

Strengthening Democratic Legitimacy at the EU level?

*Assessing the Impact of the Revised European Citizens' Initiative Regulation on
EU Legitimacy*

by

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Executive Summary

This thesis delves into the realm of EU democratic processes. The study focuses on the revised European Citizens' Initiative Regulation and its potential to enhance citizen participation at the EU level, thereby contributing to democratic legitimacy within the European Union. This study examines how these dynamics manifest within the broader EU context. Through a careful examination of the revised European Citizens' Initiative Regulation, the thesis aims to shed light on the implications for democratic legitimacy within the EU.

Key components of the study include a comprehensive literature review to establish the initial state of democratic legitimacy within the EU, as well as a multiple case study approach using secondary quantitative data from proposed ECI initiatives. By analysing the impact of the revised regulation on citizen participation and democratic legitimacy, the thesis offers valuable insights into the evolving landscape of EU governance. This thesis concludes by emphasising that the findings have significant implications for policymakers and stakeholders invested in strengthening democratic legitimacy at the EU level. By highlighting the potential of the revised European Citizens' Initiative Regulation to enhance citizen engagement and democratic processes, this thesis contributes to ongoing discussions on democratic governance within the European Union.

Overall, this thesis provides a nuanced exploration of the intersection between citizen participation, EU governance, and democratic legitimacy, offering a compelling perspective on the evolving dynamics of democracy in the European context.

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Abbreviations

ECI European Citizens' Initiative

ERA European Research Area

EU European Union

MS Member State

Acknowledgments

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This master thesis, "Strengthening Democratic Legitimacy at the EU Level? Assessing the Impact of the Revised European Citizens' Initiative Regulation on EU Legitimacy," examines the revision of the European Citizens' Initiative and its potential to enhance citizen participation at the EU level, thereby contributing to democratic legitimacy within the EU.

This thesis marks the completion of my master's program in European Studies at the University of Twente, conducted from February 2024 to June 2024.

My choice of topic stems from my prior experiences with citizen participation at the local and regional levels in the Netherlands. Having worked with various methods to enhance citizen participation, I was curious to explore how these dynamics function within the EU context. My experience has shown that citizen participation is here to stay, although decision-making institutions continue to face challenges in their integration. I hope this thesis offers valuable insights and stimulates further discussion on this topic.

I would like to express my gratitude to my supervisor, Dr. Su Yun Woo, for her guidance and support throughout this process. I specifically chose you for your expertise in citizen participation and I am grateful for our enlightening conversations and your recommendations. I also extend my thanks to Dr. Stefan Telle for his valuable feedback and guidance. Finally, I am grateful to my family and friends for their unwavering support during this journey.

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Introduction

Nowadays, citizens are increasingly encouraged to engage in democratic processes within their national governing bodies and within the European Union (EU). Since the creation of the EU institutions in 1950, there has been a concern about a democratic deficit in the EU which is attributed to factors such as insufficient public engagement, lack of political accountability, and the absence of a shared public sphere (Crombez, 2003; Kelemen, 2017). The Lisbon Treaty played into this by defining both the general right and specific mechanisms for citizens to engage in EU decision-making and introducing the European Citizens' Initiative (ECI) (Greenwood, 2018).

Henceforth, the ECI has been seen as one of the key inventions in citizen participation in the EU in the past ten years (Sullivan, 2019). Since 2012, citizens of the EU can initiate action on topics they deem significant or believe are inadequately addressed by the Union. Upon collecting the necessary level of support, these ECI initiatives (hereafter Initiatives) can request the European Commission (hereafter the Commission) to propose relevant legislation. Previously, only the European Parliament (hereafter the Parliament) and the European Council had the authority to invite the Commission to propose legislation (Flyge, 2019).

The ECI is established in the Treaty of Lisbon in Art. 11(4) TEU and Art. 24 TFEU, and is part of the concept of EU citizenship (European Commission, n.d.). The setup of EU citizenship traces its origins far into the past. With the establishment of the Treaty of Maastricht in 1993, EU citizenship was formally introduced as a legal concept of EU law (Van Eijken, 2020). The implementation was regulated in ECI Regulation No. 211/2011 which set out the procedures and conditions for the application of the Articles, and it states the aim of the ECI: "Every citizen is to have the right to participate in the democratic life of the Union" (Regulation 211/2011; p. 1). In addition, the instrument has three main objectives: to

allow European citizens to invite the Commission to submit a legislative proposal; to encourage citizen participation, and to make the Union more accessible (Hierlemann et al., 2022). Moreover, the ECI intended to create a new dialogue among political institutions, civil societies, and the public (Longo, 2019).

According to experts, the first five years of its instalment had proved disappointing, and criticism of the instrument increased (De Waele & Mastenbroek, 2018). Therefore, the Commission announced a revision of the ECI in 2017. This thesis aims to assess whether the revision of the ECI results in increased citizen participation at the EU level and consequently contributes to enhancing democratic legitimacy within the EU. This chapter has briefly introduced the instrument and will further elaborate on the research problem, the research aims, objectives, questions, and significance.

Research Questions

Building upon Lucy Hatton's (2016) recommendations, this thesis will investigate the effects of revision to the ECI on the level of citizen participation and subsequently, the level of democratic legitimacy within the EU. Hatton's research incorporates the foundational theories from leading works in the field, while also introducing an innovative perspective that clarifies the concept of citizen participation and ascertains a method for measuring its impact on democratic legitimacy. This will be further elaborated on in the following chapter.

Many scholars have investigated the functioning and impact of the instrument in the first five years of its operation (2012-2017); however, this has not been much looked at from 2020 on. In December 2023, the Commission published its first review of the ECI Regulation No. 2019/788. The ECI Review Report highlights significant improvements in the ECI process since the Regulation was enacted in January 2020. It shows that the number of registered initiatives has increased significantly since 2021 (European Commission, 2023). Additionally,

the Commission responded to four Initiatives in 2023, marking the ECI process's end. It also points out how the COVID-19 pandemic disrupted the operation of the ECI during its initial two years of implementation, and that 2023 was the most successful year for the ECI to date. Nonetheless, it is still questionable whether these developments have increased citizen participation and the level of democratic legitimacy in the EU. As stated by Hierlemann et al. (2022) only a small percentage of the EU population has actively engaged in an ECI up until 2022. Approximately ten million signatures have been gathered for Initiatives and even if each signature represented a different citizen, it would still only make up about 2.5 percent of the EU's total voting-age population (Hierlemann et al., 2022). Hence, this thesis aims to assess how the revision might result in different conclusions regarding the ECI's influence on the democratic legitimacy of the EU compared to the assessments made by scholars before the revision. To achieve this research aim, the following main research question and sub-questions are formulated:

Research question	<i>How has the revision to the European Citizens' Initiative Regulation impacted the level of democratic legitimacy of the European Union?</i>
Sub-question 1	<i>What was the level of democratic legitimacy within the EU before the revision of the ECI Regulation?</i>
Sub-question 2	<i>How has the revision of the ECI Regulation impacted citizens' participation in the EU?</i>

Sub-question 3	<i>How do the changes to citizen participation affect the level of democratic legitimacy within the EU?</i>
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The first sub-question enables me to assess the democratic legitimacy created by the ECI before the revision was implemented. It serves as a useful baseline to indicate the initial state of democratic legitimacy within the EU. The second sub-question allows me to examine the effect of the ECI Regulation on citizen participation at the EU level. It is stated that the revision aims to increase democratic legitimacy in the EU through enhanced citizens' involvement and participation (European Commission, 2017). Therefore, the effects of citizen participation must be taken into consideration when answering the main research question. The third sub-question allows me to examine if the level of democratic legitimacy within the EU has changed after the revision of the ECI Regulation was implemented. It aims to study if the changes to the level of citizen participation also affect the level of democratic legitimacy created by the ECI.

Scientific and Societal Relevance

In terms of scientific significance, this study contributes to the existing body of scholarly literature by specifically addressing citizen participation and the revision of the Regulation. Previous research has predominantly centred on the instrument within the initial five years of its implementation. However, this thesis intends to incorporate the revised Regulation into its analysis. Furthermore, while past studies have examined the instrument's effects on democratic legitimacy, they have not delved deeply into the role of citizen participation. This research aims to fill this gap in the literature, providing insights into the fundamental mechanisms and outcomes of the ECI after the revision.

The societal significance concerns fostering greater proximity between the EU and its citizens, a priority underscored by the ECI and other instruments promoting citizen participation at the EU level. Moreover, nearly half of EU citizens claim they are unsatisfied with how democracy works in the EU (European Movement International, 2020).

Nonetheless, scholars such as Conrad and Knaut (2016) argue that the ECI presents a viable means to bridge the gap between EU institutions and citizens. The recent revision of the ECI Regulation by the Commission represents the first step in this undertaking.

Structure

The thesis is organised as follows: Part I discusses the method that is being employed in this thesis. Chapter One comprises a literature review introducing the key concept of democratic legitimacy. Furthermore, the conceptualisation and the theoretical framework will be discussed. Chapter Two discusses the research methods, including the research design, data collection methods, considerations regarding validity and reliability, and data analysis. Part II presents the findings. Chapter Three will introduce the ECI process and the criticism that led to the revision of the instrument. Additionally, it addresses the first sub-question concerning the initial state of democratic legitimacy within the EU created by the ECI. Chapter Four conducts a multiple case study on 'Stop Vivisection' and 'Save Cruelty-Free Cosmetics - Commit to a Europe Without Animal Testing'. Part III will elaborate on the findings with the analysis. Chapter Five provides an analysis of the level of citizen participation after the revision and answers the second research question. Chapter Six analyses the level of democratic legitimacy after the revision and answers the third sub-question. Finally, Part IV concludes this thesis. Chapter Seven presents the concluding remarks and implications and will address the research question.

Part I Method

Chapter 1. Theory

The chapter is intended to serve two main purposes. Firstly, it will offer a clear explanation of the concept of democratic legitimacy and citizen participation before putting it into practice. This step is crucial because there's inconsistency in how these concepts are understood and utilised in research. Secondly, the chapter will introduce the theoretical framework associated with these concepts.

This chapter is structured in the following way. Subsection 1.1 entails a short literature review of the concepts of democratic legitimacy and the democratic deficit. Subsequently, subsection 1.2 presents the conceptualisation of this thesis's key concepts and variables. Finally, subsection 1.3 will establish the theoretical framework containing the expected relationships between the variables.

1.1 Literature Review

1.1.1 Defining Democratic Legitimacy

Legitimacy forms a fundamental concept within contemporary democratic governance, prompting extensive scholarly debate concerning its impact and comprehensive understanding (Flyge, 2019). Normative perspectives in political science regard legitimacy as a rationale for authority (Flyge, 2019). They define legitimacy as “the right to rule” (Flathman, 2007, p.678). In addition, Tyler (2006) states that: “the classic argument of political and social theorists has been that for authorities to perform effectively, those in power must convince everyone else that they “deserve” to rule and make decisions that influence the quality of everyone’s lives” (Tyler, 2006, p.377). Moreover, Scharpf (2003) argues that legitimacy’s function concerns securing effective government in liberal policies in which the belief in shared legitimacy

between the state and citizens is a fundamental condition. Subsequently, De Waele and Mastebroek (2018) assert that legitimacy is a crucial condition for the effectiveness and durability of the EU and that within the EU context, legitimacy and democratic legitimacy are often treated as interchangeable concepts. In literature, there is an ongoing debate about whether the EU faces a democratic deficit that impacts its legitimacy. The following subsection will further elaborate on this phenomenon.

1.1.2 Exploring the Democratic Deficit

Before exploring the ECI as a potential solution to the EU's democratic deficit, it is essential first to understand its nature. The issue of a democratic deficit within the EU has long been a subject of concern in academic circles, with criticisms persisting regarding its persistence and the apparent disregard exhibited by EU decision-making institutions towards its implications (Scharpf, 1999). In addition, Norris (2011) asserts that core decision-making institutions are criticised for failing to maintain the legitimacy standards present at the national level of Member States (MS). Furthermore, the author emphasises that “the most plausible potential explanations for the democratic deficit suggest that this phenomenon arises from some combination of growing public expectations, negative news, and/or failing government performance” (Norris, 2011, p.5). The potential reasons for the emergence of the concept serve as the basis for devising its potential remedy. According to Crombez (2003), a democratic deficit requires examining the input and output of a political process and the process itself. The author states that it is crucial to examine whether the policy preferences of voters are accurately reflected in the outcomes and whether voters are sufficiently represented at various stages of the process with the capability to exert influence. Although it is still emphasised that there is not one definition of the democratic deficit (Follesdal & Hix, 2006), the impact of the debate shows, as stated in the following sentence: “the notion of the ‘democratic deficit’ has swiftly become the most prominent label attributed to the EU polity”

(Kohler-Koch & Rittberger, 2007, p.1). Hence, it is important to delve deeper into the concept to devise strategies for tackling this persisting challenge, which remains one of the foremost issues within the EU. To accomplish this, it is necessary to provide further elaboration on the key variables of this thesis. The subsequent section will undertake this task.

