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Stakeholder engagement in regulatory policymaking in a neo-corporatist setting: assessing diversity and balance in open consultations

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Abstract

It has been argued that engaging a wide range of stakeholders in regulatory policy-making could enhance its legitimacy, quality, and acceptability. Open consultations are the only venue that theoretically allows the participation of those affected by policy proposals or those with a special position in relation to them. We examine the participation of all stakeholder types in open consultations, including organized and non-organized interests, across policy areas and time in Finland, a country with a neo-corporatist background. Our novel dataset consists of over 16,000 written statements submitted in nearly 500 open consultations over three years (2013, 2017, and 2021). We study the level of diversity among stakeholder types using the Herfindahl–Hirschman index while also discussing the balance of their participation in relation to the policy areas in which their engagement occurs. Our findings reveal that organized interests are particularly active compared to non-organized actors, although we note some increase in the engagement of companies over the years. The overall level of stakeholder diversity reflects moderate concentration, but it varies considerably across policy areas. We suggest that occasional high concentration in engagement does not necessarily indicate imbalance, as the policy issue itself determines whose involvement is most relevant.

Keywords Affectedness · Balance · Diversity · Open consultations · Regulatory policymaking · Interest groups

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Introduction

The promotion of participatory governance where all affected stakeholders are engaged is an overarching approach in modern-day regulatory policymaking both at the national and international levels, including, for example, the European Union, and international organizations, such as the Organization for Economic Co-operation and Development (OECD). The aims can be implemented through various consultation practices, supported by specific guidelines (e.g., OECD 2012; European Commission 2023). Participatory governance represents a shift from representative and organized forms of participation to more personally meaningful engagement for those potentially affected by policy decisions (McMurry and O'Sullivan 2022, p. 555; see also Bherer et al. 2016; Fung 2006; Pateman 2012). In general, involving a broad range of interests is expected to increase the quality of regulations and improve the acceptability and legitimacy of legislative policies (e.g., Braun and Busuioac 2020; Rasmussen and Reher 2023).

We examine the level of stakeholder diversity and its implications to balanced participation in regulatory policymaking in a neo-corporatist country through open consultations across policy areas and time. Theoretically, this study builds on a strand of research focused on the engagement of various types of stakeholders, while also recognizing their position as possible actors subject to the policies being commented on or having another type of relevant position on the issue in question, thereby giving a special impetus to engage (see Binderkrantz et al. 2021; Bunea and Lipcean 2023; Crepaz et al. 2022; Junk et al. 2022). This broad notion of stakeholder types includes public authorities, interest groups and their subgroups, research institutions, researchers, companies, and individual citizens, thus comprising both organized interests and non-organized stakeholders. In addition, studies have examined stakeholder diversity or compared the participation of different stakeholder types to each other (Beyers and Arras 2020; Braun et al. 2020; Fraussen et al. 2020; Marxsen 2015; Quittkat 2011; Rasmussen 2015). Following these lines of research, our approach is thus more inclusive than the traditional focus of interest group literature, which focuses solely on interest groups and their subgroups (e.g., Baroni et al. 2014).

Among various consultation approaches, open consultations tend to be the only venue that enables the participation of all targeted stakeholders or those possessing information on or an interest in the proposal. Prior research on interest groups has shown that open consultations tend to attract business and economic interests in particular, compared to other interest group types, such as those that advocate for broader social issues like the environment (Beyers and Arras 2020; Rasmussen and Carroll 2014). However, open consultations have also been argued to produce better variety between various stakeholder types compared to other consultation approaches, such as closed preparatory bodies or consultation events (e.g., Binderkrantz et al. 2021; Bunea and Lipcean 2023; see also Fraussen et al. 2020 for varying results). These findings mostly concern participation in various European Union institutions (e. g, Fraussen et al. 2020; Røed and Wøien Hansen 2018; Wonka et al.



2018), and similar results have been obtained in the USA (Yackee and Yackee 2006; Balla and Daniels 2007).

The studies mentioned above have taken place in pluralist political systems, in which participation has traditionally been open to all. This is important to acknowledge because contextual factors, such as the political system, are argued to possibly affect the patterns of stakeholder engagement, as demonstrated, for instance, by Rasmussen (2015) (see also Haber and Heims 2020; Bunea and Lipcean 2023; Huxley et al. 2016 on this discussion). The amount of research examining stakeholder engagement in open consultations, particularly within European countries (e.g., Rasch et al. 2020; Halpin and Thomas III, 2012; Binderkrantz et al. 2014), is more limited.

Our study adds to the scarce literature focusing on the national level and the engagement of stakeholders in regulatory policy via open consultations. We focus on Finland, a neo-corporatist country, where organized interests, especially labor market organizations, have historically been powerful stakeholders with a privileged position in certain policies in regulatory policymaking. However, current regulatory guidelines and the adoption of an open online consultation platform in Finland have allowed the engagement of a wider range of stakeholders, including non-organized stakeholders, such as individuals, to participate in regulatory policymaking.

Our novel dataset consists of over 16,000 written statements given in nearly 500 open consultations across three years (2013, 2017, and 2021), thus providing a thorough analysis of actual stakeholder engagement. We examine the engagement patterns of stakeholder types using a descriptive quantitative analysis. Due to the neo-corporatist background, we concentrate particularly on the level of engagement between interest groups and non-organized stakeholders. Furthermore, we examine whether any temporal changes can be identified, given that our data spans eight years—a period that reflects a significant increase in the emphasis on participatory regulatory policymaking within Finland's policy guidelines.

To examine engagement patterns, we scrutinize the stakeholder diversity of those participating in open consultations by using the Herfindahl–Hirschman index (HHI), while also adopting the concept of balance in relation to those affected (on affectedness, see Junk et al. 2022). As the focus on the policy issues in question determines whose engagement is relevant, we scrutinize the engagement patterns of stakeholder types across policy areas, which is likely to reflect the diversity and balance of participating stakeholders. This approach differs from the conventional strand of interest group literature which applies the concept of bias that refers to the representation of interest groups in relation to their population in a given political system (see, e.g., Berkhout 2024).

Our results reveal at least some level of engagement by all stakeholder types. We observed significant mobilization by interest groups, particularly business groups, compared to non-organized actors. This is likely linked to Finland's neo-corporatist tradition. Additionally, public authorities were active participants. Interest groups exhibit a greater diversity compared to the overall diversity observed among all stakeholder types. However, the engagement patterns and the level of stakeholder diversity vary across policy areas considerably. We suggest that even higher levels of concentration by some stakeholders should not automatically be deemed biased.



At least in specific policy areas where the stakeholder types affected by the regulatory policies in question may be both limited and expected to be active, the engagement may in effect be considered balanced in relation to affectedness.

Temporal changes show an increase in the engagement of companies and citizen groups, which suggests that the adoption of the open online consultation platform may have had a positive impact on the engagement of these stakeholder types. The increase may also relate to the policy issues of legislative proposals over the years examined, as the issues are likely to be linked to whether different types of stakeholders are motivated to participate or not.

