by the challenge, we will undertake a systematic analysis of provincial RIAs in the near future in view of finding content amenable to comparison. We plan to do the same with countries comparable to Canada. Comparative data would strengthen the general character of our results.

Second, the analyses presented in this article rest on a random sample rather than the full population of regulatory changes and RIAs. This sample limitation was necessary to identify the actors and the text segments in which their mood was summarized. The random selection gives us confidence that the sample is representative, and the consistency of results with cruder models tested on the entire body of regulatory changes and RIAs further strengthens this confidence (these models are not shown in the article). Current developments in machine learning give us hope that we will soon be able to work with the entire corpus without having to code it manually. We prefer working on random samples rather than resorting to manual coding, which comes with serious problems of intercoder reliability when the body of text is so large that it requires a large number of coders.

The findings in this paper have normative implications. Some readers might find it worrying that regulators respond to business uneasiness with less stringent new regulations. Others might find it reassuring that business influence on rulemaking is conditioned by the diversity of perspectives presented to regulators. More often than not, regulations target business. The fact that business communicates a mood toward projected regulations and amendments to existing ones should not surprise anyone. The idea that regulators pay more attention to business concerns when economic stakes are particularly high is also understandable. If they are too stringent, regulations that affect business most might cause serious job losses. However, it should be reassuring from a democratic perspective that even when economic stakes are high, business does not systematically prevail when opposite views are presented during regulatory consultations.

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TABLES

Variable	Obs	Mean	SD	Min	Max
Regulatory stringency	1000	8.22	30.14	0	710
Diversity of stakeholders	1000	0.20	0.36	0	45
Business uneasiness	1000	0.68	2.44	0	7
Business comfort	1000	0.24	0.64	0	22
Non-economic uneasiness	1000	0.74	2.25	0	18
Non-economic comfort	1000	0.36	1.22	0	1.61
Scope	1000	331.33	647.5	2	8303
Amendment	1000	0.71	0.45	0	1
Agriculture	1000	0.6	0.23	0	1
Finance	1000	0.17	0.38	0	1
Health	1000	0.09	0.29	0	1
Environment	1000	0.12	0.33	0	1
Transport	1000	0.11	0.32	0	1

Table 2: Predicting Regulatory Stringency

	(1)	(2)	(3)	(4)
	Pluralist	Power of business	Strength-in-unity	Alignment
diversity of stakeholders	1.538*	1.581**	1.683**	1.631**
	(1.88)	(2.02)	(2.28)	(2.13)
business uneasiness		0.962	0.922	0.934
		(-0.85)	(-1.48)	(-1.34)
business comfort		1.036	0.847	1.063
		(0.34)	(-1.08)	(0.59)
non-economic uneasiness		0.873***	0.877**	0.841***
		(-2.64)	(-2.54)	(-2.93)
business uneasiness X business comfort			1.048**	
			(2.04)	
business uneasiness X non-economic uneasiness				1.006
				(1.42)
scope	1.001***	1.001***	1.001***	1.001***
	(5.54)	(4.38)	(4.39)	(4.51)
Agriculture	0.802	0.812	0.842	0.807
	(-0.81)	(-0.77)	(-0.64)	(-0.80)
Finance	0.714	0.726	0.724	0.732
	(-1.42)	(-1.34)	(-1.35)	(-1.31)
Health	0.380***	0.392***	0.395***	0.389***
	(-3.17)	(-2.98)	(-2.97)	(-3.00)
Environment	0.456***	0.440***	0.434***	0.441***
	(-3.67)	(-3.83)	(-3.86)	(-3.82)
Transport	0.931	0.921	0.910	0.944
	(-0.32)	(-0.36)	(-0.42)	(-0.25)
overdispersion parameter	4.477***	4.428***	4.414***	4.420***
	(27.04)	(26.61)	(26.45)	(26.50)
FE Year	Yes	Yes	Yes	Yes
Observations	1000	1000	1000	1000
Pseudo R ²	0.0287	0.0303	0.0307	0.0305

Table 2 reports coefficients from negative binomial models. We transformed the count log of the response variable into rate ratios. Z-score statistics (the untransformed coefficient divided by its standard error) are in parentheses.

*, **, *** denote significance at the 10%, 5%, 1% levels, respectively.

Table 3: Predicting the Regulatory Stringency of New Regulations

	(1)	(2)	(3)	(4)
	Pluralist	Power of business	Strength-in-unity	Alignment
Diversity of stakeholders	2.015 (1.60)	1.895 (1.42)	2.239* (1.76)	2.027 (1.49)
Business uneasiness		0.837* (-1.85)	0.801** (-2.21)	0.803** (-2.12)
Business comfort		0.706** (-2.51)	0.541*** (-3.05)	0.719** (-2.37)
Non-economic uneasiness		0.939 (-1.10)	0.929 (-1.28)	0.838 (-1.52)
Business uneasiness X business comfort			1.080* (1.94)	
Business uneasiness X non-economic uneasiness				1.010 (1.55)
Scope	1.001*** (3.72)	1.002*** (2.80)	1.002*** (2.78)	1.002*** (2.89)
Agriculture	0.803 (-0.36)	0.953 (-0.09)	0.992 (-0.01)	0.952 (-0.08)
Finance	0.867 (-0.34)	1.028 (0.07)	1.062 (0.15)	1.052 (0.12)
Health	0.275** (-2.21)	0.306* (-1.83)	0.294* (-1.91)	0.329* (-1.69)
Environment	0.633 (-0.87)	0.856 (-0.27)	0.825 (-0.33)	0.768 (-0.45)
Transport	1.100 (0.23)	1.376 (0.73)	1.403 (0.77)	1.375 (0.74)
Overdispersion parameter	4.023*** (15.10)	3.938*** (14.53)	3.906*** (14.36)	3.918*** (14.48)
FE Year	Yes	Yes	Yes	Yes
Observations	290	290	290	290
Pseudo R ²	0.0382	0.0411	0.0422	0.0417

