



Confederation of Danish Industry

European Commission  
Secretariat General  
Directorate E "Better Regulation and  
Institutional Issues"  
Unit E.1 "Institutional Issues"  
B - 1049 Brussels

## **Reply to the green paper on a European Citizens' Initiative**

Confederation of Danish Industry (DI) would like to thank for the opportunity to comment on the green paper on a European Citizens' Initiative. DI welcomes the green paper and supports the ambition of the Lisbon Treaty to advance the integration of the European civil society in the legislative process.

Generally DI finds that if the citizens' initiative is to bring value to European decision-making a balance must be struck between adequate representation of Member States and a simple methodology for the execution of such initiatives.

### **Requirements and eligibility**

Concerning the question of what constitutes a significant number of Member States DI finds that one third of Member States, as suggested in the green paper, is appropriate in order to ensure that citizens' initiatives are both representative and have a clear European profile. In order to guarantee these two objectives a requirement for a minimum number of citizens per Member State is considered necessary. The suggested 0.2% of the total population of each participating Member States seems to be the appropriate threshold.

Regarding the eligibility of participants, the minimum age of supporting a citizens' initiative should equal the voting age for the European elections in each member state. This means 18 in all Member States except for Austria where the voting age is set at 16.

### **Form, registration and time frames**

If the citizens' initiative is to become a truly viable offer for European civil society attention must be paid to the practical execution of initiatives. In this respect DI finds it is sufficient to require that an initiative states the subject-matter and objectives of the proposal as proposed in section four of the green paper. In line with this approach DI supports the idea of setting up a specific website where initiatives can be formally registered through uploading of title, subject-matter, background and objectives. As a positive side effect this approach will also limit the risk of similar or identical initiatives being submitted.

Concerning section five of the green paper DI finds that unnecessary administrative burdens should be avoided by establishing minimum requirements for verification and authentication of signatures, giving the Member States a certain level of flexibility.

Regarding the various time frames DI finds that organizers of an initiative should be given one year from the completion of the registration formalities to collect the required signatures. In addition the Commission should be obliged to respond to an initiative within a time-frame of maximum 6 months. In order to avoid burdening the system and undermine the citizens' initiative as a serious instrument for democratic participation a time frame should also be set for the resubmission of an initiative. It is important that such a time frame reflects the difference between the resubmission of an identical initiative and an initiative which has been amended due to new data or legislation.

Finally DI finds that it is important to stress that no restrictions should be imposed as to who may present an initiative. Both citizens and organisations should be eligible. In line with the Commission's European Transparency Initiative organisers of initiatives should provide certain basic information of which organisations are supporting the initiative in question.

Best Regards

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