Our country-level case study focusing on a neo-corporatist political system has further reinforced the existing evidence on the connection between political systems and the varying engagement patterns they may produce, as identified by Rasmussen (2015). In addition, our focus on policy areas regarding stakeholder diversity and balance between those affected is a less considered approach, although its adoption is fruitful in the assessment of participatory governance. When examined by policy areas and in terms of those (possibly) affected, bias between stakeholders—and regarding the participation of business groups in particular—may not be as strong as previous literature has indicated.

In our analysis, we thus have a different approach compared to much of the prevailing interest group literature, which compares participation rates to the overall population of interest groups. Instead, we focus on the engagement of those who are affected by the proposed regulations. This aligns with the principles of participatory governance in regulatory policymaking.

In the following, we first examine the literature on the diversity of participatory engagement in open consultations in relation to political structures, including discussion on bias, affectedness, and balance, after which we specify the context, data, and methods of this study. In the analysis, we first examine the overall diversity of the participation of stakeholder types in open consultations within our data and in relation to their organizational levels. Furthermore, we explore whether the picture changes when we consider policy areas and the activity of stakeholder types over the specified timespan, and what the results indicate in terms of balance.

The diversity of participatory engagement in relation to political structures

Diversity of engagement

Reaching a diverse set of actors enhances the likelihood that a large variety of views and knowledge is considered in regulatory policymaking. Open consultations, in particular, have been highlighted as a method to engage a wide range of stakeholders in regulatory policymaking (e.g., Beyers and Arras 2020; Quittkat 2011). In this method, public officials typically publish a draft proposal on a website, and stakeholders can respond to it with a written statement. The process is open to all who are interested, which means that it is self-selecting and dependent on the activity of stakeholders. The procedure can also be hybrid, combining open and targeted



characteristics, as public officials may specifically request statements from those stakeholders that they perceive as relevant (see also, e.g., Rasmussen 2015; Halpin and Thomas III 2012, p. 587).

An increasing number of studies has examined the participation of stakeholders and scrutinized the ‘inclusiveness’ (Quittkat 2011) or ‘stakeholder diversity’ produced in consultations with them (e.g., Beyers and Arras 2020; Fraussen et al. 2020; Binderkrantz et al. 2021). Previous studies on interest group types in general have consistently revealed that business groups and other economic interests participate more actively compared to nonbusiness interests, such as citizen groups, that advocate for other types of public or identity interests (e.g., Beyers and Arras 2020; Yackee and Yackee 2006; Quittkat 2011; Rasmussen and Carroll 2014). The reasons for this discrepancy are often linked to organizational characteristics such as financial resources, time, and representational support, especially possessed by labor and business groups (see, e.g., Dür and Mateo 2016, p. 180; Weiler et al. 2019, p. 290). Finally, studies on interest group population research both at national level (Dür and Mateo 2016, pp. 47–48; Berkhout et al. 2017) and at EU level (Coen and Katsaitis, 2013; Wonka et al. 2010) assess that there are a greater number of business interests to begin with, which in turn may result in their more active engagement.

The strong dominance of business groups may negatively affect diversity between group types in policymaking. Scholars have argued that the interest group participation is *biased*, if some interest groups are overrepresented in relation to their overall presence within the political system, and in this context, balance is the positive expression of the same setting—an unbiased interest system—indicating that no particular types of actors or interests dominate over others or receive excess attention (see, e.g., De Bruycker and Beyers 2015; Hoff et al. 2016; Klüver 2013; Lowery et al. 2015). In these types of studies, the existing bias is based on *the extent* to which various interests are represented, and it is typically focused on the comparison between business and nonbusiness interest.

However, assessing the ‘appropriate’ level of engagement in a regulatory context is more complex, if viewed from the perspective of participatory governance, which underlines the engagement of *those affected*. For this reason, we employ the concept of *balance* in a manner that is not connected to bias in the above-mentioned way. Our method of connecting the concept of balance to affectedness resembles the approach employed by Crepaz et al. (2022) and Junk et al. (2022). These scholars have examined the balance of access to participatory venues, emphasizing that the motivation to participate is influenced by the perceived relevance of the policy issue. Their approach focused on understanding changes in political access in response to external events. From our perspective, the central idea is that combining balance with affectedness prompts expanding the viewpoint from a selected number of (interest group) actors to a full variety of stakeholder types potentially affected by policy issues. Reflections on the balance between participants thus require the consideration of their affectedness in relation to the policy issue in question.

We operationalize balance by combining stakeholder diversity and policy areas. Studies assessing levels of stakeholder diversity within participation patterns have used diversity indexes, which facilitate the comparison of participating actors and



offer metrics for assessing the extent of diversity among them (Beyers and Arras 2020; Rasmussen and Carroll 2014; Braun et al. 2020). Diverse engagement of stakeholders is not a guarantee of balanced participation; however, it can provide a tool to assess it when connected with the examination of affectedness in relation to policy issues. In our analysis, policy areas represent policy issues. The strength of the measure to assess levels of balance this way is dependent on the categorizations of the policy areas in question in terms of expected affectedness.

Variation in participation patterns has been detected across policy areas (Berkhout et al. 2017; Quittkat 2011; Fraussen et al. 2020; Beyers and Arras 2020; Binderkrantz et al. 2014) and policy types, such as whether the policy is regulatory, expenditure, or administrative (Rasmussen and Carroll 2014, p. 453; Binderkrantz et al. 2021; see also Bunea and Lipcean 2023). Many of these prior classifications have included a research design in which the focus has been on the engagement of business interests. Other studies have considered the breadth of engagement by actors (Halpin and Binderkrantz 2011; Halpin and Thomas 2012) in various policy areas but without comparing the engagement patterns of stakeholders in them.

We adopt a thematically oriented categorization of policy areas (to be depicted in detail in the methods section), inspired by the classification used previously by Fraussen et al. (2020). Hence, we aim to contextualize the proposals subject to open consultations according to the broader themes that they consider. Although this approach does not provide an exact measure for evaluating the level of balanced engagement, it can provide a means for making approximate assessments of the ratios of engagement between stakeholder and interest group types in relation to policy areas.

The political and institutional context of consultations

The political context in which consultation occurs has been argued to affect stakeholder engagement (Rasmussen 2015; Christiansen et al. 2010, p. 35; Aizenberg et al. 2024, p. 3572; see also Haber and Heims 2020 and Huxley et al. 2016 on participatory ideals across countries). One of the popular categorizations is to divide countries into corporatist or pluralist political systems (e.g., Siaroff 2020; Lijphart 1999). These are often referred to as ‘ideal types,’ accompanied by concepts such as neo-pluralism or neo-corporatism (Downes 1996, pp. 176–177; MacFarland, 2007), but the concepts are often used interchangeably with or without the prefixes.

Furthermore, various definitions of the meanings of the systems exist. In this study, we understand neo-corporatism according to Christiansen (2024, 27), who defines it as ‘a way of organizing political decision making in which state actors—elected politicians and civil servants—engage with representatives of privileged interest groups in order to compromise on public policies.’ Well-established interest groups, such as labor market organizations or trade unions, have thus been formally engaged in committees or similar bodies, in which access tends to be restricted (Ihlen et al., 2021, p. 306). This manner of organization has focused on policies concerning mainly labor market, agricultural, and to some extent social policies (Öberg et al. 2011). Policies related to working conditions or wages have been typically



negotiated within a tripartite system that brings together the state and representatives of employers and employees (Siaroff 2020, p. 122; Traxler 2004).

