



European Economic and Social Committee

**Subcommittee SC/049
The European citizens' initiative**

OPINION

European Economic and Social Committee

**Proposal for a Regulation of the European Parliament and of the Council on the European
citizens' initiative**

[COM(2017) 0482 final – 2017/0220 (COD)]

Rapporteur: **Kinga JOÓ**

Consultation	European Commission, 13/9/2017 – European Parliament, 2/10/2017 – Council, 11/10/2017
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Subcommittee responsible	Subcommittee SC/049 on the European citizens' initiative
Adopted in sub-committee	7/2/2018
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Outcome of vote (for/against/abstentions)	201/0/5

1. Conclusions and recommendations

- 1.1 Six years after Regulation 211/2011 on the citizens' initiative¹ entered into force, the European Economic and Social Committee (EESC) would like to highlight that EU citizens are at the heart of the European venture and that the European citizens' initiative (ECI) mechanism could help overcome the democratic deficit by promoting active citizenship and participatory democracy.
- 1.2 The 2016 EESC own-initiative opinion² highlighted significant technical, legal and bureaucratic problems with the design of the ECI, along with a clear excess of powers allocated to the Commission. This has limited the scope of the public debate that the ECI could generate and has led to limited legal follow-up for successful initiatives.
- 1.3 The EESC considers the current revision of the European citizens' initiative Regulation 211/2011 to be an important step towards the ECI reaching its full potential, in line with the views already voiced by the European Parliament, the Committee of the Regions and the European Ombudsman.
- 1.4 **The EESC welcomes the following improvements contained in the new proposal by the European Commission for a Regulation on the European citizens' initiative, namely to the effect that:**
 - 1.4.1 the group of organisers be allowed to begin collecting statements of support on the date of their choice;
 - 1.4.2 legal recognition be granted to citizens' committees so as to limit the criminal liability of organisers for fraud and serious negligence;
 - 1.4.3 an online collaborative platform be set up where EU citizens can obtain information and advice about the ECI, on the understanding that this will support ECI organisers through the process of registering initiatives and collecting support. The EESC would like to be involved in the online collaborative platform and be informed of its developments. The EESC considers it important that the users of the platform are well informed about the ECI-related services that the EESC offers to ECI organisers;
 - 1.4.4 the Commission recognise the need for the translation service offered since 2015 by the EESC to all ECI organisers, and that the Commission provide the translation of the ECI content into all of the official languages of the EU upon registration of an ECI;
 - 1.4.5 Member States be requested to simplify, reduce and harmonise the system of national standards laid down for the collection and verification of data; and that the right to support an ECI be based on nationality, which should ensure that no EU citizens are excluded from the ECI;

¹ Official Journal of the European Union, [OJ L 65, 11.3.2011](#).

² Official Journal of the European Union, [OJ C 389, 21.10.2016](#).

- 1.4.6 each Member State actively promote the ECI, and establish contact points to provide information and assistance to ECI organisers on technical and campaigning issues related to the ECI;
- 1.4.7 the free OCS system³ be offered by the European Commission on a permanent basis in order to simplify the collection and cataloguing of statements of support, as well as the checking of these statements by national authorities. The Committee also welcomes the fact that this tool is to be made available to people with disabilities;
- 1.4.8 the Commission be committed to raising public awareness about the existence of the ECI.
- 1.5 The EESC submits the following comments and recommendations, in relation to the new proposal:**
- 1.5.1 The roles of institutional mentor and decision-maker at registration, both of which are currently performed by the Commission, should be separated. The EESC reiterates that it is willing to continue to support initiatives and would be a natural candidate for the role of facilitator and institutional mentor.
- 1.5.2 Following the EESC's example of inviting ECI organisers to various debates in its ECI Group, sections and plenary sessions⁴, ECI organisers should have more dialogue opportunities during and after their campaign, and dialogue with successful ECIs should not necessarily end with the Commission's formal response.
- 1.5.3 The EESC also considers it important to build on its annual conference, the ECI Day, as a place for dialogue, to put more emphasis on the exchange of best practices between the organisers and to create more networking opportunities for ongoing and successful organisers.
- 1.5.4 Successful initiatives should have appropriate follow-up. With this goal in mind, the EESC would hope to see all the EU institutions equally involved in creating opportunities for the organisers to present and debate their initiatives, in line with the EESC's example of inviting ECI organisers to various debates. The EESC sees it as particularly important that the successful initiatives be debated in the plenary sessions of the European Parliament to increase the political dimension of the European debate on ECI-related issues.
- 1.5.5 In view of its recommendation to guarantee a balanced division of competences between the EU institutions as regards the ECI⁵, the EESC supports the position expressed by civil society⁶ that the European Parliament should continue to be the sole organiser of the public hearing for