1.2 Conceptualisation

This section defines and clarifies the principal variables under examination. Initially, it defines the variable concerning 'the revision of the ECI Regulation'. Subsequently, it provides clarification on 'citizen participation'. Finally, the last subsection delves into the variable of 'democratic legitimacy'.

1.2.1 The revision of the ECI

The revision of the ECI is the legal document Regulation No. 2019/788 and is the independent variable. This legal document contains the revisions made to the previous Regulation No. 211/2011. The revision was first initiated with a report on the application of the ECI Regulation in 2015. In this report, the Commission listed several challenges arising in the implementation of Regulation No. 211/2011. It also committed itself to further analyse the impact of these issues on the effectiveness of the instrument and to improve its functioning (European Commission, 2017). Furthermore, stakeholders and institutions assessed and evaluated the instrument, identifying several shortcomings in the way the instrument operates (European Commission, 2017). In 2017, the Commission published a roadmap for the revision of the ECI, to which stakeholders could be informed about the Commission's work to provide feedback (European Commission, 2017). As a result, Regulation No. 2019/788 was published in 2019 and adapted earlier proposed measures to "make the European citizens' initiative more accessible, less burdensome and easier to use for organisers and supporters, and to strengthen its follow-up in order to achieve its full potential as a tool to foster debate" (Regulation 2019/788; p. 1).

1.2.2 Citizen Participation

The revision of the ECI Regulation aims to increase the democratic legitimacy of the EU through enhanced citizen participation (European Commission, 2017).

However, the question can be raised what is meant by the enhancement of citizen participation. To understand citizen participation, it can be defined as "the means by which they can induce significant social reform which enables them to share in the benefits of the

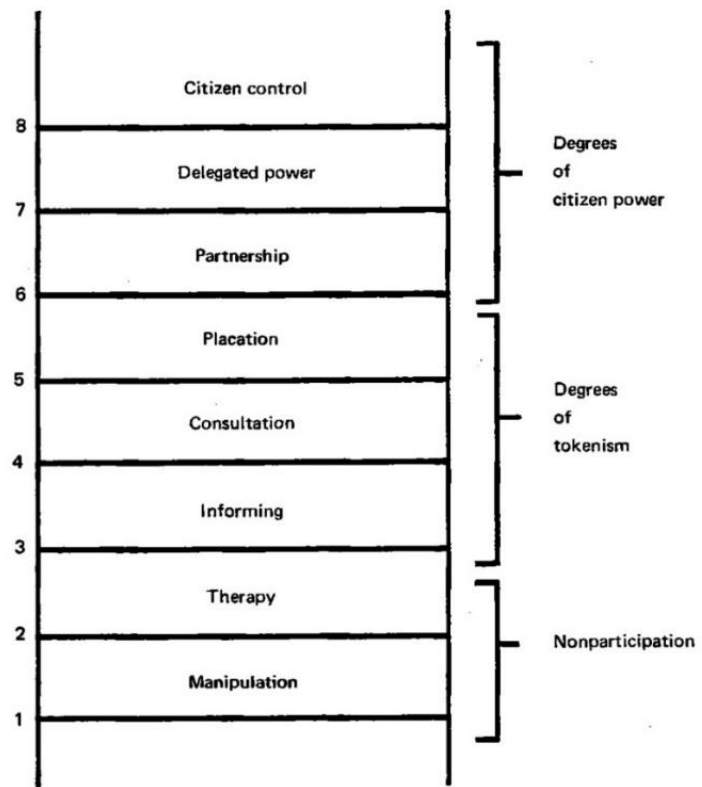


Figure 1. Citizen Participation Ladder. Retrieved from *A Ladder of Citizen Participation* (p.217) by S.R. Arnstein, 1969, *Journal Of The American Institute Of Planners*

affluent society" (Arnstein, 1969, p.216). This involves shifting power dynamics to intentionally include marginalized citizens, referred to as 'have-not citizens', who are presently excluded from political and economic processes (Arnstein, 1969). Arnstein (1969) introduced the 'Ladder of Citizen Participation' to illustrate the different levels of this concept, where each rung signifies the extent of power citizens possess in shaping outcomes. As shown in Figure 1, there are three overarching levels that encompass 'non-participation', 'degrees of tokenism', and 'degrees of citizen power'. Attaining any of these levels signifies citizen participation. Furthermore, Arnstein's (1969) ladder defines eight levels of participation, which include manipulation, therapy, informing, consultation, placation, partnership, delegated power, and citizen control. By understanding these levels, Arnstein emphasises the

significance of meaningful engagement and empowerment for marginalised societal groups (Arnstein, 1969).

1.2.3 Democratic Legitimacy

Arnstein (1969) sees citizen participation as a fundamental aspect of democracy, where all members of society can actively engage in shaping policies for the collective benefit of the community. In literature, many frameworks have been proposed as ideal democratically legitimate political systems, and come from the two concepts of democracy that resonate within the EU, namely participatory and representative democratic systems (Hatton, 2016; Van Eijken, 2020). While there has been debate regarding the classification of the ECI within the spectrum of democratic models, most scholars argue that it aligns with (direct) participatory democracy (Greenwood, 2018; Longo, 2019; Van Eijken, 2020). In this context, a democratically legitimate political system can be conceptualised as “a system that recognises the people as the appropriate source of authority, considers the recognition of political equality to be the appropriate ends of government, and gives the people the opportunity to consent to the exercise of their authority and hence expects them to accept its outcomes” (Hatton, 2016, p.3).

In reviewing relevant literature, numerous scholars have proposed analytical frameworks to enhance democratic legitimacy. One of the first scholars to present a theory was Fritz Scharpf (1999). He categorised democratic legitimacy into two dimensions: input, evaluated in terms of the EU's responsiveness to citizen concerns because of their participation referred to as “government *by* the people” (Scharpf, 1999, p.6), and output, assessed based on the effectiveness of the EU's policy outcomes *for* the people (Scharpf, 1999). He emphasises that while both dimensions are typically complementary, they diverge in their prerequisites and consequences for the democratic legitimacy of the EU when each dimension is independently examined (Scharpf, 1999).

Nowadays, the most prominent used theory comes from the scholars Wimmel (2009) and Schmidt (2012), who identify input, output, and throughput as the key variables in this discourse. This typology, originating from the systemic perspective on legitimacy developed by Scharpf, has been employed to assess the legitimising potential of specific decision-making instruments (De Waele & Mastebroek, 2018). In this regard, it is also applicable to examining the ECI. According to Wimmel (2009), *input* relates to participation and encompasses the opportunities for citizens to influence policies or actively engage in the political decision-making process. Subsequently, *throughput* refers to the procedural decision-making mechanisms within the European multi-level system (Schmidt, 2012; Wimmel, 2009). Finally, *output* concerns the quality of results attained by a political system, particularly the effectiveness of EU policy outcomes for the populace (Wimmel, 2009). In the same way, De Waele and Mastebroek (2018) examine if the ECI holds any potential to enhance the legitimacy of the EU. They employ identical variables to Wimmel and Schmidt to assess democratic legitimacy concerning the ECI. However, they exclude the output variable from their analysis, considering it an intermediate factor. They state that an ECI transforms into a legislative proposal by the Commission, subsequently entering the standard legislative and decision-making process (De Waele & Mastebroek, 2018).

In addition, the study by Lucy Hatton (2016) indicates different criteria to measure democratic legitimacy in the context of the ECI. This research does not completely adopt the variables of other experts but adjusts them according to the impact of participatory devices on democratic legitimacy. This research argues for the dependence on criteria like inclusion, tangible impacts, and the nature of the facilitated issues. However, in my analysis, these criteria demonstrate a strong correlation with the variables of input and output legitimacy. The criterion *inclusion* entails the question of who counts as an EU citizen, who is excluded from participation, and if there is an equal opportunity to influence outcomes (Hatton, 2016). This

criterion shows a strong emphasis on the concept of citizen participation and the input variable. The criterion *impact* entails the question of whether there is a direct or indirect impact, and the criterion *issues* relate to the normative justifiability of the issue and the salience of the issue (Hatton, 2016). These criteria exhibit strong correlations with the output variable, representing the outcomes derived from the process. In my opinion, Hatton's criteria do not demonstrate a strong connection to the variable "throughput," which pertains to the procedural mechanisms leading to decision-making. Notably, she argues that for the democratic system to be effective, it is crucial that people's participation is meaningful, and that the outputs produced by the system can influence political outcomes (Hatton, 2016). Overall, this study offers an alternative and deepened perspective on the application of the concept, which will be incorporated into the theoretical framework of this thesis.

In this context, I will incorporate the variables of input and output legitimacy into the analytical framework of this thesis. Regarding my research question, I believe assessing output legitimacy is crucial for evaluating the level of democratic legitimacy due to studying the effects of citizen participation and wanting to evaluate the outcome of the proposed Initiatives. Unfortunately, the aspects mentioned earlier of throughput legitimacy cannot be studied regarding the data of this study, as evaluating the effectiveness of the processes would require examining whether citizens have access to information about the decision-making process and particular decisions. This could be answered through a larger study on information accessibility in multiple countries and in-depth interviews with a diverse group of EU citizens. However, this is beyond the scope of this master's thesis. The question of the throughput legitimacy of the ECI after the revision should be studied in further research.

To conclude, the level of democratic legitimacy is determined by the state of the concept's dimensions. Changes made to the ECI result in a greater level of democratic legitimacy when they lead to increased citizen participation. For example, if the ECI revision results in

reaching a higher level on the 'Ladder of Citizen Participation', it also enhances the level of democratic legitimacy.

1.3 Theoretical Framework

This section covers the key concepts, mentioned in the previous section, related to the research question. Furthermore, the theoretical propositions will be established to clarify the expected relationships between the concepts and variables of this thesis.

As stated in the previous section, the indicated concepts in the research questions are ‘the revision of the ECI Regulation’, ‘citizen participation’, and ‘the level of democratic legitimacy of the EU’. Moreover, the theoretical frameworks from De Waele and Mastenbroek (2018) and Hatton (2016) will be used to utilise the concept of ‘the level of democratic legitimacy of the EU’. For the concept of ‘citizen participation,’ the theoretical framework of Arnstein (1969) will be employed. These theories will be the foundation that is required to answer the research question.

Based on these frameworks and the literature, the theoretical framework for this thesis can be visualised and explained. In this context, the revision of the ECI Regulation is the independent variable, and citizen participation is the intermediate variable. An intermediate variable is part of the effect that the independent variable has on the dependent variable (Zeegers et al., 2016). Furthermore, the democratic legitimacy of the EU is the dependent variable. Hence, as

shown in Figure 2, the revision of the ECI Regulation is expected to have a positive effect on

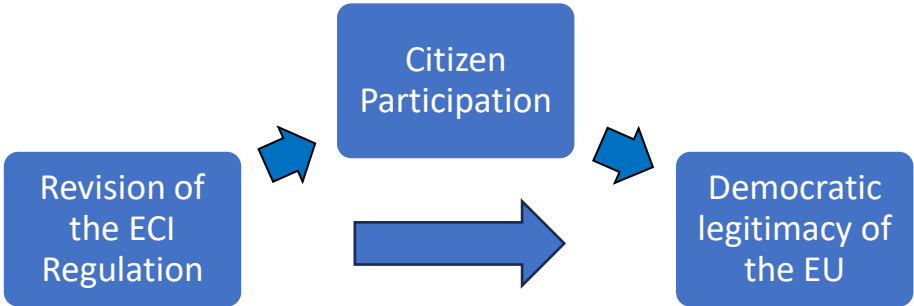


Figure 2. Theoretical Framework

the level of citizen participation at the EU level, which means that the level of citizen participation is likely to increase due to the revision. Moreover, the heightened level of citizen participation is expected to positively impact democratic legitimacy. An increase in citizen participation is likely to elevate democratic legitimacy since it closely correlates with the input variable of the concept. Furthermore, the revision of the ECI Regulation is expected to influence the input and output variable of democratic legitimacy and this relationship is expected to be positive as well. To conclude, the expected relationship is marked as positive where the revision of the ECI Regulation has a potentially positive effect on the level of democratic legitimacy.

After establishing the theoretical concepts and framework for this thesis, we can proceed to establish the methodology.

Chapter 2. Methodology

This chapter accounts for the methodology used to answer the research question. The purpose is to document the methodological choices that are made in this thesis. In doing so, the thesis will also reflect on the implications and consequences of the methodological choices and create awareness of potential weaknesses in the research.

The chapter is structured in the following way. Subsection 2.1 will introduce the strategy and design of this thesis. Next, subsection 2.2 presents the operationalisation of the variables and discusses the validity and reliability. Furthermore, subsection 2.3 deliberates on the data collection methods that are being employed in this study. Finally, subsection 2.4 presents the data analysis for the second and third sub-questions.

