Does Access Mean Success?
Connection to Policy Makers and Lobbying Influence in the EU

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Motivation & Research Question

- **Who has influence over the policy-making process? And to what extent?**

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The Guardian, February 10th, 2025:

I asked to see Ursula von der Leyen's texts to Pfizer's boss and she went to court to stop me. Why the secrecy?

Alexander Fanta

Motivation & Research Question

- **Who has influence over the policy-making process? And to what extent?**
- Empirically challenging to measure influence: need to track policy changes & lobbying
  - New data to **measure influence at one stage of the EU policy-making process**
    - Draft publication of regulation + online commenting platform
    - Possible to measure policy changes & assess the success of comments
    - & Data on meetings with the policymakers

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RQ **Do actors with direct access to policy-makers have more influence?**

- If so, what are the channels at play?
  Information transmission, political connections, institutional knowledge, intrinsic quality?

Contributions to the literature

1. **Lobbying activities**
   - Lobbying expenditure measures (Anger et al., 2015, 2016; Burghaus et al., 2019)
   - Lobbying "direction" (Meng and Rode, 2019; Bertrand et al., 2021)
   - Lobbying measured with the **textual content of informational lobbying**

2. **Influence of informational lobbying** (Bombardini and Trebbi, 2020; Bertrand et al., 2021)
   - Identify lobbying success from **policy changes** between *draft* and *adopted* regulations

3. **Value of political connections** (Brown and Huang, 2020; Bertrand et al., 2014; Ferguson and Voth, 2008; Fisman, 2001; Bomare and Logeart, 2025)
   - Political connections acquired through direct meetings lead to **increased influence**

Outline

Context & Data

European Union: 27 Member States, 450 million citizens + Brussels effect (Bradford, 2020)

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Unique setting:

1. Data to **measure influence** with the "Regulatory Procedure with Scrutiny"
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   - **Publication of draft regulation, online comments, and then adoption**

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Unique setting:

1. Data to **measure influence** with the "Regulatory Procedure with Scrutiny"
   - European Commission adopts
   - **Publication of draft regulation, online comments, and then adoption**
     - Comparing drafts and adopted texts → policy changes for 904 initiatives
     - 130k comments → content of informational lobbying

     ↪ Success of a comment defined as its inclusion in the policy changes

Context & Data

European Union: 27 Member States, 450 million citizens + Brussels effect (Bradford, 2020)

Unique setting:

1. Data to **measure influence** with the "Regulatory Procedure with Scrutiny"
2. Data on meetings with policy-makers to measure **effect of direct access on influence**
   - List of meetings with European Commission members (politicians + top bureaucrats)
   - 40k meetings in 2014-2023
   - For i commenting on regulation r: $Access_{ir} = 1$ if i had a meeting before the adoption of r

Example from an initiative on energy consumption of lighting products I

ANNEX III
Exemptions

This Regulation shall not apply to light sources and separate control gears specifically tested and approved to operate:

(a) in potentially explosive atmospheres, as defined in Directive 2014/34/EU of the European Parliament and of the Council [3] ;

(b) for emergency use, as set out in Directive 2014/35/EU of the European Parliament and of the Council [4] ;

(c) in radiological and nuclear medicine installations, as defined in Article 3 of Directive 2009/71/EURATOM [5] ;

(d) in or on military or civil defence establishments, equipment, ground vehicles, marine equipment or aircraft, as set out in Member States' regulations or in documents issued by the European Defence Agency;

(e) in or on motor vehicles, their trailers and systems, interchangeable towed equipment, components and separate technical units as set out in Regulation (EC) No 661/2009 of the European Parliament and of the Council [6] , Regulation (EU) No 167/2013 of the European Parliament and of the Council [7] and Regulation (EU) No 168/2013 of the European Parliament and of the Council [8] ;

(f) in or on non-road mobile machinery as set out in Regulation (EU) 2016/1628 of the European Parliament and of the Council [9] ;

(g) in or on civil aviation aircrafts, as set out in Commission Regulation (EU) No 748/2012 [10] ;

(h) in railway vehicle lighting, as set out in Directive 2008/57/EC of the European Parliament and of the Council [11] ;

(i) in marine equipment, as set out in Directive 2014/90/EU of the European Parliament and of the Council [12] ;

(j) in medical devices, as set out in Council Directive 93/42/EEC [13] and in vitro medical devices as set out in Directive 98/79/EC of the European Parliament and of the Council [14] .