Contrary to the (neo-)corporatist restricted and selective engagement of some interests stands the more open (neo-)pluralist system, which allows the engagement of a wider set of actors. For this reason, pluralist systems have been suggested to result in more balanced interest representation in contrast to corporatist traditions that are ‘clearly biased via privileging access for only a favored few’ (Lowery et al. 2015, p. 1226; see also Christiansen et al. 2010, p. 25; Rasmussen 2015, pp. 278–280).

In theory, one could suppose that the impact of the political system should not be that significant in the institutional arrangements of open consultations, as participation is available to all interested, resembling a pluralistic approach. However, a comparative study by Rasmussen (2015) revealed variations in engagement patterns between neo-corporatist Denmark and neo-pluralist UK regarding written statements in open consultations. The study found differences in the participation of organized interests and direct, non-organized engagement. In the UK, stakeholder participation was more direct, whereas in Denmark, organized interests were particularly active (see also recent findings of EU for similar results Bunea and Lipcean 2023).

Regardless of the political system, interest groups in general have a better position compared to individuals in policymaking, as public officials may perceive organized interests as possessing greater ‘organizational expertise and staff’ that enable them to meet the demands of participation (Rasmussen 2015, p. 276, see also Albareda 2020). In addition, it may be easier for public officials to identify key interest groups compared to individuals (Christiansen 2012, pp. 174–175), which may affect the engagement patterns. Neo-corporatist structures may further reinforce these tendencies due to the close relationship between public officials and representatives of organized interests, particularly regarding groups that enjoy a privileged position.

Yet citizen engagement is a major aspect of the participatory objective and often considered in the consultation guidelines. The general observation is, however, that their engagement has found to be rather limited, although variations among political systems exist (e.g., Rasmussen 2015; Balla and Daniels 2007 on country-level research and Marxsen 2015; Bunea and Lipcean 2023 on EU). Issues that have been highlighted as hindering citizen engagement in general relate to, for instance, ‘lack of awareness, low participation literacy, and information overload’ (Alemanno 2015, p. 4; see also Coglianese 2006; Farina and Newhart 2013).

In Finland, the neo-corporatist context of this study, only a limited amount of quantitative research exists on regulatory policymaking. One of them is the study by Vesa et al. (2018), which surveyed the access of organized interests to policymaking. The findings suggested particularly active participation by those traditionally powerful in corporatist countries, namely labor market organizations and business groups, although citizen groups also reported engagement. In general, the use and influence of tripartite negotiation have been argued to be diminishing in Finland (Sorsa et al. 2024). However, as mentioned above, its use mainly covers a limited range of policies, traditionally relating to work and economic policy.



Other temporal changes in Finland include the increased significance of open consultations in regulatory policymaking. The most recent consultation guidelines (Finlex A n.d.), introduced in 2016, emphasize the importance of open consultation via written statements, suggesting that it could only be excluded in well-justified cases. The objective of consultation thus took a more participatory turn, with an increased emphasis on obtaining views from citizens and promoting ‘equal opportunities to participate’ (Finlex A n.d.). To support this trend, a new digital platform, also launched in 2016, made open online consultations more accessible for anyone interested. Finally, public officials in Finland typically request comments from targeted stakeholders whom they consider important with regard to the topic of the proposal, making the approach hybrid in practice.

Theoretically grounded expectations

As explained above, the normative ideal of participatory governance in regulatory policymaking underlines the balanced engagement of all affected stakeholder types. Based on previous literature, we have three theoretically grounded expectations on the engagement patterns to be found.

Firstly, despite the availability of the open consultation examined supporting pluralist engagement, we expect the national level neo-corporatist context of the study to be reflected in the engagement patterns so that organized interests participate more actively compared to unorganized actors. This is grounded in the privileged position that organized interests have traditionally held in regulatory policymaking, at least regarding some policy issues in Finland along with other neo-corporatist political systems. Furthermore, statement requests are frequently sent to organized interests, which may impact the extent of their participation although it is a question that cannot be answered with our data.

Secondly, according to our *policy area expectation*, we anticipate that stakeholder types participate differently across policy areas, which affects stakeholder diversity along with the balance between those affected. For example, business groups are likely to be active across most of the policy areas, but their engagement may be even more likely in financial and various business-related policy issues, as suggested by prior research (Binderkrantz et al. 2014, 2021; Beyers and Arras 2020). Moreover, given the neo-corporatist tradition, we expect that trade unions will engage particularly in policy areas related to both financial and social matters, as these areas are likely to encompass regulations on working conditions and wages, issues in which these actors have often (although not exclusively) been involved through tripartite or other preparatory bodies (e.g., Siaroff 1999; Öberg et al. 2011; Sorsa et al. 2024).

In contrast, nonbusiness group types, such as citizen groups, may be more motivated to engage with regulations concerning, for instance, justice, social, and environmental issues (Marxsen 2015; Quittkat 2011). Furthermore, the participation of organized interests and unorganized stakeholders may vary between policy areas. As



the influence of neo-corporatist structure has primarily been important in financial and social issues, the participation of trade unions and business groups may be lesser in policies addressing environmental, cultural, and administrative matters. If these expectations of varying engagement among policy areas are confirmed, participation is likely to reflect a certain level of balanced participation due to the affectedness.

Thirdly, according to our *temporal expectation*, we anticipate improved levels of stakeholder diversity across the years examined. As the Finnish consultation guidelines were updated in 2016 (Finlex A n.d.), accompanied with the renewed online platform, both aiming to enhance inclusive participation, we expect to find an increasingly diverse set of stakeholders particularly in 2017 and 2021. In this respect, 2013 serves as a baseline representing the ‘old realm.’ In particular, we anticipate a higher level of engagement from unorganized stakeholder types due to the improved accessibility of open consultations.

Measuring engagement patterns of various stakeholder types

The regulatory dataset

First, we conducted a regulatory dataset using quantitative content analysis. A human coder reviewed all legislative proposals in 2013, 2017, and 2021—a total of 541 proposals¹—focusing on the sections that detailed the preparation process. This led to a dataset of 464 legislative proposals that had included open consultation during the ministerial preparation. In other words, the method was used in 87% of all the legislative proposals, which is in line with the normative base of Finnish regulatory policymaking supporting open participations. In the Finnish context, by regulation we refer to legislation that covers all policy areas directly affecting a variety of stakeholder types, not only business-related actors (i.e., companies and business groups).

The dataset was categorized based on policy areas to examine variation in stakeholder engagement across different policy issues. The aim was to allow for a more nuanced contextualization of stakeholder mobilization and an assessment of the balance of participation in relation to the policy matters in question. The coding was mostly based on the categorization used by Fraussen et al. (2020, p. 479). Their classification, originally designed for the EU context, required some modification, however, to be applicable to the national context. Hence, we introduced new categories covering typical policy issues in national policymaking, such as justice and safety, and administration. Additionally, we removed the category of state aids and commercial policies.

