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Civic Alliance Latvia shares the Commission's opinion of the total number of Member States that would constitute the significant number of states required by the Article 11 of the Lisbon Treaty.

At least one third of the Member States compromise the diversity of culture and language, religion, welfare and resources. Any number less than one third reflects the *misleading-diversity* of country-groups that used to be in one block after the World War II. The virtue and loophole of *traditional* country-groups' networks has to be recognized and therefore its influence limited on the decision making issues that have impact on common well-being of the European citizens.

## 2. Minimum number of signatures per Member State

*Questions:*

*Do you consider that 0.2% of the total population of each Member State is an appropriate threshold?*

*If not, do you have other proposals in this regard in order to achieve the aim of ensuring that a citizens' initiative is genuinely representative of a Union interest?*

Civic Alliance Latvia holds view that national legislation initiative rights embrace the historical, cultural and political reasoning of particular legal norms and should be respected. Instead of leveling the scale of total population of each Member State, European Commission must state unique threshold of every country.

## 3. Eligibility to support the Citizens' initiative

*Questions:*

*Should the minimum age required to support a European citizens' initiative be linked to the voting age for the European Parliament elections in each Member State?*

*If not, what other option would you consider appropriate, and why?*

Civic Alliance Latvia shares the view of European Commission by agreeing that minimum age to participate in European Citizens' initiative must be in compliance with the right of vote of European Parliament elections of citizen's resident country.

## 4. Form and wording of a Citizens' initiative

*Questions:*

*Would it be sufficient and appropriate to require that an initiative clearly state the subject matter and objectives of the proposal on which the Commission is invited to act?*



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*What other requirements, if any, should be set out as to the form and wording of a citizens' initiative?*

Civic Alliance Latvia agrees to European Commission that there should be basic requirements of wording of citizens' initiative, like – subject, objective and framework of the proposal and indication of expected influence.

#### **5. Requirements for the collection, verification and authentication of signatures**

*Questions:*

*Do you think that there should be a common set of procedural requirements for the collection, verification and authentication of signatures by Member States' authorities at EU level?*

*To what extent should Member States be able to put in place specific provisions at national level?*

*Are specific procedures needed in order to ensure that EU citizens can support a citizens' initiative regardless of their country of residence?*

*Should citizens be able to support a citizens' initiative online? If so, what security and authentication features should be foreseen?*

Civic Alliance holds that it is crucial that signatures are verified and authenticated in order to legitimize the citizens' initiative process. Therefore certain procedures must be set and diversity of authentication must be respected. Citizens have the right to express their views in any official EU language and the obligation to be verified in a most suitable form, like by giving a signature, unique personal ID number, e-signature or bank ID (common in Latvia and Estonia).

#### **6. Time limit for the collection of signatures**

*Questions:*

*Should a time limit for the collection of signatures be fixed?*

*If so, would you consider that one year would be an appropriate time-limit?*

There should be no time burden for a collection of signatures. Collection of signatures on any issue is the expression of civil society and as such citizens' initiative has to be able to compromise the common view by agreement of certain number of citizens in time. Civic Alliance Latvia holds the view that extra instruments must be strengthened to support citizens' initiative. *European Economic and Social Committee*, European Parliament's deputy groups and other forms of EU institutions



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must be channels to European Commission that deliver message of expected input of citizens in form of citizens' initiative.

### 7. Registration of proposed initiatives

*Questions:*

*Do you think that a mandatory system of registration of proposed initiatives is necessary?*

*If so, do you agree that this could be done through a specific website provided by the European Commission?*

Internet platform that reflects proposed initiatives would be useful to follow the track of discussions of people on different issues, but it cannot be the only instrument, as people rights to express their views with no access to internet must be respected.

### 8. Requirements for organisers

*Questions:*

*What specific requirements should be imposed upon the organisers of an initiative in order to ensure transparency and democratic accountability?*

*Do you agree that organisers should be required to provide information on the support and funding that they have received for an initiative?*

Organizers must secure public transparency and accountability in line with EC regulation on financial flow and represented interests.

### 9. Examination of citizens' initiatives by the Commission

*Questions:*

*Should a time limit be foreseen for the Commission to examine a citizens' initiative?*

Civic Alliance Latvia agrees on the proposal of European Commission about 6 months (mentioned in the Green Paper) as a time limit for examination of citizens' initiative.

### 10. Initiatives on the same issue

*Questions:*



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*Is it appropriate to introduce rules to prevent the successive presentation of citizens' initiatives on the same issue?*

*If so, would this best be done by introducing some sort of disincentives - or time limits?*

Civic Alliance Latvia holds the view that European Commission cannot in any case restrict the activities of civil society and therefore no limiting instruments should be introduced. In order to support more focused process of articulation of views, EC should consider the early online announcement publication of citizens' initiative (provided by organizers).

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