(a) Draft regulation

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(f) in or on non-road mobile machinery as set out in Regulation (EU) 2016/1628 [9] and in or on their trailers;

(g) in or on interchangeable equipment as set out in Directive 2006/42/EC [10] intended to be towed or to be mounted and fully raised from the ground or that cannot articulate around a vertical axis when the vehicle to which it is attached is in use on a road by vehicles as set out in Regulation (EU) No 167/2013 [11] ;

(h) in or on civil aviation aircraft, as set out in Commission Regulation (EU) No 748/2012 [12] ;

(i) in railway vehicle lighting, as set out in Directive 2008/57/EC [13] ;

(j) in marine equipment, as set out in Directive 2014/90/EU [14] ;

(k) in medical devices, as set out in Council Directive 93/42/EEC [15] or Regulation (EU) 2017/745 [16] and in vitro medical devices as set out in Directive 98/79/EC [17] .

(b) Adopted regulation

Example from an initiative on energy consumption of lighting products II

Comment from the European agricultural machinery industry association

European Agricultural Machinery CEMA

Exemption needed for lighting sources on mounted agricultural equipment

9 November 2018

CEMA, the European agricultural machinery industry association, would like to respond to the European Commission's draft regulation on ecodesign requirements for lighting sources (Ares(2018)5145935). In general, CEMA welcomes the initiative to improve the energy efficiency of light sources. Additionally, CEMA fully supports the exclusion of agricultural tractors, interchangeable towed equipment and non-road mobile machinery in the current draft. Light sources for these machines and vehicles are essential for road safety. It is important that high-quality lighting is available to ensure other road users can see the vehicles and machines on the road. Therefore, these machines and vehicles make use of the same lighting sources that are used in the automotive sector. Lighting for the automotive sector is excluded from the regulation and for the same reasons CEMA believes it is appropriate that light sources for the abovementioned vehicles and machines are excluded as well.

Next to the agricultural tractors, interchangeable towed equipment and non-road mobile machinery the same lighting sources are used on mounted agricultural equipment and trailers towed by non-road mobile machinery. This equipment is mounted on a tractor and used for example for soil preparation, spreading fertilizer or spraying plant protection products or pulled by a combine harvester and used as a header. This agricultural equipment can be relatively large and might block the lighting of the tractor or machine. In those cases it is necessary that similar lighting is installed on the towed or mounted equipment for road safety reasons. This is important to make the whole vehicle visible when going over the public roads, particularly as these vehicles can be wider or larger than most vehicles. Hence, it is essential that high-quality lighting is available for this equipment since it needs to be clearly visible for all road users.

The lighting sources for mounted agricultural equipment and non-road mobile machinery trailers are a niche markets and at the moment the lighting from the automotive sector is used. Considering the small size of the market CEMA is convinced that with the current proposal the same high-quality lighting, that is essential for road safety, will not be available for this type of equipment as the automotive light sources cannot be used.

Therefore, CEMA calls for an exemption in the ecodesign legislation for lighting sources in or on mounted equipment and trailers towed by non-road mobile machinery. In that case it will remain possible to install the high-quality automotive lighting on this equipment.

CEMA aisbl - European Agricultural Machinery
Bluepoint Building, Bld A. Reyers 80, BE-1030 Brussels
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info@cema-agri.org - www.cema-agri.org

Figure 2: Page 1

To define this type of equipment CEMA suggests to add the following exemption as part of Annex III of the regulation:

Annex III Exemptions

...

(f) In or on non-road mobile machinery as set out in Regulation (EU) 2016/1628 of the European Parliament ***and their trailers***

(..) In or on interchangeable equipment as set out in Directive 2006/42/EC intended to be towed or to be mounted and fully raised from the ground or that cannot articulate around a vertical axis when the vehicle to which it is attached is in use on a road by vehicles as set out in Regulation (EU) No 167/2013

...

Figure 3: Page 2

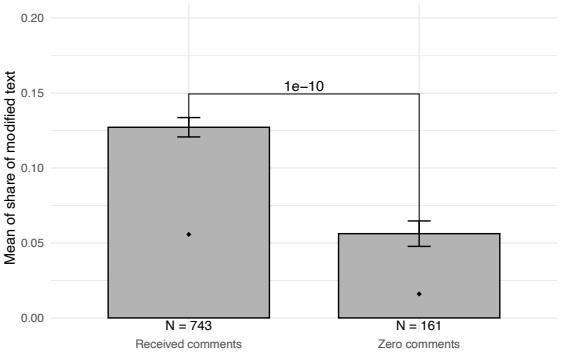
Measuring Lobbying Success

I measure the success of a comment from entity *i* on regulation *r* with **two methods**:

- **Text reuse**: text from the comment found in modifications between draft and final text
  - \+ **Transparent** method, reproducible
  - – Low flexibility: measures the ability to provide "ready-to-use" text (legal knowledge needed)
- **LLM**: ask GPT whether a requested change has been incorporated in text modifications
  - \+ **Flexible** method: change in wording does not compromise detection of success
  - – Black box
- I use both methods to benefit from a transparent method and from a flexible method

▸ Details text reuse ▸ Details GPT ▸ Prompts GPT ▸ Examples of Success

Share of modified text



↪ **Share of amended text higher for regulations receiving comments**

For these, **I can trace back 11% of the modifications to a comment**

Outline

Naive Estimations - Plagiarism-detection

Dependent variable:	Lobbying success (Y = 1)
Mean (s.d.)	.0206 (.142)
Access before adoption	.390***
	(.00255)
Observations	129,153
R^2	.153
Adj. R^2	.153

Notes. Standard errors in parenthesis. Controls include comment quality (length and complexity), language used, EU origin. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Naive Estimations - Plagiarism-detection

Dependent variable:	Lobbying success (Y = 1)	
Mean (s.d.)	.0206 (.142)	
Access before adoption	.390***	.304***
	(.00255)	(.00253)
Controls	No	Yes
Observations	129,153	129,153
R^2	.153	.241
Adj. R^2	.153	.241

Notes. Standard errors in parenthesis. Controls include comment quality (length and complexity), language used, EU origin. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Naive Estimations - Plagiarism-detection

Dependent variable:	Lobbying success (Y = 1)		
Mean (s.d.)	.0206 (.142)		
Access before adoption	.390***	.304***	.115***
	(.00255)	(.00253)	(.00283)
Controls	No	Yes	Yes
Type	No	No	Yes
Observations	129,153	129,153	129,153
R^2	.153	.241	.348
Adj. R^2	.153	.241	.348

Notes. Standard errors in parenthesis. Controls include comment quality (length and complexity), language used, EU origin. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Naive Estimations - Plagiarism-detection

Dependent variable:	Lobbying success (Y = 1)			
Mean (s.d.)	.0206 (.142)		.290 (.454)	
Access before adoption	.390***	.304***	.115***	.0596***
	(.00255)	(.00253)	(.00283)	(.0102)
Controls	No	Yes	Yes	Yes
Type	No	No	Yes	Yes
Excl. citizens & anonym	No	No	No	Yes
Observations	129,153	129,153	129,153	8,319
R^2	.153	.241	.348	.212
Adj. R^2	.153	.241	.348	.211

Notes. Standard errors in parenthesis. Controls include comment quality (length and complexity), language used, EU origin. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Naive Estimations - Plagiarism-detection

Dependent variable:	Lobbying success (Y = 1)				
Mean (s.d.)	.0206 (.142)			.290 (.454)	.291 (.454)
Access before adoption	.390*** (.00255)	.304*** (.00253)	.115*** (.00283)	.0596*** (.0102)	.0505*** (.0102)
Controls	No	Yes	Yes	Yes	Yes
Type	No	No	Yes	Yes	Yes
Excl. citizens & anonym	No	No	No	Yes	Yes
Regulation FE	No	No	No	No	Yes
Observations	129,153	129,153	129,153	8,319	8,227
R^2	.153	.241	.348	.212	.370
Adj. R^2	.153	.241	.348	.211	.340

Notes. Standard errors in parenthesis. Controls include comment quality (length and complexity), language used, EU origin. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Naive Estimations - Large Language Model

Dependent variable:	Lobbying success (Y = 1)				
Mean (s.d.)	.00843 (.0914)			.131 (.337)	.131 (.337)
Access before adoption	.149***	.133***	.0255***	.0163	.0141
	(.00173)	(.00181)	(.00210)	(.00850)	(. 00854)
Controls	No	Yes	Yes	Yes	Yes
Type	No	No	Yes	Yes	Yes
Excl. citizens & anonym	No	No	No	Yes	Yes
Regulation FE	No	No	No	No	Yes
Observations	129,153	129,153	129,153	8,319	8,227
R^2	.0545	.0617	.131	.0116	.204
Adj. R^2	.0545	.0617	.131	.0101	.167

Notes. Standard errors in parenthesis. Controls include comment quality (length and complexity), language used, EU origin. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Methodology

- Two challenges to measure the effect of meetings on influence
  1. Organization with access might write "better" comments for other reasons (better info...)
  2. Little within organization variation (one meeting sets $Access_{ir} = 1$ for all future comments)

