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# European Citizens' Initiative Consultation

**A response from the  
Scottish Council for Voluntary Organisations**

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## **About SCVO**

The Scottish Council for Voluntary Organisations (SCVO) is the national body representing the interests of the voluntary sector in Scotland. It does so through its Policy Committee which is elected from its membership of around 1300 Scottish voluntary organisations (including large and small, local, national and international voluntary organisations, covering many different fields of activity). Many of these members are themselves intermediary bodies representing the interests of the sector locally and with respect to specific types of work. Through them we maintain a further contact with the sector at large and the issues that affect it.

SCVO's mission is to advance the values and shared interests of the voluntary sector; to provide them with information and assistance; to improve their effectiveness and efficiency; and to represent their views to Government and other public bodies. In addition to building voluntary sector capacity and strengthening governance; increasing the effectiveness of the voluntary sector's infrastructure; and promoting citizen action and civic engagement, SCVO has adopted "Promoting civil society interaction locally, nationally and globally" as one of its key objectives for the period 2007-2010. Further details about SCVO can be found at [www.scvo.org.uk](http://www.scvo.org.uk).

A main focus of our international work is supporting and sharing learning between SCVO and its members and our respective counterpart organisations across the globe. This engagement is facilitated through our leading role with the global Affinity Group of National Associations (AGNA) and the recent development of the European Network of National Associations which bring together SCVO-equivalents from across Europe. Additionally, SCVO facilitates Scottish voluntary organisations' links and activity at a European level, and have recently convened a European Policy Group for the Scottish voluntary sector. This Group's experience and knowledge is instrumental in informing our policy positions.

## **Introduction**

SCVO welcomes the opportunity to respond to this consultation on the European Citizens Initiative and to participate in the planned strengthening of citizens' voice in Europe. Our answers to the questions contained in the Green Paper and the key points below reflect both internal discussions within SCVO and those of the Scottish Voluntary Sector's European Policy Group. Additionally, our response reflects the very positive experience of Scottish voluntary organisations in using the Scottish Parliament's public petition system, which allows individuals, community groups and organisations to participate in policy processes by raising issues of concern with their Parliament.

In general, we believe the Green Paper is well set out, covers a broad range of considerations and options, and is presented in a reasonable and balanced way. The priority that the consultation has being given (so soon after the Lisbon Treaty agreements) is pleasing, and we hope that the initiative itself will be implemented with equal speed once the consultation is complete.

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

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? **YES**

2. Minimum number of signatures per Member State

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

**YES.** Obtaining 0.2% of the total population's signatures would properly reflect the idea of a 'citizens' initiative, though it would still require a substantial amount of organising to achieve. Any less than 0.2% might encourage spurious attempts to influence policy.

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

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?

**Not necessarily.** The European Union has the opportunity to lead the way in ensuring that young people are involved in making key decisions that affect them and their future. We suggest that the minimum age for eligibility to support a citizens' initiative should be sixteen years of age. This would encourage young people to participate in the process; show a commitment by the European Commission to take young people's views seriously; and tidy up the discrepancy that 16 and 17 year old Austrians (and potentially Germans, as the voting age in local elections is also 16) could participate whilst under-18s in other member states could not. There is also a range of other precedents that could be used to support this, including legislation establishing 16 as the age where people become legally responsible, as well as being subject to taxation from then too.

4. Form and wording of a citizens' initiative

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? **YES**

What other requirements, if any, should be set out as to the form and wording of a citizens' initiative? **That the initiative could be set out to indicate the 'Problem' and the 'Proposed Solution(s)'**.

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

The extent to which the collection of signatures is regulated and the nature of the requirements for verification and authentication needs to be considered in depth once more general responses to the questions below have been received and analysed.

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? **YES** – but they need to be workable and not too onerous and complicated.

To what extent should Member States be able to put in place specific provisions at national level? **Only non-restrictive ones.**

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

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

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

Should a time limit for the collection of signatures be fixed? **YES**  
If so, would you consider that one year would be an appropriate time-limit? **YES**

#### 7. Registration of proposed initiatives

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

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

#### **Additional question – should there be an ex ante admissibility check? YES**

We support the opinion of the European Parliament that an ex ante admissibility check should be made. In the life and experience of the EU there is ample evidence to indicate that the ability of citizens' to fully assess what legally falls within the framework of the Commission's powers is seriously questionable. To expect this would also add an additional legal and financial burden on organisers, thereby undermining the original intent of a citizens' initiative.

#### 8. Requirements for organisers - Transparency and funding

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

**Very little, if any.** Transparency and democratic accountability should relate to the proposed initiative itself. It should stand or fall on its merits.

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

**NO** – nothing additional to what they already do. Civil society organisations already have to be accountable for their funding in a large number of ways and those that are part the flawed EU 'Register of Interests' already have to provide extensive information about their funding (unlike private sector lobbyists). If, as can be expected, a new organisation is created by interested citizens specifically to put forward a citizens'

initiative, then they (and/or any existing organisations) may be able to generate the required number of signature through voluntary effort alone, i.e. it could just be individual signatories rather than organisations, and there wouldn't necessarily be any funding to declare.

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

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

**YES** - 2 months to verify the representativeness of an initiative and say what action the Commission proposes to take, and then a further 3 months to examine and take a decision and give a formal response on the substance of the initiative. The latter period of '3 months' could be '12 weeks' to fall in line with the time we are supposed to be given for consultation responses.

#### 10. Initiatives on the same issue

Is it appropriate to introduce rules to prevent the successive presentation of citizens' initiatives on the same issue? **YES**, but repeats should be allowed if, for example, more member states reach the required threshold.

If so, would this best be done by introducing some sort of disincentives - or time limits? **Probably time limits** but these would need to be carefully chosen to ensure particular campaign momentum is not lost by too long a gap before resubmission is allowed. However, possibly only one resubmission should be allowed.

### **Conclusion**

We trust that the Commission will consider our submission when progressing plans for the EU Citizens Initiative. We are generally supportive of the Commission's approach. We hope that our concerns will be addressed and, if that is the case, we believe this Initiative will become a useful and workable tool to enhance European Union democracy.

### **References**

Third Sector Summit Interim Research Briefing (November 2007) – Provides latest intelligence on the size of the Third Sector in Scotland, and interim findings from a survey on needs and challenges of SCVO's member organisations.

<http://www.scvo.org.uk/scvo/Information/ViewInformation.aspx?Info=1550&TCID=27&PageName=Facts>

Scottish Voluntary Sector Statistics (May 2007) – Full statistical briefing on the Scottish Voluntary Sector as released at the Gathering, May 2007.

<http://www.scvo.org.uk/scvo/Information/ViewInformation.aspx?al=t&page=&all=&from=DSR&Info=1464&TCID=27&PageName=Facts>