Suggested answers to the European Commission's Public Consultation of the Revision of the ECI Regulation endorsed by Democracy International, the ECI Campaign, Mehr Demokratie and ECAS

Public consultation of the European citizen's initiative:
https://ec.europa.eu/eusurvey/runner/European_citizens_initiative

Introduction and about you

The replies in this section are mandatory but up to you to complete. Please fill out this section at your discretion.

The European citizens' initiative and you / General considerations

Do you consider that the European citizens' initiative has so far achieved its objective of fostering the participation of citizens in the democratic life of the EU and bringing the EU closer to the citizens?
Rather disagree

In your view, how important are the following considerations when revising the rules for the European citizens' initiative?

a) Signing an initiative should be as simple as possible (statements of support should be collected in a user-friendly way and the personal data requested should be kept to the minimum needed).
Rather important

b) The rules and procedures for organising an initiative should not be burdensome and should remain proportionate to the nature of the tool (a tool for citizen participation which does not lead to a binding outcome).
Rather important

c) Citizens' initiatives should be launched only on issues relevant to citizens in a significant number of member states.

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Neither important nor unimportant
d) Citizens' initiatives should foster debate and interactions between like-minded citizens across the EU as well as between themselves and the EU institutions.
Neither important nor unimportant

e) The rules for giving support to an initiative should allow the use of the best available technology in terms of security and user-friendliness.
Very important

f) Other. Please specify:
200 character(s) maximum
In reference to sub-question d), citizens' initiatives should also foster transnational debate between both like-mind and different-minded citizens.

Preparatory phase of a citizens' initiative / Citizens' committee

In accordance with the Regulation, the Commission has established a point of contact which provides information and assistance to organisers. Do you consider that the provision of information and assistance to organisers in this phase should be strengthened?
Strongly agree

Assistance to organisers in the preparatory phase should be provided by:
The Commission through its point of contact ('helpdesk')
Independent expert(s), for instance through an online collaborative platform

In your opinion, what would be the best way(s) to limit the liability of organisers?
Other

Do you have any other suggestions for improving this preparatory phase/the citizens' committee?
500 character(s) maximum
In a reference to the above question regarding limiting the liability of organisers: citizens' committees of an ECI should within the regulation be defined as a legal body of EU-lawmaking and the organiser can therefore not be individually held liable.

Registration Phase

Should the registration phase continue to include an admissibility check to verify that the proposed initiative does not fall outside the Commission's powers?
Yes

Should the legal assessment indicate that the proposed initiative partly or fully falls outside the Commission's powers:
Organisers should have the possibility to redraft their proposed initiative so that it falls within the Commission's powers, on the basis of a preliminary assessment by the Commission. They could then collect statements of support on the basis of the redrafted initiative, once legally cleared.

In order to redraft their proposed initiative, the organisers should have the possibility to be assisted by:
Independent expert(s), for instance through an online collaborative platform
An officer within the Commission with an independent and impartial role for the European citizens' initiative ('hearing officer')

Do you have any other suggestions for improving the registration phase?
500 character(s) maximum

Collection Phase

- Online collection

The hosting of online collection systems exceptionally offered by the Commission should be:
Made permanent and simplified (transformed into an online collection platform readily available for organisers upon registration, without the need for a certification) while still remaining optional.

To which extent do you agree on the importance of using new solutions for electronic identification such as eID or electronic signature for supporting initiatives?
Strongly agree

Would these electronic identification solutions make the online collection more user-friendly for citizens and organisers?
Yes, to some extent

To which extent do you agree that several ways for providing support to an initiative online (filling the form online, using eID, using other e-identification solutions) should be available in parallel in order to maximise the user-friendliness of the tool?
Strongly agree

- Collection in paper form

In the case of a single online platform to gather support, how should the collection of statements of support in paper form be organised?
Organisers should collect statements in paper form and send them to the competent national authorities for verification at the end of the collection period. At the same time, they should have the possibility to record the number of statements collected in paper form on the online platform during the collection process.

- Requirements for signatories

In your view, should EU citizens residing outside the EU be allowed to support a European citizens' initiative?
Yes

In your view, what should be the minimum age to give support to an initiative?
It should be harmonised at 16.