2.1 Strategy and Design

This research design aims to describe the steps to answer the research questions. To answer the first research question, the thesis has conducted a literature review, using secondary qualitative data from scientific papers, articles, research, etc. This literature review allows for an indication of the initial state of democratic legitimacy within the EU. Moreover, a literature review provides a comprehensive overview of the existing knowledge of the subject (Randolph, 2009). Furthermore, the level of democratic legitimacy will be determined by the state of input and output legitimacy. Data collection will come from online databases. For the setting, the research will use data from the years before the implementation of the revision, from 2012 to 2019.

To answer the second research question, the thesis is on the other side structured as a multiple case study, using secondary quantitative data from proposed Initiatives. A multiple-case study design discerns similarities and differences across various cases (Gerring, 2004). The cases

consist of proposed initiatives that have gone through the entire ECI process. One case will come from the period before the revision and one from after implementing ECI Regulation No. 2019/788, so it can be measured if there are any observable changes in the level of citizen participation. The cases selected for comparison are ‘Stop vivisection’ and ‘Save Cruelty Free Cosmetics’. These cases have been selected based on similar objectives and topics, while both propose a European legislative framework aimed at phasing out animal experiments. This approach, known as the Most Similar Systems Design, involves selecting cases that are as similar as possible, except for the specific effects the researcher intends to study (Anckar, 2008). The level of participation in these cases will be analysed through Arnstein’s ‘Ladder of Citizen Participation’. To establish the level of citizen participation in both cases, there first must be an indication of some basic information, like who the initiators of the proposed Initiatives are and the policy areas that the initiators have launched. Furthermore, it must be examined how the Initiatives have been handled by the appropriate institutions, and what the proposed follow-up measures are. Data collection will come from existing data about Initiatives. For the setting, the research uses data from the proposed Initiatives from before (2012-2019) and after the implementation of the revision (2020-2023).

To answer the third research question, this thesis will conduct a comparative analysis, using secondary data from Initiatives. It will make sense of the case study findings by operationalising the conceptualisation of input and output legitimacy by De Waele and Mastenbroek (2018) and Hatton (2016). Furthermore, it will explore additional data from other proposed Initiatives from before and after the revision to determine the level of democratic legitimacy. Data collection will come from existing data about the Initiatives. For the setting, the research uses data from the proposed Initiatives from before (2012-2019) and after the implementation of the revision (2020-2023).

2.2 Operationalisation

This operationalisation will discuss the measurement of the variables and the validity and reliability of this proposed operationalisation.

Firstly, the revision of the ECI Regulation can be assessed by comparing the legal amendments made in the new Regulation No. 2019/788 to Regulation No. 211/2011. These alterations reflect the Commission's aims to enhance key aspects of Regulation No. 211/2011. This comparison will offer insight into the modifications to the ECI Regulation and shed light on how Regulation No. 2019/788 affects the variables of citizen participation and democratic legitimacy.

Secondly, to evaluate citizen participation, Sherry R. Arnstein's 'Ladder of Citizen Participation' must be operationalised. This involves transforming the eight levels into specific, measurable questions regarding the extent of citizen participation in the proposed initiatives. To simplify the categorisation based on the ladder, I have adjusted the original framework. The two lowest levels are combined into a single category labelled "non-participation", due to overarching similarities. The level of '*non-participation*' occurs when decision-makers explain their policies to EU citizens but disregard any criticism. At this level, decision-makers aim solely to educate or cure participants and there is no indication of any form of citizen participation in the decision-making process (Arnstein, 1969). '*Informing*' describes a situation where decision-makers only provide factual information to EU citizens about their decisions. Similarly, '*consultation*' is characterised by decision-makers gathering information from EU citizens without any commitment to follow through (Arnstein, 1969). This means that EU citizens are invited to provide their opinions and feedback on already established legislative plans. In the level of '*placation*', decision-makers allow EU citizens to offer advice and propose legislation, but they maintain to be the ultimate decision-making authority (Arnstein, 1969). The level of placation is reached when specific strategies are

employed. Placation strategies may include appointing a few selected individuals from marginalised groups to advisory boards or public bodies, without ensuring they have significant decision-making authority (Arnstein, 1969). Overall, citizens can only give their advice and it gives the illusion of citizen involvement without empowering them to make significant decisions or impact outcomes (Arnstein, 1969). '*Partnership*' denotes a scenario where EU citizens can negotiate and engage in trade-offs with decision-makers (Arnstein, 1969). Although decision-making institutions maintain the authority to enact EU legislation, citizens have increased opportunities to collaborate with decision-makers on their proposals (Arnstein, 1969). In this scenario, citizens and decision-makers engage in meaningful dialogue, negotiate decisions, and work together to address issues (Arnstein, 1969). Moreover, '*delegated power*' is evident when EU citizens work alongside decision-makers, in crafting EU legislation (Arnstein, 1969). This means that citizens have significant control over resources, decision-making processes, and the implementation of legislation. Finally, '*citizen control*' is achieved when EU citizens have the ultimate authority to make decisions in the decision-making process (Arnstein, 1969). Citizen participation has both direct and indirect effects on policy outcomes. Direct effects are evident in the implementation of legislation, while indirect effects manifest as subtle changes not only in legislation but also in other areas. However, this study will only focus on examining the direct impact due to its scope. To conclude, these levels of citizen participation are intricately linked to variables of democratic legitimacy and have the potential to influence them.

Thirdly, input legitimacy can be measured using the analytical framework developed by De Waele and Mastebroek (2018). As illustrated in Appendix 1, the criterion of '*equal access*' can be evaluated by assessing whether all EU citizens have equitable opportunities to participate in the ECI. This involves examining the accessibility of both proposing and signing an Initiative. To propose an Initiative, one must gather a group of at least seven EU

citizens residing in seven different EU countries. Additionally, each MS may have its own set of conditions for signing an initiative, including requirements such as providing name, nationality, ID number, place and date of birth, and address. Similarly, the criterion of '*representative demands*' can be assessed by investigating measures taken to prevent the addition of unrepresentative demands on the agenda. This entails scrutinising the reasons for rejecting the proposed Initiatives to identify instances where demands are deemed unrepresentative of the EU agenda.

Fourthly, output legitimacy can be measured through the impact criterion, established by Lucy Hatton as stated in Appendix 2. According to Hatton (2016), concerning the ECI, it is important to inquire whether the ECI provides citizens with the chance to influence policy outcomes. These impacts may manifest *directly* by causing a noticeable alteration in the EU's decision-making process, including its analytical stages such as agenda setting, discussion and debate, the decision-making itself, and implementation (Hatton, 2016). Alternatively, the impacts could be *indirect*, leading to consequences beyond the ECI process, driven by the idea that participation fosters further participation (Hatton, 2016). However, due to time constraints, the indirect impact of the ECI will not be examined in this thesis. Furthermore, regarding the criterion of *actual impact*, it should be assessed whether the effects that the ECI can potentially have, or is currently having, align with the intended impacts it was designed to achieve (Hatton, 2016).

2.2.1 Validity and Reliability

This operationalisation takes validity and reliability into account. There are different forms to measure validity, and content validity is one of them. This entails covering the range of meanings within a concept (Kimberlin & Winterstein, 2008). Content validity in this thesis can be ensured by drawing on established theoretical analytical frameworks used by scholars in the literature. In their research, De Waele and Mastenbroek (2018) examined the causal

relationship between the ECI and democratic legitimacy in the first five years of its operation. As stated before, they have created several criteria to measure the variables of input and throughput legitimacy. These variables and their given indicators should hold for examining the years after the implementation of the revised ECI Regulation, as experts in the field give them. The reliability of this operationalisation ensures that this research can be reproduced when the research is repeated under the same conditions, and this could be assessed by checking the consistency of results across time (Kimberlin & Winterstein, 2008). To operationalise this, I will compare the indicators' results before and after the revision of Regulation No. 211/2011, as well as analyse case studies from both periods.

2.3 Data Collection Methods

To measure the variables that are described qualitative data will be used. An overview of the data collection resources and indicated measurements can be found in Appendix 3.

To measure the concept of 'the revision of the ECI Regulation', the legal revisions that have been made to Regulation No. 211/2011 will be examined. This can be done by analysing the ECI Regulation No. 211/2011, and ECI Regulation No. 2019/788. The measurement of 'citizen participation' will be conducted through the 'Ladder of Citizen Participation'. The multiple case study design will allow this research to assess if there is an observable change in the level of citizen participation after the revision was implemented. Data will be sourced from the official ECI website, the Commission's website, and official response documents. To assess 'the level of democratic legitimacy', the study will examine input and output legitimacy as key variables. This analysis will determine if the level of democratic legitimacy has changed after the revision of the ECI was implemented and if this can be caused by a change in the level of citizen participation. Data will be gathered from sources such as the ECI Regulation No. 2019/788 and official response documents to rejected Initiatives from the Commission. Additionally, the study will investigate the direct impact of Initiatives by

examining whether any resulted in legislative policy. Furthermore, it will evaluate whether the actual impacts align with the intended impacts by analysing the extent to which the Commission adopted the aims of Initiatives in their official final responses. Data will be sourced from official response document(s) from the Commission and ECI proposal(s).

2.4 Data Analysis

There are different methods employed to analyse the data conducted in this thesis. To address the second sub-question, content analysis will be used to highlight distinct similarities and differences between the two cases examined in the multiple case study. By using content analysis, the intentions of the Commission to enhance citizen participation will be determined. Therefore, codes are first developed to analyse relevant documents. The codes will analyse relevant parts of the selected response documents that provide insight into the level of citizen participation created by the ECI. This analysis will focus on interpreting the proposed codes to interpret the Commission's communication. Additionally, by examining these cases, the researcher aims to gain a deeper understanding of the level of citizen participation facilitated by the ECI before and after the implementation of the revision.

Finally, the process tracing method will be employed for the third sub-question to identify themes in the rejected Initiatives after the revision. Process tracing is defined as “the systematic examination of diagnostic evidence selected and analysed in light of research questions and hypotheses posed by the investigator” (Collier, 2011). According to Collier (2011), this qualitative analysis method can help to evaluate causal claims. Process tracing utilises four distinct tests, each carrying varying implications regarding certainty and uniqueness (Bennett & Checkel, 2014). The straw-in-the-wind test offers circumstantial evidence lacking both uniqueness and certainty (Bennett & Checkel, 2014). Moreover, employing this test would necessitate a series of evaluations, a task exceeding the scope of this thesis. The hoop tests involve evidence that is certain but not unique, meaning passing

this test does not enhance confidence in explaining a proposition (Bennett & Checkel, 2014). Additionally, the doubly decisive tests rely on evidence that is both unique and certain (Bennett & Checkel, 2014). Nonetheless, such evidence cannot be ascertained in this thesis. Hence, the smoking-gun tests will be employed in this study, as they provide a sufficient but not necessary criterion for accepting the causal inference (Bennett & Checkel, 2014). It can strongly support a given proposition, but failure to pass does not reject it (Collier, 2011). Moreover, if a given proposition passes, it weakens rival propositions (Collier, 2011). With this approach, the reasoning behind rejecting Initiatives will be identified. Moreover, it determines if the ECI process functions according to the aim of the revision with wanting to limit the high rates of refusals of the proposed Initiatives. Therefore, the selected documents are used to provide an overview of the relevant rejection themes.

Part II Findings

Chapter 3. The European Citizen's Initiative

To examine the legitimising effect of the ECI mechanism before the revision, the thesis requires a solid foundation for comprehending its workings and ultimately its failures.

Therefore, the first subsection will provide a brief overview of the ECI process. Furthermore, the second subsection will discuss the main criticism that led to the revision of the instrument.

Finally, the first sub-question will be answered.

The chapter is structured in the following way. Subsection 3.1 will introduce the process of the instrument for Initiatives to follow. Next, subsection 3.2 elaborates on the ECI before the revision was implemented, and discusses the main points of criticism. Finally, subsection 3.3 discusses the level of democratic legitimacy before the revision and answers the first sub-question.

3.1 The Process

For a better understanding of the ECI, it is essential to consider the process involved. The process that an initiative must go through consists of four steps:

1. Forming of the citizens' committee
2. Registration and admissibility check by the Commission
3. Signature collection
4. Submission and hearing at the Commission

According to the European Union (n.d.), to initiate an ECI a citizens' committee must be formed. This committee is tasked with preparing and submitting the initiative to the Commission (European Union, n.d.). Once the committee is established, the Initiative must undergo a registration and admissibility check by the Commission before signature collection

can begin (European Union, n.d.). During this check, the Commission verifies if the subject falls within its legislative scope, and only initiatives within this scope are registered (European Union, n.d.). Upon receiving preliminary admissibility approval, signature collection can start. The Initiative must gather at least one million statements of support within 12 months, which can be collected online and in person (European Union, n.d.). The Commission has provided an online platform for secure signature collection. Additionally, the Regulation stipulates that signatures must be obtained from citizens in at least one-quarter of MS. After submission, the Commission examines the Initiative, offering organisers the chance to present it at a public hearing before the Parliament (European Union, n.d.). Furthermore, after the revision, it was initiated that the Parliament could hold a debate which could lead to it adopting a resolution related to the issue regardless of the Commission's decision. Finally, the Commission prepares its answer and decides if the proposal makes it into legislation or if the follow-up is non-legislative and consists of other measures (European Union, n.d.).