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↪ I perform my analysis on a balanced sample, using **propensity score matching**

- *Observables*: comment quality (length and complexity), language used, EU origin, type
- Regulation fixed effects, standard errors clustered at the organization level

▸ Balancing test

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- *Observables*: comment quality (length and complexity), language used, EU origin, type
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▸ Balancing test

- Linear probability model:

$$LobbyingSuccess_{ir} = \alpha + \beta\, Access_{ir} + \sum_t \gamma_t\, type_i^t + \eta\, \mathrm{X}_{ir} + \delta_r + \varepsilon_{ir}$$

Baseline Results

Dependent variable:	Lobbying success (Y = 1)	
	Plagiarism-detection	LLM
Mean (s.d.)	.364 (.481)	.145 (.353)
Access before adoption	.0422**	.0230*
	(.0143)	(.0106)
Controls	Yes	Yes
Regulation FE	Yes	Yes
Observations	3,775	3,775
Adj. R^2	.309	.153

Notes. Standard errors clustered by organization. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

- **Access associated to higher chances of lobbying success by 2.30 to 4.22 pp**

Results I

1. **Comments by entities with access to policy-makers are more likely to succeed**, compared to similar comments written on same regulation but without access
   - Driven by access to higher levels of the hierarchy details
   - Driven by comments from organizations with more meetings details

? More chance to persuade poliy-makers?
Favored by political connections?
Acquire institutional knowledge / bureaucratic capital (Laurens, 2015)?
Intrinsically "better" organizations?

Outline

Mechanisms - Temporality of meetings I

- Meeting with policy-makers:
  - $\Rightarrow$ Transmit information (**persuasion**)
  - $\Rightarrow$ Build **political connections**
  - $\Rightarrow$ Build **institutional knowledge**
  - $\Rightarrow$ Signal higher **intrinsic quality**

Mechanisms - Temporality of meetings I

- Meeting with policy-makers:
  - $\Rightarrow$ Transmit information (**persuasion**) $\longrightarrow$ *Time-topic specific*
  - $\Rightarrow$ Build **political connections** $\longrightarrow$ *Person specific*
  - $\Rightarrow$ Build **institutional knowledge** $\longrightarrow$ *Institution specific*
  - $\Rightarrow$ Signal higher **intrinsic quality** $\longrightarrow$ *Organization specific*
- **Distinguish channels** with time-dimension of meeting + turnover between mandate

Mechanisms - Temporality of meetings II

	Access			
	Contemp.	Prior meetings Past Com. (stayed)	Past Com. (left)	Post adoption

Mechanisms - Temporality of meetings II

	Access			
	Contemp.	Prior meetings Past Com. (stayed)	Past Com. (left)	Post adoption
Information transmission	Yes	No	No	No

Mechanisms - Temporality of meetings II

	Access			
	Contemp.	Prior meetings Past Com. (stayed)	Past Com. (left)	Post adoption
Political connection	Yes	Yes	No	No

Mechanisms - Temporality of meetings II

	Access			
	Contemp.	Prior meetings Past Com. (stayed)	Past Com. (left)	Post adoption
Institutional knowledge	Yes	Yes	Yes	No

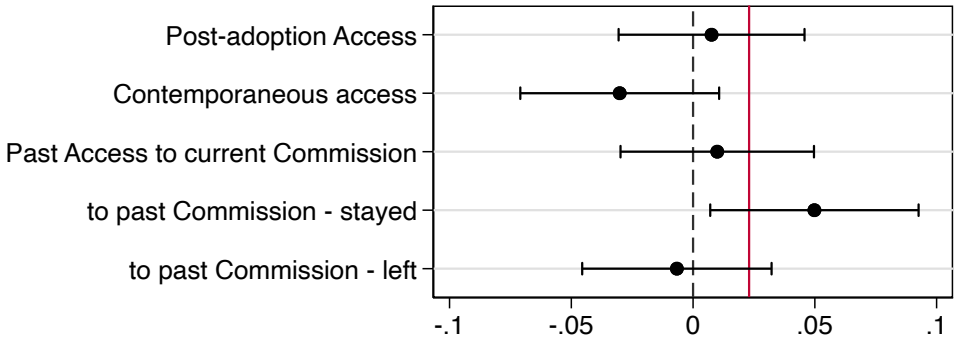
Mechanisms - Temporality of meetings II

	Access			
	Contemp.	Prior meetings Past Com. (stayed)	Past Com. (left)	Post adoption
Intrinsic quality	Yes	Yes	Yes	Yes