Ultimately, our revised categories included seven policy areas. They are: (1) Finance, including all financial and corporate regulation including, for instance,

¹ From 2021, we excluded COVID-19 proposals whose regulation was only temporarily valid, which according to the legislative proposals often meant that the drafting had been done in a hurry and had not necessarily followed the consultation guidelines. There were 49 such proposals.



working conditions and taxation²; (2) Justice, which relates to regulation on rights, legal procedures, defense, and criminal policy; and (3) Social, which considers regulation on social and health care, and education and culture; (4) Environment, which consists of environmental, energy, and construction regulation; (5) Traffic, with policies relating on transportation, telecommunication and information systems, (6) Agriculture, including regulation on food, agriculture, and animal care; and finally, (7) Administration, which consists mainly of regulation that relates to administrative bodies. Not only do these themes reflect the topics addressed by legislative proposals, the classification also roughly follows the ministerial division of responsibilities in Finland.

The three years in question were selected because they were situated in the middle of a government's term and were therefore not close to elections. Proposals from these years should thus be roughly comparable to each other in terms of scope because legislative proposals are typically shorter than average at the beginning of the government period, and the end of the period can include particularly large and complex proposals, some of which may not proceed to the parliamentary procedure. In 2013 and 2017, governance was under a right-wing party, in contrast to 2021, when a left-wing coalition was in power. As governments pursue their own political objectives through legislative proposals, this influences the types of legislative proposals introduced, which, in turn, may affect the share of proposals in different policy areas over the years.

As depicted in Table 1, the distribution of legislative proposals in relative shares among policy areas was quite even. The most notable change occurred in the policy areas of Justice (+9%), Finance (-7%), and Administration (-8%). Additionally, Table 1 shows the division of statements given on these proposals across policy areas between the years examined. The changes in the shares of statements across policy areas do not align clearly with the findings of proposal division. For instance, although the share of proposals in the policy area of Justice increases, the share of statements shows a decrease. Regardless, we note a fairly similar division of both proposals and statements given on them over the years examined in our data.

Varying numbers of proposals across policy areas over time are likely to affect the mobility of stakeholder types. Instead, the connection of the government and stakeholder participation may be less important. For example, a left-wing government may promote environmental regulation, but regardless of the composition of the government and the tightening or loosening of the regulation, the same actors

² Legislative proposals in the Finance policy area included, for instance, proposals on supplementary pension rights of employees and self-employed persons, and amending the Tax Settlement Act. Policy area of Justice featured, for instance, proposals on amending the Criminal law and the Civilian Service Act. In the Social policy area, proposals focused, for example, on amending the Health Insurance Act, social security legislation, and educational issues such as the Pupil and Student Welfare Act. Environmental proposals addressed, for instance, regulation on waste management law, as well as the Emissions Trading Act, and the Water Management and Land Use Act. Traffic policy proposals included regulations on transport fuels, electronic communications, and amendments to private road laws. Examples on the policy area of Agriculture involved amendments to the Food Act, regulations on medicating and breeding of animals, and changes to hunting laws. Many proposals in the Administration policy area related to the government agencies, and, for instance, their personnel, including amendments to the Civil Service Act and regional provisions for public employment and business services.



Table 1 Percentages of legislative proposals and statements and differences in their numbers over time (%)

	Proposals				Statements			
	2013	2017	2021	Change *	2013	2017	2021	Change*
Finance	27 ↓	22 ↓	20	-7	16 ↓	14 ↑	16	+/-2
Justice	19	19 ↑	28	+9	15 ↓	13 ↓	12	-3
Social	15 ↑	20 ↓	17	+5	29 ↑	32 ↓	24	-8
Environment	13 ↓	11 ↑	14	+3	20 ↓	13 ↑	17	-7
Traffic	10 ↑	13 ↓	11	+3	7 ↑	14 ↓	13	+7
Agriculture	7 ↓	5 ↑	7	+2	4 ↓	3 ↑	5	+2
Administration	9 ↑	11 ↓	3	-8	20 ↓	12 ↑	15	-8
%	100	100	100		100	100	100	
N	151	153	160		4548	6284	5457	

*Change in percentage points between smallest and largest difference

are expected to participate, such as business groups representing business interests and citizen groups representing environmental values. Hence, the varying compositions of the government may not have a clearly predictable impact on stakeholder mobilization.

The dataset on written statements

Our second *dataset on written statements* consists of actors who have provided a written statement in an open consultation platform on legislative proposals included in the regulatory dataset, consisting of 16 288 statements altogether. We began the collection of this data with the assistance of the Lawradar (Lakitutka),³ a research infrastructure that searches legislative documents in Finland that are accessible through an open interface. It refers to a governmental project register platform, which is a website on which public officials provide information on their ongoing legislative projects, leading to legislative proposals. With the assistance of the Lawradar, we then received information on actors that had provided a written statement on these proposals in 2013, 2017, and 2021. The information was nearly complete for 2017 and 2021, but almost half of the legislative projects for 2013 were not documented on the governmental platform. In the cases of absent data, we contacted the ministries responsible for the preparation, asked for missing stakeholder information, and coded them manually into our dataset. Participation in the open online platforms requires strong identification, for instance, with personal bank credentials, which means that engaging multiple times per proposal, is not possible.

³ Lawradar is an open-access research infrastructure provided by the University of Turku that pools together public political and legal documents related to law-making from various sources (https://resea.rch.utu.fi/converis/portal/detail/Publication/175346393?auxfun=&lang=en_US).



We categorized all engaging stakeholders (the name of the agency or whether the stakeholder was an individual⁴) into seven stakeholder types (see Appendix 1. for more details). In the categorization, we sought to capture essential elements within the stakeholder types as well as the differences between them, with the aim of comparing the engagement of organized and non-organized interests. The stakeholder types are: (1) public authorities, (2) interest groups, (3) researchers, (4) companies, and (5) individuals. Regarding interest groups, we further categorized them according to the INTERARENA classification (e.g., Binderkrantz et al. 2014; Vesa et al. 2018) with minor changes. The interest groups include: (1) trade unions, (2) business groups, consisting of, for example, employer organizations, industry organizations, and other organized actors with business interests, (3) professional associations, (4) institutional associations, and (5) citizen groups.

⁴ Due to data protection requirements, we replaced all mentions of individuals' names with the information 'individual' when processing the data.

Definitions of stakeholder types.

Stakeholder type	Definitions	Remarks
1 Public authorities	Ministries, cities, municipalities, hospital districts, courts, and other municipal actors	
2 Trade unions (interest group)	Trade unions and their central organizations that pursue the interests of employees	They seek to improve working conditions and employment contracts
3 Business groups (interest group)	Groups representing organizations of employers, industries, private entrepreneurs, and companies	All those organized groups with business interests. The employer organizations consider working conditions and employment contracts from the employer side
4 Professional associations (interest group)	Professional associations whose goal is to develop the profession or improve its prestige (cf. working conditions or contracts)	
5 Institutional associations (interest group)	Organizations representing various bodies such as municipalities and institutions (educational, cultural, social welfare, and health)	
6 Citizen groups (interest group).	All organizations promoting public interest, identity, leisure organizations, and other actors representing civil society.	
7 Research.	Universities and their networks, research centers and institutes, science and research committees, researchers, statement givers with a research title.	Universities were coded into the company category if the consultation considered the organization of their work instead of a research viewpoint on the matter.
8 Companies.	Companies, private educational institutions, banks, funds, insurance operators, entrepreneurs.	
9 Individuals (citizens).	Individuals without any affiliation to organizations.	



