

**MORAIS BISMARQUE GASPAR Ana Gloria**

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**From:** EFVI - European Free Vaping Initiative [REDACTED]  
**Sent:** 31 March 2014 15:53  
**To:** Euro-Ombudsman  
**Subject:** Re: Own Initiative Inquiry: OI-9-2013-TN

Dear Ms O'Reilly,

I hope it is not too late to submit our answers to your ECI inquiry on behalf of European Free Vaping Initiative.

1. We've found that the citizens' initiative right is not well known enough amongst the citizens at the moment, the majority of the people thinks that ECIs are simple petitions and they have no idea about ECI mechanics and possibilities in general.

2. The tech team of the Commission was extremely helpful. However, we've found that the ECI registration procedure is very poorly documented when it comes to the hosting of the Online Collection System and its certification procedure. It is not clear how to request the system being hosted by the Commission (as it turns out it is asked by the Commission upon registration, but this information is not documented). It is also not clear that the organizers don't have to wait with the certification procedure until their OCS hosted by the Commission is up and running. Our ECI lost 1.5 months of the signature collection window due to the lack of information available on these subjects and the Commission declined to extend our deadline.

3. The OCS provided by the Commission is very useful, however their platform of choice makes it very hard to find hosting providers. Being an Enterprise Java system, it has very complex hosting requirements and common webhosting solutions and skills are insufficient to operate such an environment.

4. I think the deadline extensions were fair and sufficient. However, there are still issues regarding launching the OCS for new ECIs, and the Commission's new practice is to allow no more deadline extensions, regardless of the delays new ECIs suffer.

5. The paper forms are useful, but there are some issues with the downloadable localized versions. Half of the sheet is occupied by information on the ECI and its regulation, leaving room for only a few signatures on an A4 sheet. We've also found that some of the translations have the privacy statement truncated in the footer, as there is no room for the whole text in some of the languages, in German, for example. Some signatories thought that it is truncated on purpose and felt uncomfortable to sign a paper without the proper privacy statement present.

6. None.

7. The Europe map with per member state statistics is just great in the current version of the OCS.

8. For certification we've went with CTIE in Luxembourg as we did not think that our national authorities are prepared enough to handle such a task, so we picked the safe route. We have no experience on the validations of signatures yet.

9. Standardizing the personal information required in each member state would be great. Currently a lot of European citizens are unable to sign an ECI due to the different requirements in each country. For instance English citizens living outside of the UK.

Also, a longer deadline, or a lower amount of required signatures would be great for the success of ECIs that are ran by common citizens, and have no large organizations behind them.

10. If the Commission could provide its hosting services as a permanent feature, that could greatly reduce the difficulties of launching ECIs. Also, if ECIs could officially act as legal entities for the duration of their campaign, that would be a great help too. Currently if an ECI is ran by common citizens then there is no legal entity behind the ECI and it is hard to establish one, considering the committee being scattered around Europe, which makes communication with authorities and companies very difficult, and it makes accepting funding almost impossible.

Thank you for the opportunity for a feedback.

Sincerely,

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Krisztian Pifko

European Free Vaping Initiative

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