

# Organisers' assessment of the application of Regulation (EU) 2019/788 on the European citizens' initiative

## Survey report

### 1. Introduction

This document summarises the feedback received through an online survey launched by the ECI Team in the Secretariat-General of the European Commission that ran **between July and November 2022** (16 replies) and additional interviews (18) carried out by the ECI Forum contractor in January 2023. These activities targeted 47 initiatives that were either ongoing (at any stage in the ECI lifecycle) on 1 January 2020 when [Regulation \(EU\) 2019/788](#) on the European citizens' initiative<sup>1</sup> (the ECI Regulation) started to apply or that started after (until mid-October 2022).

### 2. Overall experience with the ECI and preparatory phase

Most respondents reported having started their ECI journey out of personal interest in a cause that, in their view, should be addressed at EU level. A third of the respondents started an ECI out of professional or academic interest – including, in one case, in response to other ECIs ('a reaction to the fact there is no way to sign against an ECI'). Several respondents cited links to past ECIs.

Half of the respondents had explored other tools before – such as petitions at national level or to the European Parliament – which they considered did not prove sufficient for achieving their goals. Examples of why the ECI was chosen:

- because it has more political impact ('as the Commission is forced to respond');
- as a 'strong back-up for advocacy strategies, to give more legitimacy to the campaign'; or
- for its EU-wide dimension.

Some respondents cited using the tool as an experiment, to see how it works and whether it can achieve something, 'to have a seat at the table, to understand how it works and participate in future reforms'; and also 'to see if it is possible to succeed as a non-NGO'. One organiser indicated carefully choosing the timing of the ECI so that it could be taken into account in a planned review of the relevant legislation.

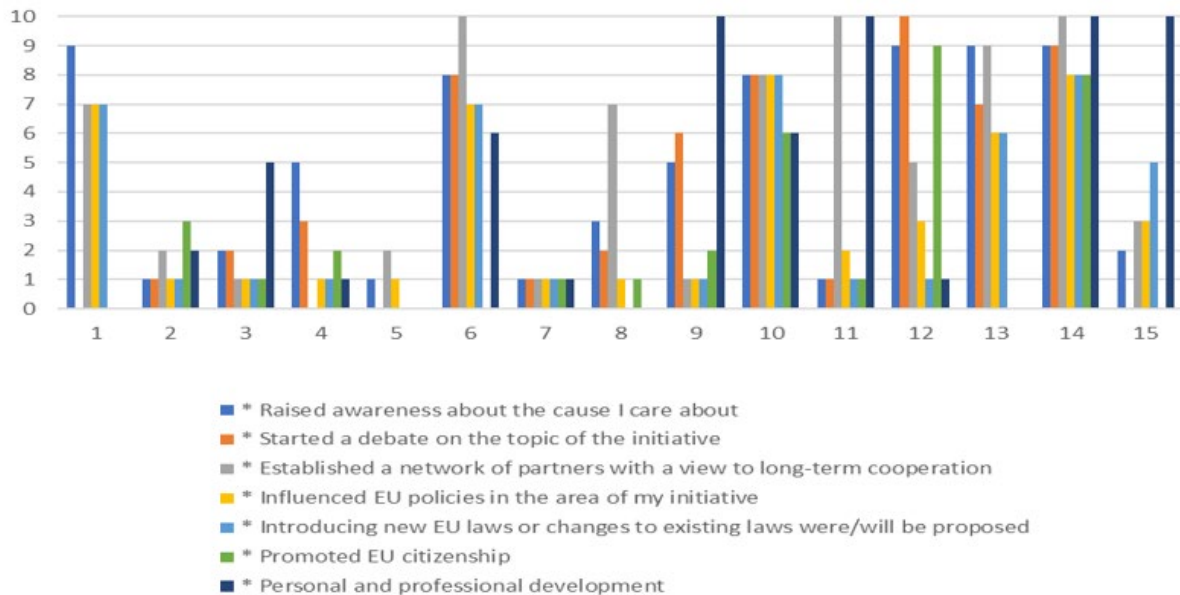
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<sup>1</sup> [Regulation \(EU\) 2019/788](#) of the European Parliament and of the Council of 17 April 2019 on the European citizens' initiative (OJ L 130, 17.5.2019, p. 55).

In terms of what they achieved through the ECI, organisers scored the highest:

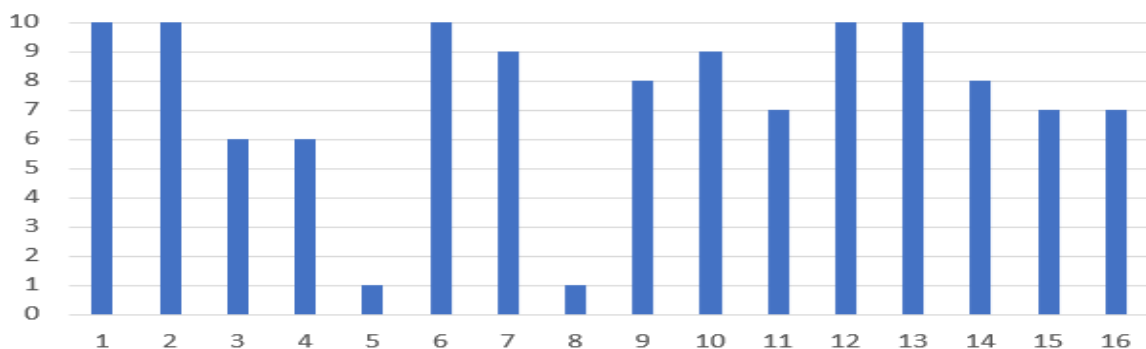
- personal and professional development;
- raising awareness about the cause they care about;
- starting a debate on the topic of their initiative; and
- establishing a network of partners with a view to long-term cooperation.