Mechanisms - Temporality of meetings II

	Access			
	Contemp.	Prior meetings Past Com. (stayed)	Past Com. (left)	Post adoption
Information transmission	Yes	No	No	No
Political connection	Yes	Yes	No	No
Institutional knowledge	Yes	Yes	Yes	No
Intrinsic quality	Yes	Yes	Yes	Yes

Political connection channel explains the results



Notes. N = 2,500. 95% confidence intervals. LPM model. Dep. var: lobbying success (LLM measure). Mean = .126. SD = .331. Sample restricted to the von der Leyen Commission. Controls: actor type, comment length (log), comment complexity, main-EU-language indicator variable, and EU country indicator variable. FE: regulation. SE: clustered at organization level.

Results II

1. Comments by entities with access to policy-makers are more likely to succeed, compared to similar comments written on same regulation but without access
   - Driven by access to higher levels of the hierarchy
   - Driven by comments from organizations with more meetings
2. **Increased influence of org. with access to policymakers explained by political connections**
   - Comments from organizations with access to policy-makers who stayed are more likely to succeed, compared to similar comments written on same regulation but without access

? Results on similar comments from different organizations
↪ organizations can still be different on unobservable dimensions

Mechanisms - Effect of Loosing Connections I

Existing variation within organization: **connection loss** with change of mandate

I distinguish two types of organizations with access to the past Commission:

- Members met left $\rightarrow PastAccess_i^{left} = 1$
- Members met stayed (at least one) $\rightarrow PastAccess_i^{stayed} = 1$

to measure effect of keeping versus loosing connections

Linear probability model:

$$Success_{ir} = \beta_S \, VdL_r \times PastAccess_i^{stayed} + \beta_L \, VdL_r \times PastAccess_i^{left} + \eta \, X_{ir} + \delta_i + \delta_r + \varepsilon_{ir}$$

Mechanisms - Effect of Loosing Connections II

Dependent variable:	Lobbying success (Y = 1)	
	Text Reuse	LLM
Mean (s.d.)	.360 (.480)	.154 (.361)
Von der Leyen mandate x past meetings & stayed	.0633 (.0469)	.0801* (.0398)
Von der Leyen mandate x past meetings & left	-.0637 (.0765)	.00837 (.0732)
Comment Controls	Yes	Yes
Organization FE	Yes	Yes
Regulation FE	Yes	Yes
Observations	4,182	4,182

- An organization keeping a connection becomes more likely to succeed, compared to its previous comments ↪ connections become more valuable with time
- An organization losing its connection does not experience such a success increase compared to its previous comments

Results III

1. Comments by entities with access more likely to succeed, compared to similar comments on same regulation but without access
   - Driven by access to higher levels of the hierarchy
   - Driven by comments from organizations with more meetings
2. Increased influence of org. with access to policymakers explained by political connections
   - Comments from organizations with access to policy-makers who stayed are more likely to succeed, compared to similar comments on same regulation but without such access
3. Within organizations, keeping connections after a change of mandate increases influence

Conclusion

- This paper provides a unique, large-scale dataset that combines
  1. **policy changes** between draft and final regulations
  2. **lobbying content** $\rightarrow$ textual analysis to identify success
  3. **access to policy-makers** from Commission meetings data
- This paper provides evidence on the role of direct access to policymakers in influence
  1. **Comments by entities with access more likely to succeed**, compared to similar comments on same regulation but without access
  2. Increased influence of org. with access **explained by political connections**
  3. Within org., **keeping connections through mandate change increases influence**
- Regulatory changes obtained through political connections do not necessarily reflect interests of the majority $\Rightarrow$ potential important welfare losses

Thank you for your attention!