³ OCS is the abbreviation for online collection software, which is a tool provided free of charge by the European Commission for collecting signatures online. This tool simplifies both the collection of data and the checking of those data by the national authorities. OCS complies with Regulation (EU) No 211/2011 of the European Parliament and of the Council and with Implementing Regulation (EU) No 1179/2011 of the Commission: <https://joinup.ec.europa.eu/software/ocs/description>.

⁴ EESC Bureau decision of 14.10.2014 on the internal criteria for inviting the organisers to plenary sessions and section meetings.

⁵ Point 1.4.5 of the opinion of the European Economic and Social Committee on the European Citizens' Initiative (review) (own-initiative opinion) from 13 July 2016.

⁶ The EESC held a public hearing on the new ECI proposal with civil society organisations on 12.12.2017.

successful initiatives, with the Commission represented at an appropriate level. Public hearings at the European Parliament constitute a crucial event for organisers of successful ECIs to express their objectives, and to engage with MEPs, who are the representatives of the wider body of EU citizens.

- 1.5.6 The Commission should give detailed and clear reasons for all its decisions to refuse registration of an initiative, be it a partial or complete refusal.
- 1.5.7 The EESC welcomes the Commission's proposal to allow for registration of part of an ECI proposal. However, a single registration decision should be maintained.
- 1.5.8 Given the importance of the ECI for EU democracy, its recent introduction, and considering that the time that will be needed to implement the changes resulting from the current legislative review will be significant, the time period for review of the ECI should remain at three years.
- 1.5.9 The EESC welcomes the recognition by the European Commission of the value of and continued need for the translation service provided by the EESC since 2015. The Commission's future provision of translation services should also include the translation of the annexes to an ECI proposal. This is important to facilitate fuller public understanding of the initiative proposals⁷.
- 1.5.10 The EESC recognises the value of, and the need for, further debate to decide whether to lower the minimum age for supporting an ECI.

2. **General comments**

- 2.1 The European citizens' initiative is an innovative instrument introduced by the Treaty of Lisbon, and an important part of the current and future development of transnational participatory democracy in the EU⁸. The ECI is a right that stems from citizens' right to participate in the democratic life of the Union. The ECI should facilitate the active involvement of every citizen in the EU agenda-setting and decision-making process, by developing public debate across the EU, and by giving citizens the opportunity to directly call on the Commission to propose a legal act of the Union.
- 2.2 The rules and procedures that govern the ECI are set out in an EU regulation adopted on 16 February 2011 and have been in force since 1 April 2012⁹. The European Commission proposed a new Regulation on 13 September 2017 as part of the package accompanying the State of the Union.

⁷ For discussion of the importance of annexes see paragraphs 47-58 in *Izsák and Dabis v. Commission* Case T-529/13.

⁸ Article 11(4) of the Treaty on the European Union (TEU), and Article 24(1) of the Treaty on the Functioning of the European Union (TFEU).

⁹ Regulation (EU) No 211/2011 of the European Parliament and of the Council of 16.2.2011 on the citizens' initiative, Official Journal of the European Union, [OJ L 65, 11.3.2011](#).

- 2.3 Under the current regulation, an ECI can be organised or signed by all EU citizens who have reached the legal age to vote in European Parliamentary elections¹⁰. Initiatives are arranged by a citizens' committee. Organisations may promote or support these initiatives, provided they do so with full transparency.
- 2.4 The ECI procedure involves three steps:
- 2.5 The initial phase involves setting up a citizens' committee¹¹, registering the initiative¹² subject to an eligibility assessment by the Commission¹³ and certifying the system for the online collection of signatures¹⁴.
- 2.5.1 During the collection phase, a minimum of 1 million "statements of support" (signatures) must be collected over a maximum period of twelve months and from at least seven EU countries¹⁵. The signatures are certified by the competent national authorities¹⁶ and a successful ECI is then submitted to the Commission.
- 2.6 After submission, the successful initiative is examined by the Commission, prior to a meeting with the organisers. There is a public hearing at the European Parliament. The Commission has three months in which to decide to what extent to adopt the legislative proposal in the initiative, if at all, and to respond with a communication.
- 2.7 To date, more than 8 million EU citizens have signed an ECI. Although 69 initiatives have been submitted, only 48 have been registered by the Commission, of which four have collected at least 1 million signatures¹⁷. There have been some limited responses to successful initiatives; only one successful initiative has led to a commitment from the Commission to put forward a new legislative proposal¹⁸.