Table 3 reports coefficients from negative binomial models. We transformed the count log of the response variable into rate ratios. Z-score statistics (untransformed coefficient divided by its standard error) are in parentheses.

*, **, *** denote significance at the 10%, 5%, 1% levels, respectively.

FIGURE LEGENDS

Figure 1: The figure depicts the predictive margins of regulatory stringency as diversity of interests increases (CIs=90%). The effect is estimated for proposed regulatory changes that occur in a typical consultative process (average number of words of the consultation section of the RIAS=331).

Figure 2: The figure depicts the marginal effects of business uneasiness on regulatory stringency as diversity of interests during consultations increases (CIs=90%). The effect is estimated for proposed regulatory changes that occur in a typical consultative process (average number of words of the consultation section of the RIAS=331). The interaction is statistically significant when the upper and the lower bound of the confidence intervals are both below or above the zero line.

APPENDICES

Appendix I : Stringency Lexicon

must · must not · shall · shall not · may · may not · is to be · is to ensure · is to have · is under an obligation · is entitled to · has the right to · is required to · is required

Appendix II : Mood Lexicons

Uneasiness (n=164)	Comfort (n=63)
<p>advocate for · be critical of · be too strict · feel that · propose that · raise the follow issue · they revise the proposal · advocate that · also raise · amendment would create an uneven · be oppose · ask for · believe that · call for · challenge · cite concern · comment be receive question · comment that · comment concern the cost of enforcement · comment receive request · comment be receive identify potential inconsistency · concern issue · concern be · concern by · concern with · concern about · concern and suggestion express · concern on · concern that be raise · consistently advocate for · contend that · demonstrate concern · do not adequately · do not agree · do not fulfill · do not think · disagree that · dissent · do not favour · do not reflect the reality of business · express a preference · do no support · express concern · express disapproval · express indifference to this rationale · express its opposition · express opposition · express the desire · express their opposition · feel that · further argue that · have comment pertain · have identify the need to · have some administrative concern · have be actively query · have comment extensively · highlight the lack of · indicated objection · indicate that this be not necessary · be inconsistent with · be not supportive · be oppose to · issue have be raise · it would be preferable · make a suggestion · make some suggestion · maintain that · may not be sufficient · moreover suggest · not align with their expectation · not provide enough · not reasonable · notice of objection · object to · objection raise · objection to the · oppose setting · oppose that · oppose the · oppose these · oppose this · oppose those · oppose comment · oppose view · personal concern · post-mortem recommendation · preferred a · preferred some · propose an amendment · propose additional · provide a detailed list of information that should be · question how · question the · question these · question this · question those · raise a concern · raise a question · raise concern · raise question · raise the issue · recommendation from · recommend an · recommend removal · recommend revision · recommend strengthening · recommend elimination · request be make · request a · request an · request some · request that · request the · request these · request this · request those · request to clarify · respond with comment concern · restated concern · see a lack of · seek to delay · should be require · should not force · some concern · seek clarification · stakeholder suggest · stress a need to · suggest that · suggest the · suggest these · suggest this · suggest those · the proposal should · there be inadequate · there be indication · they estimate an annual net loss · they object to · this change would impose a large risk · this be problematic · voiced concern · be a concern · be also a concern · be also concern · be also request · be also suggest · be insistent that · be propose · be raise as a way of circumvent · be suggest · be unfair to · be also suggest that · be concern that · be concern · be critical · be not in support of · be not supportive · be seek clarification · be negatively impact · with respect to the concern · would affect their ability · would like to see · would prefer · concern have be raise · mixed reaction</p>	<p>acknowledge that · agree that · agree it be important · agree with the propose requirement · all in support · all support · appreciate the opportunity · be satisfy that · be satisfy with · be supportive · broad support · do not express concern · express no objection · express support · express their support · express willingness to · favourable support · feedback on the propose modification be positive · fully support · general support · have indicate support · in favour · indicate support · indicate he have no problem · indicate no objection · indicate no concern · indicated support · indicate they have no problem · indicate unanimous support · be support by · letter support · no concern or issue be · no concern raise · no concern be · no issue have be report · no opposition · no respondent object · no significant comment be receive · no significant concern · not express any objection · public support the · rather than strong objection · reason for support · recommend move forward with the change · show support · support from · support that · support the · support these · support this · support those · support be express · support rationale · understand that · be approve by · be in favour · be not oppose · be positive · be very supportive · widespread support · will be supportive · would not negatively impact · have be supportive</p>