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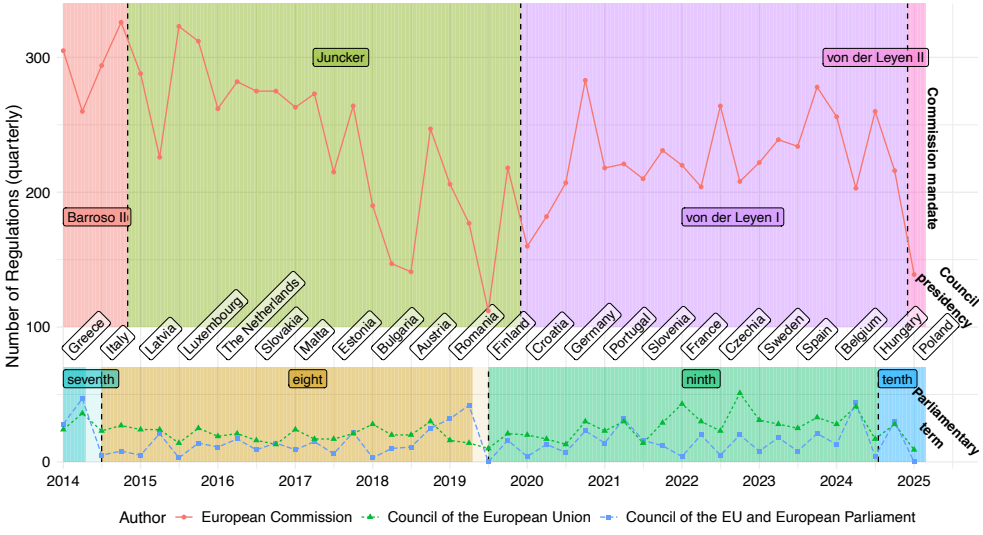
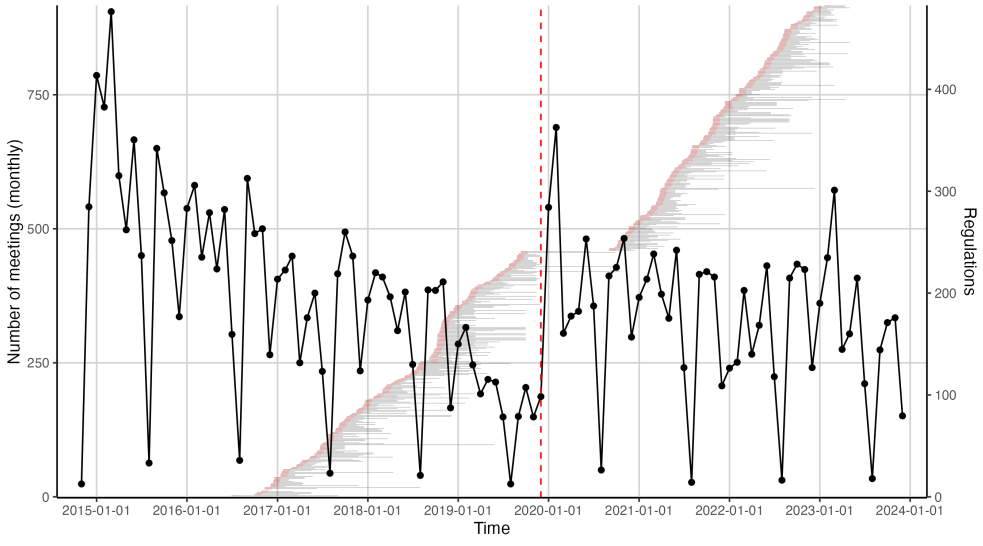
Distribution of regulations



Distribution of meetings and regulations



Details Text Reuse

1. Extract word sequences that are **modified** between the draft and the adoption of r
2. Consider the set of word sequences from i's comment on r (5-grams)
3. Is there an **overlap**? Yes $\Rightarrow$ $LobbyingSuccess_{ir} = 1$

Plagiarism-detection algorithm (Djourelova, 2023; Cagé et al., 2020; Casas et al., 2020)

Details GPT

1. Identify articles with modifications
2. Ask GPT to enumerate the modifications
3. For each comment, GPT to enumerate requested changes
4. Has a requested change been incorporated? Yes $\Rightarrow$ $LobbyingSuccess_{ir} = 1$

Prompts GPT

For each regulation:

▶ **For each article with modifications:** *You are a policy-maker. You will be provided with an article of a draft regulation first, followed by its final version. Your goal is to identify and extract only policy-relevant changes between the draft and the final version. Ignore purely stylistic or wording changes that do not impact the regulatory obligations, scope, or intent. If the draft is an empty string, it means that the article is new. Explain the additions. If the final version is an empty string, it means that the article has been deleted. Explain what has been discarded from the regulation.*
For each policy-relevant change, provide a 1-sentence explanation, clearly explaining the impact of the change on the regulation's implementation or stakeholders.