¹⁰ The legal voting age is 18 years in all Member States except Austria, where it is 16.

¹¹ A citizens' committee must be composed of at least seven EU citizens, residing in seven different EU Member States.

¹² The initiative must be described in no more than 800 characters (100 for the title, 200 for the description and 500 for details of the objectives).

¹³ Article 4(2) of Regulation (EU) No 211/2011. Most important is Article 4(2)(b), which requires that a proposed ECI does not manifestly fall outside the framework of the Commission's powers to submit a proposal for a legal act of the Union for the purpose of implementing the Treaties. For an assessment of Commission registration decisions see James Organ, "Decommissioning direct democracy? A critical analysis of Commission decision-making on the legal admissibility of European Citizens Initiative proposals", 10 EuConst (2014), 422–443.

¹⁴ Article 6 of Regulation (EU) No 211/2011. The regulation stipulates that this process is the responsibility of the competent authorities of each Member State in which statements of support are collected.

¹⁵ The regulation stipulates that a minimum number of signatures must be collected per country, commensurate with the number of inhabitants: <http://ec.europa.eu/citizens-initiative/public/signatories?!g=en>.

¹⁶ Article 15 of Regulation (EU) No 211/2011.

¹⁷ The following proposals have been successful: *Water and sanitation are a human right! Water is a public good, not a commodity!; Stop vivisection; One of us; and Ban glyphosate and protect people and the environment from toxic pesticides*: <http://ec.europa.eu/citizens-initiative/public/initiatives/successful>.

¹⁸ Communication from the Commission on the European Citizens' Initiative *Ban glyphosate and protect people and the environment from toxic pesticides*, C(2017) 8414 final. On 1 February 2018, the Commission also adopted a [proposal for the revision of the Drinking Water Directive](#), which is in part a reaction to the [Right2Water](#) ECI.

- 2.8 It is now widely accepted by the EU institutions, organisers and representatives of organised civil society that, despite some positive technical changes, the ECI instrument is still far from reaching its full democratic potential. The Commission announced at the 2017 ECI Day¹⁹ that it would carry out a full legislative review. This is an important opportunity to strengthen EU public debate, and the agenda-setting and decision-making capability of the public to influence EU policy through the ECI. There is also a general agreement that the ECI has the potential to bring EU citizens together for the causes that unite them, and to strengthen the sense of European identity.
- 2.9 ECI organisers have highlighted that there is also value in the ECI process itself in terms of developing networks for common causes, which complements the objective of collecting 1 million signatures.
3. **Institutional response to the ECI**
- 3.1 The EESC has raised the profile of the ECI at its annual ECI Day²⁰ and set up an ECI helpdesk²¹ that has provided initiative organisers with, inter alia, translations of ECI descriptions (delivered within 3 working days of the request), printed and online publications on the ECI and various opportunities for presenting the ECIs at meetings of the EESC's ECI ad hoc Group, sections and plenary sessions²².
- 3.2 The EESC adopted its own-initiative opinion on 13 July 2016²³, in which it recommended making the ECI more efficient, visible and citizen-friendly.
- 3.3 The conclusions of a European Parliament study²⁴ were taken up in October 2015 in a resolution²⁵ in which the Parliament formally requested a review of the ECI regulation and made strong recommendations for change to the Commission. The European Parliament also produced a draft own-initiative report in 2017²⁶ proposing changes to the ECI regulation.

19 ECI Day is an annual conference organised by the EESC. [ECI Day 2017](#) partners were the European Committee of the Regions, The ECI Campaign, European Citizens' Action Service, University of Liverpool, School of Law and Social Justice, Democracy International, Initiative and Referendum Institute Europe and People2power. The ECI revision was announced by the First Vice-President Frans Timmermans in the opening session.