**Chart 1: ‘How close to your initial goals did you get on the following counts? (rate each from 1=very far to 10=very close)’**



Most respondents considered the ECI as a worthwhile experience because they came close to their initial goals on at least one or several counts (out of those mentioned in the survey) – see Chart 2.

**Chart 2: ‘On a scale of 1(min) to 10 (max), was being involved in an ECI a worthwhile experience?’**



Survey respondents considered the ECI more impactful than other tools of public participation, even though they scored the ECI accessibility at 3 on a scale from 1 to 10.

Complementing the above survey findings, interview respondents referred to the low political impact of successful initiatives as an issue for their campaigning and communication efforts.

In particular, organisers referred to the ECI as a ‘weak instrument’; as a result they considered that large organisations, NGOs and multipliers are unwilling to invest time, money and resources in campaigning for ECIs. Additionally, some explicitly mentioned the threshold of 1 million statements of support as too high to reach. They pointed out that there is a risk that the ECI becomes a tool for civil society organisations only, as they are the actors that are able to campaign effectively to reach the required support.







### 3. Group of organisers

The two most common strategies for setting up the group of organisers cited by respondents to the survey are:

- using previous connections;
- finding partners through social media.



Only 1 respondent cited having used the ECI Forum for setting up the group of organisers.

**Table 1: ‘How did you find the other members of your organisers’ group?’**

|   |   | Answers |
|---|---|---------|
| I knew them already, from work or studies |    | 10      |
| Through searches on the Internet          |  | 3       |
| Via social media                          |  | 8       |
| Through the ECI Forum                     |  | 1       |
| Other                                     |  | 4       |
| No answer                                 |  | 1       |







While the revised ECI Regulation allows for the setting up of a legal entity for managing an ECI, only a minority of organisers used this possibility (2), finding it overall useful. Those that have not used it mention as reasons: the administrative burden, the associated costs and the procedural delays for setting up such entities.

**Table 2: ‘Did you set up a legal entity to manage the initiative?’**

|     |   | Answers | Ratio |
|-----|---|---------|-------|
| Yes |  | 2       | 12.5% |
| No  |  | 14      | 87.5% |

Regarding the challenges faced in the preparatory phase, respondents rank as highest ‘raising of funds to get started’, followed by ‘finding other members for the organisers’ group’ and ‘finding specialised support (e.g. legal)’.

**Table 3: ‘What were the biggest challenges you faced in the preparatory phase?’**

|  |  | Answers |
|--|--|---------|
| Setting up the organisers’ group, finding other members        |  | 7       |
| Finding information  |   | 1       |
| Finding specialised support e.g. (legal)                       |  | 5       |
| Raising funds to get started                                   |  | 10      |
| Drafting the initiative to make sure that it can be registered |  | 5       |
| Other  |  | 2       |

As confirmed also through the interviews, initiatives started within NGOs are more likely to find the requirements for setting up the group of organisers easy to meet, while individual, non-affiliated citizen organisers find it more difficult to meet these requirements.

#### 4. Registration

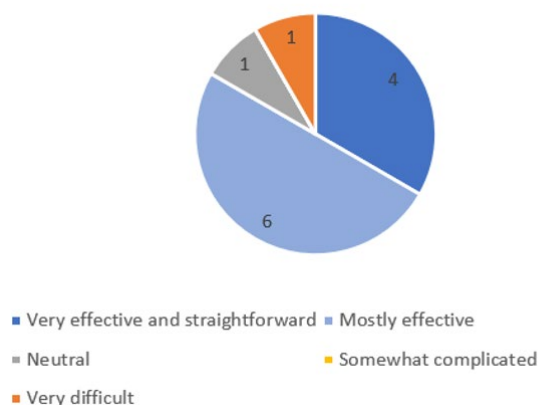
Most respondents to the online survey (12 out of 16) represented initiatives registered after the revised rules started to apply. Given the focus of the report on the effectiveness of the revised rules, the analysis in this chapter focuses on the experiences with registration under Regulation (EU) 2019/788 (thus initiatives registered after 1 January 2020).