3.2 The European Citizens' Initiative Before the Revision

The instrument faced criticism almost immediately after its implementation (Van Eijken, 2020). As stated before, the Initiatives can petition the Commission to propose new legislation but lack the authority to mandate EU institutions (Greenwood, 2016). This is one of the most substantial criticisms the instrument has faced over the years. Critics argue that the Commission tends to use its role restrictively (Conrad & Knaut, 2016; De Waele & Mastenbroek, 2018; Greenwood, 2018; Longo, 2019). In literature, the ECI is considered the primary tool for participatory democracy within the EU and the sole method of direct democracy at the supranational level (Parol, 2020). However, this is criticised by Greenwood (2018) who asserts that the Commission promotes it as an agenda-setting and participatory democracy measure, rather than one of direct democracy. Moreover, Conrad and Knaut (2016) argue that even if an Initiative meets all the requirements, the Commission retains the

authority to decide whether to translate it into a concrete legislative proposal. Numerous stakeholders called upon the Commission to reassess its existing approach to increase the frequency of successful registrations (Athanasidou, 2019). Moreover, De Waele and Mastenbroek (2018) state that many proposed Initiatives were not accepted for registration due to the restrictive interpretation of topic areas by the Commission. In addition, they noted that there was unequal access since conditions for signing up for an Initiative were different across countries. Furthermore, Hatton (2016) argued that the financial and organisational burdens associated with launching an Initiative are a significant constraint on the participation of ordinary citizens in the ECI process. Her rationale revolved around estimating financial costs at €1 million per ECI, coupled with a notable absence of public awareness regarding the ECI (Hatton, 2016). These aforementioned scholars considered their criticisms to be incredibly important and advocated for immediate action for a reform of the instrument.

The Commission acknowledged the shortcomings of the ECI and published its first review in 2017. The review underscored that "the instrument has not realized its anticipated efficacy" (European Commission, 2017, p. 4), while also indicating "limited discourse and impact thus far engendered by citizens' initiatives" (European Commission, 2017, p. 5). Moreover, it identified elevated rates of rejection during the registration phase and challenges encountered in the process of the signature collection as principal challenges. Ultimately, this evaluation initiated the revision governing the ECI.

In light of the upcoming revision, scholars provided solutions to reform the ECI. According to Athanasidou (2019), the Commission should provide enhanced guidance to organisers and implement a more lenient application of the admissibility test. Furthermore, Longo (2019) stated that in the revision, the ECI should have been distanced from the Commission and power must have been divided between the Parliament and the European Court of Justice. This would enhance the democracy of the procedure and counter the issues caused by the

Commission (Longo, 2019). Furthermore, Long (2019) argued that the ECI is essential for fostering a transnational public sphere, positing that its absence would perpetuate the EU's democratic deficit.

Critics such as Berg and Hieber (2022) assert that the points of criticism remain valid even after the instrument's 2020 revision, though the Commission has pledged improvements. The first evaluation of Regulation No. 2019/788 indicates that the Commission is increasingly responsive to ECIs. Additionally, the Commission has affirmed in the review that it will actively consider successful ECIs when formulating policy proposals and consistently involve its organisers in relevant consultations. The veracity of this statement must be substantiated over time; however, the focus of this study entails an in-depth examination of the initial three-year period after the revision.

3.3 Democratic Legitimacy Pre-Revised ECI Regulation

This subsection discusses the first sub-question, partly based on the literature provided in the previous chapter. The sub-question deals with the following: *What was the level of democratic legitimacy within the EU before the revision of the ECI Regulation?* It is impossible to provide an extensive overview of this question, as there are only a few studies that have investigated the legitimacy created by the ECI. However, this research aims to discuss the available and relevant literature on the legitimacy created by the ECI. The level of democratic legitimacy is determined by the state of the variables mentioned in the literature.

Firstly, the ECI has impacted input legitimacy in the first five years of its operation.

According to De Waele and Mastenbroek (2018), this is partly due to its relative thresholds for participation and the available methods for guaranteeing that special interests are unable to capture the instrument. However, they state that there is a hint of unequal access due to the different conditions for signing up for an Initiative across MSs (De Waele & Mastenbroek,

2018). The requirements for signing an ECI are determined by national governments, leading to potential variations between MSs (De Waele & Mastebroek, 2018). Some countries with more stringent regulations may require additional personal information from citizens before they can sign an Initiative (De Waele & Mastebroek, 2018). Moreover, Hatton (2016) states that on paper the criterion of inclusion is met when “there are no explicit exclusions to participation within the Regulation, and every signature in support of an ECI campaign is weighted equally so that all participants are officially granted an equal voice to influence outcomes” (Hatton, 2016, p.200). However, she questions if the ECI has the potential to influence input legitimacy in practice (Hatton, 2016). Regarding the criteria for inclusion, she detected several limitations like the limited campaigning for the ECI and therefore limited knowledge among EU citizens (Hatton, 2016). In addition, Greenwood (2018) concluded that the registered proposal has shown that the ECI has broadened the EU policy agenda. Furthermore, the author states that it also has enthused a young audience and brought new campaigners to EU politics instead of the usual suspects (Greenwood, 2018). In conclusion, scholars examined that the ECI does show characteristics that establish input legitimacy created by the instrument. On the other hand, they do provide examples calling this into question.

Secondly, the ECI has shown a minor impact on output legitimacy in the first five years of its operation. The ECI is expected to produce a direct impact on legislation, as one can request the Commission to submit a proposal for legal acts of the Union (European Commission, 2017). According to Hatton (2016), there are four stages of the democratic decision-making process that are visible in terms of direct impact: agenda-setting, debate and discussion, decision-making, and implementation. Moreover, she emphasises that the ECI can have an indirect impact as well, by triggering consequences outside of the ECI process through the theory that participation breeds participation (Hatton, 2016). The author also argues that on

paper the impact criterion is met, however, the Regulation locates the ECI's impact on the legislative agenda-setting stage of the decision-making process, without having any influence on the decision-making stage (Hatton, 2016). This is contested in her practical evaluation, as Hatton (2016) questions if the ECI has influenced the Commission's legislative agenda setting and she underscores this in the following statement: "in practice the ECI has not had any impact in the form that the Regulation led many to expect, thereby garnering much disappointment" (Hatton, 2016, p.203). In addition, Flyge (2019) concludes that the ECI has not increased the output legitimacy of the Union from before its implementation. She explains this in the following statement: "since no legislative policy has been finalised as a direct result of an ECI, it has not influenced the policy performance of the EU in working for the people" (Flyge, 2019, p.79). To conclude, scholars are very reluctant to state that the ECI has impacted or increased the output legitimacy of the EU, showing that in practice the instrument has not met its objectives.

In their conclusions, all scholars state that the instrument has legitimising potential, but are also critical of the instrument's impact. Greenwood (2018) contests if the ECI has or will lead to enhance the legitimacy of the EU. Nevertheless, he thinks that the ECI can offer a pathway to create a transnational public sphere, but legislative issues remain to be present.

Accordingly, De Waele and Mastenbroek (2018) address the obstacles the ECI has faced but conclude that the ECI still has the potential to enhance the legitimacy of the EU. Nonetheless, they stress that experience suggests that the instrument has remained underdeveloped. They underscore that "the risk that too many proposals would come to naught has indeed materialised, damaging the legitimacy of the EU and its institutions, even while the underlying motives for the exclusions and rejections cannot legitimately be questioned" (De Waele & Mastenbroek, 2018, p.91). Moreover, Hatton (2016) argues that on paper all three criteria are met, but questions if the effects can be measured in practice. Nonetheless, Hatton

becomes more optimistic when taking the broader view concluding that on all three criteria, stating that the ECI has the potential to the democratic legitimacy of the EU. However, she finally concludes that “the size of the impact is at present likely to remain small” (Hatton, 2016, p.205).

In addressing the research question concerning the level of democratic legitimacy within the EU before the revision of the ECI Regulation, this subsection has engaged with the available literature, offering critical insights into its impact on both input and output legitimacy within the first five years of its operation. Regarding input legitimacy, scholars such as De Waele and Mastebroek (2018) have noted positive aspects, including the ECI's relative thresholds for participation and its potential to broaden the EU policy agenda. Overall, it can be concluded that the ECI has increased input legitimacy in the EU. However, concerns remained raising questions about the instrument's practical influence. Similarly, discussions on output legitimacy revealed minimal impact, with scholars like Hatton (2016) and Flyge (2019) highlighting discrepancies between theoretical expectations and practical outcomes, particularly in terms of influencing the legislative agenda and policy performance of the EU. It can be concluded that in the first five years, the ECI did not increase output legitimacy in the EU. In their conclusions, scholars recognise the instrument's capacity to enhance the EU's legitimacy, but they also emphasise persistent challenges and the underdevelopment of the instrument. Notably, the risk of proposals going unrealised has been identified as a potential threat to the legitimacy of EU institutions, underscoring the need for further refinement and enhancement of the ECI.

Overall, while the ECI demonstrated promising characteristics for bolstering democratic legitimacy within the EU, its effectiveness in practice remained to be a subject of ongoing debate. Scholars advocated for continued exploration and improvement of the instrument to maximise its potential in promoting democratic governance and citizen engagement at the

European level. This leads to the further examination of the revision of the instrument, which will be discussed in chapter six. First, with the ECI mechanism's operation, critiques of the instrument, and the assessment of its democratic legitimacy pre-revision, the subsequent chapter will delve into two Initiatives. One from before the revision was put into effect, and one from after its implementation.

Chapter 4. Multiple Case Study

This chapter presents a multiple case study of two Initiatives: 'Stop Vivisection' and 'Save Cruelty-Free Cosmetics'. It will provide an overview of these Initiatives by examining their origins and the policy areas they target. The study will then follow each Initiative's progression, starting from the initial proposal to the final response from the Commission.

The chapter is structured in the following way. Subsection 4.1 introduces the Initiative 'Stop vivisection'. Furthermore, subsection 4.2 introduces the Initiative 'Save Cruelty Free Cosmetics - Commit to a Europe Without Animal Testing'. In both sections, the Initiative and the Commission's response will be introduced. Finally, subsection 4.3 will conclude the multiple case study.

4.1 Stop Vivisection

4.1.1 Background

The Initiative entered the ECI process in 2012 when the Initiative was registered. It took approximately three more years before it was submitted, as the third-ever Initiative, to the Commission. It was signed by 1,173,130 citizens (European Union, n.d.) and most of the signatures and the Initiative's budget came from Italy (Germain et al., 2017). Furthermore, the Initiative urged the Commission to “abrogate directive 2010/63/EU “on the protection of animals used for scientific purposes” and put forward a new proposal aimed at phasing out the practice of animal experimentation, making compulsory the use - in biomedical and toxicological research - of data directly relevant for the human species” (Stop vivisection, n.d.).

The initiators of this Initiative consist of researchers and biologists and a former European parliamentarian. The representative of this Initiative is André Menache, a European Veterinary

Specialist in Animal Welfare Science, Ethics, and Law for the European Board of Veterinary Specialisation (Animal Free Science, 2020). He is also a member of the European College of Animal Welfare and Behavioural Medicine (Animal Free Science, 2020). In a scientific article, Menache (2016) stated that the Initiative proposed a European legislative framework aimed at phasing out animal experiments and assessing the utilisation of animal models based on evidence-based science and scientific theory. Furthermore, he clarified that the directive 2010/63/EU is firmly based on the principle of the Three Rs, to replace, reduce, and refine the use of animals for scientific purposes (Menache, 2016). However, he emphasises that it also affirms using animals as models for testing products destined for human use (Menache, 2016). Therefore, the Initiative wanted to challenge the assumption made in Directive 2010/63/EU that the use of animal models is valid as a means of predicting human outcomes concerning pharmaceutical drugs, industrial chemicals, and human diseases (Menache, 2016).

However, the Initiative faced criticism from various stakeholders, particularly from the animal research community and some political groups. According to Balls (2015), the animal research community expressed total opposition to the Initiative, arguing that repealing Directive 2010/63 on the protection of animals used for scientific purposes would be a major step backward for animal welfare in the EU and Europe's leading role in biomedical research. Germain et al. (2017) state that this highlights the ongoing debate about the use of animals in science. Moreover, the authors highlight a similar case in Italy as the Italian's adoption of the EU directive on animal experimentation involved heated public debate and the implementation of national amendments to the European Directive 2010/63.

