

# Influencing regulations



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## **Abstract**

The Netherlands has developed a new tool called internetconsultatie.nl, which allows anyone (individuals, groups, companies, organisations, institutes, etc.) to provide feedback regarding regulative proposals through submissions, thereby facilitating institutional entrepreneurship. I study the submissions quantitatively following the model proposed by Battilana et al. (2009), using logistic regression models to determine the relations between the enabling conditions, framing strategies and allies variables and the contributions to regulative change. In so doing, I am the first to quantitatively test Battilana et al.'s (2009) model. I find that nearly all the variables contribute to regulative change. Therefore, this research substantiates Battilana et al.'s (2009) model and related theories, indicating that the model can be used to determine which activities of institutional entrepreneurs have a higher probability of effectuating regulative change. Additionally, I advise the Ministry of Justice and Security to improve transparency. Lastly, I advise policymakers to be wary of potential biases and to include more of the proposed changes.

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# 1. Introduction

In 2013, Dutch banks asked the Ministry of Finance for their immediate attention for the Dutch banking sector and the overall Dutch economy. Strict regulations caused problems regarding loans and the banks' competitive position. Therefore, the Dutch banks applied pressure collectively and proposed multiple suggestions. Ultimately, some of these suggestions were implemented verbatim in the legislative proposal. This was an opaque process, and after it became known, the influence of banks on legislation was heavily discussed. The main criticism was that, while stakeholders should be involved in the formulation of legislative proposals, they should not be allowed to write (parts of) the proposals (NOS, 2015; NRC, 2015).

To make the influence of external parties more transparent and increase the involvement of Dutch society, the Dutch government introduced a new medium called *internetconsultatie.nl*, through which governmental departments can publish formal institutions, like laws and regulations, and allow everyone (individuals, groups, companies, organisations, institutes, etc.) to provide feedback. Institutions entail formal institutions, such as laws, rules and regulations, while informal institutions refer to norms and values (Greif & Kingston, 2011). Consultations help to improve formal institutions by using the knowledge and expertise embedded in society (Bos, 2007; Broek et al., 2016).

Through this consulting, *internetconsultatie.nl* facilitates institutional entrepreneurship. Institutional entrepreneurship can be defined as actors' endeavour to influence existing institutions. (Battilana et al., 2009). Allowing actors to make suggestions to change proposed formal institutions fosters institutional entrepreneurship.

Battilana et al.'s (2009) work is regarded as the most influential paper in the institutional entrepreneurship literature, with 72.64 citations per year (Tiberius et al., 2020). It proposes a model for the process of institutional entrepreneurship by combining multiple enabling conditions and key activities. These activities are embedded in the political activities that institutional entrepreneurs undertake in their attempt to effectuate institutional entrepreneurship (Kaleem, 2010). The main political activity is lobbying, which is defined as the usage of political tactics and power to effectuate a proposed institutional change (Pacheco et al., 2010; Woolthuis et al., 2013). However, lobbying lacks transparency due to a lack of regulations (Hogan et al., 2008) and its opaque nature (Mulachy, 2015). Hence, the government developed the additional tool *internetconsultatie.nl*.

Battilana et al.'s (2009) model has been applied in multiple studies to substantiate the institutional framework used in institutional entrepreneurship literature. For example, Pelzer et al. (2019) studied the emergence and used strategies of Uber as an institutional entrepreneur in the Netherlands, Rasmussen et al. (2017) examined the formulation and diffusion of policies in the Danish construction industry, and Stål et al. (2014) explored the study on institutional entrepreneurship in the agri-food sector. However, the model has never been quantitatively tested. The tool *Internetconsultatie.nl* makes this possible, allowing me to test Battilana et al.'s (2009) model to validate its theories. I can also determine the relative influences on institutional change of the dimensions defined in Battilana et al. (2009). These dimensions (i.e., enabling conditions, framing strategies and allies) are elaborated in the theory section.

This research aims to incorporate internet consultations into scientific literature and to test the extent to which internet consultations and Battilana et al.'s (2009) three dimensions—enabling conditions, framing strategies and allies—contribute to regulative changes. To accomplish this, I pose the following research question:

*How do actors' enabling conditions, framing strategies and allies in internet consultations contribute to regulative change?*

By studying two legislative trajectories involving internet consultations, this research examines the contribution of internet consultations to regulative changes. I am the first to systemically compare the text of proposed legislation with suggestions made by actors through internet consultations. I will show that transparency of the institutional field, intermediate organisations, knowledge institutes, small- to medium-sized enterprises, diagnostic framing, prognostic framing, motivational framing, diversity of allies, number of allies and joint submissions influence regulative change. Theoretically, this enriches Battilana et al. (2009) by quantitatively confirming the proposed model, which, in turn, can form the foundation for related theories. I show stakeholders which dimensions to include to achieve a higher probability of effectuating regulative change. Finally, policymakers can use this research to reflect on potential preferences and make adjustments to enhance the inclusivity of the Internetconsultatie.nl tool.

## 2. Theory

### 2.1 Background: Internet consultation in the Netherlands

The current policy-making process utilises the lobbying mechanism to propose visions of divergent change to policymakers (Pacheco et al., 2010). In this model, the public is unaware of topics and courses of discussion (Mulachy, 2015), resulting in an opaque mechanism exclusively utilised by a select few big actors. As a countermeasure to lobbying, the Dutch government has developed [Internetconsultatie.nl](http://Internetconsultatie.nl) to function as a transparent alternative. This tool allows actors, individuals and other organisations to publicly give their opinions regarding proposed regulative changes, yielding insights for both the government and civil society and, thereby, enhancing legitimacy (Bos, 2007; Broek et al., 2016). All submissions are summarised and incorporated into the regulative proposal before admission to the decisive jurisdictional organs.

An important difference between lobbying and internet consultations is that lobbying activities are utilised throughout the whole process of institutional entrepreneurship, while internet consultations are considered solely when a legislative change is proposed to the government (Bos, 2007; Broek et al., 2016). Therefore, internet consultations do not function as an alternative for the lobbying mechanism; rather, they are a transparent addition to the institutional entrepreneurship process.

### 2.2 Institutional entrepreneurship

Institutional entrepreneurship is part of institutional theory, which is the overarching theory focusing on the creation, diffusion, alteration and weakening of institutions (Dacin et al., 2002). Within this theoretical field, institutional entrepreneurship focuses on the creation or alteration of institutions. The present research emphasises formal institutions, which are described in Scott's (1995) regulative pillar as containing the regulative processes: that is, the establishment of rules and laws, monitoring actors and sanctioning activities. The institutional logic forming the foundation of this pillar is that laws and rules are crafted based on the belief that they will advance interests. Individuals comply with laws and rules to gain associated rewards or avoid associated sanctions. Through this dynamic of rewarding and sanctioning, formal institutions create stability in the contexts to which they apply. To maintain this stability, however, institutions must change, both incremental and drastically.

Battilana et al. (2009) developed a model to describe the key phases, conditions and activities in the process to effectuate institutional change (Figure 1). The first phase identifies factors that allow the emergence of institutional change: namely, field characteristics and actors' social position. In the second phase, following the emergence of institutional entrepreneurship, institutional entrepreneurs engage in activities key to implementing divergent change. These activities create a vision for divergent change and mobilise allies behind the vision. Together, they can effectuate institutional change.