83% of the surveyed organisers <sup>(2)</sup> to whom the new rules for registration applied reported that the ECI procedure for registration was overall effective and straightforward. Only one respondent found the procedure very difficult to comply with. Most respondents <sup>(3)</sup> considered that the requirements for registering an ECI are clear and that the technical process of submission through the organiser account is easy. Most of the respondents had found the conditions for registration quite easy to meet, but two of them (17%) considered the conditions relatively difficult to meet – due to the requirements for administrative checks related to residence and the need to ensure that no part of the ECI manifestly falls outside the Commission's competences. The greatest challenge reported by organisers during the registration phase is linked to resources – time and funding.

<sup>(2)</sup> 10 out of 12 replies representing initiatives registered after 1 January 2020.

<sup>(3)</sup> 10 out of 12 replies representing initiatives registered after 1 January 2020.

**Chart 3: ‘What is your overall assessment of the effectiveness of the ECI procedure for registration?’**



The surveyed organisers who had gone through the two-stage procedure for registration considered the information provided by the Commission in the initial assessment to be clear. They used the guidance offered by the ECI Forum, which most of them found essential for ensuring the registration of their ECI. Only in the case of the refused ECI registration did its representative report that the reasons for refusal were not fully clear <sup>(4)</sup>.

**Table 4: ‘Were the requirements for registering an ECI clear to you?’**

|               |        | Answers | Ratio  |
|---------------|--------|---------|--------|
| Very clear    | ████   | 4       | 33.33% |
| Rather clear  | ██████ | 6       | 50%    |
| Neutral       | █      | 1       | 8.33%  |
| Quite unclear |        | 0       | 0%     |
| Very unclear  | █      | 1       | 8.33%  |




**Table 5: ‘Are the requirements for registering an ECI easy to meet?’**

|                         |        | Answers | Ratio  |
|-------------------------|--------|---------|--------|
| Very easy to meet       |        | 0       | 0%     |
| Rather easy to meet     | ██████ | 6       | 50%    |
| Neutral                 | ████   | 4       | 33.33% |
| Quite difficult to meet | ██     | 2       | 16.67% |



<sup>(4)</sup> The ECI Forum can support organisers during the registration phase with legal advice, particularly regarding the Commission competences to adopt legal acts. In the case of the only ECI that was refused, the organisers did not use the services of the ECI Forum despite being encouraged to do so.

|                        |  |   |    |
|------------------------|--|---|----|
| Very difficult to meet |  | 0 | 0% |
|------------------------|--|---|----|



**Table 6: ‘How easy was it to submit your registration request via the ‘Organiser Account’?’**

|                 |   | Answers | Ratio  |
|-----------------|---|---------|--------|
| Very easy       |  | 5       | 41.67% |
| Rather easy     |  | 5       | 41.67% |
| Neutral         |   | 0       | 0%     |
| Quite difficult |  | 2       | 16.67% |
| Very difficult  |   | 0       | 0%     |



**Table 7: ‘(Two-stage procedure) Was the information provided following the initial assessment by the Commission clear?’**

|           |   | Answers | Ratio  |
|-----------|---|---------|--------|
| Yes       |  | 2       | 16.67% |
| Not fully |   | 0       | 0%     |
| No answer |  | 10      | 83.33% |




**Table 8: ‘Were the steps you had to take to revise the initiative clear?’**

|           |   | Answers | Ratio |
|-----------|---|---------|-------|
| Yes       |  | 3       | 25%   |
| Not fully |   | 0       | 0%    |
| No answer |  | 9       | 75%   |



**Table 9: ‘Did you use the ECI Forum in the process of revising your initiative?’**

|           |   | Answers | Ratio |
|-----------|---|---------|-------|
| Yes       |  | 3       | 25%   |
| No        |   | 0       | 0%    |
| No answer |  | 9       | 75%   |







**Table 10: ‘How essential was the support you received from the ECI Forum?’**

|                    |   | Answers | Ratio  |
|--------------------|---|---------|--------|
| Irrelevant         |   | 0       | 0%     |
| Not that important |   | 0       | 0%     |
| Neutral            |  | 1       | 8.33%  |
| Important          |  | 2       | 16.67% |
| Critical           |   | 0       | 0%     |
| No answer          |  | 9       | 75%    |

**Table 11: ‘Were the reasons for refusal clear?’**

|           |  | Answers | Ratio  |
|-----------|--|---------|--------|
| Yes       |  | 0       | 0%     |
| Not fully |   | 1       | 8.33%  |
| No answer |  | 11      | 91.67% |

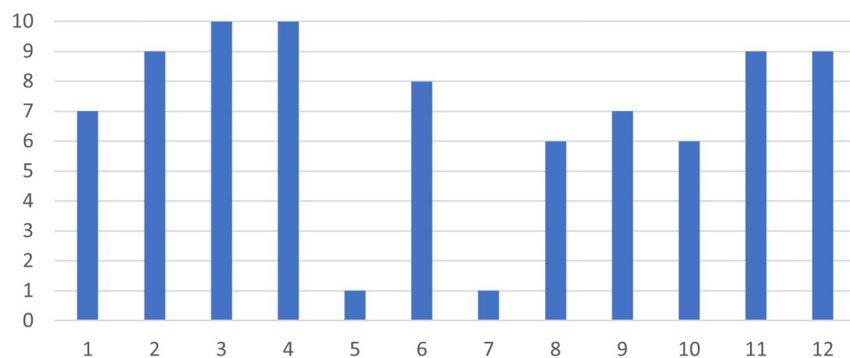
**Table 12: ‘What were the biggest challenges you faced during the registration phase?’**

|   |  | Answers | Ratio  |
|---|--|---------|--------|
| Insufficient legal expertise                        |   | 2       | 16.67% |
| Technical: setting up/using the Organisers’ Account |   | 2       | 16.67% |
| Finding agreement with the other organisers         |   | 2       | 16.67% |
| Resources: time, funding                            |  | 7       | 58.33% |
| Communication (language)                            |   | 2       | 16.67% |
| Other   |   | 2       | 16.67% |