4.1.2 Commission's Response

After the public hearing in front of the Commission on the 6th of May 2015, the Commission reported its final decision not to alter the current legislation and to continue its current efforts to reduce the use of animals in research and develop alternatives. The Commission stated in

its response that “while working towards the goal of full replacement of animals, Directive 2010/63 is an indispensable tool at the EU level to protect those animals still required” (European Commission, 2015). Furthermore, the Commission affirmed that the focus would remain on the three Rs and the support of the development of non-animal approaches (European Commission, 2015). The response outlines four actions regarding the two objectives of the Initiative to accelerate the development and adoption of non-animal approaches in research and testing. These actions include accelerating progress in the Three Rs through knowledge sharing, developing, validating, and implementing new alternative approaches, enforcing compliance with the Three Rs principle, aligning relevant sector legislation, and engaging in dialogue with the scientific community (European Commission, 2015). However, it does not replace animal models and no valid non-animal procedures and testing strategies were put in place.

The organisers of the Initiative expressed dissatisfaction with the Commission's response and lodged an official complaint with the European Ombudsman. The complaint stated: “The complainants, the organisers of the initiative, considered that the Commission had given an inadequate response to the initiative and the detailed proposals put forward in the context of the initiative” (O'Reilly, 2017). The organisers believed that the Commission's actions fell short of addressing their concerns. Following an investigation, the European Ombudsman determined that the Commission had not engaged in maladministration.

In conclusion, the 'Stop vivisection' Initiative marked the inception of animal welfare initiatives within a challenging environment. Ultimately, the Commission made it clear that it would not directly address the Initiative's goal of repealing Directive 2010/63.

4.2 Save Cruelty Free Cosmetics - Commit to a Europe Without Animal Testing

4.2.1 Background

The Initiative 'Save Cruelty Free Cosmetics' began the ECI process in 2021. The Initiative was set up by the following organisations: Cruelty Free Europe, Eurogroup for Animals, the European Coalition to End Animal Experiments, Humane Society International/Europe, and People for the Ethical Treatment of Animals (PETA) (Targeted News Service, 2023). The representative of this Initiative is Sabrina Engel, who is part of PETA Germany. Moreover, the other initiators are animal rights activists and researchers. It was formally submitted to the Commission in 2023 after gathering 1,217,916 verified statements of support (European Union, n.d.). No other Initiative has ever received so much support in so many different countries, with validated signatures from twenty-two different MSs (BNNVARA, 2023). Moreover, this Initiative is also noteworthy as it is the ninth ECI to meet the required thresholds outlined in the Treaty on EU and the ECI Regulation (European Commission, 2023). Additionally, it marks the second successful Initiative focused on animal welfare after the 'Stop vivisection' Initiative (Targeted News Service, 2023).

Like the 'Stop vivisection' Initiative, this one urges the Commission to address the use of animals for scientific purposes. The organisers aimed to “strengthen the cosmetics animal testing ban, transform chemical regulations, and modernise science through legislative changes” (European Commission, 2023). They have outlined three main objectives: firstly, to fortify the ban on cosmetics animal testing, ensuring no cosmetics ingredients are tested on animals for any purpose at any time; secondly, to reform EU chemicals regulation to safeguard human health and the environment without resorting to new animal testing requirements; and finally, to modernise science in the EU by proposing legislation to phase out all animal testing before the current legislative term concludes (Engel, n.d.). The organisers detailed the objectives of the Initiative in a meeting with the Commission in March

2023 and at the public hearing organised by the Parliament in May 2023 (European Commission, 2023). Furthermore, in July 2023, the Parliament held a plenary debate on the ECI (European Commission, 2023).

Simultaneously, the Parliament responded to widespread public support for the cause by passing a resolution. This resolution called upon the Commission to develop a concrete plan for accelerating the transition to non-animal testing, in collaboration with MSs (Targeted News Service, 2023). However, like the 'Stop vivisection' Initiative almost eight years prior, this Initiative also encountered criticism. Institutions like the University of Maastricht raised concerns about the implications of a total ban on animal testing in the EU. They argued that the consequences of such a sudden ban are uncertain and could lead to stagnation in scientific research, potentially hindering the development of drugs, vaccines, and disease detection methods (Bartholomeus, 2023). These critics would rather opt for an acceleration of innovations that will eventually make the use of laboratory animals unnecessary (Bartholomeus, 2023).

4.2.2 Commission's Response

The Commission responded to the Initiative at the end of July 2023. The response emphasises the view of the Commission that all animal testing for regulatory purposes should be phased out. However, the Commission states that “this is a long-term goal that will only be reached step by step and that requires further scientific developments in identifying hazards and risks solely based on non-animal methods” (European Commission, 2023). Moreover, they affirm the belief that in the short and medium term, animal testing remains important for assessing the risks of chemicals to human health and the environment (European Commission, 2023). Nonetheless, they will make current revisions to several pieces of chemical legislation to foster the use of non-animal approaches where possible (European Commission, 2023).

In response to the objectives outlined in the Initiative, the Commission (2023) has proposed several actions. Firstly, it commits to maintaining and enforcing the ban on animal testing within the framework of the EU Cosmetics Regulation. Additionally, it acknowledges the necessity of potentially introducing legislative changes to clarify the relationship between the EU Cosmetics and REACH Regulations, pending the outcome of an ongoing judicial review. Furthermore, the Commission promises to embark on the development of a roadmap aimed at gradually phasing out animal testing in chemical safety assessments. This roadmap would involve multiple actions and a collaborative approach with all relevant stakeholders.

However, the Commission will not propose a legislative proposal for the goal of phasing out the use of animals in research and education. Moreover, they plan to initiate various measures to accelerate the reduction of animal testing in research, education, and training. These measures include hosting exploratory workshops and establishing new training initiatives tailored for early career scientists. Lastly, the Commission reaffirms its commitment to supporting research focused on alternatives to animal testing through continued EU funding.

In conclusion, the 'Save Cruelty Free Cosmetics' Initiative emerged as the first follow-up to the 'Stop vivisection' Initiative, also focusing on animal welfare. It entered the ECI process simultaneously with calls from EU citizens urging the Parliament to adopt a resolution on transitioning to non-animal testing methods. The Commission responded two years later with measures mostly aligned with the Initiative's objectives.

4.3 Conclusion

In this multiple case study, two Initiatives were examined: 'Stop Vivisection' and 'Save Cruelty Free Cosmetics'. Each Initiative addressed the use of animals in scientific research and proposed legislative changes to safeguard animal welfare.

The 'Stop Vivisection' Initiative, initiated in 2012, aimed to repeal Directive 2010/63 and phase out animal experimentation. Despite gathering significant public support, it faced opposition from the animal research community and political groups. In 2015, the Commission decided not to alter existing legislation, emphasising the importance of animal experimentation for human and animal health. In contrast, the 'Save Cruelty Free Cosmetics' Initiative, launched in 2021, sought to strengthen the ban on cosmetics animal testing and modernise EU chemical regulations. It also garnered substantial support and prompted the Parliament to pass a resolution advocating for a transition to non-animal testing methods. The Commission's response, delivered in 2023, acknowledged the long-term goal of phasing out animal testing while emphasising the importance of scientific advancements in developing non-animal methods.

In conclusion, both Initiatives exemplify citizens' concerns regarding animal welfare and the use of animals in scientific research. While the Commission's responses differed, they reflect ongoing efforts to balance animal welfare with scientific progress within the European Union. However, in both cases, the Commission emphasises that they will not immediately phase out animal testing, and they also state they will not propose any legislation in this regard, contrary to the aim of both Initiatives. Furthermore, it took the 'Stop vivisection' Initiative longer to be considered a 'valid initiative' and for the Commission to respond. It also did not receive a hearing from the Parliament, as this was not part of the ECI process before the revision. Moreover, the response to 'Save Cruelty Free Cosmetics' states more specific points of action than the response document for 'Stop vivisection'. These case studies provide valuable insights into the dynamics of citizen-led Initiatives and their impact on EU policy- and decision-making.

Part III Analysis

Chapter 5. The New Level of Citizen Participation

At this point, the thesis has developed a robust theoretical comprehension of the ECI as an instrument that aims to increase citizen participation and accordingly democratic legitimacy at the EU level. Moreover, empirical evidence has been gathered from a multiple case study involving the Initiatives 'Stop Vivisection' and 'Save Cruelty Free Cosmetics'. Consequently, the next phase entails evaluating the level of citizen participation created by the ECI and investigating whether this level of participation has been altered post-implementation of the revision.

This chapter is structured in the following way. Before comparing the case study findings, it is essential to establish the legal revisions made to the ECI Regulation. Subsection 5.1 will discuss the legal revisions that have been made to Regulation No. 211/2011. Furthermore, subsection 5.2 presents the analysis of the impact of the Initiatives discussed in the previous chapter, by evaluating the Commission's response and any subsequent actions taken. Finally, the findings will be used to draw empirically grounded conclusions regarding the level of citizen participation created by the ECI mechanism.

5.1 The Revisions Made to the ECI

After the first report on the functioning of the ECI, the Commission stated that it became clear that “the instrument has not achieved its full potential” (European Commission, 2017).

According to the European Commission (2017), this ‘full potential’ has not yet been reached because citizens face difficulties proposing initiatives that meet legal requirements, as evidenced by a high rate of refusals due to being outside the Commission's scope. Secondly, the process for collecting statements of support is complex and burdensome, leading to a low success rate in reaching the required number of signatories within the allotted time frame

(European Commission, 2017). Finally, the Commission's Review Report states that there has been limited debate and impact from citizens' initiatives thus far (European Commission, 2017). Therefore, a proposal was set up to revise ECI Regulation No. 211/2011. This proposal encompasses several key areas but highlights procedural alterations to the ECI process.

Firstly, there are clarifications and enhancements regarding the group of organisers, including conditions of liability and the option to create a legal entity (European Commission, 2017). Organisations' Support mechanisms are also improved through information and assistance measures, such as a Commission helpdesk and online collaborative platform (European Commission, 2017). Furthermore, the registration procedure is streamlined, allowing for partial registration and harmonisation of the minimum age to support an initiative at sixteen (European Commission, 2017). Personal data requirements for signatories are simplified, and organisers can choose the collection period (European Commission, 2017). Additionally, reporting requirements are implemented for organisers to disclose sources of support and funding above EUR 500 per sponsor (European Commission, 2017). The Commission establishes a central online collection system, while organisers retain the option to develop their certified system (European Commission, 2017). Subsequently, the examination phase, where the Commission decides on the adoption of the Initiative, is extended from three to five months to allow for increased citizen participation and debate (European Commission, 2017). Provisions are included for publication, public hearings, and Commission response within specified timeframes (European Commission, 2017). This involves adding a public hearing at the Parliament in addition to the existing hearing at the Commission (European Commission, 2017). This allows the Parliament to support an Initiative independently of the Commission (Regulation 2019/788; p.58). Additionally, communication activities are added to raise awareness of the ECI and both organisers and the Commission are permitted to collect the

email addresses of signatories for communication purposes (European Commission, 2017).

Regulation No. 2019/788 fully implemented these proposed measures.

As previously mentioned, the Commission believes these measures will enhance accessibility, reduce burdens, and simplify the use of the ECI for both organisers and supporters. According to Regulation No. 2019/788, these measures are intended to bolster follow-up actions to fully realise the ECI's potential as a tool for stimulating debate. Additionally, they aim to facilitate the participation of a larger number of citizens in the democratic decision-making process of the EU (Regulation 2019/788).

5.2 Commission's Responses

This analysis provides insight into the Commission's response and actions towards the enhancement of citizen participation at the EU level. Therefore, the Commission's response documents have been analysed as well as the follow-up measures stated on the official ECI website. Furthermore, keywords are formulated along with categories and formulated actions. Lastly, data is extracted from the relevant response documents.

5.2.1 Identification of Keywords

The units of meaning refer to the intensity of action. Regarding the composition, the unit "support" denotes actions specifically provided by the Commission. The unit "investigation" denotes actions in their preliminary stages, while the unit "execution" describes actions in the implementation phase. These distinct terms are used to categorise the action stages chosen by the Commission for the Initiative. Support represents the initial stage, while execution signifies the final stage.

Table 1. Summary of keywords

Units of meaning	Categories
Support	Research, Funding, Cooperation
Investigation	Assessment, Examine, Monitor, Analyse, Development
Execution	Conference, Workshop, Implementation

5.2.2 Data Extraction

The analysis examines two response documents and two web pages¹. The data set included the response document 'Communication from the Commission on the ECI Stop vivisection', the ECI webpage for Stop vivisection, the response document 'Communication from the Commission on the ECI Save Cruelty Free Cosmetics', and the ECI webpage for Save Cruelty Free Cosmetics. Appendix IV presents the extended coding scheme for content analysis. The extraction of the data ensures the sorting of the documents into two distinct categories namely the Initiative 'Stop vivisection' and the Initiative 'Save Cruelty Free Cosmetics'. First, all documents and webpages will be analysed to find the keywords for 'support', 'investigation', and 'execution'. The classification of the support stage identified the keywords: 'Research', 'Funding', and 'Cooperation'. Next, the classification of the investigation stage identified the keywords: 'Assessment', 'Examine', 'Monitor', 'Analyse', and 'Development'. Moreover, the keywords relating to the execution stage are classified as 'Conference', 'Workshop', and 'Implementation'. All documents are analysed to find the keywords using the PDF search function and the analysis will be repeated to diminish the error. However, for the response documents only the chapters of the actual response toward the objectives will be analysed, as the other chapters are introductory.