▶ **For each comment:** *You are a policy-maker. You will be provided with a comment on a draft regulation. Your goal is to extract requests from comments, as well as a 1-sentence summary for these requests.*

▶ **For each article-comment pair:** *You are a policy-maker tasked with evaluating stakeholder influence on regulatory changes. You will first be provided with article-by-article policy changes between the draft and final versions of a regulation. Next, you will receive requests made by a stakeholder, indicating how they wanted the draft to evolve. Your goal is to identify whether the stakeholder's requests successfully led to changes in the final regulation. Respond with 'Yes' or 'No', followed by a brief explanation. Indicate whether the stakeholder's requests have been 'entirely successful', 'partially successful', or 'not successful'.*

Example from an initiative on endocrine disruptors I

Draft regulation:

Section A - Endocrine disrupting properties with respect to humans

1. An active substance shall be identified as having endocrine disrupting properties with respect to humans if it is a substance that meets all of the following criteria:

   (1) it is known to cause an adverse effect relevant for human health, which is a change in the morphology, physiology, growth, development, reproduction, or, life span of an organism, system, or (sub)population that results in an impairment of functional capacity, an impairment of the capacity to compensate for additional stress, or an increase in susceptibility to other influences;

Adopted regulation:

Section A - Endocrine disrupting properties with respect to humans

(1) A substance shall be considered as having endocrine disrupting properties that may cause adverse effect in humans if, based on points (a) to (d) of point (2), it is a substance that meets all of the following criteria, unless there is evidence demonstrating that the adverse effects identified are not relevant to humans:

   (a) it shows an adverse effect in an intact organism or its progeny, which is a change in the morphology, physiology, growth, development, reproduction or life span of an organism, system or (sub)population that results in an impairment of functional capacity, an impairment of the capacity to compensate for additional stress or an increase in susceptibility to other influences;

Example from an initiative on endocrine disruptors II

Comment from a Spanish citizen

1) La Comisión propone identificar sólo los EDCs que provoquen efectos adversos “conocidos” en humanos y vida silvestre. La expresión “conocido” significa tener pruebas. El hecho de pedir esas pruebas debilita la legislación actual que exige regular aquellas sustancias que “puedan” causar daño (como para los cancerígenos se utiliza “que puedan causar cáncer”). Ese umbral de prueba tan elevado se opone a la opinión de los expertos sobre la probabilidad de un efecto y es inaceptable, ya que puede generar daños en humanos y medio ambiente antes de que se actúe, en contra del Principio de Precaución consagrado en los tratados de la UE. También choca con el actual enfoque de identificación y clasificación de sustancias cancerígenas y tóxicas para la reproducción, en base al nivel de evidencia. Las sustancias deben identificarse como EDCs cuando se conoce o presume que tienen efectos adversos. Sólo este enfoque es consistente y coherente con la ley de biocidas que dice que no se debe permitir en el mercado biocidas si “se considera que tienen propiedades de disrupción endocrina que puedan causar efectos adversos en humanos”. La Comisión debe actuar con el conocimiento científico existente y la mejor opción para la salud es un enfoque con 3 categorías de acuerdo al nivel de evidencia

Modifications & Comments per DG

Access and success distrib. per type

Directorate-General	N	Del.	New	Comments	Found
Competition	1	.38	.48	29.00	.42
Energy	27	.28	.34	2,586.07	.14
Justice and Consumers	2	.16	.16	30.00	.22
Mobility and Transport	44	.13	.18	17.16	.13
Health and Food Safety	132	.13	.15	55.21	.08
Climate Action	24	.13	.20	12.62	.10
Environment	21	.11	.12	54.52	.10
Financial Stability, Services and Capital Markets Union	25	.10	.12	1,882.88	.23
Communications Networks, Content and Technology	3	.09	.11	59.00	.31
Migration and Home Affairs	2	.04	.09	5.00	.07
Agriculture and Rural Development	64	.03	.04	22.45	.08
Maritime Affairs and Fisheries	7	.03	.03	3.86	.16
All	**443**	**.11**	**.14**	**291.38**	**.11**

↪ On average, **14% of the text is amended**. I can trace back 11% of the modifications.

Distribution of Success and Access per Actor Type

Type	N	Access (%)	Success (%)	
			Plagiarism	LLM
Academic/research Institution	251	7.97	26.29	5.98
Anonymous	1,241	-	15.07	-
Business association	**2,580**	**46.40**	**35.35**	**15.04**
Citizen	119,593	0	0.06	-
Company/business org.	**2,835**	**27.20**	**27.90**	**12.24**
Consumer organization	78	35.90	12.82	8.97
Environmental organization	160	25.62	23.75	20.63
NGO	**1,141**	**36.99**	**24.36**	**13.50**
Other	709	18.19	20.59	8.32
Public authority	452	2.43	33.85	15.49
Trade union	113	38.05	14.16	14.16
Total	129,153	2.06	2.06	-
w/o citizen and anonymous	8,319	32.30	28.97	13.09

Balancing test (difference no access vs. access)