We thus examine the stakeholder groups based on the level of their organizational status and focus. Individuals and companies are types of non-organized stakeholders who are often the ultimate target groups of regulations. Furthermore, unlike interest groups, they do not *represent, or claim to represent*, any particular group, and the same applies to research. Two coders conducted inter-coder reliability tests on 327 randomly selected units, resulting in a Krippendorff's alpha of 0.89 for stakeholder type coding (Krippendorff 2004). The results show that the inter-coder reliability was high.

Method of analysis

Our method for examining the engagement patterns of stakeholders relies on descriptive analysis. The unit of analysis is a written statement by a stakeholder on a draft legislative proposal. We investigate the engagement of various stakeholder types by studying the shares of all the written statements by all stakeholder types on average, across different policy areas, and years examined. In other words, we compare how the engagement of different stakeholder types varies against the average levels of their participation over the years (Tables 2 and 3) and across policy areas (Table 4).

Although this choice of method cannot reveal the causes behind the potentially varying engagement patterns of stakeholders across different years and policy areas, we expect the descriptive analysis to highlight notable changes in frequencies. We use cross-tabulation to detect connections between stakeholder types and policy areas. The statistical significance of the results is tested with the Chi-square test.

To measure the level of stakeholder diversity between various stakeholder types, we use the Herfindahl–Hirschman index (HHI). It measures the level of concentration of stakeholder types (see also, e.g., Beyers and Arras 2020; Rasmussen and Carroll 2014). The HHI is determined by summing the squared proportions of stakeholders within each group type category. The HHI can be as high as 1, showing minimal diversity and indicating that all engaging stakeholders belong to the same group type, or as low as $1/N$, where N is the number of groups, reflecting maximal diversity with equal participation from each group type. Hence, the higher the value, the less diversity there is. In our analyses, the range of the HHI is from $1/5$ (0.2 to 1) and from $1/6$ (0.16 to 1). We calculate measures of HHI between various stakeholder types across years (Tables 2 and 3), and across policy areas (Tables 4 and 5).

The participation of stakeholder types

Engagement patterns of various stakeholder types

The examination of stakeholder types and their participation over the three years (2013, 2017, 2021) reveals clear differences between their engagements (Table 2). Although we note some participation by all of the stakeholder types, public authorities were undoubtedly the single most active stakeholder type: the number



of statements by them totaled more than half of all the statements given. Interest groups were the next most actively engaged stakeholder type, as they gave a third of all statements. The rest of the stakeholder types, the unorganized ones—companies, researchers, and individuals—gave the remaining statements, about a tenth of the total. These results align with expectations on engagement patterns in a neo-corporatist political system, as interest groups engage much more than unorganized stakeholder types, entailing an advocacy structure in the engagement instead of more ‘direct’ participation. Regarding those engaging directly, the difference between individuals and companies is notable, with the latter being more active. At the aggregate level and all years examined, stakeholder diversity is 0.41, which reflects a rather high concentration according to the general interpretation of the index, particularly in the context of market competition (e.g., Brezina et al. 2016, p.

Table 2 The engagement of stakeholder types in open consultations (percentages, years, and change over them, and level of diversity across them)

	2013	2017	2021	Total	Chi(×2)	Change (2013–2021)
Public authorities	57.4	55.7	50.1	54.3	59.78***	– 7.2
Interest groups (<i>organized actors</i>)	32.0	31.2	35.8	32.9	30.19***	+3.5
<i>Non-organized actors</i>	10.6	13.1	14.1	12.8	28.31***	+3.5
Research	3.1	2.2	3.2	2.8	12.67***	+0.7
Companies	6.6	8.7	9.8	8.5	33.43***	+3.2
Individuals	0.9	2.2	1.1	1.5	34.98***	+0.2
%	100	100	100	100		
N	4548	6283	5457	16,288		
Level of diversity (HHI)	0.44	0.42	0.39	0.41		

Significance levels: * $p < 0.05$; ** $p < 0.01$; *** $p < 0.001$

The italic values are supposed to underline the difference between the varying stakeholder types

Table 3 The participation of interest group types (%)

	2013	2017	2021	Total	Chi(×2)	Change (2013–2021)
Trade unions	19.3	17.1	15.6	17.1	3.97	– 3.7
Business groups	39.4	39.0	38.9	38.9	6.90*	– 0.5
Professional associations	9.1	8.8	6.7	8.1	2.85	– 2.4
Institutional associations	7.7	7.3	8.0	7.6	3.06	+0.3
Citizen groups	24.5	27.8	30.8	28.4	41.53***	+6.3
%	100	100	100	100		
N	1455	1956	1951	5362		
Level of diversity (HHI)	0.26	0.27	0.28	0.27		

Significance levels: * $p < 0.05$; ** $p < 0.01$; *** $p < 0.001$



Table 4 Engagement of stakeholder types by policy area (%)

	Finance	Justice	Social	Environment	Traffic	Agriculture	Administration	Total %	Chi(X ²)
Public authorities	41.0	64.9	49.4	48.0	47.9	56.2	78.0	54.3	935.75***
<i>Interest groups (organized actors)</i>	47.2	28.6	37.6	31.3	31.5	33.6	16.9	32.9	574.15***
<i>Non-organized actors</i>	11.8	6.5	12.9	20.8	20.3	10.4	6.1	12.8	457.77***
Companies	8.5	2.8	8.0	15.2	14.7	3.3	3.5	8.5	435.19***
Researchers	2.8	2.8	3.0	3.5	2.8	4.9	2.3	2.8	36.12***
Individuals	0.5	0.9	1.9	2.1	2.8	2.2	0.3	1.5	82.35***
%	100	100	100	100	100	100	100	100	
N	2445	2134	4133	2611	1895	635	2434	16 287	
Level of diversity (HHI)	0.39	0.50	0.39	0.35	0.35	0.43	0.64	0.41	

Significance levels: * $p < 0.05$; ** $p < 0.01$; *** $p < 0.001$

The italic values are supposed to underline the difference between the varying stakeholder types



53). However, this result resembles the levels of diversity found among stakeholder types in prior research (Beyers and Arras 2020; Braun et al. 2020).

Table 2 also reveals results concerning our expectations on *temporality*. The variation in stakeholder diversity across the years is almost nonexistent (0.39–0.43); however, the subtle change in the trajectory is in line with participatory objectives, meaning that the level of diversity has slightly increased over the years. The most notable change concerns the engagement of public authorities as their share of given statements declines clearly from 2013 to 2021 (– 7.2 percentage points). This is most likely connected to the impact of specific policies. For example, in 2017, there were many proposals regarding the organization of social and health services, which prompted cities to participate actively, as they have traditionally been responsible for providing these services in Finland. The increase in individuals' participation in 2017 similarly may be related to a few proposals that captured their attention and triggered engagement. One such proposal was the Alcohol Act, which altered the conditions for the sale of alcoholic beverages and received a lot of media publicity. Finally, notable changes occurred with respect to organized interest groups and non-organized companies, with increases of +3.5 and +3.2 percentage points, respectively. Differences between the years were statistically significant for the shares of written statements by each stakeholder type.