¹ https://citizens-initiative.europa.eu/initiatives/details/2012/000007/stop-vivisection_en & https://citizens-initiative.europa.eu/save-cruelty-free-cosmetics-commit-europe-without-animal-testing_en

Appendix V presents the data extraction Table 2a, an overview of present keywords in the selected papers. Moreover, data extraction Table 2b provides a comprehensive overview of the keywords for the support stage. The left column lists the name of the response documents and the webpages, and the keywords each have their column. The same applies to Tables 2c and 2d, providing a general overview of the analysed keywords per category.

5.2.3 Results

Firstly, a distinction must be made between the response document and the webpage from the Initiatives. The response documents show the intention of the Commission, and the web pages show the already performed follow-up actions. Overall, as can be seen in Table 2a., all stages of action are visible for both Initiatives. However, there are some distinct differences between the two cases, which will be highlighted in the following sections.

Stop Vivisection

Response document

In the response document, most actions from the Commission were identified to be in the investigation stage. All five actions of this stage were mentioned. As stated in subsection 4.1.2, focussing on the progress of the Three Rs these actions include knowledge sharing, developing, and validating. Moreover, the keyword ‘Monitoring’ is only mentioned in the response for this Initiative. The Commission also speaks of research and cooperation in their response, which is visible in the support stage. For example, as stated in subsection 4.1.2, they speak of engaging in dialogue with the scientific community. Finally, the execution stage is least mentioned with only mentioning of the keywords ‘Conference’ and ‘Implementation’. As indicated in subsection 4.1.2 the Commission aims to implement new alternative approaches.

Webpage

On the webpage, with the performed actions, most actions from the Commission were indicated to be in the execution phase. Three out of four actions in this stage were mentioned. For example, a scientific conference was organised in December 2016 to discuss advances in non-animal research methods. At this event, the Commission reported on progress made in implementing the initiative's follow-up actions. The webpage did not mention a workshop being held. In addition, there were also actions in the investigation phase identified. For instance, the Commission published review reports of Directive 2010/63 in 2017 and February 2020, offering assessments of the Directive's objectives and its implementation by MSs. Furthermore, only one out of three actions in the support stage were indicated on the webpage, with only a mention of research support.

Save Cruelty Free Cosmetics

Response document

In the response document, most actions were set out to be in the support stage. However, the execution phase closely follows. All three keywords from the support stage are present in the response document. As identified in subsection 4.2.2, the Commission affirms its commitment to supporting research focused on alternatives to animal testing through continued EU funding. Regarding the execution stage, three out of four keywords were mentioned in the text. For example, as stated in subsection 4.2.2, they plan to initiate various measures to accelerate the reduction of animal testing in research, education, and training. These measures include hosting exploratory workshops and establishing new training initiatives tailored for early career scientists. Lastly, the keywords 'Assessment', 'Analyse', and 'Development' from the investigation stage were mentioned. They introduced the development of the roadmap, aimed at gradually phasing out animal testing in chemical safety assessments. Moreover, as mentioned in subsection 4.2.2, the Commission wants to introduce legislative

changes to clarify the relationship between the EU Cosmetics and REACH Regulations but will wait for the outcome of an ongoing judicial review.

Webpage

On the webpage, most actions from the Commission were in the support and execution stages.

The keywords 'Research' and 'Funding' were present for the support stage. The webpage states: "The Commission will continue to strongly *support* the development of alternative approaches with appropriate funding. It will also initiate a series of actions to accelerate the reduction of animal testing in research, education and training" (European Union, n.d.).

Regarding the execution stage, the Union mentions the keywords 'Conference', 'Workshop', and 'Implementation'. For example, they organised two workshops. In the second half of 2023, the Commission initiated work on a roadmap to phase out animal testing for chemical safety assessments, with plans to finalise it by the first quarter of the 2024-2029

Commission's mandate (European Union, n.d.). Furthermore, a workshop held on 11 and 12 December 2023 engaged stakeholders in developing the roadmap, with a second workshop scheduled for 25 October 2024 (European Union, n.d.). Additionally, the European

Partnership for Alternative Approaches to Animal Testing organised various events, including conferences and forums, to promote non-animal testing methods (European Union, n.d.).

Finally, the Commission has proposed a European Research Area (ERA) policy action on non-animal approaches for biomedical research and pharmaceutical testing, pending review by the ERA Committee (European Union, n.d.). Moreover, alternatives to animal testing have been included in the strategic plan of Horizon Europe for 2025-2027 (European Union, n.d.).

There were only two out of five keywords mentioned from the investigation stage. In particular, judgments from the General Court on the relationship between REACH and the Cosmetic Products Regulation were issued on 22 November 2023 (European Union, n.d.).

To conclude, there was also a follow-up meeting between Commissioner Virginijus Sinkevičius and the organisers of 'Save Cruelty Free Cosmetics', which took place on November 8, 2023, discussing the Commission's response to the Initiative (European Union, n.d.).

Conclusion

In conclusion, the results of the content analysis revealed significant differences in the stages of action between the two Initiatives, 'Stop Vivisection' and 'Save Cruelty Free Cosmetics', as documented in both response documents and webpages. For 'Stop Vivisection', the response document primarily emphasises actions in the investigation stage, focusing on knowledge sharing and research development, while the webpage highlights actions in the execution phase, such as organising scientific conferences and reviewing directives. Conversely, 'Save Cruelty Free Cosmetics' displays a greater emphasis on support and execution stages in both response documents and webpages, with actions ranging from funding support for alternative research to hosting workshops and proposing policy actions.

These findings underscore the multifaceted nature of follow-up actions undertaken by the Commission in response to the Initiatives, reflecting varying degrees of commitment and engagement with citizen concerns. In summary, the Commission's response, and subsequent actions regarding the 'Stop Cruelty Free Cosmetics' Initiative were more comprehensive compared to those for the 'Stop Vivisection' Initiative, with a greater emphasis on actions in the execution stage. It should be noted that the 'Stop vivisection' Initiative only stated two objectives, and the 'Save Cruelty Free Cosmetics' Initiative accounted for three. Nonetheless, this could indicate that after the revision of the ECI Regulation, the response and follow-up actions provided by the Commission were more comprehensive.

5.3 Examining the Impact on EU Citizen Participation

This subsection discusses the second sub-question, based on the information about the Initiatives provided in the previous chapter. The sub-question deals with the following: *How has the revision of the ECI Regulation impacted citizens' participation in the EU?* To answer this question, the level of citizen participation in the 'Stop vivisection' Initiative is first established based on the 'Ladder of Citizen Participation'. Likewise, this will be done for the 'Save Cruelty Free Cosmetics' Initiative. To ascertain these levels of citizen participation, we will revisit and discuss the similarities and differences across the cases mentioned in the previous subsections and chapter.

The 'Stop vivisection' Initiative was the first Initiative concerning animal welfare and has shown that the road towards non-animal use for scientific purposes in the EU is a difficult one. As stated before, it gathered significant public support, but it also faced opposition from the animal research community. Moreover, the Commission decided not to alter existing legislation, emphasising the importance of animal experimentation for human and animal health. The response document from the Commission primarily showed actions in the investigation stage, focusing on knowledge sharing and research development. As a result, the organisers filed an official complaint with the European Ombudsman. However, this complaint was found to be inadmissible. The follow-up measures were mostly situated in the execution stage, with the mention of scientific conferences and reviewing directives. In conclusion, this Initiative shows signs of the citizen participation level of *'placation'*. The treatment of the Initiative shows that it has passed the stage of *'consultation'*, where decision-makers only gather information without any commitment to follow through. Furthermore, the treatment of the Initiative indicates that a small group of EU citizens can offer advice and propose legislation or alteration of it. This group of EU citizens comprises scholars and well-known animal rights activists in both cases. Still, the Commission remains the ultimate

decision-making authority. The Initiative outcomes show that the ECI has been used as a placation strategy, an advisory board consisting of EU citizens. The examination of the Initiative has revealed that it has not significantly impacted any direct policy outcomes, with the Directive 2010/63 still in place.

The 'Save Cruelty Free Cosmetics' Initiative is seen as the follow-up initiative for 'Stop vivisection' and clearly shows a few differences. As stated before, the Initiative also sought to strengthen the ban on cosmetics animal testing and modernise EU chemical regulations. It also garnered substantial support, with 1,217,916 signatures, and prompted the Parliament to pass a resolution advocating for a transition to non-animal testing methods. The Commission's response acknowledged the long-term goal of phasing out animal testing while still emphasising the importance of scientific advancements in developing non-animal methods. The first thought would be that nothing has changed in the Commission's stance on the subject, however, when we delve deeper into the proposed actions it appears to have changed. The response to 'Save Cruelty Free Cosmetics' states more specific points of action than the response document for 'Stop vivisection'. For example, the response to objective two to create a roadmap highlighted nine elements that would be included to support the transition towards chemical safety assessments based on non-animal testing. In contrast, the response document for 'Stop vivisection' does not specifically list these elements. Moreover, the Initiative displays a greater emphasis on the support and execution stages in both response documents and webpages, with actions ranging from funding support for alternative research to hosting workshops and proposing policy actions. In conclusion, this Initiative shows signs of the citizen participation level of '*partnership*'. Although the Commission maintains the authority to enact EU legislation, citizens have increased opportunities to collaborate with decision-makers on their proposals. For example, there was a follow-up meeting between Commissioner Virginijus Sinkevičius and the 'Save Cruelty Free Cosmetics' organisers,

discussing the Commission's response to the Initiative. Moreover, the organisers participated in a workshop starting the development of the roadmap. Also, since the revision, the Commission is not the only institution involved in the process. If the Parliament finds the objectives of the Initiative to be admissible, it can urge the Commission to act. This has increased the chances for EU citizens that their initiative is being acted upon.

In conclusion, after the analyses, the level of citizen participation has increased after the implementation of Regulation No. 2019/788. The 'Stop vivisection' Initiative was on the '*placation*' level of the Ladder of Citizen Participation but the 'Save Cruelty Free Cosmetics' Initiative shows signs of rising to the level of '*partnership*'. The revision of the ECI has impacted citizen participation positively, with more signs of citizens' involvement in the EU policy- and decision-making processes.

Chapter 6. The Level of Democratic Legitimacy After the Revision of the ECI

The thesis is now ready to connect the dots between the theoretical foundation, the empirical findings, and the analysis of the level of citizen participation, to analyse whether the ECI increases the Union's legitimacy. This chapter analyses the variables comprising the concept of democratic legitimacy.

This chapter is structured as follows. Subsection 6.1 discusses whether the revised ECI influences input legitimacy. Furthermore, subsection 6.2 will discuss whether the instrument impacts the Union's output legitimacy after the revision. Finally, subsection 6.3 addresses the third sub-question.

6.1 Input Legitimacy

The level of input legitimacy will be assessed based on two criteria. The first criterion, 'equal access,' examines whether all EU citizens have the same opportunities to participate in the ECI process. The second criterion, 'representative demands,' explores the reasons behind rejected Initiatives. The process tracing method helps determine how the Commission addresses unrepresentative demands to ensure they do not influence the EU agenda.

Moreover, it ascertains the opportunities for citizens to influence policies or actively engage in the political decision-making process, as described by Wimmel (2009).

6.1.1 Equal Access to Participate

This section will analyse the accessibility of both proposing and signing an Initiative after the revision. Moreover, this determines if all EU citizens have equal access to participate in the ECI process. Regarding the accessibility of proposing an Initiative, this section does not only look at the conditions to be able to propose but also the usability of the instrument. The instrument's usability is vital to examining equal access because the Commission sees it as an

important condition to ascertain a higher rate of successful Initiatives (European Commission, 2017).

Proposing an Initiative

The conditions for proposing an Initiative remain consistent following the revision.

Regulation No. 2019/788 maintains the prerequisite that Initiatives must involve citizens from at least seven EU MSs. These citizens must be of voting age in their respective countries, typically eighteen years old across most EU nations, with exceptions such as Belgium, Malta, and Austria where the voting age is sixteen, and Greece where it is seventeen (European Union, n.d.). Additionally, none of the required citizens can be members of the Parliament (European Union, n.d.). In summary, the accessibility requirements for organising an Initiative have not undergone any noticeable changes.

Regulation No. 2019/788 highlights three actions to fulfil its aim of enhancing the accessibility of the ECI process for organisers. To improve the accessibility and usability of the ECI, the Commission aims to provide comprehensive support and information to citizens and organiser groups (Regulation 2019/788). This includes establishing an online collaborative platform offering discussion forums, legal advice, and independent assistance (Regulation 2019/788). This platform has been set up and it is called the 'ECI Forum'. It is available in all twenty-four official EU languages and provides learning materials to set up an Initiative. Furthermore, the ECI Forum provides an overview of the latest success stories and provides a link to webinars about launching and promoting an Initiative. Moreover, there is a discussion page to discuss proposals for specific ideas for Initiatives or any general topic related to the ECI.