- • Personal data to be provided by signatories and subsequent verification process

In your view, what should be verified in relation to the signatories' personal data? Please keep in mind that a citizens' initiative is a tool for citizen participation which does not lead to a binding outcome.

a) that data is not entered by a robot and that the overall probability of having entered fake data is below predetermined thresholds (based on data analysis techniques)
Yes

b) that a person corresponding to the data provided exists
Yes

c) that the person is eligible to support a citizens' initiative (old enough and EU citizen)
Yes

d) that the person has provided his/her own data (that he/she did not introduce someone else's data fraudulently)
Yes

e) that this person has not supported an initiative more than once.
Yes

f) other. Please specify:
500 character(s) maximum

Which types of personal data do you think citizens would <u>not</u> be willing to provide when giving support to a European citizens' initiative? How does this vary between member states?
Name at birth, place of birth, personal identification (document) number, driving license number, the last three digits of your personal identification (document) number / driving license number, email address

The current Regulation sets out different data requirements for signatories depending on the member states (see above). Among the following options, which one do you think would be the most user-friendly?
Requiring the same set of personal data in all member states. Then signatories may be contacted to provide additional personal data depending on the country they come from, for verification purposes.

According to you, who needs to have access to the signatories' personal data?
Organisers or other persons acting on their behalf who collect the statements of support and the public authorities in charge of their verification

Should signatories be kept informed about the initiative they have signed and its follow-up, for example by email?
Yes, by the organisers.
Yes, by the Commission.
Signatories should have the option to receive general information about the European citizens' initiative, including on other initiatives they might be interested in.

- Time limit for the collection period

Should the time limit for collecting statements of support (12 months from the date of registration) be revised?
Yes

In your view, how should the time limit be changed?
It should be extended to 18 months and it should be possible for the organisers to choose the start date of their collection within a given time period.

Do you have any other suggestions for improving the process of collection of statements of support and their verification?
500 character(s) maximum
It is crucial for the time limit for collecting statements of support to be extended to 18 months, and it should be possible for organisers to choose their own start date within a given time period.

Submission to the Commission and follow-up

Do you think that there should be a time limit for the submission of a successful initiative to the Commission?
Yes

In your view, what should be this time limit?
Between six months and one year from the end of the collection

According to you, what would be the best way(s) to ensure that stakeholders representing different views are heard before the Commission replies to the initiative?
The public hearing in the Parliament should ensure that different views are represented by inviting various stakeholders to speak, in addition to the organisers.
The Commission should be given more time before its reply so that it can consult widely and transparently (for example by organising an open public consultation).

Should the European Parliament and the Council be invited to express their views before the Commission takes position on a successful initiative?
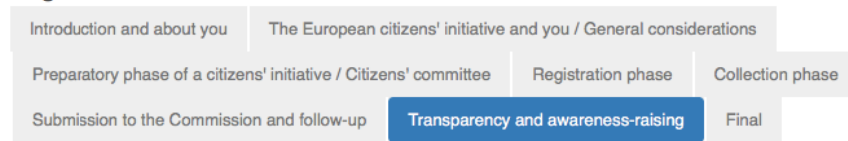*Yes*

Do you have any other suggestions for improving the examination procedure and the possible follow-up to initiatives that have reached the required number of signatories?
1000 character(s) maximum
The Commission should make the most concrete, detailed communication possible in its follow-up to initiatives that reach the required number of signatories. This gives the organiser the opportunity to concretely follow-up with their political campaigns and have a political debate with facts and figures provided by the Commission. E.g., in an environmental protection initiative which the Commission does not approve because of the argument of high costs, the Commission should sufficiently explain its reasoning including concrete financial facts.

Transparency and awareness-raising

What more could be done to better inform citizens and communicate on the European citizens' initiative?

750 character(s) maximum

The issue of low awareness of the ECI itself is a core problem. The Commission should publish a regular ECI newsletter for organisers, signatories and interested citizens with information about ECIs in a particular field or milestones that ECIs reach. E.g., the newsletter could feature ECIs that have 100,000 more signatures to go in order to boost the likelihood of an ECI's success and to recognise the efforts of organisers. Recognising the milestones that organisers reach will increase the likelihood that citizens start an ECI. An ECI newsletter would help grow a distribution list of those who are in principle interested in European politics and would therefore help build a constructive European public sphere.

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