Table 3 shows the engagement and the level of diversity among organized interests. Most of the causes advocated by the interest group types (on average 71.7% of participants) consider business, work, or other vocationally related matters, and the highest level of mobilization occurs among business groups across all years (on average 38.9% of participants). At the aggregate level (Table 2), the diversity showed a higher level of concentration among stakeholder types in general (0.41 on average) compared to the diversity among interest group types (0.27 on average), as demonstrated in Table 3. Regarding temporal changes, a substantial increase in the mobilization of citizen groups (+6.3%) has occurred, whereas the participation of trade unions (– 3.7%) and professional association (– 2.4%) exhibit a minor decline over time.

According to *the policy area expectation*, we expect stakeholder types to participate differently across policy areas, which affects stakeholder diversity. As expected, the results show variation in mobilization (Table 4). The advocacy of organized interests is clearly strongest in the policy areas of Finance and Social, in which trade unions or business groups, particularly those that represent the employer side, have traditionally been active. Correspondingly, the participation of non-organized actors within these policy areas is less frequent. The differences between the years were statistically significant for the shares of written statements by business groups and citizen groups.

The mean share of engagement by interest groups is 32.9% (as shown in the Total column), and only in the areas of Finance and Administration is there substantial variation compared to this average level of participation by the stakeholder type. In contrast, the engagement of non-organized actors, especially companies, is focused on the policy areas of Environment (20.8%) and Traffic (20.3%), in which interest groups are also active (31.3% and 31.5%). The results regarding the two areas imply that regulation in these areas was particularly targeted toward companies.



Table 5 Participation and stakeholder diversity of interest group types across policy areas (%)

	Finance	Justice	Social	Environment	Traffic	Agriculture	Administration	Chi(×2)
Trade unions	18.4	22.1	21.5	3.3	8.7	5.2	34.8	246.64***
Business groups	55.0	18.7	19.0	60.3	56.5	58.5	20.4	951.29***
Professional associations	8.0	16.7	7.0	4.8	8.3	9.0	5.6	90.53***
Institutional associations	4.7	3.8	12.5	6.1	5.0	6.1	10.2	120.27***
Citizen groups	14.0	38.8	39.9	25.5	21.5	21.2	29.0	271.10***
%	100	100	100	100	100	100	100	
N	1154	611	1557	817	600	212	411	
Level of diversity (HHI)	0.36	0.26	0.26	0.44	0.38	0.40	0.26	

Significance levels: * $p < 0.05$; ** $p < 0.01$; *** $p < 0.001$

The results on stakeholder diversity across policy areas (HHI) suggest again that stakeholder engagement is somewhat concentrated. The most 'diverse' policy areas are Environment (0.35) and Traffic (0.35), and the least diverse are Administration (0.64) and Justice (0.50), which indicate particularly high concentration. Although the diversity levels show rather concentrated results, they do not necessarily reflect imbalance among those targeted. For example, the high mobilization of public authorities in the policy area of Administration (78.0%) is intuitively evident because they are typically the implementers of the regulations in this area, as well in Justice (64.9%), where they are also expected to possess significant expertise on the matters being regulated.

Table 5 presents the results on the mobilization of interest group types across policy areas. The policy areas of Social, Justice, and Administration had the highest level of diversity (0.26), whereas the least diverse areas were Environment (0.44), Agriculture (0.39), and Finance (0.36). In other words, in the areas in which participation by business groups is less frequent, the stakeholder diversity is higher, and vice versa.

Discussion and conclusions

In this study, we have examined the participation of stakeholder types to assess the level of stakeholder diversity among those engaged in policymaking and introduced a method to draw conclusions about balanced participation. The context of our study is regulatory policy, with the premise of participatory governance, according to which those subject to regulation should have an opportunity to participate to ensure



balanced engagement and the delivery of relevant views. This study thus aligns with research focused on the engagement of various types of stakeholders, while also recognizing their position in relation to policies being commented on (see Binderkrantz et al. 2021; Bunea and Lipcean 2023), which, for instance, Junk et al. (2022) have referred to as affectedness. Accordingly, rather than adopting the typical approach found in interest group literature, which compares the participation of these groups to their population, we employed a more context-driven method that focuses on the engagement of those (possibly) affected by the proposed regulations.

Our key findings reveal both similarities and differences when compared to previous research. All stakeholder types participate to varying extents, consistent with the findings of the majority of studies on this topic (Quittkat 2011; Binderkrantz et al. 2021; Bunea and Lipcean 2023; Rasmussen 2015; Fraussen et al. 2020). In our study, the most active stakeholder types were public authorities, however, a result which differs from most of prior research (mentioned above) that has considered the engagement of this stakeholder type. The measure of stakeholder diversity (HHI) indicated somewhat high concentrations among the various group types at the aggregate level, a result that is most likely connected to the substantial participation by public authorities. Higher diversity was observed among interest group types. The results regarding stakeholder diversity as well as variation across policy areas were somewhat similar to those of previous research (Beyers and Arras 2020; Rasmussen and Carroll 2014).

Among interest group types, business groups constituted the most active category, consisting of organizations representing various industries, employers' organizations, or groups with a commercial or business-related perspective. This result has remained consistent across different political systems. However, the dominance of business interests is not as remarkable in our study when compared to prior findings that consider the engagement of a large variety of stakeholder types (e.g., Bunea and Lipcean 2023; Rasmussen 2015; Beyers and Arras 2020). Overall, the mobilization of business interests in our study is less than 20%, when business interest groups and private companies are combined.

Moreover, we considered the context of the study, a neo-corporatist political system, based on which we had expectations regarding the engagement of organized and unorganized stakeholder types. Despite the open nature of the consultation approach, which allows all stakeholder types to participate, we anticipated significant participation from organized interests. As expected, we noted significantly stronger participation of organized interest groups compared to non-organized actors. Among non-organized stakeholders, the engagement of companies was more pronounced than of individuals, which entails that the views of individuals are predominantly advocated through organized interests (or not at all). Our findings thus resemble of those by Rasmussen (2015) from Denmark, another neo-corporatist country, in which interest groups are active and companies, and particularly individuals, participate less than in the studies with non-corporatist settings (Rasmussen 2015; see also Quittkat 2011; Bunea and Lipcean 2023).

The participation of stakeholder types varied across policy areas, aligning with our policy area expectation, and remaining consistent with findings from previous research (e.g., Binderkrantz et al. 2014; Quittkat 2011; Beyers and Arras 2020).



Engagement patterns measured by the stakeholder diversity index (HHI) showed variation across policy areas. Policies relating to social, justice, and environmental regulation were most diverse, whereas policies regarding financial, traffic, and administrative matters were somewhat more concentrated. In general, diversity decreased and showed more concentration in areas where public authorities or business groups were particularly active (see also Bunea and Lipcean 2023).