Additionally, the Commission planned to create a central online system for collecting statements of support, free of charge, with accessibility features for people with disabilities.

This online collection system has been launched and the Commission highlights its

advantages on the ECI website. These advantages include requiring minimal preparation and being provided free of charge to organisers (European Union, n.d.). Moreover, approval is not necessary as the system already meets technical and security standards; organisers simply need to sign an agreement with the Commission (European Union, n.d.). In some countries, supporters can utilise e-identification to sign (European Union, n.d.). Furthermore, the system ensures full accessibility for people with disabilities and allows organisers to communicate with supporters via email (European Union, n.d.). Additionally, it provides statistical data per Initiative to its organisers, aiding in monitoring and analysis (European Union, n.d.).

Furthermore, to streamline the Initiative process, the Commission proposed partial registration for Initiatives that meet certain criteria, ensuring clarity and transparency in the registration process and providing detailed explanations for any decisions made. The available information on the ECI website does not make this type of distinction in the ECI process.

Therefore, whether this action has already been implemented cannot be determined.

Signing an Initiative

The conditions for signing an Initiative have not changed after the revision. Each MS may still impose its conditions for signing an Initiative, including providing personal information such as name, nationality, ID number, place and date of birth, and address. However, Regulation No. 2019/788 Article 2 details the right to support an ECI. Article 2 describes that every EU citizen who has reached the voting age for elections to the Parliament is entitled to support an Initiative by signing a statement of support as per the Regulation (Regulation 2019/788). MSs have the option to set the minimum age for supporting initiatives at sixteen years, provided they notify the Commission accordingly (Regulation 2019/788). Furthermore, both MSs and the Commission are obligated to ensure that individuals with disabilities have equal access to supporting Initiatives and accessing relevant information, by applicable laws

(Regulation 2019/788). This right was absent in Regulation No. 211/2011, but the conditions remain the same.

Furthermore, once validated by national authorities, each signature on an Initiative holds equal weight toward reaching the one million signature threshold. However, the potential for signatures from countries of varying sizes to wield various levels of influence persists due to the minimum signature thresholds being determined by the disproportionate allocation of members of the Parliament by MS populations.

Synthesis of results

The theoretical discussion in Chapter 1 established a close linkage between the revision of the ECI Regulation (input variable) and citizen participation (intermediate variable). As noted previously, there has been an increase in citizen participation levels following the revision, evidenced by greater signs of citizen involvement in EU decision-making processes. Yet, analysis of the "equal access to participate" criteria indicates minimal alterations, with Regulation No. 2019/788 maintaining consistent conditions for proposing an Initiative and requirements for signing one. This suggests that the augmented citizen involvement may not directly correlate with expanded opportunities for EU citizens to propose or sign Initiatives. The legal modifications stem directly from the Regulation revision, and while observable changes are evident, further examination is needed to ascertain their impact.

6.1.2 Prevention of Unrepresentative Demands

This section analyses the measures taken by the Commission to prevent the addition of unrepresentative demand on the EU agenda. Moreover, this entails scrutinising the reasons for rejecting the proposed Initiatives to identify instances where demands are deemed unrepresentative of the EU agenda. Therefore, the process tracing method will be employed to analyse the response to the rejected Initiatives. Furthermore, the smoking-gun test will indicate the causal inference and it determines if the ECI process functions according to the

aim of the revision with wanting to limit the high rates of refusals of the proposed Initiatives. First, data is extracted from the relevant documents. Lastly, the smoking-gun test will determine if the theoretical proposition ‘if the rates of refusals of the proposed Initiatives have decreased after the revision’ holds and there will be further elaboration on the results.

Data extraction

The analysis examines twenty-three response documents from the Commission. The data set includes all response documents to rejected Initiatives from before and after the revision. These rejected Initiatives are labelled by the official ECI website as ‘Refused registration requests’ and therefore have not entered the official ECI process, as described in subsection 3.1. The response document for the ‘ONE MILLION SIGNATURES FOR “A EUROPE OF SOLIDARITY” Initiative could not be analysed due to translation issues. There have been four types of reasoning for rejection indicated by the Commission. Appendix VI shows these diverse types of reasoning by the Commission in Table 3a. Moreover, Table 3b provides an overview of the distinct types of reasoning and states the number of times this reasoning was present. Furthermore, the different Initiatives and the reason for rejection are listed in Table 3c as well as Table 3d.

Rejection Before the Revision

While examining the rejected Initiatives before the revision, there are a few things that stand out. In total, there were twenty-two Initiatives rejected within the first eight years. This results in 2,75 rejected Initiatives each year. On the other hand, there were fifty-four registered Initiatives in these years, which resulted in approximately 6,75 registered Initiatives each year. By contrast, the Commission responded to eleven Initiatives that ‘there is no legal basis in the Treaties’ and therefore declared the Initiative to be inadmissible. This is the most used reasoning for rejection used by the Commission. Next, the Commission responded to five Initiatives that ‘Regulation No. 2019/788 does not allow citizens’ initiatives to ask the

Commission to propose changes to the Treaties'. Closely followed the reasoning of 'policy areas remain the exclusive responsibility of the Member States', with four mentions. Lastly, there was only one statement that 'the proposed citizens' initiative does not invite the Commission to submit a proposal for a legal act of the Union'.

Rejection After the Revision

There is only one rejected Initiative noted after the revision. This results in approximately 0,33 rejected Initiatives each year. Furthermore, the Initiative was rejected based on the following reasoning: 'Regulation No. 2019/788 does not allow citizens' initiatives to ask the Commission to propose changes to the Treaties'. In contrast, the Commission reported thirty-seven registered Initiatives within the first three years after the revision. This resulted in 12,3 registered Initiatives each year.

Synthesis of results

The Commission has taken up several measures to prevent unrepresentative demands from being put on the EU agenda. The data extracted from the period before the revision indicate that there were approximately 2.75 rejected Initiatives and 6.75 registered Initiatives per year. Following the revision, the number of rejected Initiatives decreased to 0.33 per year, while the number of registered Initiatives increased to 12.3 per year. It is important to note that the post-revision period was shorter than the pre-revision period. Despite this, the data suggest positive progress in the functioning of the ECI in the initial years following the revision.

All pieces of evidence, presented in the short analysis above, show a decrease in the number of refusals of proposed Initiatives after the revision. Hence, the theoretical proposition will not be rejected, and it could be indicated that one of the main objectives of the Revision has been reached. Nonetheless, the data extraction suggests the need for a closer examination of the interpretive implications of this statement.

There were four types of reasoning used by the Commission before the revision, and only one was used after the revision. The most used type of reasoning before the revision was that ‘there is no legal basis in the Treaties’. The only used kind of reasoning for the rejection of the Initiative after the revision was: ‘Regulation No. 2019/788 does not allow citizens’ initiatives to ask the Commission to propose changes to the Treaties’. The data of the distinct types of reasoning from the Commission are not conclusive about a change after the revision. For the one Initiative that was rejected after the revision, the same reasoning was applied as the Commission did before. Therefore, this data does not give a definitive answer on a different strategy to prevent unrepresentative demands from being put on the EU agenda.

6.2 Output Legitimacy

The smoking gun test showed a slight increase in the level of input legitimacy. Accordingly, evaluating the level of output legitimacy will provide insight into the quality and effectiveness of the outcomes. Thus, this analysis will offer a comprehensive understanding of the level of democratic legitimacy following the revision.

The level of output legitimacy will be assessed based on two criteria. The criterion ‘direct impact’ examines whether there is an observable change to the EU’s decision-making process. Moreover, it will determine if any of the cases, presented in the previous chapter, result in legislative policy(ies). Furthermore, the criterion ‘actual impacts’ evaluates whether the impacts that the Initiatives can have or are having, if any, are the impacts that it was designed to have. Therefore, this subsection will determine to what extent the Commission adopted the Initiative's aims.

6.2.1 Direct & Actual Impact

This section ascertains if any of the Initiatives resulted in a legislative proposal or policy and if the actual impacts of the Initiatives are the same as the intended impacts. The intended impacts are the follow-up measures to the objectives stated in the Initiatives proposals.

The 'Stop vivisection' Initiative had a singular objective: to repeal Directive 2010/63.

However, as discussed in subsection 4.1.2, the Commission's response emphasised the ongoing necessity of the Directive for the protection of animals used for scientific purposes, thus refusing to repeal it. Instead, the Commission offered four supportive actions aligned with the Initiative's goal, albeit only partially addressing its concerns. Consequently, this Initiative did not lead to any direct legislative proposals or policy changes. Moreover, the actual outcomes differed from the intended impacts as the objective was not adopted and the Commission only organised a scientific conference to discuss only part of the Initiative's aim.

The objectives of the 'Save Cruelty Free Cosmetics' Initiative encompassed three proposed legislative changes. Objective 1 aimed to safeguard and reinforce the ban on cosmetics animal testing, but the Commission refrained from proposing changes due to ongoing scrutiny by the General Court of two relevant Regulations (European Commission, 2023). The General Court's review was published on November 22, 2023. In response, the Commission indicated its intention to carefully consider the Court's judgments for potential future measures, without making further commitments (European Union, n.d.). Objective 3 sought a legislative proposal to create a roadmap for phasing out all animal testing, but the Commission disagreed on the suitability of legislative action to achieve this goal (European Commission, 2023). Instead, it proposed a set of action points to expedite the reduction of animal testing, emphasising collaboration with member states (European Commission, 2023). The sole objective that initiated a legislative proposal was objective 2, aiming to reform EU chemicals legislation. The Commission pledged to develop a roadmap toward chemical safety

assessments devoid of animal testing (European Commission, 2023). However, this roadmap has not directly translated into legislative changes or policies, serving as a foundation for future actions. It will delineate milestones and specific actions necessary for transitioning to an animal-free regulatory system under relevant chemical legislation (European Commission, 2023). In summary, this Initiative did not directly lead to legislative changes or policies, and the actual outcomes often diverged from the intended impacts.

In conclusion, neither the 'Stop Vivisection' nor the 'Save Cruelty Free Cosmetics' Initiatives resulted in direct legislative proposals or policy changes. While the Initiatives aimed to achieve specific objectives, such as repealing Directive 2010/63 and phasing out animal testing, the Commission's responses varied. The Commission provided supportive actions aligned with the Initiatives' goals but did not directly commit to legislative changes. Moreover, the outcomes differed from the intended impacts.

6.3 Conclusion

This subsection discusses the third sub-question, partly based on the analysis of the level of citizen participation provided in the previous chapter. The sub-question deals with the following: *How do the changes to citizen participation affect the level of democratic legitimacy within the EU?* First, the level of democratic legitimacy after the revision of the ECI Regulation will be determined. Lastly, the connection with the level of citizen participation will be made.

The level of democratic legitimacy is determined by how well the variables, like input and output legitimacy, are upheld. Previous sections have shown that input legitimacy has remained consistent since the implementation of the new Regulation, with only a few changes to the criteria. However, the smoking-gun test strongly suggests a decrease in the rejection rate of proposed Initiatives after the revision. Therefore, while the examination of the criterion

does not yield a definitive result, it does suggest that the level of input legitimacy could potentially improve over time. Similarly, there have not been significant changes to output legitimacy following the revision. The analysis revealed disparities between the actual and intended impacts of the Initiatives, underscoring the persistent difficulties in turning citizen-led initiatives into tangible legislative measures. While Initiatives theoretically have the potential to directly influence outcomes, they have not directly resulted in legislative changes or policies.

As discussed in Chapter Five, citizen participation increased following the implementation of the revision. The theoretical framework suggests that this rise in participation could positively influence input and output legitimacy criteria, offering insights into the overall level of democratic legitimacy. However, analysis of the third sub-question reveals that changes in citizen participation do not seem to directly impact democratic legitimacy. While there are indications of increased citizen involvement in EU policy and decision-making processes post-revision, this has not yet resulted in a noticeable enhancement in democratic legitimacy. This may be due to the limited scale of the actions that increased citizen participation. Although there are more observable actions of citizen involvement, these actions are relatively insignificant compared to the criteria of democratic legitimacy. For instance, follow-up meetings and involvement in workshops do not directly lead to legislative changes. Nevertheless, the possibility of an indirect effect of citizen participation on democratic legitimacy cannot be excluded. While most conditions for proposing an Initiative remained unchanged, there were notable additions and clarifications, such as partial registration, which could be linked to the rise in registered Initiatives and fewer rejections. However, as evidenced by the 'Save Cruelty Free Cosmetics' Initiative, which did not result in any direct legislative or policy changes, the extent of citizen participation in the EU decision-making process remains questionable.

Part IV Concluding Remarks

Chapter 7. Summary and Implications

The previous chapters have addressed the results of the sub-questions. This thesis is now prepared to present the concluding remarks and discuss the implications that can be derived from it.

7.1 Summary

This subsection answers the central research question using the answers to the previous sub-questions. The main research question is '*How has the revision to the European Citizens' Initiative Regulation impacted the level of democratic legitimacy of the European Union?*'.