## 5. Collection phase

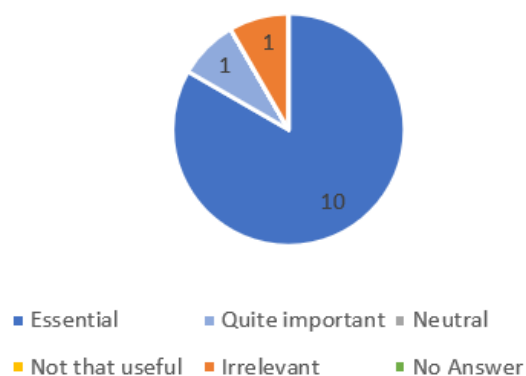
Respondents reported being mostly satisfied with the effectiveness of the procedures and tools available for the signature collection phase.

**Chart 6: ‘What is your overall assessment of the effectiveness of the procedures and tools available for the signature collection phase? (1=min to 10=max)’**



Most respondents representing ECIs registered under the revised rules considered the six months available after registration as essential to prepare the signature collection. Those having used the central online collection system were also overall positive about sharing the responsibility for the protection of personal data with the European Commission by signing the Joint Controllership Agreement.

**Chart 7: ‘How useful are the 6 months available after registration to prepare the signature collection?’**





Respondents mentioned the following as the most frequent challenges faced during the collection phase:

- Citizens' reluctance to provide the required personal data (7 mentions, 4 of which representing initiatives registered under the old rules);
- Citizens' lack of awareness about the ECI (5 mentions);
- Finding the time to dedicate to the initiative (5 mentions);
- Attracting media interest (3 mentions);
- Finding partners for promoting the initiative in at least 7 Member States (3 mentions).

As regards enablers that helped in the process of collecting signatures, respondents cited:

- Support from NGOs;
- Large signature collection platforms (Avaaz, WeMove, Campact);
- Influencers;
- Visibility in various national and European media.

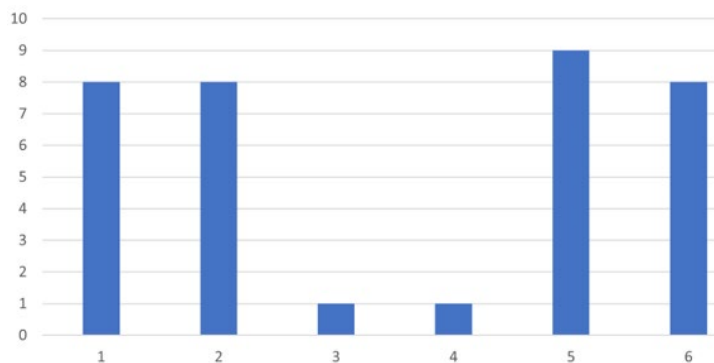
### 5.1. Online collection systems

9 respondents to the online survey had used the central online collection system, while 7 had used individual online collection systems.

#### 5.1.1. Central online collection system

Most respondents having used the central online collection system (4) scored highly their satisfaction with the system, while a minority (2) indicated low satisfaction levels.

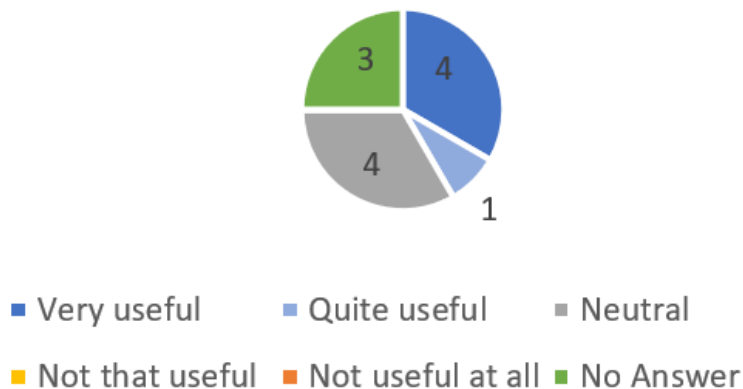
**Chart 8: 'What is your overall satisfaction with the central online collection system? (1=min to 10=max)' (scores given by the 6 organisers that responded to this question)**



According to organisers the **main advantages/strengths** of the central online collection system are:

- Free of charge for organisers (7 mentions)
- Multilingualism (5 mentions)
- Ease to set up and use (3 mentions)
- Compliance with data protection rules (3 mentions)

**Chart 9: ‘How useful is sharing the responsibility for the protection of personal data with the European Commission by signing the Joint Controllership Agreement?’**



Only 2 respondents reported facing issues when using the central online collection system, namely: signatories reporting difficulties to sign the initiative, the IT support offered, communication with signatories and limited information related to users’ interaction with the system.