This model can also be applied to [Internetconsultatie.nl](http://Internetconsultatie.nl). I formulate hypotheses for each of the described phases.

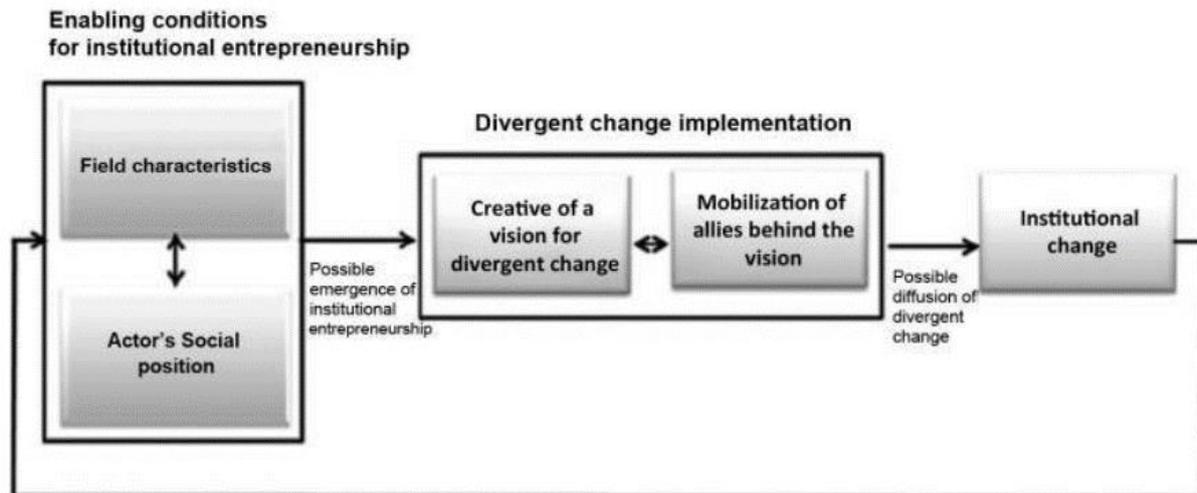


Figure 1. Process of institutional entrepreneurship (Battilana et al., 2009).

## 2.3 Phases of institutional entrepreneurship

### 2.3.1 Phase 1. Enabling conditions

#### Field characteristics

The organisational field is the environment in which an actor operates (Battilana et al., 2009). It is influenced by the institutional context (Scott, 2008), and it can be transparent, hazy or opaque, depending on two types of characteristics: multiplicity, which is determined by the number of perspectives on what the regulations should do (Dorado, 2005), and the degree of institutionalisation, which is the extent to which actors' activities in a field conform to existing regulations (Zucker et al., 1977). A field is hazy when there is high multiplicity and low institutionalisation, causing uncertainty (Dorado, 2005). High multiplicity hinders actors' ability to envision regulative changes, while low institutionalisation limits the number of new regulations institutional entrepreneurs can create. Therefore, a hazy field hinders institutional entrepreneurship. A field is opaque when there is low multiplicity and high institutionalisation, causing extreme certainty (Dorado, 2005). Low multiplicity limits actors' ability to deviate from current regulations, while high institutionalisation causes current regulations to be taken for granted. Therefore, a hazy field hinders institutional entrepreneurship. A field is transparent when both multiplicity and institutionalisation are moderate, providing space for regulations to be formed and for new regulations to build upon existing ones (Dorado, 2005). Therefore, the transparent field is considered the most beneficial for institutional entrepreneurship. From this, we derive the following hypothesis:

*H1: A transparent organisational field yields a higher probability of effectuating regulative change.*

#### Actors' social position

An actor's social position refers to the actor's legitimacy and ability to access resources, relative to other actors embedded in the same environment. Battilana et al. (2009, p. 76) emphasised the importance of social position as follows: "Social position is important because it might affect both actors' perception of a field (Bourdieu, 1977) and their access to the resources needed to engage in institutional entrepreneurship (Lawrence, 1999)". Additionally, actors' social positions are intertwined with their legitimacy, which is their endorsement and

acceptance by key stakeholders (Aldrich & Fiol, 1994). Actors with higher legitimacy have higher credibility when proposing institutional change (Battilana et al., 2009), increasing the chance that the regulative change is effectuated (Fligstein, 1997). This leads to the following hypothesis:

*H2: A higher social position increases an institutional entrepreneur's probability of effectuating regulative change.*

### 2.3.2 Phase 2. Divergent change implantation

#### 2.3.2.1 Creation of a vision for divergent change

To form the coalitions required to break the current regulative status quo, institutional entrepreneurs must develop a vision for divergent change that is appealing to actors (Hillman & Hitt, 1999). The literature shows that institutional entrepreneurs face specific challenges when initiating divergent change and attempting to coalesce with allies, particularly stemming from political opposition and actors' dependence on current regulative institutions (Battilana et al., 2009). These issues entail framings of (1) the problem it helps to resolve; (2) the improvement compared to the existing regulative context; and (3) the motivation through compelling arguments (Battilana et al., 2009; Rao et al., 2000). I develop corresponding framing strategies to overcome these three issues. Further, for each type of frame, I also develop a hypothesis.

#### *Diagnostic framing:*

*Diagnostic framing* consists of two elements: the observation that the current institutional framework is unjust and requires change and the attribution of responsibility for the incompetence (Benford & Snow, 2000; Misangyi et al., 2008; Snow, 2007; Suddaby & Greenwood, 2005). In this framing strategy, the development of an injustice frame allows the institutional entrepreneur to highlight the shortcomings of the regulative framework, thereby identifying the victims of this shortcoming, amplifying their victimisation (Benford & Snow, 2000) and, ultimately, delegitimising current regulations (Rasmussen et al., 2017). The literature shows that these injustice frames offer windows of opportunity (Rasmussen et al., 2017). They are, for example, prefatory to collective non-compliance, protests and rebellions (Benford & Snow, 2000; Jasper & Poulsen, 1995; Jenness, 1995; Weed, 1997). Following the injustice frame, the institutional entrepreneur focuses on the source of incompetence, thereby taking directed action and delegitimising the source (Benford & Snow, 2000). Through these two elements, diagnostic framing justifies the introduction of regulative changes (Rasmussen et al., 2017). Thus, I formulate the following hypothesis:

*H3: The use of diagnostic framing in internet consultation increases the probability of effectuating regulative change.*

#### *Prognostic framing*

The second strategy is *prognostic framing*, in which the institutional entrepreneur articulates a regulative change to address the incompetence of the current institutional framework (Benford & Snow, 2000; Snow, 2007). Through this framing, actors legitimise their regulative changes for potential allies (Rasmussen et al., 2017). Since the institutional entrepreneurs compete in a field in which multiple legislative changes can be proposed, prognostic framing includes refutations of legislative changes advocated by others (Benford & Snow, 2000). Through this process, institutional entrepreneurs attempt to legitimise their own regulative changes while delegitimising the regulative changes of others to support their potential allies. The literature indicates that prognostic framing is the continuation of diagnostic framing and that using both

frames yields the desired outcomes (Benford & Snow, 2000; Rasmussen et al., 2017). From this, I formulate the following hypothesis:

*H4: The use of prognostic framing, in addition to diagnostic framing, in internet consultations increases the probability of effectuating regulative change.*

*Motivational framing:*

The third strategy is *motivational framing*. This strategy entails the construction of vocabularies of motive, which are arguments to take action promoting and adopting a regulative change. Motivational framing provides arguments for overcoming the fears related to supporting the proposed regulative change (Misangyi et al., 2008; Rasmussen et al., 2017; Snow, 2007), which it accomplishes by highlighting the severity of the current incompetence, the urgency to take action now, the moral obligation and the priority of taking action (Snow, 2007). Thus, this strategy entails providing compelling arguments to gain legitimacy and acquire active support for the proposed regulative change (Misangyi et al., 2008; Rasmussen et al., 2017). This framing strategy has been referred to as the creator of agency, since motivational framing is what develops the actual capacity to act (Gamson, 1982; Snow, 2007). Battilana and D'Aunno (2009) show that this agency is key in creating and disrupting institutions, such as the regulative changes proposed through diagnostic and prognostic framing in internet consultations. From this, I formulate the following hypothesis:

*H5: The use of motivational framing in addition to diagnostic and prognostic framing in internet consultations, increases the probability of effectuating regulative change.*

#### 2.3.2.2 Mobilisation of allies behind a vision

The second activity in the divergent change implementation phase is the *mobilisation of allies behind the vision*. Here, actors engage in activities to acquire support and acceptance from other actors, who are generally necessary to effectuate the institutional change (Battilana et al., 2009). By mobilising allies and, thus, affiliating with other actors, institutional entrepreneurs gain legitimacy, agency (Battilana et al., 2009; David et al., 2013; Fligstein, 1997) and access to resources (Battilana et al., 2009; Fligstein, 1997; Maguire et al., 2004), thereby improving their chance of effectuating the regulative change (Battilana et al., 2009; David et al., 2013). This research considers two attributes of allies in internet consultations that can influence the effectuation of institutional change: the number of actors and the diversity of actors.

*Number of actors*

Battilana et al. (2009) argues that financial resources, formal authority and social capital are vital for convincing other actors to endorse and support the implementation of regulative change. Financial resources are an actor's financial assets, through which the institutional entrepreneur can overcome such challenges as sanctions imposed by other actors. Additionally, actors can use financial resources to convince other actors to coalesce. Formal authority refers to the legitimacy of an actor, which helps to legitimise the regulative change proposed by the institutional entrepreneur. Institutional entrepreneurs can form coalitions to gain legitimacy and, thus, strengthen the proposed regulative change. Social capital is an actor's informal network position, which corresponds to the position of the institutional entrepreneur in a network of social relations that offers access to information and political support. Institutional entrepreneurs can use their social capital to assemble a coalition around a regulative change, thereby gaining access to resources and legitimacy. Institutional entrepreneurs lacking a central position in their network cultivate relations with other actors who do have a central position. The number of actors supporting a regulative change

influences the three attributes required for the effectuation of the regulative change. From this, I formulate the following hypothesis:

*H6: The more actors support internet consultations, the higher the probability of effectuation of the regulative change.*

*Diversity of actors*

Maguire et al. (2004) argues that a diverse set of arguments and resources have a higher chance of convincing stakeholders than a homogeneous set. These arguments and resources correspond to the following attributes: financial resources, formal authority and social capital. By affiliating with diverse actors, the institutional entrepreneur gains access to the attributes embedded in these actors, thereby acquiring legitimacy, network centrality and political support that were not previously present (Battilana et al., 2009; Maguire et al., 2004). For example, a collaborative submission to an internet consultation by Shell and the World Wildlife Fund would be expected to have a higher chance of effectuation than individual submissions by these organisations. This leads to the following hypothesis:

*H7: The more diverse the actors supporting an internet consultation are, the higher the probability of effectuation of the regulative change.*

2.4 Conceptual model

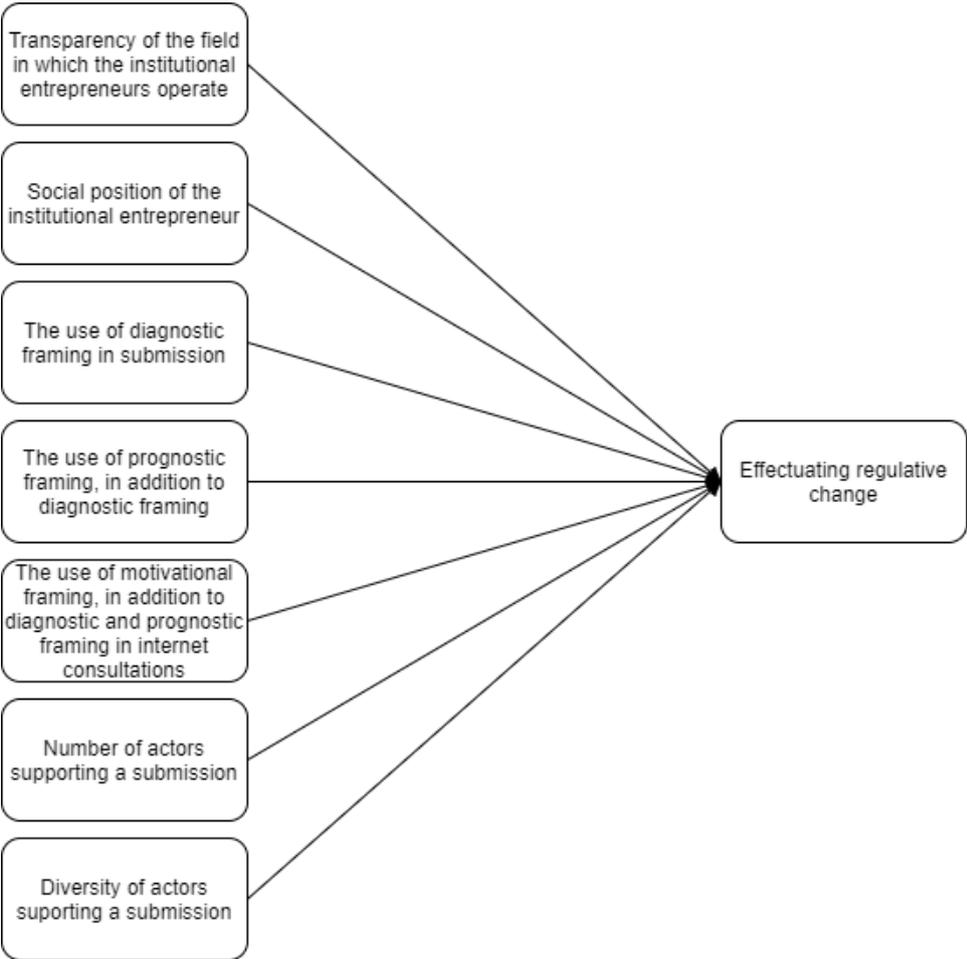


Figure 2. Conceptual model

## 3. Method

I study two legislative trajectories by systematically comparing the initial proposal and the definitive. Both legislative trajectories focus on the additional taxation of environmentally damaging practices, which was met with resistance by actors in both institutional fields. In total, actors have submitted more than 3000 submissions for the cases, making them among the most popular internet consultations. A difference between the cases is the method through which respondents can file submissions. The cases are relevant for this research because of their similarities in topics, combined with differences in methods. After explaining the cases, I operationalise the phases of institutional entrepreneurship discussed in the theory. Lastly, I describe the method used to analyse the data.

