

Contribution to this consultation process
GREEN PAPER on a European Citizens' Initiative

Comments by the Latvian Association of Local and Regional Governments
(LALRG)

- 1) *Do you consider that one third of the total number of Member States would constitute a "significant number of Member States" as required by the Treaty? If not, what threshold would you consider appropriate, and why?*

Contrary to the EC position, the LALRG considers the proposed option of ¼ of inhabitants of member states (inhabitants of nearly 7 countries) as appropriate and proportional. The option "most of the Member States" (14) is rather inoperable; also 1/3 or 9 countries is too many.

The EC argues, for example, that parliaments of 9 countries may object to violation of subsidiarity principle. However, such example is not quite relevant since national parliaments cooperate among each other on regular basis while it is much more difficult to mobilize inhabitants of nine different countries.

- 2) *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?*

The threshold of 0,2% from every country as proposed by the EC is logical and acceptable. Even if for smaller countries the proportion of 0,2% would constitute a comparably low number of inhabitants, still it will be significant in order to reach the total of 1 million.

- 3) *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?*

Yes, the minimum age to support European citizens' initiative is required. The age limit could be linked to the minimum age for voting at the European Parliament elections. In case it is possible to get an approval from Austria where the minimum voting age is 16, member states could agree on setting the threshold – age of 18, as in most of member states.

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

The LALRG supposes that it is sufficient and appropriate to require that an initiative clearly states the subject matter and objectives of the proposal. The initiative could be expressed as a clear suggestion to the EC definition of aims, and if necessary and desirable – draft legislation. The main idea behind this is that one million of inhabitants should sign under a clearly understandable proposal, not a legal document.

- 5) *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?*

In Latvia, the procedure of collection of signatures is carefully elaborated and it can be explained in three stages:

1) not less than 10 000 citizens of Latvia eligible to vote have the right to submit a draft legislation to the Central Election Commission (CEC). Every signature must be certified not earlier than 12 months before submission. In case it is completed, the procedure of collection of signatures is commenced.

2) The period of collection of signatures is 30 days. Authentication of signatures is checked after passport by recording person's name, surname, personal identification number and date of signing.

3) If the necessary number of signatures is collected, a referendum is organized.

Verification of signatures should rather be left as a competence of member states themselves. These requirements cannot and should not be harmonized. In addition, this could rather cause additional expense for Member States. At the same time, minimum requirement should be common. And member states should agree also on minimum requirements.

- 6) *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?*

In Latvia, the time period for collection of signatures is 30 days. Although it is an example of a very short period and this is a case of one single state, 1 year

for European initiative is still too long, especially taking into account the addition time that afterwards will be required for elaboration of the initiative. The main reason for this objection is that during a year, issues to be discussed may lose their topicality and relevance. Therefore, we suggest shortening this period, for instance, to nine months.

- 7) *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?*

Suggestion to create a mandatory system of registration of proposed initiatives through a specific website provided by the European Commission is strongly favourable. The EC in a very early stage could be invited to provide explanation and comments whether the proposed initiative corresponds to the EC's competences. It would prevent one from unsuitable use of energy and resources.

- 8) *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?*

We agree to the EC that initiatives could be submitted both by individuals and organizations. Information on the support and funding that they have received for an initiative must be provided mandatory. It could be done through the internet website.

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

It is definitely necessary to foresee the minimum time limit during which EC will consider validity of the initiative and launch an action. The proposed period of 6 months, to our mind, is too long. Even more, taking into account the fact that it is not expected to have a huge number of initiatives. We suggest shortening this period to 3 months. The total period then would still be very long (collection of signatures, review, elaboration of initiative, procedure of legislative process).