

Question 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?

I think that requiring an individual to get one million signatures from at least one third of the Member States is setting quite a high threshold. The language barriers alone makes the idea of canvassing in 9 different Member States quite daunting.

If not, what threshold would you consider appropriate, and why?

Though I'm not convinced that there is a need for this threshold, as most citizens are still more likely lobby their national governments on national issues, if a minimum threshold must be set then I think that a threshold of 5 Member States would be acceptable.

Question 2

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

If you are going to set the minimum threshold for Member States at one third or even one quarter then I do not think that this requirement would be appropriate. Imagine that a group of citizens in one year have managed to collect 200,000 signatures in Sweden, 50,000 in Luxembourg, 100,000 in Denmark, 75,000 in Finland, 50,000 in Latvia, 130,000 in Poland, 200,000 in France, 100,000 in UK and 100,000 in Germany. They have one million signatures but the signatures collected in the UK and Germany do not count as they do not account for 0.2% of their respective populations. However it is obvious that if an initiative was to receive this sort of support it would be "genuinely representative of a Union interest". Clearly the requirement of minimum 0.2% of the population need to be gathered in a Member State before those signatures will be counted may be overly strict in some circumstances.

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?

I think it might be simpler to cap the number of signatures that can be collected in any single Member State. I would suggest 300,000 as a suitable figure.

Question 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, I think the minimum age required to vote in the EP elections is an appropriate age requirement.

Question 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?

Requiring a clear statement of the subject matter and objectives of the proposal before a submission can be made seems appropriate. Obviously submitters should also be able to send in other information such as research, anecdotal evidence, draft legislation etc if they feel it will add weight to their proposal.

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

It should be in one of the official languages of the EU.

I am curious to know if it is the citizen who will be responsible for getting their submission translated into all the official languages of the EU or will this be done for the citizen once it is submitted? Perhaps there is adequate support for this at EU level, I certainly think there should be. As the citizen is required to get the signatures from a significant number of Member States then it seems only fair that there should be language supports available to him or her.

I am worried that the initiative is better suited to action by international groups, institutions and companies rather than by private individuals and I would like to see supports being set up to aid citizens to utilize this process to its maximum potential.

Question 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?

I think that the easiest way would be to collect all the signatures online. People could enter their name, nationality and their passport number or some other official ID number, this could be verified with the relevant national database. Obviously this would mean that a Lithuanian resident in French would count as a Lithuanian signature rather than French but I think this is acceptable and I think any other system would be overly bureaucratic.

I realise that not everyone has access to a computer or to the internet but it should also be possible for some officials of some sort, perhaps in the local council, or garda station to take citizens' details and register for them.

I think it would be inadvisable to introduce EU ID cards for the purposes of harmonising the collection and verification of citizen's signatures. While there was no suggestion of this, I still wanted to make clear that it isn't something I'd be in favour of for the moment. I don't think most people will object to filling in information such as a passport number though as these days you sometimes need to fill in this type of information when you book an airline ticket online.

If so, what security and authentication features should be foreseen?

Obviously it would need to be a highly secure website if it is going to be taking information such as names and passport IDs. I think it would also be essential that although the ID number would be used to verify the digital signature, that the fact that they had signed this initiative could not be traced with this ID number.

Question 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?

Yes, I think one year is an appropriate time-limit.

Question 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?

Yes, I think this would be a great not only to register proposed initiatives, the website could also be used to promote the various proposals. I think that ads bringing people's attention

to this website should be run on all state-funded television and radio stations in all Member States periodically.

However, the Commission does not consider that such a registration process should involve any decision by the Commission as to the admissibility of the proposed initiative. Indeed it does not consider that it would be appropriate for the Commission to verify the formal admissibility of proposed initiatives before any signatures have yet been collected. Such an approach could lead to confusion, giving the impression that the Commission had given some form of green light to proposed initiatives on more than purely procedural grounds. It would require checks to be made which would delay the moment from which signatures could be collected. Moreover, the admissibility and substance of initiatives cannot be seen in isolation and thus it would not be appropriate at the early stage of registration to undertake this examination.

The Commission understands that there may be some reluctance to launching an initiative across the EU, with the risk that it may ultimately be rejected on the grounds that it is not admissible. However it should be noted that the admissibility criterion - that the proposal on which the Commission is invited to act should be within the framework of its powers – is sufficiently clear and is known at EU level. In any event, organizers can normally be expected to have fully assessed whether the initiative legally falls within the framework of the Commission's powers before launching an initiative.

I'm concerned that you don't think it is necessary to verify if the Commission has the competence to act on a proposed initiative prior to its registration. Your reason appears to be that you don't want to verify if submissions are valid prior to signatures being collected as this might give those making the submissions false hope that you are definitely going to act in that area. I am confident that most citizens are sufficiently intelligent to understand the difference a valid proposal and a successful one. Also you mention that the verification process would delay the time it would take to get started with gathering signatures. I'm quite certain that most people would happily endure such a delay rather than endure a year of pointless signature gathering in a significant number of Member States. I don't understand how *“the admissibility and substance of initiatives cannot be seen in isolation and thus it would not be appropriate at the early stage of registration to undertake this examination”* when *“the admissibility criterion ... is sufficiently clear and is known at EU level”*. If its sufficiently clear and known at EU level couldn't someone at that level review submissions to ensure that they are valid? I really cannot see any reason why invalid proposals would be registered.

Question 8

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

I think that organisers should have to declare whatever “interests” they might have in the Commission acting on a particular issue. For example, if the subject matter of the initiative relates to harmonising and increasing the level of IT security of SMEs throughout the Union and the individual proposing the initiative works for an IT security firm then they should have to declare this interest. While declaring a conflict of interest will probably rarely be this straightforward I think it is essential to the fairness of this initiative that citizens are aware of any such conflicts.

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

I think that for individual citizens or for even a small group of citizens, the thought of having to fill out financial statements explaining how they have funded their campaign could be huge disincentive and as this is supposed to be engaging citizens I wouldn't want to make the process needlessly bureaucratic. That said, I think that it should be necessary to provide this information where there is at least one contribution of €10,000 or more, or if total funding exceeds €50,000, regardless of the size of each contribution.

Question 9

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

An obligation for the Commission to examine a citizens' initiative within a reasonable time-frame not exceeding 6 months would be fantastic but I think there should be some allowance whereby this this period could be extended to 9 months or even a year where the subject matter was very complex and/or politically or socially sensitive.

Question 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?

I don't think this would be appropriate as the whole process of obtaining 1 million signatures is in itself a sufficient disincentive. Also considering the fact that any time voters at national level have rejected an EU treaty, they have always had to vote again on the

same issue it seems a little unfair to force citizens to accept the Commission's refusal as final.