	Whole sample	PSM sample
Observations	5,637 + 2,682	1,888 + 1,914
Comment length	$.726^{***}$(.0289)	−.0236 (.0360)
Comment complexity	$.160^{***}$ (.0146)	.0114 (.0162)
Main EU languages	$.104^{***}$ (.00672)	−.000148 (.00532)
EU origin	$.0734^{***}$ (.00728)	.00630 (.00858)
Type		
Academic/research Institution	$-.0335^{***}$ (.00400)	.00251 (.00301)
Business association	$.203^{***}$ (.0106)	−.0169 (.0158)
Company/business organisation	$-.0737^{***}$ (.0111)	.0156 (.0151)
Consumer organisation	.00157 (.00226)	−.00224 (.00323)
Environmental organisation	−.00582 (.00322)	−.000281 (.00460)
Non-governmental organisation	$.0320^{***}$ (.00806)	.000825 (.0122)
Other	$-.0526^{***}$ (.00653)	−.00134 (.00766)
Public authority	$-.0741^{***}$ (.00526)	−.000602 (.00240)
Trade union	.00361 (.00272)	.00244 (.00380)

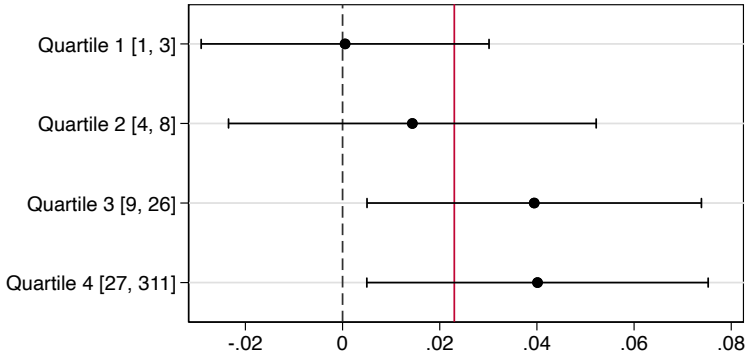
Notes. Comparison of whole and balanced samples for comments written from entities without or with access to policy-makers: nb of observations, and mean statistical difference with standard error in parenthesis. Complexity = average length of words, stop words excluded. * $p < 0.05$, ** $p < 0.01$, *** $p < 0.001$

Results driven by access to the highest levels of the hierarchy

Dependent variable:	Lobbying success (LLM)				
Access to Presidency	.0498***				.0340
	(.0146)				(.0176)
Directors-General		.0419***			.0303
		(.0124)			(.0174)
Commissioners			.0329**		.00840
			(.0118)		(.0189)
Cabinet Members				.0213*	-.0152
				(.0107)	(.0167)
Controls	Y	Y	Y	Y	Y
Regulation FE	Y	Y	Y	Y	Y
Observations	3,775	3,775	3,775	3,775	3,775
Pseudo R^2	.155	.155	.154	.153	.155

Intensity of Access: Number of Meetings (quartiles)

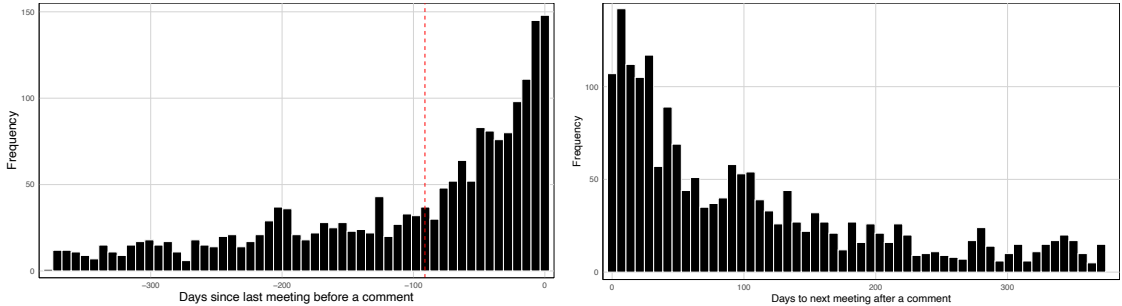
$$LobbyingSuccess_{ir} = \alpha + \sum_{q \in \{Q1, Q2, Q3, Q4\}} \beta_q \, Access_{ir}^{q} + \sum_{t} \gamma_t \, type_i^t + \eta \, \mathrm{X}_{ir} + \delta_r + \varepsilon_{ir}$$



- **Results driven by comments written by organizations with more meetings**

Mechanisms

Days between a comment and closest meetings



(a) Before comment

(b) After comment