### 3.1 Data collection

I collected the data from [internetconsultatie.nl](http://internetconsultatie.nl). This website offers several insights into public reactions. Firstly, I examined a report on the internet consultation, which contains general information about the internet consultation, such as its duration. The report also contains a summary of the arguments stated in respondents' submissions, as well as the government's reaction to these arguments. Furthermore, the website provides the initial regulative proposal, an explanatory memorandum and additional information. I retrieved the definitive regulative proposal from the government website [rijksoverheid.nl](http://rijksoverheid.nl), which publishes and explains all definitive regulative proposals.

I collected the data regarding the individual submissions on the internet consultation by contacting the Ministry of Justice and Security. For both cases, they provided me a Microsoft Excel datasheet containing personal details of the respondents and their submissions. I enriched these datasheets using the steps described in the following sections. The data I acquired were the submissions of respondents, who gave permission for their submissions to be public. Some submissions were filed anonymously. For these, I received only the number of anonymous submissions, but not their content or personal information. I tried to acquire the content of the anonymous submissions by filing a Wet Openbaarheid van Bestuur (WOB) request, through which civilians can request insights into government actions; however, this request was declined, making it impossible to incorporate the anonymous submissions into this research.

### 3.2 Case Selection

#### 3.2.1 Climate plan

The first case is the 'Climate Plan'. This regulative proposal summarises the main points for the climate policy for the period from 2021 to 2030. The Climate Plan is based on the Climate Agreement of June 2019, and it contains measures required to reduce national CO<sub>2</sub> emissions by 49% by 2030. The Climate Plan aims to be feasible and affordable for everyone, while maintaining the same competitive position. The legislative proposal has received a total of 2217 submissions, of which 1813 were filed by individuals and 404 were filed by companies and organisations. Most of the submissions ask for the Climate Plan to pay more attention to nuclear energy and/or thorium energy, due to the unreliability of solar and wind energy.

#### 3.2.2 Industry CO<sub>2</sub> Levy Act

The second case is the 'Industry CO<sub>2</sub> Levy Act'. In this regulative proposal, the Ministry of Finance elaborates on the additional tax proposed in the climate agreement, which affects the emissions of CO<sub>2</sub> by industrial processes and waste incineration. This levy is designed to achieve reduction targets for the industry, while maintaining the same international competitive position. This legislative proposal has received a total of 3358 submissions, of which 3300 have been filed by individuals and 3200 propose stricter and higher levies. Similar propositions have been made via submissions by environmental organisations, such as Dutch Greenpeace. Furthermore, approximately 30 industrial companies and related interest groups filed submissions supporting the goals of the climate agreement, but suggesting delayed implementation due to the economic uncertainty associated with the COVID-19 pandemic and the development of the Green Deal of the European Union. Additionally, these companies propose alternatives that they deem necessary to maintain the same international competitive position. Ultimately, the Dutch government implemented the law on the 1<sup>st</sup> of January 2021. Due to the economic uncertainty caused by the COVID-pandemic, the law has been implemented with a reduction factor that makes the law less drastic. The pricing of the levy conforms to the guidelines of the climate agreement.

### 3.2.3. Case comparison

Both cases focus on the taxation of a polluting activity, while maintaining the same competitive position. In both internet consultations, submissions range from suggesting stricter taxing of polluting activities to proposing more lenient taxation, resulting in a dispersed set of submissions. A clear difference between the cases is the method through which respondents can file a submission: The first case offers predefined questions that guide the respondent through the submission, while the second case offers the complete initial regulative proposal, without providing any focus, specification or predefined questions. Furthermore, in terms of number of submissions, the Climate Plan case ranks 10<sup>th</sup> and the Industry CO<sub>2</sub> Levy Act ranks 7<sup>th</sup> out of the 1885 total internet consultations. Due to the different methods through which respondents can file submissions and their high number of submissions, these cases are representative of the internet consultations provided by internetconsultatie.nl. However, the representativeness could have been improved by including a case with a non-environmental topic.

## 3.3 Measurement

### 3.3.1 Dependent variable

The dependent variable is the change between the initial proposal and the definitive proposal in response to a submission. I use two approaches to determine the dependent variable: textual changes and content changes. These two approaches, which build on each other, form a robust method for determining the independent variable and, thereby, improving reliability.

Firstly, the proposed legislative change and definitive legislative change are compared using the Microsoft Word document comparison tool. This tool shows each textual difference between the definitive legislative change and the proposed legislative change. These changes are compared to the suggestions made in the internet consultation submissions.

Secondly, I thoroughly study and compare the documents, since even small text changes could result in content changes that alter the content of the proposal. Therefore, the documents must be interpreted and compared. Differences between the documents could be affected by the internet consultation submissions.

Next, I compare the acquired textual and content changes with the alterations proposed in the submissions. When a textual or content change matches an alternative proposed in a submission, the submission has successfully effectuated regulative change. Therefore, the categorial variable ‘impact’ of this submission has a value of 1. When a submission does not propose a textual or content changes, the submission has not effectuated regulative change. The categorial variable ‘impact’ of such submissions has a value of 0.

In total, 1225 submissions made an impact and eight proposed changes have been effectuated. These include two changes in the Industry CO<sub>2</sub> Levy Act case, which focuses on the implementation of the regulation and the price per tonne of CO<sub>2</sub>. The proposed changes for the Climate Plan case focus on a variety of topics.

Case	Proposed changes	Number of submissions
Climate plan	Budget climate plan	2
Climate plan	Blue hydrogen	1
Climate plan	Monitoring	9
Climate plan	Usage of the heat net	4
Climate plan	Waterbed effect	1
Climate plan	Wind energy on Sea	7
Industry CO <sub>2</sub> Levy Act	Rate per tonne CO <sub>2</sub> €30	2
Industry CO <sub>2</sub> Levy Act	Implementation in 2021	1199

### 3.4. Independent variables

I characterise all submissions according to four independent variables: field characteristics, actors’ social positions, framing strategies and allies.

#### 3.4.1 Field characteristics

The opaqueness of the institutional field in which the cases are embedded depends on the type of method through which respondents can file submissions. This can be either a generic invitation to react to the legislative proposal or multiple concrete, government-formulated questions to guide respondents’ submissions. The generic invitation method allows respondents to evaluate the legislative proposal without any bias, whereas the formulation of concrete questions to guide submissions can lead to multiple biases. Choi and Pak (2005) emphasise how the formulation of questions influences respondents’ answers through, for example, hypothetical bias and double-barrelled question bias. Hypothetical bias occurs when questions ask respondents about their opinions regarding a situation rather than their behaviours in the same situation, since their opinions are hypothetical and their behaviours are personalised (Burton et al., 2007; Choi & Pak, 2005; Moore et al., 2012). Double-barrelled question bias occurs when a question comprises multiple questions, making it difficult for the respondent to answer every part of the question (Choi & Pak, 2005; Sreejesh et al., 2014). Additionally, the type of legislative proposal influences the opaqueness of the institutional field. Specifically, a law gives a precise definition of the rules the government enforces, while a plan proposes the optimal trajectory to follow to achieve a certain goal. A law offers no space for different interpretations, while a plan does.

