

100 Griffith Avenue
Dublin 9
Ireland
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European Commission
Secretariat General
Directorate E "Better Regulation and Institutional Issues"
Unit E.1 "Institutional Issues"
B-1049 Brussels

**Re. Green Paper on a European Citizens' Initiative
COM(2009) 622 Final Brussels 11.11.2009**

Sir/Madam,

I set out below my comments and observations this Green Paper

1 Minimum number of Member States from which citizens must come

I suggest that the minimum number of states from which citizens be set at 20 per cent of the EU members states or whichever whole number is below what an exact mathematical 20 per cent would be

This would mean 5 member states for the existing 27 EU members.

Reason:

- People do not identify with the EU in the same way as they do with the EU member states of which they are citizens.
- Thus to promote addressing the democratic deficit at EU level, it is desirable to make it much easier to launch a citizens' initiative than it is within those states which provide for this measure.
- Given the diversity of
 - Languages
 - Political traditions, culture and practicewithin the 27 EU member states, it will always be a major challenge for any group to gather a sufficient number of signatures to support any initiative.

2 Minimum number of signatures per Member State

I fully support the Commission proposal of 0.2% of the total population of each Member State as being the appropriate threshold.

3 Eligibility to support a citizens' initiative - minimum age

I agree that the minimum age required to support a European citizens' initiative be exactly the same as the voting age for the European Parliament Elections in each Member State.

4 Form and wording of a citizens' initiative

It is sufficient and appropriate that the initiative clearly state the subject-matter and objectives of the proposal on which the Commission is invited to act.

This does not preclude the promoters of a European citizens' initiative from adding other material, in whatever form the promoter feel is appropriate, to a clear statement of objectives.

5 Requirements for the collection, verification and authentication of signatures

There should be a common EU set of procedural requirements for the collection, verification and authentication by Member States' authorities.

Citizens residing outside their country of origin should be able to support a European Citizens' Initiative

Citizens should be able to support a citizens' initiative online. Security and authentication procedures can be drawn up based on a suitable combination of

- The individual social security number issued to each citizen, or the functional equivalent assuming this applies in all EU Member States
- Date of Birth
- Place of Birth
- National Identity Number or Passport.

6 Time limit for the collection of signatures

There should be a time-limit for the European Citizens' Initiative

I propose that this time limit be set at 36 months for the reasons set out in Section 1 above.

If the matter is really of great urgency, it is reasonable that the EU political and administrative authorities will take appropriate action even if a European Citizens' Initiative has been started.

7 Registration of proposed initiatives

I agree that there should be a registration process, through a specific web-site provided by the European Commission

8 Requirements for organisers - Transparency and funding

The organisers of any initiative should be subject to the same obligations for transparency and funding as those imposed on the many existing bodies which either

- represent special interests at EU level eg. industrial and trade associations, non-governmental organisations

or

- lobby the EU authorities on behalf of formally or informally constituted interests.

No more, no less.

9 Examination of citizens' initiatives by the Commission

There should be a 6-month time-limit set for the EU Commission to examine and issue a public report setting out its response to the subject matter of each initiative, specifying

- What action, if any, it proposes to take
- The time scale within which it proposes to take than action
- Reasons for not taking any action, should that be the considered view of the EU Commission.

I suggest that this time limit is adequate given that the EU authorities will be well aware of any European Citizens' Initiative.

10 Initiatives on the same issue

At this stage, there should be no rules to prevent successive presentation of citizens' initiatives on the same or similar issues.

Given the characteristics of the European Union (eg. many languages, different forms of statehood (eg. federations v unitary states, kingdoms v republics, some with written constitutions, different ways of forming governments, different voting systems), it is to be expected that it will be difficult to organise any European Citizens' Initiative on any topic, let alone be successful in getting 1m signatures.

The use of a European Citizens' Initiative is sure to evolve. While I do not claim to be aware of how initiatives have evolved in those countries and states which have them, I suggest it better not to constrain this means of addressing the democratic deficit.

Yours sincerely


Donal O'Brolchain