According to those respondents **the following features of the central online collection system should be improved as a matter of highest priority:**

- Facility to set up and use;
- Ease of supporting an initiative, including with e-ID;
- Facility to keep track of collection.

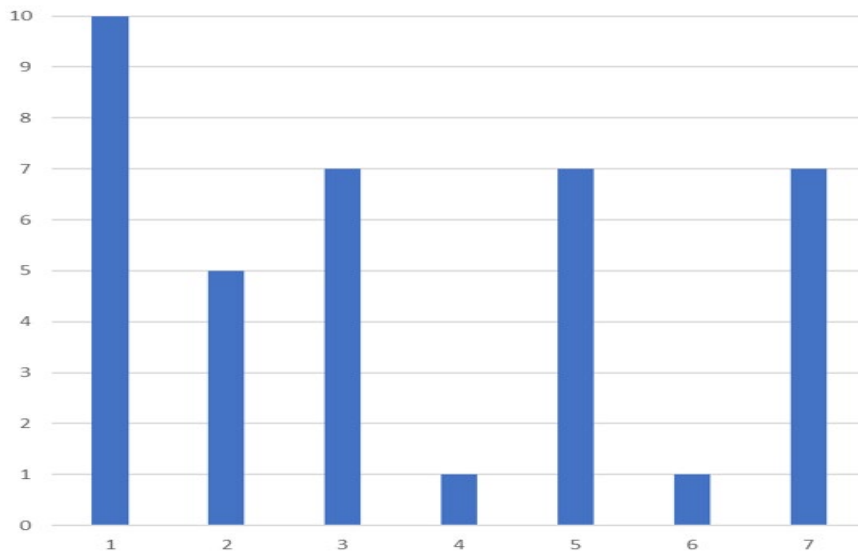
The interviews provided additional information. The benefits of the central online collection system highlighted by interviewees relate to its legitimacy (being part of the institutional page of the EU) and security; the drawbacks are the perceived difficulty to use, being overly formal and not allowing sufficient engagement with the community.

Some common suggestions for the central online collection system made by interviewees are: having a more integrated website; increasing possibilities to individualise the system; making it more campaigner-friendly, more engaging; making it possible to embed the signature system into a campaign website; and keeping track of signed ECIs (to lower the risk of signing the same ECI multiple times).

### **5.1.2. Individual online collection systems**

4 respondents reported being very or fairly satisfied with individual online collection systems, while 3 indicated lower levels of satisfaction. 4 respondents mentioned having faced challenges when using their own collection system.

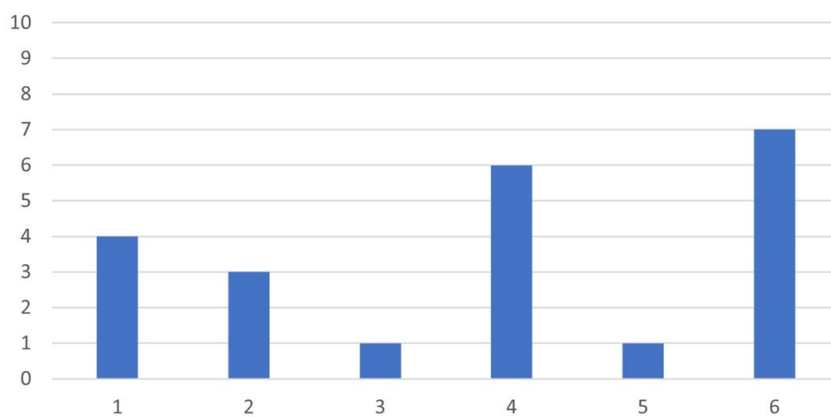
**Chart 10: ‘What is your overall satisfaction with your own collection system? (1=min to 10=max)’ (scores given by the 7 organisers that responded to this question)**



The **main advantages/strengths** of own collection systems reported by organisers are:

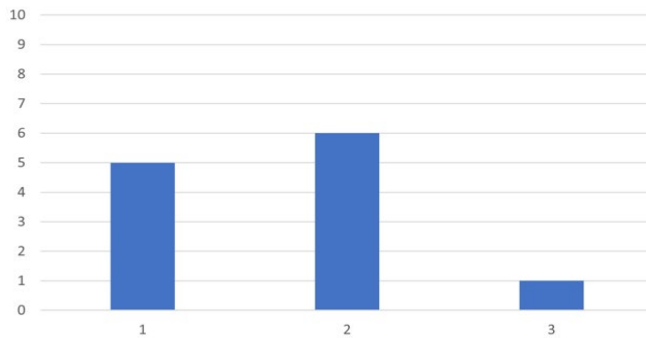
- Communication with signatories (5 mentions);
- Cost (4 mentions);
- Users’ (signatories’) interaction with the system (4 mentions);
- Ease to keep track of collection (3 mentions);
- Ease of supporting an initiative (3 mentions).