The internet consultation for the Industry CO<sub>2</sub> Levy Act case enables respondents to read the legislative changes utilising a generic invitation method. The whole legislative proposal is made available, and respondents are able to file submissions regarding its complete content. Due to this transparency and lack of bias, the categorial variable for field characteristics, called 'transparency', has a value of 1, indicating that the case is embedded in a transparent institutional field.

For the internet consultation in the Climate Plan case, the government enables the respondents to read the plan and formulate multiple concrete questions to guide their submissions. In total, the government has formulated 13 questions categorised into nine sections. Respondents are able to answer the question, but they have no option to give additional feedback regarding the consultation. Additionally, multiple respondents have stated that the provided question are leading, forcing them to give certain answers. When studying the 13 questions both the hypothetical bias and the double-barrelled bias can be identified. Due to the presences of these biases and the confirmations of the respondents, the transparency variable has a value of 0. Indicating that the case is embedded in an opaque institutional field.

### 3.4.2 Actors' social positions

To understand the actors' social positions, we must understand who the actors are who file submissions to internet consultations. Therefore, I compiled a list of all the actors who filed such submissions. When the content of a submission states that multiple actors have developed a submission, I consider solely the actor who filed the submission.

I categorise this list of actors based on the fact that institutional entrepreneurs can be either organisations (Battilana, 2006; Garud et al., 2002) or individuals (Battilana, 2006; Fligstein, 1997; Maguire et al., 2004). Here, I distinguish between a lower social position and a higher social position. Organisations acquire legitimacy and resources more easily than individuals due to better access to financial resources, formal authority and social capital. Therefore, I view individuals as having a lower social position and organisations as having a higher social position.

Based on van Rijnsoever et al.'s (2015) distinction of actors, I distinguish six types of actors, including the lower socially positioned Individuals and five types of organisations: small- or medium-sized enterprises (SMEs), large enterprises (LEs), knowledge institutes (KIs), governmental organisations (GOs) and intermediary organisations (IOs). Individuals are persons who file a submission stating their personal opinion. SMEs are firms with a maximum of 250 employees. LEs are companies with more than 250 employees. KIs are non-profit institutes that conduct fundamental research, such as universities. GOs are organisations facilitated by and connected with the government. IOs, such as lobbyists, are organisations that facilitate communication among other organisations.

The distributions of the types of actors filing submissions for both cases are presented in the following table:

Type of actor	Number of submissions
GO	15
Individual	3036
IO	33
KI	13
LE	16
SME	3

Total	3116
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*Table 1: Distribution of the types of actors*

### 3.4.3 Framing strategies

To determine the types of framing strategies utilised in the internet consultation submissions, I study each submission individually to determine whether it uses diagnostic, prognostic, motivational or no framing strategy. This ordinal variable has a value of 1 when diagnostic framing is utilised, a value of 2 when prognostic framing is utilised, a value of 3 when motivational framing is utilised and a value of 4 when no frame is utilised. Each submission can use only one framing strategy, with the deviation between framing strategies made based on information given in the theory section. When a submission merely states that something regarding the legislative proposal is wrong, the submission uses a diagnostic framing strategy. When a submission states that something regarding the legislative proposal is wrong and offers a solution, the submission uses a prognostic framing strategy. When a submission states that something regarding the legislative proposal is wrong, offers a solution and provides compelling arguments to gain legitimacy, the submission uses a motivational framing strategy. When a submission states that the respondent agrees with everything in the legislative proposal, the submission uses no framing strategy.

An overview of the framing strategies utilised in the submissions is presented in table 1:

Type of framing	Number of submissions
Diagnostic	363
Prognostic	2183
Motivational	564
No Frame	6
Total	3116

*Table 2: Distribution of types of framing*

### 3.4.4 Allies

#### Number of allies

I determine the number of allies by studying the content of each submission individually using three methods. Firstly, the content of a submission can state that it agrees with another submission. Secondly, the content of a submission can state that the submission is a joint product of multiple actors. Thirdly, a respondent can file the exact same submission as the submission they support, meaning that two different respondents file submissions with identical content. When one of these methods is applicable to a submission, the submission has at least one ally. When none of the methods are applicable, the submission has no allies.

To determine their exact numbers of allies, I categorise the submissions into groups. When a submission has at least one ally, the submission is categorised into the group supporting that particular submission. This process yields four groups for the Climate Plan case and seven groups for the Industry CO<sub>2</sub> Levy Act case. For each submission that is part of a group, the categorial variable 'joint submission' has a value of 1. If a submission is not part of any group, joint submission has a value of 0.

An overview of the joint submissions for the Climate Plan case is presented in table 3. Syp Wynia is a media personality who initiated a joint submission. GGD is the area health authority in the Netherlands, and seven GGDs jointly filed the same submission. Civilians initiated the joint submissions for Fehling and André Bijkerk.

Submission	Number of allies
No allies	1458
Submission Syp Wynia	84

Submission GGD	7
Submission Fehling	6
Submission André Bijkerk – climategate.nl	19

*Table 3: Distribution of allies regarding the Climate Plan case*

An overview of the joint submission for the Climate Plan case is presented in table 4. Apart from the submission initiated by Friends of the Earth Netherlands, all joint submissions are a product of a cooperation between two companies. The submission initiated by Friends of the Earth Netherlands is primarily supported by individuals.

Submission	Number of allies
No allies	339
Joint submission of Nature and Environment and Nature and Environmental Federations	2
Joint submission of MKB Netherlands and VNO-NCW	2
Initiated submission by Friends of the Earth Netherlands	1191
Joint submission of Wise and Market Watch	2
Joint submission of Tata Steel and FNV Metal	2
Joint submission of Loyrens & Loeff en Yara Sluiskill B.V.	2
Joint submission of NVDE and MVO Netherlands	2

*Table 4: Distribution of Allies regarding the CO<sub>2</sub> Levy Act case*

#### Diversity of allies

The diversity of allies depends on the different types of actors supporting a submission in the categorised groups. For each of these groups, the type of actors supporting the submission is determined based on the distinction used in section 3.3.2. To calculate the diversity of the allies, I apply Shannon's (1948) entropy formula, which determines the randomness of a distribution, while considering variety and balance (Stirling, 2007). The formula for entropy (H) is:

$$H = - \sum_s p_s \ln p_s$$

Where  $p_s$  represents the proportion of submissions with a specific type and number of allies  $s$ .

I determine the relation between the diversity of the actors and the dependent variable by adding the resulting entropy to the logistic regression models.

An overview of the numbers and types of allies for the Climate Plan case is presented in table 5:

Submissions	GO	Individual	IO	KI	LE	SME
No allies	1	1435	16	2	3	1
Submission Syp Wynia		84				
Submission GGD	7					

Submission Fehling		6				
Submission André Bijkerk – climategate.nl		19				

Table 5: Overview of the numbers and types of allies for the Climate plan Case.

