

Submission on the green paper on a European Citizens' Initiative from the Working-group on Europe of the Church of Ireland Church in Society Committee to the Oireachtas Joint Committee on European Affairs.

We welcome the ambition of the European Commission, as expressed in the green paper (p.3) to ensure that European citizens should benefit from this new right as soon as possible after the entering into force of the Lisbon Treaty (i.e., by December 2010). We are glad to avail ourselves of the opportunity afforded us by the Commission and the Oireachtas Joint Committee on European Affairs to submit our comments.

Before taking in numerical order the issues set out in the green paper we wish to put on record our appreciation of the fact that the proposed Initiative goes some way towards addressing the view frequently expressed by supporters of the Union, as well as by its critics, that insufficient effort is devoted to bridging the gap that is perceived to exist between the citizens of the member states and the institutions of the Union. We also recognise that in devising the *modus operandi* of the Initiative the perennial tension between parliamentary democracy and populism has to be borne in mind.

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1. Minimum number of member states from which citizens must come

We consider that a minimum of one third is preferable, and that while this is easily computed with 27 member states, the number would be rounded up where the number of member states was not evenly divisible by three.

2. Minimum number of signatures per member state

While the suggested 0.2% seems reasonable to us, it might foster alliances between large and small states by stipulating a minority of 0.2% per state to require each state to reach 1% of the aggregate of participating states.

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

We agree that the age for eligibility to sign should in each state be the age of eligibility for voting in European elections there, noting that this is the general practice in those states that have an equivalent of the Citizens' Initiative.

4. Form and wording of a Citizens' Initiative

While arguing that requiring proposers to draft a legal document is unrealistic (and quite likely in the eyes of some to cast doubts on the good faith behind the whole concept of citizen involvement) yet we acknowledge the necessity to avoid frivolous, unclear and inappropriate proposals. Nor would we wish to see the spirit that informs the concept to become the tool of well-organised and well-funded pressure groups. Perhaps a template of some kind needs to be provided identifying

- the terms of the proposal itself

- the aims that it seeks to achieve, with arguments
- how it relates to treaty-based powers of the Commission
- such organisations and groups that support the proposal, with details of their sources of funding (see 8 below)

5. Requirements for collection, verification and authentication of signatures

While at first sight a harmonised procedure for collecting signatures would be attractive, it is scarcely necessary in practice, and so we would recommend that the mechanisms that already exist for such procedures in member states should suffice. However, account needs to be taken of the fact that in the case of Ireland, for example, the register for European elections lists voters who are not necessarily citizens.

So far as the participation of non-resident citizens is concerned, it should be noted that they have no votes in Irish elections other than those for university seats in Seanad Éireann. Furthermore, and while it might be consistent with the spirit of the Citizens' Initiative for the signatures of non-resident citizens to be allowed, the sheer logistics of validating them would seem daunting.

6. Time limit for the collection of signatures

The period of one year would seem reasonable.

7. Registration of proposed initiatives

A mandatory system of initiation is necessary, the ratification of registration being the required starting point for the collection of signatures. We would recommend that the registration process be the business of the Ombudsman, rather than of the Commission or other institutions of the Union.

8. Requirements for organisers-Transparency of funding

Agreed

9. Examination of citizens' Initiatives by the Commission

We agree that there is a strong case for fixing a time limit for the Commission to respond to a Citizen's Initiative. Six months, with the possibility of extension by a further three months in especially complex cases, would seem appropriate.

10. Initiatives on the same issue

We would be reluctant to envisage the Commission or other EU institutions having the right to reject Initiatives other than for non-compliance with the provisions provided for in (4) and (8) above, and would prefer that no disincentives were put in place.