20 The first edition of the ECI Day took place on 30.3.2012, one day before the ECI Regulation entered into force. Since then the EESC has organised six editions which happen every year in April. The seventh, 2018, edition will take place on 10 April.

21 For more details, please refer to the EESC publication: "[ECI Helpdesk at the European Economic and Social Committee](#)".

22 Cf. ft 4.

23 EESC own-initiative opinion on the *European citizens' initiative (review)*, Official Journal of the European Union, OJ [C 389, 21.10.2016](#), p.35.

24 European Parliamentary Research Service, "[Implementation of the European Citizens' Initiative. The experience of the first three years](#)", 2015.

25 European Parliament resolution of 28.10.2015 on the European citizens' initiative (2014/2257(INI). Rapporteur: György Schöpflin: <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+TA+P8-TA-2015-0382+0+DOC+XML+V0//EN>.

26 Draft report – Revision of Regulation (EU) 211/2011 on the citizens' initiative, 11.9.2017: <http://www.europarl.europa.eu/committees/en/afco/draft-reports.html?ufolderComCode=AFCO&ufolderLegId=8&ufolderId=09289&linkedDocument=true&urefProcYear=&urefProcNum=&urefProcCode=>.

- 3.4 In March 2015, following an own-initiative inquiry, the European Ombudsman drew up 11 guidelines for further improvements to the ECI²⁷ and in July 2017 she sent an open letter to the Commission reinforcing this²⁸.
- 3.5 In October 2015, the Committee of the Regions adopted an opinion in favour of a rapid and substantial revision of the regulation²⁹, and will vote on a further opinion in its plenary session in March 2018.
- 3.6 The Commission published a progress report in April 2015, and a response to the European Parliament proposals in February 2016, which acknowledged the difficulties encountered by citizens who organise and support ECIs.
- 3.7 ECI organisers have challenged a number of Commission ECI registration decisions in the Court of Justice³⁰ and through complaints to the European Ombudsman³¹. Decisions in these cases have added to the pressure to change the ECI Regulation, especially in relation to the partial registration of an ECI and the Commission's duty to explain its decision.

4. The EESC role and the European citizens' initiative

- 4.1 The EESC, as the bridge between the European institutions and organised civil society, has been involved since the beginning of the debate on the ECI. This is demonstrated by the opinions adopted to date³², by the support provided for the ECI, and by the establishment of an ad hoc group for monitoring the development and implementation of this right to participate in the democratic life of the Union³³.
- 4.2 The EESC will continue to be actively involved in the multi-institutional engagement in the ECI process, with a dual role of facilitator and institutional mentor. EESC initiatives and competences include:

²⁷ Case: OI/9/2013/TN opened on 18.12.2013 and decision on 4.3.2015:
<http://www.ombudsman.europa.eu/en/cases/decision.faces/it/59205/html.bookmark>.

²⁸ Case: SI/6/2017/KR; letter dated 11.7.2017:
<https://www.ombudsman.europa.eu/cases/correspondence.faces/en/81311/html.bookmark>.

²⁹ Committee of the Regions, Opinion on the *European Citizens' Initiative*, Official Journal of the European Union, [OJ C 423, 17.12.2015, p. 1](#).

³⁰ In particular the successful challenges in the judgements of the Court dated 3.2.2017 in Case T-646/13 (Minority SafePack); dated 10.5.2017 in Case T-754/14 (Stop TTIP); and dated 12.9.2017 in Case C-589/15 P (One million signatures for a Europe of solidarity).

³¹ Decisions in Case 1086/2017/PMC dated 4.10.2017 (Mum, Dad & Kids); in Case 1609/2016/JAS dated 18.4.2017 (Stop Vivisection); and complaints 402/2014/PMC (confidential) dated 3.3.2015 and 2071/2013/EIS dated 12.12.2014 (Stop Vivisection).

³² EESC opinion on *The implementation of the Lisbon Treaty: participatory democracy and the citizens' initiative (Article 11)*, Official Journal of the European Union, [OJ C 354, 28.12.2010, p. 59](#).

EESC opinion on the *Citizen's initiative*, Official Journal of the European Union, [OJ C 44, 11.2.2011, p. 182](#).

EESC own-initiative opinion on the *European citizens' initiative (review)*, Official Journal of the European Union, [OJ C 389, 21.10.2016](#).