Based on the qualitative analysis, the effect of the revision on citizen participation and democratic legitimacy at the EU level was examined. The findings suggest that while the revision has led to increased citizen participation, the overall impact on democratic legitimacy at the EU level appears to be limited. Despite the rise in citizen engagement, democratic legitimacy has not undergone significant changes, with only a few potentially impactful alterations observed. Nevertheless, the heightened citizen participation resulting from the revision holds promise for enhancing democratic legitimacy in the long term.

This thesis offers new insights by examining the impact of the revised ECI Regulation on levels of citizen participation and democratic legitimacy, shedding light on the influence of citizen-led initiatives on the EU decision-making process. Utilising a multiple case study design, it analyses changes in these factors following the revision. The findings indicate that the citizen-led Initiative has ascended on the 'Ladder of Citizen Participation' post-revision. However, there is no evident improvement in the level of democratic legitimacy. Notably, similarities in democratic legitimacy levels are observed both before and after the revision. Discrepancies still persist between theoretical expectations and practical outcomes, with

actual impacts differing from intended ones. However, there is a mitigated concern regarding high refusal rates, evidenced by a notable decrease within the first three years post-revision.

In conclusion, while the revised ECI Regulation has spurred increased citizen participation within the EU, its direct impact on democratic legitimacy appears to be nuanced. The study underscores the importance of continued research to explore the evolving dynamics of citizen engagement and democratic legitimacy in the EU context.

7.2 Implications

This thesis contributes to the ongoing discourse on EU legitimacy by shedding light on the complex interplay between citizen participation, democratic legitimacy, and institutional reforms. The relationship between the revision and increased citizen participation has been deepened and further established. However, the effect of citizen participation on enhancing democratic legitimacy remains ambiguous. This thesis aimed to evaluate whether the revision would yield different conclusions regarding the ECI's influence on democratic legitimacy within the EU. Although the theoretical potential of the ECI is acknowledged, its practical outcomes continue to lag behind. As described by Hatton (2016), this is similar to the situation before the revision. Therefore, it can be inferred that the ECI's impact remains limited, but the revision represents a significant step toward enhancing its potential. Future developments will reveal whether more substantial measures within the current Regulation will be taken to further enhance citizen participation and whether this increased level of participation will ultimately have a greater impact on democratic legitimacy in the EU. The decision-making institutions appear to be the ones responsible for acting upon the opportunities presented by the revision.

7.2.1 Limitations of the Research

One of the most important threats to this research is researcher bias, as the researcher collects and analyses data to support the hypothesis. The previously obtained knowledge, experiences, and assumptions could influence the gathered data. However, the same researcher analyses the gathered data twice to reduce error. Therefore, the accuracy and consistency of the codes are strengthened. Furthermore, another limitation of this research is the use of only two cases along with the method of a multiple case study. The limited scope hinders the ability to generalise the research findings to other settings and contexts. As stated, there were only three Initiatives that completed the process after the revision. Yet, this limited scope allows the researcher to examine the selected cases' positions within the EU decision-making process and their contribution to legislative proposals.

7.2.2 Recommendations for Further Research

As discussed in the summary section, the results reveal nuances that do not fully align with the existing literature, highlighting opportunities for further research in different settings and contexts. Future research could incorporate various cases in a multiple case study format. Analysing cases from different policy areas may yield different responses from the Commission, allowing for the detection of both similarities and differences. Additionally, further research could investigate the effects on throughput legitimacy, thereby expanding the interpretation of the revision's impact on democratic legitimacy. The effectiveness of decision-making processes could be examined through a study on information accessibility across multiple countries and in-depth interviews with a diverse group of EU citizens.

Moreover, the results suggest that the revision of the Regulation has increased the potential for Initiatives to influence legislative proposals. This finding indicates that Initiatives can impact EU legislation, potentially enhancing the level of democratic legitimacy within the EU. Given this, it would be valuable to repeat the research following the publication of

another review report. A longer investigation period may reveal different practical impacts of the ECI and lead to alternative conclusions.

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Appendices

Appendix I. Analytic framework variable input legitimacy

Legitimacy variable	Criterion	Specified criterion
Input	Equal access	<i>Criterion 1: Equal Access.</i> The same conditions for access in different Member States.
	Representative demands	<i>Criterion 2: Qualifiers.</i> Relating to EU law, while not being too prohibitive <i>Criterion 3: Signature quorum.</i> Ensuring broad active support <i>Criterion 4: Interest groups.</i> Preventing interest group capture
Throughput	Horizontal and vertical accountability	<i>Criterion 5: Accountability.</i> Presence of a forum with a) exchange of information, b) debate, and c) possible sanctions by both citizens and other EU institutions, relating to 1) decision on official registration by the Commission, and 2) final Commission decision.
	Transparency	<i>Criterion 6: Transparency.</i> Information about 1) official registration and collection process and, 2) decisions by the Commission should be publicly available
	Legality of the throughput process	<i>Criterion 7: Legality.</i> Does the Commission meet its own procedural requirements concerning 1) official registration process, and 2) final Commission decision making

Source (De Waele & Mastenbroek, 2018)

Appendix II. Analytic framework variable output legitimacy

Legitimacy variable	Criteria	Specified criteria
Output (Impact)	Direct impact	Observable change to the EU’s decision-making process
	Indirect impact	Triggering consequences outside of the ECI process through the theory that participation breeds participation
	Actual impact	Evaluate whether the impacts that the ECI can have, or is having, if any, are the impacts that it was designed to have

Note. Adapted from *Democratic Legitimacy and the European Citizens’ Initiative: A recipe for disappointment and disaffection?* By Hatton, 2016.

Appendix III. Operationalisation table

Theoretical concepts	Variables	Measurement	Data collection
European Citizens Initiative Regulation	The revision of the ECI Regulation	What are the legal revisions that have been made to Regulation (EU) No 211/2011?	ECI Regulation (EU) No 211/2011 & ECI Regulation (EU) 2019/788
		(To what extent...)	
Citizen participation	Citizen control	Are EU citizens enabled to make final decisions in the decision-making process?	Official response documents & ECI Regulation (EU) 2019/788 & ECI website
	Delegated power	Are EU citizens enabled to make decisions together with the decision-makers?	Official response documents & ECI Regulation (EU) 2019/788 & ECI website
	Partnership	Can EU citizens negotiate and engage in trade-offs with decision-makers?	Official response documents & ECI Regulation (EU) 2019/788 & ECI website
	Placation	Do decision-makers allow EU citizens to give advice, but retain to be the only one who ultimately decides?	Official response documents & ECI Regulation (EU) 2019/788 & ECI website
	Consultation	Do decision-makers only gather information from EU citizens?	Official response documents & ECI Regulation (EU) 2019/788 & ECI website
	Informing	Do decision-makers only provide factual information to EU citizens?	Official response documents & ECI Regulation (EU) 2019/788 & ECI website
	Non-participation	Do the decision-makers only explain to EU citizens what they are doing and is there no form of citizen participation?	Official response documents & ECI Regulation (EU) 2019/788 & ECI website
The level of democratic legitimacy of the EU	Input	Do all EU citizens have equal access to participate?	ECI Regulation (EU) No 211/2011 & ECI Regulation (EU)

		<p>What is being done to prevent unrepresentative demands from being put on the agenda?</p>	<p>2019/788 & the ECI website</p> <p>Response documents from the Commission to rejected Initiatives</p>
	Output	<p>Can the ECI have a direct impact?</p> <ul style="list-style-type: none"> ➤ Did any of the Initiative's result in legislative policy? <p>Are the actual impacts the same as the intended impacts?</p> <ul style="list-style-type: none"> ➤ To what extent did the Commission adopt the Initiative's aims? 	<p>Official response document(s) from the European Commission & ECI website</p> <p>Official response document(s) from the European Commission & Initiatives proposal(s)</p>

Appendix IV. Coding scheme for content analysis

Codes	Categories	Description	Decision Rules
Support	Research, Funding, Cooperation	This code includes all mentioned actions of support from the Commission	If the text refers to actions of support by the Commission
Investigation	Assessment, Examine, Monitor, Analyse, Development	This code includes all mentioned actions in the preliminary stage by the Commission	The text mentions a preparatory action by the Commission
Execution	Conference, Workshop, Implementation	This code includes all mentioned actions in the execution stage by the Commission	If the text refers to an action that is being implemented

Appendix V. Data extraction tables of the second sub-question

Table 2a. Data extraction results

Response document or webpage	Support	Investigation	Execution
<i>Communication from the Commission on the ECI Stop vivisection</i>	Present (2/3)	Present (5/5)	Present (2/4)
<i>Webpage Stop vivisection</i>	Present (1/3)	Present (3/5)	Present (3/4)
<i>Communication from the Commission on the ECI Save Cruelty Free Cosmetics</i>	Present (3/3)	Present (3/5)	Present (3/4)
<i>Webpage Save Cruelty Free Cosmetics</i>	Present (2/3)	Present (3/5)	Present (3/4)

Table 2b. Data extracted from keywords code support

Response document or webpage	Research	Funding	Cooperation
<i>Communication from the Commission on the ECI Stop vivisection</i>	Present	-	Present
<i>Webpage Stop vivisection</i>	Present	-	-
<i>Communication from the Commission on the ECI Save Cruelty Free Cosmetics</i>	Present	Present	Present
<i>Webpage Save Cruelty Free Cosmetics</i>	Present	Present	-

Table 2c. Data extracted from keywords code investigation

Response document or webpage	Assessment	Examine	Monitor	Analyse	Development
<i>Communication from the Commission on</i>	Present	Present	Present	Present	Present

<i>the ECI Stop vivisection</i>					
<i>Webpage Stop vivisection</i>	Present	-	Present	-	Present
<i>Communication from the Commission on the ECI Save Cruelty Free Cosmetics</i>	Present	-	-	Present	Present
<i>Webpage Save Cruelty Free Cosmetics</i>	Present	-	-	-	Present

Table 2d. Data extracted from keywords code execution

Response document or webpage	Conference	Workshop	Implementation	Adopted
<i>Communication from the Commission on the ECI Stop vivisection</i>	Present	-	Present	-
<i>Webpage Stop vivisection</i>	Present	-	Present	Present
<i>Communication from the Commission on the ECI Save Cruelty Free Cosmetics</i>	Present	Present	Present	-
<i>Webpage Save Cruelty Free Cosmetics</i>	Present	Present	Present	-

Appendix VI. Data extraction tables of the third sub-question

Table 3a. Different types of reasoning from the Commission

Number	Reasoning
1	The proposed citizens' initiative does not invite the Commission to submit a proposal for a legal act of the Union.
2	Regulation (EU) 2019/788 does not allow citizens' initiatives to ask the Commission to propose changes to the Treaties.
3	There is no legal basis in the Treaties.
4	Policy areas remain the exclusive responsibility of the Member States.

Table 3b. Data extraction results

Number of reasoning	Amount of times mentioned before revision	Amount of times mentioned after revision
1	1	-
2	5	1
3	11	-
4	4	-

Table 3c. Data extraction before revision

Initiative	Year of rejection	Reasoning Commission
Fortalecimiento de la participación ciudadana en la toma de decisiones sobre la soberanía colectiva	2012	3
Recommend singing the European Anthem in Esperanto	2012	3
My voice against nuclear power	2012	2
Abolición en Europa de la tauromaquia y la utilización de toros en fiestas de crueldad y tortura por diversión.	2012	4
ONE MILLION SIGNATURES FOR "A EUROPE OF SOLIDARITY"	2012	-*

Création d'une Banque publique européenne axée sur le développement social, écologique et solidaire	2012	2
Unconditional Basic Income	2012	4
Enforcing selfdetermination Human Right in the EU	2013	2
Ensemble pour une Europe sans prostitution légalisée	2013	3
Stop cruelty for animals	2013	3
To hold an immediate EU Referendum on public confidence in European Government's (EG) competence.	2013	3
Right to Lifelong Care: Leading a life of dignity and independence is a fundamental right!	2013	3
Our concern for insufficient help to pet and stray animals in the European Union	2013	4
The Supreme Legislative & Executive Power in the EU must be the EU Referendum as an expression of direct democracy.	2014	2
A new EU legal norm, self-abolition of the European Parliament and its structures, must be immediately adopted.	2014	2
Ethics for Animals and Kids	2014	3
Vite l'Europe sociale ! Pour un nouveau critère européen contre la pauvreté	2014	4
Stop Brexit	2017	3
British friends-stay with us in EU	2018	3

EU-wide referendum whether the European Citizens want the United Kingdom to remain or to leave!	2018	3
Stopping trade with Israeli settlements operating in the Occupied Palestinian Territory	2019	3
DERECHO DE LA UNIÓN, DERECHOS DE LAS MINORÍAS Y DEMOCRATIZACIÓN DE LAS INSTITUCIONES ESPAÑOLAS	2019	1

*Reasoning not determined due to translation issues

Table 3d. Data extraction after revision

Initiative	Year of rejection	Reasoning Commission
INICIATIVA EVE PARA LA CREACION DEL DERECHO DE DECISION	2021	2