**Chart 11: ‘How easy was it to comply with the technical specifications to obtain certification? (1=very difficult; 10=very easy)’**



Organisers having used individual online collection systems considered that it is relatively difficult to comply with the technical specifications to obtain certification of their individual online collection system and to get the system certified by national authorities.

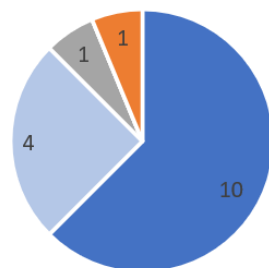
**Chart 12: ‘How easy is it to get the system certified by the national authorities? (1=very difficult; 10=very easy)’ (scores given by the 3 organisers that responded to this question)**



### 5.2. Use of eID

The large majority of respondents considered that it is important to allow the use of new solutions for electronic identification such as eID or electronic signature for supporting initiatives.

**Chart 13: ‘How important is it to allow the use of the new solutions for electronic identification such as eID or electronic signature for supporting initiatives?’**

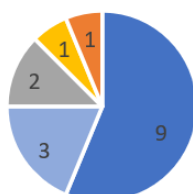


■ Very important ■ Somewhat important ■ Neutral ■ Not that important ■ Irrelevant

### 5.3. Minimum age for supporting ECIs

The large majority of respondents (75%) considered the reduction of the minimum age for supporting ECIs to 16 in all Member States as important for the success of ECIs.

**Chart 14: ‘How important is reducing the minimum age for supporting ECIs to 16 in all Member States for the success of your initiative?’**



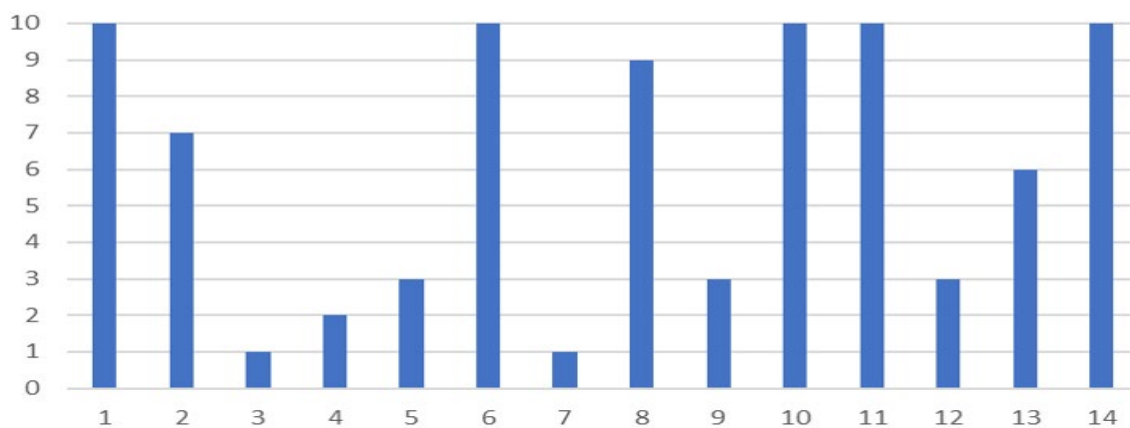
■ Very important ■ Somewhat important  
 ■ Neutral ■ Not that important  
 ■ Irrelevant

Interview respondents also expressed the need for harmonisation and standardisation in the procedure, e.g. all Member States should lower the age in order to limit discrepancies across Member States, which make the coordinating role of organisers more difficult. Some who were less in favour of lowering the ECI support age argued that it would help certain thematic initiatives, but not necessarily help the instrument.

#### 5.4. Impact of COVID-19

Not all initiatives whose representatives responded to the survey were impacted by the COVID-19 outbreak to the same degree.

**Chart 15: ‘How much has the COVID-19 outbreak had an impact on the success of your initiative? (1=not at all; 10=a lot)’**



Out of those initiatives that were significantly impacted, the following measures were regarded as most effective in facing the challenges posed by the pandemic:

- The extension of deadlines for signature collection (6 mentions);
- The availability of an online infrastructure for running an ECI (6 mentions);
- The shift to online activities made it easier to promote the ECI (3 mentions);
- Sharing experiences with other organisers (2 mentions);
- Targeted guidance from the ECI Forum (1 mention).

In terms of what should be kept/continued/reinforced in the future, respondents mentioned:

- Improving the visibility of the ECI (3 mentions), including on EU channels;
- Improving the online collection system (3 mentions), the organiser account (2 mentions) and the ECI website (1 mention);
- Improving the follow-up to initiatives (2 mentions);
- Providing guidance to improve the initial submission (1 mention);
- Training such as the EU Academy course (1 mention);
- Clarifying the administrative evidence required for checking residence in 7 different EU Member States (1 mention);
- Funding and networking (1 mention).

