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To the
**Members of the Committee on
Constitutional Affairs (AFCO)
of the European Parliament**

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Via e-mail

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Dear AFCO members,

The European Citizens' Initiative (ECI) is a unique opportunity to bestow more democracy on the EU! Making the best of the ECI could bridge the growing gap between the Union and its citizens. Let us seize this chance for a democratic U-turn!

Since early 2010 the Junge Europäische Bewegung has been waving the flag for a citizen- and youth-friendly ECI Regulation together with other NGOs. So we participated in the public consultation and the subsequent hearing of the Commission. Shortly after the Commission proposed its Regulation draft, we reacted with a statement and concrete amendment proposals. All these documents can be accessed on our website <http://jeb-bb.de/?ebi>.

The decisive issue is to design the ECI in a way which makes citizens perceive it as an effective, usable tool. The ECI Regulation should encourage active involvement in debates on European level. We hence ask you to support the following six demands:

1. We consider the **quorum** proposed by the European Commission – namely one third of its member states – as too high. The prime purpose of the quorum is not to ensure proper representation. It rather aims at ensuring the European character of the citizens' initiatives, in turn preventing the channeling of national interests. Reviewing all facts, we would appreciate to drop the threshold of a quorum altogether since the accession of new member states would automatically hamper the chances for successful citizens' initiatives. Why should European enlargement negatively affect political integration here? In our opinion, an appropriate threshold would rather consist of **five Member States**.
2. We further reject the requirement of **minimum age** being derived from the minimum age for classic elections. This association does not hold water as the legal consequences of a citizens' initiative are by far not as extensive as the ones of classical elections. The ECI is rather comparable to the right of petition, which is not subject to any age limitations. Moreover, the ECI opens an outstanding window of opportunity for inspiring the interest of young people in European affairs and transnational democratic decision-making. This is a chance we must not spoil hastily! We therefore call for an age restriction of **14 years maximum**.
3. By no means can we support the proposal of assessing the **admissibility** citizens' initiative only after 300.000 or 100.000 supporters have been gathered in three member states. The level of frustration arising once a proposition is rejected due to legal caveats – which in some cases might have been remedied easily – is to be avoided at all costs, bearing in mind the time-consuming and expensive character of gathering such a large number of signees. We thus urge for a threshold of **1.000 statements of support** in total.

4. We further clearly refuse the part of the proposal enabling the Commission to reject the **registration** of any initiative from the outset by reason of suspected misuse, lacking seriousness or violation of community values. In our opinion, every initiative must be treated fairly and equally with **transparent procedures** and justiciable decisions. Single aspects of admissibility must not be dealt with in a prior procedure, but adhere to the same logic as the regular legal recourse.
5. The Commission should translate the ECI proposals that have been declared admissible in all official EU languages and provide a safe **online-system** for the electronic collection of statements of support which secures private data and does not ask for national identification numbers, passport data or social security numbers. Only in this way can it be ensured that the proposal supported by all signees is legally identical.
6. Speaking of **legal consequences**, the proposal of the Commission falls short, too. An obligation to give reasons alone does not measure up to the enormous effort of collecting one million signatures. We hereby support the proposal of the European Parliament: The Commission should allow the organisers to explain the nature of their initiative in a public hearing. This **right to be heard** should be enshrined in the Regulation itself.

The widespread, baseless fears accompanying the debate on the ECI raise our concern. The frustration which would be caused by a Regulation furnished with too many hurdles entails a much higher risk for the image of the EU than any feared 'abuse' of the tool. The extremely low turn-out at the European Parliament elections in June 2009 should be enough of a wake-up call. The EU needs to dare more democracy and design innovative instruments to foster citizen's involvement in European politics. This is why we strongly invite you to contribute to turning the ECI into a **flexible and user-friendly tool** which can provoke fresh debates within and across societies in Europe!

Yours sincerely,