³³ The EESC's ad hoc group on the ECI was set up in October 2013 to provide political guidance on the ECI and monitor developments in this area.

- 4.2.1 the "ECI Day", organised by the EESC every year to raise the profile of the ECI, has played an important role in keeping the ECI high on the EU's institutional agenda. The ECI Day is already an important opportunity for dialogue between ECI organisers, EU institutions, and other stakeholders; to assess the state of implementation and the effectiveness of the ECI; and to exchange best practice and facilitate networking among organisers and other stakeholders; and to be a platform of dialogue for the successful ECIs. The EESC will continue to build on the success of the ECI Day and will broaden the scope and role of the conference, for example by a regular review of the follow up by the Commission in response to successful ECIs. The ECI Day is organised by the ad hoc group in cooperation with relevant strategic partners;
- 4.2.2 drawing up a practical guide – now in its third edition – to raise awareness and promote the ECI³⁴. The ECI also takes centre stage in another Committee publication, the European Passport to Active Citizenship³⁵ (available in print and in an HTML version³⁶), which aims to inform EU citizens of their rights and to promote transnational participatory democracy;
- 4.2.3 inviting ECI organisers with initiatives falling within the scope of the Committee's policy areas to present their initiatives at the EESC³⁷. These opportunities allow the EESC to provide ECI organisers with a platform to engage with representatives from civil society and social partners, and to raise the profile of the ECI as a democratic tool, whilst maintaining a neutral position regarding the specific policy issue concerned;
- 4.2.4 always providing an own-initiative opinion on the subject matter of a successful ECI, where it falls within the scope of the EESC's work;
- 4.2.5 EESC representatives should participate in every European Parliament public hearing for successful initiatives, thus contributing to the inter-institutional analysis process of how to respond to a successful ECI. The EESC should be invited to the public hearing by default³⁸. The opinion of the EESC will be based on discussions in the EESC plenary session, to which the organisers are invited.
- 4.2.6 The EESC welcomes the online collaborative platform, and would like to be involved in and informed of its developments. The EESC also believes that it is important for users of the platform to be well informed about the ECI-related services that the EESC offers to ECI organisers.
- 4.2.7 The EESC shall continue to campaign for a stronger and more efficient ECI, and to raise awareness on a national and local level, such as through its own "Going Local" initiatives.

34 <http://www.eesc.europa.eu/resources/docs/qe-04-15-566-en-n.pdf>.

35 <http://www.eesc.europa.eu/resources/docs/qe-04-15-149-en-n.pdf>.

36 <http://www.eesc.europa.eu/eptac/en>.

37 Cf ft 4.

38 On 2.2.2014 the then EESC President Henri Malosse sent the then President of the European Parliament Martin Schulz an official letter in which he expressed the EESC's interest in being invited on a regular basis to the public hearings on the successful ECIs.

5. Comments about regulation changes

- 5.1 The ECI was supposed to be clear, simple and user-friendly. However, many ECI organisers, representatives of civil society organisations³⁹, academic commentators⁴⁰ and institutional actors have reported significant technical and legal issues relating to the ECI. The EESC welcomes the proposal from the Commission to reform the regulation in order to tackle the more complex institutional, legal and organisational issues, and to promote dialogue between citizens and the institutions. This, in turn, will enhance the EU-wide debates that the ECI process facilitates, regardless of whether an ECI reaches one million signatures or not.
- 5.2 The EESC strongly reiterates its support for the European citizens' initiative. The EESC considers that proper and complete implementation of the ECI could help bridge the gap between EU citizens and EU institutions and significantly improve public involvement in the democratic life of the Union. It is also an important step in the wider development of participatory democracy in the EU.
- 5.3 The EESC recognises the strong inter-institutional support for the ECI and welcomes the proposals for change from the European Parliament, the Committee of the Regions and the European Ombudsman. Each institution has an important role to play during and after ECI campaigns in order to provide assistance and opportunities for dialogue between the institutions and the organisers.
- 5.4 The EESC recommends that each Member State establish contact points to provide information and assistance to ECI organisers on technical, as well as campaigning, issues related to the ECI and actively promote the ECI on the national and local level;
- 5.5 The EESC would suggest the following proposals for reforming the regulation with a view to making the ECI mechanism simpler and more effective:
- 5.5.1 The Commission's roles of institutional mentor⁴¹ to ECI organisers and of decision-maker at registration should be separated. This is crucial for resolving a potential conflict of interest in the Commission and for enabling the ECI mechanism to be implemented fully and effectively. The EESC would be a natural candidate for the role of institutional mentor.
- 5.5.2 There should be more dialogue opportunities with ECI organisers, during and after the campaign to raise the political profile of the topics of ECI campaigns. With this goal in mind, the EESC would hope to see all the EU institutions equally involved in creating opportunities for the organisers to present and debate their initiatives, following the EESC's example of

