

**Eurogroup for Animals comments on the European Commission Green Paper
on a European Citizens' Initiative (COM(2009)622)**

Eurogroup welcomes the opportunity to contribute to the discussion on the modalities for the introduction of the citizens' initiative. We would like to make the following comments:

1. Minimum number of Member States from which citizens must come

Eurogroup agrees that one third of the total number of Member States would constitute a significant number of Member States as required by the Treaty.

2. Minimum number of signatures per Member States

Eurogroup believes the number of signatures required per Member States should be based on the Member State population. We accept the proposal of the Commission to consider that 0.2% of the population of a given member State is an appropriate threshold to ensure that the citizens' initiative is representative of a Union interest.

3. Eligibility to support a citizens' initiative – minimum age

Eurogroup agrees with the Green Paper proposal that the minimum age to support a European citizens' initiative should be linked to the voting age for the European Parliament elections in each Member State.

4. Form and wording of a citizens' initiative

Eurogroup believes that it is sufficient for the initiative to clearly state the subject matter and the objectives of the proposal on which the Commission is invited to act, as well as the reasons underlying the call for EU action.

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

It is clear that a system needs to be put in place to verify signatures. Eurogroup believes that basic provisions should be set at EU level including minimum requirements for verification and authentication of signatures, and obligations for Member States to facilitate the collection process and remove unduly restrictive requirements. We do not think that detailed requirements for collecting and verifying signatures should be set up at EU level as some MS might already have their own system in place.

6. Time limit for the collection of signatures

Eurogroup believes a time limit should be fixed for the collection of signatures. We think that one year is too short due to the huge number of signatures required. Eighteen months seem a more appropriate time period. The Regulation also needs to specify that the time needed to verify the signatures should be on top of the time allocated for the collection of signatures.

7. Registration of proposed initiatives

Eurogroup agrees that a mandatory system of registration of proposed initiatives is necessary. We think that as part of the registration, the eligibility of the call should be examined. This would be in line with the European Parliament resolution that an ex-ante admissibility check should be made, showing that the initiative concerns an area of responsibility of the EU. This assessment should be carried out by the Commission's office in the Member States where the initiative is presented, and a limit of 60 days should be set up for the Member State to reply to the registration request.

8. Requirements for organisers – transparency and funding

The organisers of a citizens' initiative should provide information on their organisation, including the name and details of a contact person. Eurogroup doesn't think that organisers need to provide funding information.

9. Examination of citizens' initiatives by the Commission

The Green Paper proposes that the Commission would present its conclusions on the initiative in a communication, which may include the need to carry out studies and impact assessments in view of possible policy proposals. This seems quite far away from the treaty requirement which is that citizens "may take the initiative of inviting the Commission, within the framework of its power, to submit any appropriate **proposal** on matters where citizens consider that **a legal act** of the Union is required for the purpose of implementing the Treaties".

The Green Paper text introduces uncertainties with regard to the kind of action required from the Commission by a successful citizen initiative. Eurogroup believes that, if an initiative is considered eligible and the adequate number of signatures is presented, respecting the rules for a citizen initiative as set up in the Regulation, then the Commission has the obligation to present a proposal for a legal act. A Communication might be the first step to the preparation of a legislative proposal, but this must be clearly stated in the Regulation. The Green Paper text is far too vague and would allow too much interpretation with regard to the Commission's obligations inferred from the submission of the citizens' initiative.

Eurogroup also agrees that a time limit needs to be set for the examination of the successful citizens' initiative by the Commission, and considers that a maximum of six months would be adequate.

In addition the European Commission should present every year a report on the number of citizen initiatives registered, their outcome, and, in case the Commission has not taken action on a successful initiative, the reasons for it.

10. Initiatives on the same issue

Information on on-going and past initiatives and their outcome should be easily available to those who want to initiate such a process to collect signatures, and this information should be provided to organisers when they submit their initiative for registration.