An overview of the numbers and types of allies for the Industry CO<sub>2</sub> Levy Act case is presented in table 6:

Submissions	GO	Individual	IO	KI	LE	SME
No allies	7	304	11	5	11	1
Joint submission of Nature and Environment and Nature and Environmental Federations				2		
Joint submission of MKB Netherlands and VNO-NCW			2			
Initiated submission by Friends of the Earth Netherlands		1188		2		1
Joint submission of Wise and Market Watch				2		
Joint submission of Tata steel and FNV Metal			1		1	
Joint submission of Loyrens & Loeff en Yara Sluiskill B.V.			1		1	
Joint submission of NVDE and MVO Netherlands			2			

Table 6: Overview of the number and type of allies for the Industry CO<sub>2</sub> Levy Act case.

### 3.5 Control variable

I use the number of words per submission as the control variable. The number of words per submission is of interest because submissions with more words could contain more information, especially regarding frames. For example, a submission with more than 1000 words is more likely to contain motivational framing than a submission with 100 words. However, research shows that submissions can be too long, leading to information dilution and decreasing their effectiveness (Ramaswamy, 2015). Submissions can also be too short, resulting in them containing too little information and becoming insignificant. Thus, though the number of words is not directly of interest to the research, it can influence the research results. The number of words per submission is determined using the R program, which finds an average number of words per submission of 352 and a standard deviation of 465.

### 3.6 Analysis

I test the hypotheses via a series of multilevel logistic regression models with a random intercept dependent on the change between the initial proposal and the definitive proposal in response to a submission, using the 'lme4' package in the R program. The dependent variable is the change between the initial regulative proposal and the definitive regulative proposal in response to the submissions. As independent variables, the model contains the enabling conditions, the framing strategies and the number of and diversity of allies. To support the hypotheses, the p-values of each estimator must be <0.05. To determine how well the model fits the data, I use the McFadden R<sup>2</sup>. When the value of the McFadden R<sup>2</sup> is higher than 0.2, the model fits the data well (McFadden, 1977). To check the quality of the model, I conduct an Anova test, using a model containing solely the dependent variable as the reference model. The Anova test compares the reference case with each logistic regression model. When this results in a significant relation (p<0.05) the logistic regression model adds value to the research. Lastly, I determine the variance influence factor (VIF) per independent variable in each logistic regression model to help identify the degree of multicollinearity. When VIF>10, the independent variables influence each other, indicating a high level of multicollinearity and meaning that they are not actually independent. This makes it difficult to estimate the relation

between the independent variables and dependent variable within the regression model (Curto & Pinto, 2011).

## 4. Results

I start by describing the performance indicators of the multiple logistic regression models. Table 7 presents the mean and standard deviation. Table 8 presents the correlation between the variables. Table 9 presents the VIF of each variable in the logistic regression. Finally, table 10 presents the McFadden R and the Anova test. After describing the quality of the models, I elaborate on the logistic regression models presented in table 9. I conclude by arguing whether the results of the models support each hypothesis.

Variable	Mean	Standard deviation
Transparency	0.494	0.500
GO	0.005	0.069
Individual	0.975	0.155
IO	0.011	0.105
KI	0.386	0.487
LE	0.006	0.076
SME	0.383	0.486
Framing	2.068	0.548
Diversity	0.415	0.329
Number of Allies	458.217	576.637
Joint Submission	1.423	0.494
Number of Words	352.065	464.948

Table 7: Mean and standard deviation per variable.

	Impact	Trans- parency	GO	Individual	IO	KI	LE	SME	Framing	Diversity	Number of Allies	Joint Submission	Number of Words
Impact	1												
Transparency	0.782	1											
GO	-0.046	-0.004	1										
Individual	0.082	-0.037	-0.437	1									
IO	-0.048	0.01	-0.007	-0.67	1								
KI	0.931	0.798	-0.055	0.079	-0.084	1							
LE	-0.061	0.052	-0.005	-0.479	0.153	-0.06	1						
SME	0.934	0.794	-0.055	0.117	-0.084	0.991	0.06	1					
Framing	-0.079	-0.14	0.118	-0.271	0.181	-0.078	0.13	0.089	1				
Diversity	-0.877	-0.724	0.028	-0.126	0.101	-0.936	0.08	0.942	-0.018	1			
Number of Allies	0.933	0.793	-0.055	0.126	-0.084	0.992	0.06	0.998	-0.084	-0.95	1		
Joint submission	0.857	0.715	0.006	0.057	-0.042	0.916	0.03	0.917	0.052	-0.986	0.926	1	
Number of words	-0.376	-0.412	0.034	-0.355	0.335	-0.377	0.16	-0.4	0.587	0.29	-0.394	-0.232	1

Table 8: Correlation matrix

	Model 1	Model 2	Model 3	Model 4	Model 5	Model 6
Transparency		1.054				1.466
GO			1.625			1.692
Individual			5.144			6.381
IO			3.740			4.217
KI			13.698			1.681
LE			1.000			1.000
SME			13.718			16.164
Framing				1.049		2.614
Diversity					23.539	
Number of Allies					21.099	
Joint Submission					11.966	
Number of Words		1.054	1.579	1.049	1.545	2.277

*Table 9: VIF per independent variable in each logistic regression model.*

Table 9 shows that multicollinearity is present in multiple models, mostly clearly in the number and types of allies in model 5. Additionally, the independent variables SME and KI show high degrees of multicollinearity, negatively influencing the reliability of the models and making the identified relations uncertain.

All variables						
Dependent variable:						
Impact						
	(1)	(2)	(3)	(4)	(5)	(6)
Transparency		5.160*** (0.221)				2.096*** (0.287)
GO			0.872 (1.329)			0.611 (1.380)
Individual			-0.041 (0.839)			0.632 (0.921)
IO			2.614*** (0.927)			2.194** (1.015)
KI			3.228*** (0.803)			2.048** (0.893)
LE			-13.662 (511.099)			-14.532 (517.890)
SME			3.664*** (0.812)			3.606*** (0.887)
Prognostic Framing				4.813*** (0.388)		
Motivational Framing				4.537*** (0.486)		
No Frame				-11.433 (359.778)		
Diversity					5.341*** (1.552)	
Number of allies					0.007*** (0.001)	
Joint Submission					1.717** (0.740)	
Framing						0.317 (0.222)
Number of Words	-0.007*** (0.0004)	-0.001*** (0.0002)	-0.001** (0.0003)	-0.009*** (0.0004)	-0.0002 (0.0003)	-0.0003 (0.0003)
Constant	1.139*** (0.073)	-3.752*** (0.221)	-3.190*** (0.876)	-2.960*** (0.385)	-6.942*** (1.062)	-5.396*** (1.129)
McFadden R	0.2357479	0.5577976	0.7995628	0.3848493	0.7939660	0.8143373
Anova Pr(>Chi)		<2.2e-16***	<2.2e-16***	<2.2e-16***	<2.2e-16***	<2.2e-16***
Observations	3,116	3,116	3,116	3,116	3,116	3,116
Log Likelihood	-1,595.851	-923.372	-418.537	-1,284.509	-430.224	-390.673
Akaike Inf. Crit.	3,195.701	1,852.744	853.074	2,579.018	870.448	801.346

Note:

\*p<0.1; \*\*p<0.05; \*\*\*p<0.01

Table 10: Overview of the regression models.