## 6. Verification phase

Questions related to the verification phase were only asked to representatives of initiatives that had reached 1 million signatures and had carried out the verification procedure. Therefore, representatives of two initiatives could respond to this part of the survey. They replied that they consider the verification procedure as overall effective, while noting certain delayed responses from Member States.

## 7. Examination phase

Questions related to the examination phase were only asked to representatives of initiatives that had reached this stage in the ECI process. Therefore, representatives of two initiatives could cover this part of the survey.



They were mostly positive or neutral regarding the clarity of the procedure during the examination phase and overall satisfied with the opportunities offered to present their initiative during the meeting with the Commission and the public hearing at the European Parliament. For the 2 initiatives already replied to by the Commission, organisers considered that the Commission had explained in a clear, comprehensible and detailed manner the reasons for its intended action in response to a successful initiative. Organisers cited a common reason that influenced the success of their initiative, namely having chosen a popular topic (on the one hand pesticides, and on the other animal rights).

## 8. Transparency & data protection

Half of the respondents (8) considered the rules for reporting funding very clear, 3 were neutral and the rest (5) considered that there is room for improvement.

Respondents considered the data protection rules very clear and effective (10) or relatively clear (5); one respondent was neutral (1). They also reported not having faced any difficulties in complying with these rules. Respondents were overall positive about the usefulness of the guidance provided by the Commission on data protection matters, as well as regarding the division of responsibilities for data protection compliance between the different actors (organisers, Commission, national authorities).

**Table 13: ‘Have you faced/are you facing any difficulties or challenges as regards compliance with data protection rules?’**

|           |   | Answers | Ratio |
|-----------|---|---------|-------|
| Yes       |   | 0       | 0%    |
| No        |  | 14      | 87.5% |
| No answer |  | 2       | 12.5% |











## 9. Information provision

87% of the respondents considered that it was easy to find information about starting an initiative; they had used the ECI website alone or in conjunction with the ECI Forum. Both platforms were rated positively regarding the quality of the information (average of 8 out of 10). The 1 respondent that contacted the National Contact Point, rated the quality of the information provided highly (10).

Out of the various means of promoting their initiative offered by the Commission, respondents considered the following as the most valuable:

- Easy access to their initiative from the ECI website (11 mentions);
- Participation as speakers in events (11 cumulative mentions of in-person and online events);
- Possibility to share the initiative on social media from the ECI website (5 mentions).

**Table 14: ‘Which communication action carried out or facilitated by the European Commission do you find most valuable for you as an organiser?’**

|   |   | Answers |
|---|---|---------|
| Easy access to our initiative from the ECI website  |    | 11      |
| Possibility to share the initiative on social media from the ECI website                                |  | 5       |
| Contacting signatories of our initiative via the mailing system of the central online collection system |  | 1       |
| General promotion of all initiatives by the Commission  |  | 4       |
| Mentions of our initiative in the ECI newsletter  |  | 3       |
| Participation as speakers at physical events  |  | 5       |
| Participation as speakers in online events/webinars   |  | 6       |
| Featuring our experience in videos  |  | 1       |
| Showcasing the initiative in the CitizenCentral podcasts  |  | 3       |
| No answer   |  | 2       |

Both interview and survey respondents expressed the need for more media coverage around the ECI. Some organisers stated that while they had enough opportunities to campaign at European level, at the national level they were mostly invisible. Some respondents also suggested the use of public channels in Member States to communicate about the ECI as a tool but also to promote ongoing and upcoming initiatives.

Respondents considered the ECI website, the ECI newsletter and social media as the most cost-effective tools for increasing citizens’ awareness about the ECI. Additional suggestions made are:



- Promotion of the ECI by Members of the European Parliament during their activities on the ground;
- Further involving local EU offices, influencers, universities and NGOs;
- Organising online contests teaching teenagers at school about the ECI;
- Showcasing concrete results of initiatives;
- Developing an app where people who signed an initiative can sign other initiatives without entering their data again.

## 10. ECI Forum



Two-thirds of respondents had made use of the ECI Forum services. In the preparatory phase, the most useful services offered by the ECI Forum are the learning materials and activities, followed by facilitating the search of partners and discussing ideas. One-third also used the Forum during the collection phase, with very high satisfaction rates.

In the survey, the most frequently mentioned reason for not using the ECI Forum is that the organisers did not need the services offered. Additional reasons identified through the interviews are: organisers’ lack of knowledge about the services offered by the ECI Forum; a lack of relevant material; lack of clarity of the Forum website; reliance on peers already familiar with the ECI or their own NGO networks.