Connecting these findings on policy areas to the neo-corporatist background indicates variation across policy areas, especially on regulation relating to financial, work, and other business-related policies (Finance), where the engagement of organized interests was higher, and the mobilization of unorganized stakeholders is less frequent. In contrast, particularly in the policy areas of Energy and Traffic, companies engaged actively, and the participation of interest groups decreased, especially when compared to the policy area of Finance. Hence, these results imply that the neo-corporatist tradition appears stronger in policy areas where the organized interests have traditionally represented the views of civil society, such as various economic and social policies related to, for instance, working conditions or wages (the policy areas of Finance and Social).

The results also indicated some temporal changes. The decreasing mobilization of public authorities was most likely one of the reasons behind the positive change within the level of stakeholder diversity at the aggregate level (from 0.44 to 0.39). Furthermore, the engagement of interest groups (particularly citizen groups) and companies increased. This trajectory occurred during a period in which a discourse on open participation was emphasized, along with the adoption of an online-based consultation platform. These changes thus lend some support to our expectations regarding temporal changes, where we anticipated improved levels of diversity and balance between stakeholder types. However, we cannot rule out the potential varying impact relating to specific policy issues over the years, as our data shows that some individual legislative proposals were exceptionally popular, which could affect the results.

In addition to assessing the diversity among stakeholders (HHI), we have discussed the balance between them in relation to policy areas. We suggested that even lower levels of diversity should not automatically be deemed biased, at least in specific policy areas where those affected by a regulation belong to a limited stakeholder type to begin with. The examination of policy areas allowed us to demonstrate indications of balanced engagement, but only in a crude manner considering those possibly affected by the regulation. For more detailed results regarding the balance between stakeholder types across policy areas, one would need to assess the aims of the regulations in addition to those targeted by them but examining engagement patterns with large quantitative datasets in this manner can be challenging. Future research could thus refine the classification of policy areas to enable more precise results regarding those affected by proposed regulations and scrutinize in detail some policy areas with a more limited number of proposals.

Finally, the last limitation to be aware of relates to the temporal changes discussed in the study. Due to the descriptive nature of the research design, we have not aimed to ascertain the causes behind the temporal changes identified. The observed



effects could stem from the adoption of the online platform or the renewed consultation guidelines, or they might be associated with the changing policy issues throughout the examined years.

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Declarations

Conflict of interest On behalf of all authors, the corresponding author states that there is no conflict of interest.

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References

- Aizenberg, E., H. Werner, and S. van Geldere. 2024. Helping citizens to lobby themselves. Experimental evidence on the effects of citizen lobby engagement on internal efficacy and political support. *Journal of European Public Policy* 31 (11): 3561–3590.
- Albareda, A. 2020. Prioritizing professionals? How the democratic and professionalized nature of interest groups shapes their degree of access to EU officials. *European Political Science Review* 12 (4): 485–501.
- Alemanno, A. 2015. Stakeholder engagement in regulatory policy. In *Regulatory policy outlook*. Paris: OECD Publishing.
- Balla, S.J., and B.M. Daniels. 2007. Information technology and public commenting on agency regulations. *Regulation & Governance* 1 (1): 46–67.
- Baroni, L., B.J. Carroll, A. William Chalmers, L.M.M. Marquez, and A. Rasmussen. 2014. Defining and classifying interest groups. *Interest Groups & Advocacy* 3: 141–159.
- Berkhout, J. 2024. “Lobbying communities as organizational systems: Theories and counts of politically active organizations”, *Handbook on Lobbying and Public Policy*. Edward Elgar Publishing 2024: 38–52.
- Berkhout, J., M. Hanegraaff, and C. Braun. 2017. Is the EU different? Comparing the diversity of national and EU-level systems of interest organizations. *West European Politics* 40 (5): 1109–1131.
- Beyers, J., and S. Arras. 2020. Who feeds information to regulators? Stakeholder diversity in European Union regulatory agency consultations. *Journal of Public Policy* 40 (4): 573–598.
- Bherer, L., P. Dufour, and F. Montambeault. 2016. The participatory democracy turn: An introduction. *Journal of Civil Society* 12 (3): 225–230.
- Binderkrantz, A.S., J. Blom-Hansen, and R. Senninger. 2021. Countering bias? The EU Commission's consultation with interest groups. *Journal of European Public Policy* 28 (4): 469–488. <https://doi.org/10.1080/13501763.2020.1748095>.



- Binderkrantz, A.S., P.M. Christiansen, and H.H. Pedersen. 2014. A privileged position? The influence of business interests in government consultations. *Journal of Public Administration Research and Theory* 24 (4): 879–896.
- Braun, C., A. Albareda, B. Fraussen, and M. Müller. 2020. Bandwagons and quiet corners in regulatory governance. *International Review of Public Policy* 2 (2): 209–232.
- Braun, C., and M. Busuioac. 2020. Stakeholder engagement as a conduit for regulatory legitimacy? *Journal of European Public Policy* 27 (11): 1599–1611.
- Brezina, I., J. Pekár, Z. Čičková, and M. Reiff. 2016. Herfindahl–Hirschman index level of concentration values modification and analysis of their change. *Central European Journal of Operations Research* 24: 49–72.
- Bunea, A. & Lipcean, S. 2023, “Understanding patterns of stakeholder participation in public commenting on bureaucratic policymaking: Evidence from the European Union,” Regulation & Governance.
- Christiansen, P.M. 2012. The usual suspects: Interest group dynamics and representation in Denmark. In *The scale of interest organization in democratic politics: data and research methods*, ed. D. Halpin and G. Jordan, 161–179. London: Palgrave Macmillan.
- Christiansen, P.M. 2024. “Corporatism”, Handbook on Lobbying and Public Policy. *Edward Elgar Publishing* 2024: 26–37.
- Christiansen, P.M., A.S. Nørgaard, H. Rommetvedt, T. Svensson, G. Thesen, and P. Öberg. 2010. Varieties of democracy: Interest groups and corporatist committees in Scandinavian policy making. *Voluntas: International Journal of Voluntary and Nonprofit Organizations* 21: 22–40.
- Coen, D., and A. Katsaitis. 2013. Chameleon pluralism in the EU: An empirical study of the European Commission interest group density and diversity across policy domains. *Journal of European Public Policy* 20 (8): 1104–1119.
- Coglianesi, C. 2006. Citizen participation in rulemaking: Past, present, and future. *Duke Law Journal* 55 (5): 943–968.
- European Commission 2023. Better regulation toolbox, retrieved from https://commission.europa.eu/document/download/9c8d2189-8abd-4f29-84e9-abc843cc68e0_en?filename=BR%20toolbox%20-%20Jul%202023%20-%20FINAL.pdf.
- Crepaz, M., W.M. Junk, M. Hanegraaff, and J. Berkhout. 2022. *Viral lobbying: Strategies, access and influence during the COVID-19 pandemic*. De Gruyter.
- De Bruycker, I., and J. Beyers. 2015. Balanced or Biased? Interest groups and legislative lobbying in the European news media. *Political Communication* 32 (3): 453–474. <https://doi.org/10.1080/10584609.2014.958259>.
- Downes, D. 1996. Neo-corporatism and environmental policy. *Australian Journal of Political Science* 31 (2): 175–190.
- Dür, A., and G. Mateo. 2016. *Insiders versus outsiders: Interest group politics in multilevel Europe*. Oxford: Oxford University Press.
- Farina, C. R. & Newhart, M. J. 2013, Rulemaking 2.0. Understanding and getting better public participation, Cornell eRulemaking Initiative Publications, Paper 15.
- Finlex A., n.d., Säädosvalmistelun kuulemisopas [Consultation guidelines for regulatory drafting], retrieved from <http://kuulemisopas.finlex.fi/>.
- Fraussen, B., A. Albareda, and C. Braun. 2020. Conceptualizing consultation approaches: Identifying combinations of consultation tools and analyzing their implications for stakeholder diversity. *Policy Sciences* 53 (3): 473–493. <https://doi.org/10.1007/s11077-020-09382-3>.
- Fung, A. 2006. Varieties of participation in complex governance. *Public Administration Review* 66: 66–75.
- Haber, H., and E. Heims. 2020. Regulating with the masses? Mapping the spread of participatory regulation. *Journal of European Public Policy* 27 (11): 1742–1762.
- Halpin, D.R., and A.S. Binderkrantz. 2011. Explaining breadth of policy engagement: Patterns of interest group mobilization in public policy. *Journal of European Public Policy* 18 (2): 201–219.
- Halpin, D.R., and H.F. Thomas III. 2012. Evaluating the breadth of policy engagement by organized interests. *Public Administration* 90 (3): 582–599.
- Hoff, A., H. Lelieveldt, and R. van der Does. 2016. A biased rapporteur or politics as usual? Reassessing the balance of interests in the EU food information labelling case. *Journal of European Public Policy* 23 (2): 296–313.
- Huxley, K., R. Andrews, J. Downe, and V. Guarneros-Meza. 2016. Administrative traditions and citizen participation in public policy: A comparative study of France, Germany, the UK and Norway. *Policy & Politics* 44 (3): 383–402.