Table 9 presents six logistic regression models. Column 1 is a model containing only the dependent variable and the control variable. This model is used as a reference for the Anova test. Columns 2 through 5 contain the logistic regression models of the independent variables. Column 6 includes the framing strategies as one variable: 'framing'. Column 6 also contains all independent variables except for diversity, number of allies and joint submission. Including these variables results in a biased model (see appendix A). Except for the variables transparency, prognostic framing and motivational framing, none of the variables have a significant relation with effectuating regulative change. All other variables except for number of words have a highly insignificant relation ( $p > 0.9$ ) with effectuating regulative change. The high degree of multicollinearity among the diversity, number of allies and joint submissions variables yields an unreliable and biased model; therefore, these are excluded from model 6.

The McFadden R2 shows that the models fit the data well. Further, the Anova test shows that all logistic regression models add value to the research.

Model 2 shows a strong positive significant relation ( $p < 0.01$ ) between the transparency of the institutional field and the impact on regulative changes. This is also the case in model 6, in which transparency also has a strong positive significant relation ( $p < 0.01$ ) with effectuating regulative change. This supports hypothesis 1.

Model 3 shows that being an Intermediary organization (IO), knowledge institute (KI) or small- or medium-sized enterprise (SME) has a positive significant relation ( $p < 0.05$ ) with effectuating regulative change. This is especially true for SMEs and KIs, which have a higher estimate. Governmental organizations (GO) and large enterprises (LE) have no significant relation ( $p > 0.1$ ) with effectuating regulative change. This could be because only one GO and no LEs have yet made an impact on regulative change. Additionally, model 3 shows that there is no significant relation ( $p > 0.1$ ) between individuals and effectuating regulative change. Model 6 shows very similar relations. The biggest difference is that, in model 6, KI has a less significant ( $p < 0.05$ ) relation than in model 3. To better determine the relation between the actors' social positions and effectuating regulative change, I developed a logistic regression model per social position (table 11). Having a lower social position has a negative and significant relation ( $p < 0.01$ ) with effectuating regulative change, meaning that having a lower social position (i.e., being an individual) does not lead to a higher probability of a submission effectuating regulative change. However, having a higher social position does have a positive significant relation ( $p < 0.01$ ) with effectuating regulative change, meaning that having a higher social position (i.e., being an organisation) increases a submission's probability of effectuating regulative change. This supports hypothesis 2.

<b>Actors' social position</b>		
	<i>Dependent variable:</i>	
	Impact	
	(1)	(2)
Lower Social position	-5.858*** (0.185)	
Higher social position		5.858*** (0.185)
Number of words	-0.003*** (0.0003)	-0.003*** (0.0003)
Constant	3.310*** (0.146)	-2.548*** (0.154)
Mcfadden R	0.762	0.762
Anova Pr(>Chi)	2.2e-16***	2.2e-16***
Observations	3,116	3,116
Log Likelihood	-496.733	-496.733
Akaike Inf. Crit.	999.466	999.466

*Note:* \* p<0.1; \*\* p<0.05; \*\*\* p<0.01

**Table 11: Overview of actors' social positions.**

Model 4 shows a positive significant relation ( $p < 0.01$ ) between the prognostic and motivational framing strategies and effectuating regulative change. Using no frame in a submission has an insignificant relation ( $p > 0.1$ ) with effectuating regulative change. Diagnostic framing is not included since this is used as the reference category. Model 6 shows that framing strategies have no significant relation ( $p > 0.1$ ) with effectuating regulative change, thereby contradicting the results of model 4. To determine the relation between the framing strategies and effectuating regulative change, I separate the framing strategies by developing a logistic regression model per framing strategy (Table 12). Diagnostic framing has a negative significant relation ( $p < 0.01$ ) with effectuating regulative change, meaning that using diagnostic framing in a submission decreases the probability of effectuating regulative change. This does not support hypothesis 3. Prognostic framing has a positive significant ( $p < 0.01$ ) relation with effectuating regulative change, meaning that using prognostic framing in a submission increases the probability of effectuating regulative change. This supports hypothesis 4. Motivational framing has no significant relation ( $p > 0.1$ ) with effectuating regulative change. However, the Anova test yields a value higher than 0.05, meaning that the model does not add value and the hypotheses cannot be tested through this model. Therefore, I determine the relation between motivational framing and effectuating regulative change, based on model 5,

which shows that using motivational framing has a positive significant relation ( $p < 0.01$ ) with effectuating regulative change. Meaning that using motivational framing in a submission increases the probability of effectuating regulative change. This supports hypothesis 5.

<b>Framing strategies splitted</b>					
<i>Dependent variable:</i>					
	Impact				
	(1)	(2)	(3)	(4)	(5)
Diagnostic	-4.789*** (0.388)				
Prognostic		3.282*** (0.196)			4.813*** (0.388)
Motivational			-0.124 (0.271)		4.537*** (0.486)
No Frame				-14.584 (218.356)	-11.433 (359.778)
'Aantal woorden'	-0.009*** (0.0004)	-0.008*** (0.0004)	-0.007*** (0.0004)	-0.007*** (0.0004)	-0.009*** (0.0004)
Constant	1.825*** (0.087)	-1.529*** (0.192)	1.134*** (0.074)	1.161*** (0.074)	-2.960*** (0.385)
McFadden R	0.379	0.359	0.235	0.240	0.385
Anova Pr(>Chi)	<2.2e-16***	<2.2e-16***	0.646	7.069e-05***	<2.2e-16***
Observations	3,116	3,116	3,116	3,116	3,116
Log Likelihood	-1,295.967	-1,339.049	-1,595.745	-1,587.954	-1,284.509
Akaike Inf. Crit.	2,597.935	2,684.097	3,197.491	3,181.909	2,579.018
<i>Note:</i>	* $p < 0.1$ ; ** $p < 0.05$ ; *** $p < 0.01$				

**Table 12: Overview of separated framing strategies.**

Model 5 shows that there is a significant relation ( $p < 0.05$ ) between joint submission and number of allies and making an impact on regulative changes. This indicates that filing a submission together with allies, as well as the number of these allies, positively influences the probability of effectuating regulative change. This supports hypothesis 6. Additionally, there is a positive significant relation ( $p < 0.01$ ) between the diversity of allies and making an impact on regulative changes. A more diverse set of allies supporting a submission results in a higher possibility of effectuating regulative change. This supports hypothesis 7. However, the variables' VIF values are higher than 10, meaning that the results may be unreliable. Therefore, to confirm the significance of the relations identified in table 9, I separate the diversity, number of allies and joint submission variables by making a logistic regression model per variable

(Table 13). This model shows that all variables have a significant relation with effectuating regulative change, thereby confirming the relations found in Table 9 and supporting hypotheses 6 and 7.