**Table 15: ‘Did you use the services offered by the ECI Forum?’**

|     |   | Answers |
|-----|---|---------|
| Yes |  | 11      |
| No  |  | 5       |

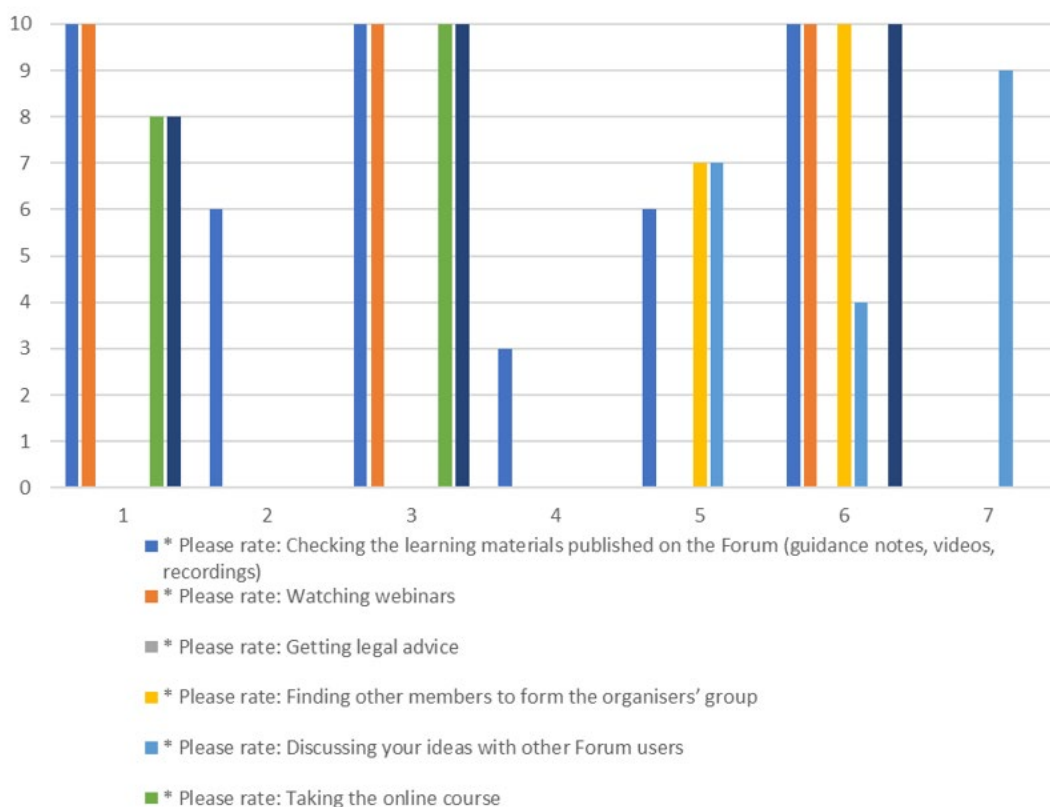
**Table 16: ‘Which ECI Forum services did you use and how useful did you find them?’**

|   |   | Answers |
|---|---|---------|
| Checking the learning materials published on the Forum (guidance notes, videos, recordings) |  | 9       |
| Watching webinars   |  | 5       |






|   |   |   |
|---|---|---|
| Getting legal advice                                |  | 1 |
| Finding other members to form the organisers' group |  | 4 |
| Discussing your ideas with other Forum users        |  | 4 |
| Taking the online course                            |  | 3 |
| Reading blog articles                               |  | 4 |
| Other   |  | 3 |
| No answer   |  | 5 |



**Chart 1: 'Which ECI Forum services did you use and how useful did you find them? (for each, from 1-min to 10-max)??'**



**Table 17: 'Did you ask for advice to the ECI Forum during the collection phase?'**




|           |   | Answers |
|-----------|---|---------|
| Yes       |  | 6       |
| No        |  | 6       |
| No answer |  | 4       |



|  |   |   |
|--|---|---|
| Clearer timelines for the verification phase   |   | 0 |
| Extension of the time for the examination phase, more opportunities to present your initiative |  | 3 |
| The obligation to inform citizens about the ECI existence                                      |  | 2 |
| The creation of National Contact Points  |   | 0 |

75% of the respondents considered the communication and interaction with the European Commission during their ECI journey as smooth and efficient.

**Table 19: ‘How was the communication and interaction with the European Commission during your whole ECI journey?’**

|                  |   | Answers | Ratio |
|------------------|---|---------|-------|
| Smooth/efficient |  | 12      | 75%   |
| Neutral          |  | 2       | 12.5% |
| Difficult        |  | 2       | 12.5% |

Respondents to the online survey were given the possibility to make final remarks not covered under the previous sections of the survey and to suggest further improvements to the ECI. Some of the main ideas collected include:

- Setting up a fund to support the promotion of ‘approved’<sup>5</sup> ECIs;
- Reinforcing visibility of the ECI in general and of specific initiatives, and providing more marketing platforms and/or networking options to initiatives (including at the EU Open Days);
- Extending the 12-month collection period;
- Assuring organisers that once an ECI has gathered 1 million signatures, its proposals will be implemented;
- Developing an app to facilitate signature of multiple ECIs without entering all personal data again.

Organisers interviewed shared suggestions for structural solutions they believed would help future ECI organisers. Amongst them, some suggested that there should be direct funding from the EU to allow equality between the initiatives. Others suggested connecting the ECI to citizens’ panels or linking the procedure to the European Parliament and not the European Commission. Some organisers interviewed would also appreciate more information about how signatures are verified.

<sup>5</sup> It is not clear whether this suggestion concerns registered or valid initiatives.