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Submission from the Centre for Public Policy PROVIDUS, Latvia:

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?

We support the proposal to set the limit at one third of the total number of Member States, or 9 out of the current 27 Member States. At the same time we are also concerned whether this criteria would not limit the application of European Citizens’ Initiative for more regional issues, when gathering the needed support from citizens living outside of the particular region may be difficult. However, as citizens’ initiatives have to be European, and not regional – reflecting the interests of citizens of significant number of Member States - this issue may be addressed by introducing less cumbersome procedures for the verification and authentication of signatures. In that case it would be more likely to gather the necessary popular support from at least one third of Member States for a regional issue.

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 regards in order to achieve the aim of ensuring that a citizens’ initiative is genuinely representative of a Union interest?

We support setting the threshold at 0.2% of the total population of each Member State on the condition that the procedures for the verification and authentication of signatures are harmonized and less cumbersome as the current rules in some Member States (see point 5).

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?

We support the proposal to set the minimum age requirement according to Member States’ requirements for European Parliament elections.

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?

We consider it inappropriate to set only vague requirements for the content of the initiative, as it could lead to general requests such as increasing employment, pensions, environmental protection or the quality of education (these are the top issues where citizens would want to exercise European Citizens’ Initiative, according to Eurobarometer data of 2005). Therefore we support the idea to request the organiser to clearly state the subject-matter and the objective of the proposal. At the

same time, the submission of a draft legislative proposal – as an attachment to the description of the initiative - should be voluntary.

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 citizens' initiative online? If so, what security and authentication features should be foreseen?

We support the full harmonization of procedural requirements at EU level as different procedures in different Member States may dramatically decrease the likelihood to gather the necessary popular support in countries with strict norms, for example, the requirement for a notary to authenticate all signatures at the time of collection, as in the case of Latvia. For European Citizens' Initiative it would be appropriate to harmonize the procedural requirements, providing less cumbersome and costly ways for citizens to engage in EU policy making. Therefore we support the creation of both online and off-line tools to secure opportunities to support European Citizens' Initiatives for people with different skills and technical means. As for online tools, the requirement to use electronic signature may be too cumbersome, therefore we propose the collection of some personal data - minimum data required for verification by national election authorities in respective Member State taking also into account data security and sensitivity. As for offline tools, signatures may be collected in public places, considering the use of Europe Direct points, European Commission Representation offices (or European houses where they exist) for this purpose. After the lists of signatures with personal data are collected, the election authority in each Member State should provide the verification that these citizens meet the requirement of the minimum age.

We do not believe that there is a need to impose stricter requirements for verification and authentication of signatures as there may be situations when the popular support leads to no action, for example, in cases when the European Citizens' Initiative is on a topic outside of Commission' scope of action (like Strasbourg seat of the European Parliament, or halting of accession negotiations with Turkey).

6. Should a time limit for the collection of signature be fixed? If so, would you consider that one year would be an appropriate time-limit?

We consider 1 year to be an appropriate time-limit to gather popular support for a European Citizens' Initiative, as we believe that this should provide enough time to mobilize EU citizens for an issue that is truly European. In addition, we believe that setting too long time-limits would exhaust citizens' interest and engagement in the issue as we have to take into account not only the time for the collection of signatures, but also time for verification of signatures (via national election authorities), and the examination of the proposal by the Commission before it takes a decision to act on it. We believe that there is a need for a fast-track approach for European Citizens' Initiatives' initial stages, as citizens' interest and engagement in the issue may be tested enough during the lengthy ordinary legislative procedure once the initiative takes the form of a legislative act proposal.

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?

We welcome the creation of a mandatory system to register all proposed initiatives to provide an overview for EU citizens, current or potential initiative organisers, EU institutions and all other interested parties. This should be best done via a specific website provided by the European Commission.

8. What specific requirement 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 would like to draw Commissions' attention to the fact that there may be initiatives that are organized by individuals on a voluntary basis, not investing other resources than their own time and energy in a European Citizens' Initiative. There may be cases when individuals gather the necessary support via extensive use of social networks such as Facebook or Twitter. Therefore we believe that all organizers should be required to describe who they are (organization, individuals) and – in case the campaign involves buying media time or publishing of pamphlets – declare their sources of this funding. There should be a possibility for individuals or organizations to join one or the other European Citizens' Initiative, declaring their support for it via the register (specific website).

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

As we believe that European Citizens' Initiative requires a fast-track approach in the initial stages of the process, we consider 6 months to be an adequate time limit for the Commission to examine the initiative.

10. 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?

There is no need to introduce artificial disincentives to prevent repeated initiatives on the same issue for several reasons. Firstly, who would be to judge whether the initiative is really on the same issue? If it would be the Commission or any other institutional body assessing whether any initiative resembles a previously proposed initiative, it may weaken citizens' engagement due to this strong institutional control in the initial stage of the initiative. Secondly, on what criteria could one judge whether the initiative is really on the same issue? If the assessment would be based on whether the Commission acted in the previous instance or whether the Commission has the right to act on this proposal, the situation may have changed in the meantime. For example, the EU may be given new powers to act in areas where it did not have powers to draft legislative acts earlier. We believe that these issues will be solved if the organizers of the initiative are allowed to take the responsibility of proposing a repeated initiative, taking the risk that they may not gather enough support for it.