<b>Allies splitted</b>				
<i>Dependent variable:</i>				
Impact				
	(1)	(2)	(3)	(4)
Diversity	-8.431 <sup>***</sup> (0.266)			5.341 <sup>***</sup> (1.552)
Number of allies		0.006 <sup>***</sup> (0.0002)		0.007 <sup>***</sup> (0.001)
Joint submission			5.428 <sup>***</sup> (0.171)	1.717 <sup>**</sup> (0.740)
Number of Words	-0.003 <sup>***</sup> (0.0003)	-0.0002 (0.0002)	-0.004 <sup>***</sup> (0.0003)	-0.0002 (0.0003)
Constant	3.371 <sup>***</sup> (0.140)	-3.291 <sup>***</sup> (0.173)	-2.324 <sup>***</sup> (0.143)	-6.942 <sup>***</sup> (1.062)
McFadden R	0.738	0.791	0.725	0.794
Anova Pr(>Chi)	$<2.2e-16^{***}$	$<2.2e-16^{***}$	$<2.2e-16^{***}$	$<2.2e-16^{***}$
Observations	3,116	3,116	3,116	3,116
Log Likelihood	-547.853	-436.397	-573.501	-430.224
Akaike Inf. Crit.	1,101.707	878.794	1,153.002	870.448
<i>Note:</i>	* p<0.1; ** p<0.05; *** p<0.01			

**Table 13: Overview of separated allies variables.**

## 5. Conclusion

In this research, I answer the question “How do actors’ enabling conditions, framing strategies and allies in internet consultations contribute to regulative change?” I use logistic regression models to determine the relation between the independent variables and the contribution to regulative change. From the models, I conclude that, regarding the enabling conditions, a transparent institutional field and a higher social position of actors increase the probability of

effectuating regulative change. Regarding the framing strategies, using diagnostic framing decreases the probability of effectuating regulative change, using prognostic framing or motivational framing increases the probability of effectuating regulative change. Filing a submission with allies increases the probability of effectuating regulative change, particularly when the set of allies is diverse. I show that Battilana et al.'s (2009) model is applicable to internetconsultatie.nl. Further, I am the first to quantitatively substantiate Battilana et al.'s (2009) model, showing that almost all phases have a positive significant relation with effectuating regulative change. This means that internet consultations can be enhanced to effectuate regulative change: a finding that the Ministry of Justice and Security should consider.

## 6. Discussion

### Theoretical contributions

This research is the first to quantitatively test Battilana et al.'s (2009) model through the tool internetconsultatie.nl. I test all defined phases in Battilana et al.'s (2009) model and show that they have significant relations with regulative change, thereby quantitatively substantiating that all phases are relevant in the process of regulative change. This is particularly true for field characteristics, actors' social positions and mobilisation of allies behind the vision. I test the creation of a vision for divergent change by determining the usage of framing strategies and show that using diagnostic framing negatively influences regulative change. Therefore, this research does not fully support the 'creation of a vision for divergent change' phase. Based on this research, future studies can use Battilana et al.'s (2009) model as a method to determine which activities of institutional entrepreneurs have higher probabilities to effectuate regulative change. Future research should focus on quantitatively validating my findings and, thus, substantiating Battilana et al.'s (2009) model. Additionally, future research should focus on the usage of framing strategies in internet consultations to either refute my findings or confirm the negative relation of diagnostic framing with effectuating regulative change.

This research is the first to study the effect of internet consultations on regulative changes for two legislative trajectories. The developed method accurately determines the impact of each internet consultation on regulative change. This is a new concept regarding how institutional entrepreneurship occurs that has not been studied before. I show that Battilana et al.'s (2009) model is applicable to this new concept. Future research should focus on determining whether the developed method is feasible and applicable to future studies regarding internet consultations.

### Limitations

This research presumes that the changes between the initial regulative proposal and the definitive regulative proposal are caused solely by the internet consultations. However, the initial regulative proposal is influenced by multiple lobby mechanisms, both formal and informal, which are not considered in this research. This makes the actual impact of the internet consultations on the definitive regulative proposal uncertain. Future research should focus on mapping all lobby mechanisms that impact regulative changes and, hence, determining the contribution of internet consultations within this variety of lobby mechanisms.

When a respondent files a submission, they can choose to file it signed or anonymously. I try to include both type of submissions in this research; however, internetconsultatie.nl and the Ministry of Justice and Security were unable to provide me with the anonymous submissions, stating that respondents who file submissions anonymously do not want others to read their submissions and that providing me with the anonymous submissions would go against this purpose. Therefore, I was unable to acquire all submissions that potentially effectuated

regulative change. The relation between the independent variables and effectuating regulative change could have been different if these submissions were included.

Initially, I tried to apply the latent dirichlet allocation (LDA) method (Hoffman et al., 2010) to the used dataset. I spent a lot of time trying to apply this method; however, even after data cleaning and stemming, the method was still not feasible. Therefore, LDA ultimately did not contribute to this research.

In this research, I study two representative cases. However, the small number of cases could still limit the validity and reliability of the research. Future research should focus on incorporating more (preferably all) internet consultations and submissions.

#### Practical contributions

This research shows that the probability of a submission effectuating regulative change can be enhanced by having a transparent field, a higher social position, utilizing a prognostic framing strategy, allies and a diverse set of allies. Internetconsultatie.nl aims to include all types of actors and strategies to impact regulative change; therefore, I advise them to critically reflect on potential preferences as presented in this research to enhance their inclusivity.

Internetconsultatie.nl must become more transparent. It currently allows anonymous submissions, which creates the potential for opaque lobbying. Though these submissions can effectuate regulative change, stakeholders are unable to read them. Internetconsultatie.nl is meant to be a transparent addition to the lobbying mechanism, but its transparency is negatively affected by actors' ability to file their submissions anonymously. Therefore, the tool should be wary of becoming opaque or useful solely to a select few stakeholders via lobbying. I advise internetconsultatie.nl to make every submission as transparent as possible and prohibit anonymous submissions.

Internetconsultatie.nl is an inclusive tool that enables institutional entrepreneurship for all actors. However, the suggestions made in the submissions are rarely included in the definitive regulative proposals. When suggestions are included, the changes are mostly incremental changes, marginally affecting the proposals' content. Radical suggestions that significantly change the regulative proposal are never included. I suggest that policymakers include more of the proposed changes, including radical changes. Otherwise, the effectiveness and validity of internetconsultatie.nl is limited.

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# Appendix

## Appendix A:

<b>All variables (including Allies)</b>	
	<i>Dependent variable:</i>
	Impact
Transparency	2.018*** (0.294)
GO	-110.915 (12,401.330)
Individual	-111.110 (12,401.330)
IO	-109.760 (12,401.330)
KI	-110.307 (12,401.330)
LE	-127.052 (12,481.620)
SME	-108.146 (12,401.330)
Prognostic	0.985* (0.422)
Motivational	1.169* (0.573)
No Frame	-15.727 (2,662.848)
Entropy	60.522 (2,368.374)
Number of allies	0.218 (21.855)
Joint submission	4.783 (116.872)
Number of words	-0.0004 (0.0003)
Constant	64.093 (11,108.480)
McFadden R	0.816
Anova Pr(>Chi)	<2.2e-16***
Observations	3,116
Log Likelihood	-384.644
Akaike Inf. Crit.	799.287
<i>Note:</i>	* p<0.1; ** p<0.05; *** p<0.01

**Table 14: Overview of all variables (including allies)**