³⁹ C. Berg, J. Tomson, *An ECI that works! Learning from the first two years of the European Citizens' Initiative*, 2014: <http://ecithatworks.org/>.

⁴⁰ Recent articles include: Organ, "EU Citizen Participation, openness and the European Citizens Initiative: the TTIP legacy", 54 CMLRev 1713–1748 (2017); Karatzia, "The European Citizens Initiative and the EU institutional balance: On realism and the possibilities of affecting EU lawmaking", 54 CML Rev. (2017), 177–208; and Vogiatzis, "Between discretion and control: Reflections on the institutional position of the Commission within the European citizens' initiative process", European Law Journal; 2017; 23; 250-271.

⁴¹ Cf. pp. 1.2 and 4.3.2 of the EESC opinion on the *Citizen's initiative*, Official Journal of the European Union, [OJ C 44, 11.2.2011, p. 182](#).

inviting ECI organisers to various debates in its ECI Group, sections and plenary sessions. The European Parliament plenary hearing is central to these dialogue opportunities.

- 5.5.3 Appropriate follow-up for successful initiatives must be guaranteed. With due respect for the Commission's right of initiative, the EESC would ask the Commission to expect to prepare a legislative proposal within 12 months of the end of the campaign, or to provide full justification for a decision not to present a proposal.
- 5.5.4 In addition to hearings held at the European Parliament and the Commission's meeting with the organisers, the Commission should also establish closer ties with ECI organisers. To this end, there should be engagement with organisers in activities that take place in relation to the subject of a successful ECI after the Commission has delivered its initial opinion.
- 5.5.5 In order to ensure the right balance of tasks and competences, the EESC supports the view expressed by civil society at an EESC hearing that the Parliament should continue to be sole organiser of the public hearing on the successful ECI.
- 5.5.6 There should be detailed and clear reasons given for all Commission decisions to refuse registration of an initiative, whether it is a partial or complete refusal.
- 5.5.7 The EESC welcomes the Commission's proposal to allow for partial registration. However, in the interests of adopting clear and straightforward procedures and criteria for ECI registration, a single registration decision should be maintained. The Commission could provide organisers with advice about the legal basis of their proposal in advance of submission and propose possible solutions in order to avoid inadmissibility.
- 5.5.8 The EESC shall follow the discussion on lowering the minimum age for supporting and taking part in an ECI. The EESC is aware that this issue raises a lot of questions, yet at the same time it recognises the need for further discussion.
- 5.5.9 It is important that the time period for review of the ECI remains at three years. This is because of the importance of the ECI for EU democracy, its recent introduction, and because of the time that will be needed to implement the changes resulting from the current legislative review.
- 5.5.10 Procedures for informing citizens and raising awareness about the ECI should be strengthened. This must be done primarily through ad hoc campaigns promoted by the Commission and the Member States. With this goal in mind, the EESC also proposes enabling the group of organisers to inform interested supporters about developments in and achievements of the campaign (provided that the supporters have authorised this contact). The same applies to the Commission, which must publicise the follow-up to successful initiatives more effectively, as well as first informing the group of organisers.
- 5.5.11 The EESC is pleased to see the European Commission recognising the need for the translation service provided since 2015 by the EESC. The provision of translation services should also

include the translation of the annexes to an ECI proposal⁴². This is important to facilitate fuller public understanding of an initiative's proposals.

5.5.12 New methods should be explored for linking up the online collection of signatures with social and digital media in order to reach out to an ever-larger audience.

Brussels, 14 March 2018

Georges Dassis

The president of the European Economic and Social Committee

⁴² For discussion of the importance of annexes see paragraphs 47-58 in Izsák and Dabis v. Commission Case T-529/13.