- Ihlen, Ø., A.S. Binderkrantz, and P. Öberg. 2021. Lobbying in Scandinavia. In *Power, communication, and politics in the Nordic countries*, ed. E. Skogerbø, Ø. Ihlen, N.N. Kristensen, and L. Nord, 305–323. Gothenburg: Nordicom, University of Gothenburg. <https://doi.org/10.48335/9789188855299-15>.
- Junk, W.M., M. Crepez, M. Hanegraaff, J. Berkhout, and E. Aizenberg. 2022. Changes in interest group access in times of crisis: No pain, no (lobby) gain. *Journal of European Public Policy* 29 (9): 1374–1394.
- Klüver, H. 2013. *Lobbying in the European Union: Interest groups, lobbying coalitions, and policy change*. Oxford University Press.
- Krippendorff, K. 2004. *Content analysis: An introduction to its methodology*. Thousand Oaks: Sage Publications.
- Lijphart, A. 1999. *Patterns of democracy: Government forms and performance in thirty-six countries*. Yale University Press.
- Lowery, D., F.R. Baumgartner, J. Berkhout, J.M. Berry, D. Halpin, M. Hojnacki, H. Klüver, B. Kohler-Koch, J. Richardson, and K.L. Schlozman. 2015. Images of an unbiased interest system. *Journal of European Public Policy* 22 (8): 1212–1231.
- Marxsen, C. 2015. Open stakeholder consultations at the European level—Voice of the citizens? *European Law Journal* 21 (2): 257–280.
- McFarland, A.S. 2007. Neopluralism. *Annual Review of Political Science* 10: 45–66.
- McMurry, N., and S. O’Sullivan. 2022. A human rights perspective to participation. *Studies in Social Justice* 16 (3): 554–570.
- Öberg, P., T. Svensson, P.M. Christiansen, A.S. Nørgaard, H. Rommetvedt, and G. Thesen. 2011. Disrupted exchange and declining corporatism: Government authority and interest group capability in Scandinavia. *Government and Opposition* 46 (3): 365–391.
- OECD 2012. Recommendation of the Council on Regulatory Policy and Governance.
- Pateman, C. 2012. Participatory democracy revisited. *Perspectives on Politics* 10 (1): 7–19.
- Quittkat, C. 2011. The European Commission’s online consultations: A success story? *Journal of Common Market Studies* 49 (3): 653–674.
- Rasch, D., F. Spohr, R. Eising, and S. Röss. 2020. Uncovering interest group participation in Germany: Web collection of written statements in ministries and the parliament. *Interest Groups & Advocacy* 9: 330–341.
- Rasmussen, A. 2015. Participation in written government consultations in Denmark and the UK: System and actor-level effects. *Government and Opposition* 50 (2): 271–299.
- Rasmussen, A., and B.J. Carroll. 2014. Determinants of upper-class dominance in the heavenly chorus: Lessons from European Union online consultations. *British Journal of Political Science* 44 (2): 445–459. <https://doi.org/10.1017/S0007123412000750>.
- Rasmussen, A., and S. Reher. 2023. (In)equality in interest group involvement and the legitimacy of policy making. *British Journal of Political Science* 53 (1): 45–64.
- Røed, M., and V. Wøien Hansen. 2018. Explaining participation bias in the European Commission’s online consultations: The struggle for policy gain without too much pain. *JCMS: Journal of Common Market Studies* 56 (6): 1446–1461.
- Siaroff, A. 2020. Corporatism and representation. In *Research Handbook on Political Representation*, Edward Elgar Publishing, pp. 121–134.
- Siaroff, A. 1999. Corporatism in 24 industrial democracies: Meaning and measurement. *European Journal of Political Research* 36 (2): 175–205.
- Sorsa, V.P., J. Kaitila, and A. Alaja. 2024. Partial organization and economic coordination: The gradual re-organization of Finnish corporatism. *Competition & Change* 28 (5): 561–580.
- Traxler, F. 2004. The metamorphoses of corporatism: From classical to lean patterns. *European Journal of Political Research* 43 (4): 571–598.
- Vesa, J.A., A. Kantola, and A.S. Binderkrantz. 2018. A stronghold of routine corporatism? The involvement of interest groups in policy making in Finland. *Scandinavian Political Studies* 41 (4): 239–262. <https://doi.org/10.1111/1467-9477.12128>.
- Weiler, F., S. Eichenberger, A. Mach, and F. Varone. 2019. More equal than others: Assessing economic and citizen groups’ access across policymaking venues. *Governance* 32 (2): 277–293.
- Wonka, A., F.R. Baumgartner, C. Mahoney, and J. Berkhout. 2010. Measuring the size and scope of the EU interest group population. *European Union Politics* 11 (3): 463–476.



- Wonka, A., I. De Bruycker, D. De Bièvre, C. Braun, and J. Beyers. 2018. Patterns of conflict and mobilization: Mapping interest group activity in EU legislative policymaking. *Politics and Governance* 6 (3): 136–146.
- Yackee, J.W., and S.W. Yackee. 2006. A bias towards business? Assessing interest group influence on the US bureaucracy. *The Journal of Politics* 68 (1): 128–139.

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