



Study to support the preparation of an impact assessment on a potential EU policy initiative to support broad and inclusive participation of mobile EU citizens in European Parliament elections and in municipal elections in Europe

Annexes

KANTAR PUBLIC

Kantar Public & Milieu
15th of November 2021



EUROPEAN COMMISSION

Directorate-General for Justice and Consumers
Directorate D — Equality and Union citizenship
Unit D.3 — Union citizenship rights and free movement

E-mail: JUST-CITIZENSHIP-ELECTIONS@ec.europa.eu

*European Commission
B-1049 Brussels*

Study to support the preparation of an impact assessment on a potential EU policy initiative to support broad and inclusive participation of mobile EU citizens in European Parliament elections and in municipal elections in Europe

Annexes

Manuscript completed on 15th of November 2021

DISCLAIMER

This document has been prepared for the European Commission however it reflects the views only of the authors, and the Commission cannot be held responsible for any use of which may be made of the information contained therein.

More information on the European Union is available on the Internet (<http://www.europa.eu>).

Authors:

Kantar Public (lead): Daniela Ulicna, Diego Maldonado, Nicolas Becuwe, Robin Maillard

Milieu: Marta Ballesteros, Linus Sioland

Luxembourg: Publications Office of the European Union, 2021

© European Union, 2021



The reuse policy of European Commission documents is implemented by the Commission Decision 2011/833/EU of 12 December 2011 on the reuse of Commission documents (OJ L 330, 14.12.2011, p. 39). Except otherwise noted, the reuse of this document is authorised under a Creative Commons Attribution 4.0 International (CC-BY 4.0) licence (<https://creativecommons.org/licenses/by/4.0/>). This means that reuse is allowed provided appropriate credit is given and any changes are indicated.

For any use or reproduction of elements that are not owned by the European Union, permission may need to be sought directly from the respective rightholders.

Table of Contents

| | |
|---|------------|
| Annex 1 – Analysis of citizen enquiries..... | 7 |
| Issues related to the registration process | 11 |
| Annex 2 – Indicative effort to implement preferred policy option per Member State | 22 |
| Annex 3 – Summary of Member States’ existing measures (Status Quo) . | 24 |
| Annex 4 – Analysis of targeted survey of mobile European citizens..... | 108 |
| Annex 5 – Summary of EU-level interviews..... | 154 |
| Ability to vote as mobile EU citizens | 156 |
| Common obstacles to voting for mobile EU citizens | 158 |
| Candidacy as a mobile EU citizen | 161 |
| Information provision..... | 168 |
| Easing Administrative Procedures..... | 170 |
| Enhancing the exchange of information between Member States | 171 |
| Exchange of best practice | 172 |
| Improving the opportunities for mobile EU citizens to join political parties and stand as candidates..... | 173 |
| Increasing long-distance voting modalities | 173 |
| Extending the capacity to vote to more intermediate-tier elections | 173 |
| Early voting age and political education | 174 |
| Annex 6 – Summary of expert online community..... | 175 |
| Administrative burden | 176 |
| Double voting in European Parliament elections | 178 |
| Unclear duration and effects of registration | 178 |
| Insufficient communication | 178 |
| Mobile EU citizens are not empowered enough | 179 |
| Lack of comparable data | 180 |
| Other significant problems..... | 180 |
| Influencing Member States to ease registration requirements | 182 |
| Establishing a Recommendation on automatic registration | 182 |
| Exchange of good practices on information provision..... | 183 |
| Social media campaigns targeted at mobile EU citizens..... | 184 |
| Strengthening the legal obligation for Member States to provide information | 184 |
| Set up a multilingual EU-level helpdesk | 185 |
| Influence Member States to ease candidacy requirements | 185 |
| Clearly state that mobile EU citizens should be able to join political parties..... | 186 |
| Address issues related to the exchange of data between Member States..... | 187 |
| Require Member States to avoid the deregistration of mobile EU Citizens from national elections | 187 |
| Encourage host Member States to extend voting to other intermediate elections ... | 188 |
| Implement additional remote voting options for European Parliament elections | 188 |
| Other Suggested Policy Options | 189 |
| Policy option ranking..... | 189 |
| General objective evaluation | 193 |
| Evaluation of voting participation success indicators | 194 |
| Evaluation of candidacy success Indicators | 195 |

| | |
|--|------------|
| Annex 7 – Analysis of the Open Public Consultation..... | 196 |
| Local elections | 197 |
| Status quo and problem analysis | 230 |
| Policy options..... | 231 |
| Annex 8 – Third-country case studies | 233 |
| Australia | 233 |
| Voting rights | 233 |
| Electoral roll | 233 |
| Use of registers in provincial elections | 234 |
| Canada..... | 234 |
| Voting rights | 235 |
| Electoral roll | 235 |
| Use of registers in provincial elections | 236 |
| Summary of findings | 237 |
| Possible good practices or points of discussion | 237 |

Annex 1 – Analysis of citizen enquiries

Overview of entries analysed

This document summarises the citizen enquiries and complaints received by different services of the European Commission and the European Parliament which relate to European citizenship issues, including local or European Parliament elections.

A total of 1120 entries, both complaints and general enquiries, were received overall. Of these, 538 were submitted to Your Europe, 520 to the European Parliament citizen enquiry unit, 15 to Solvit and 47 to DG JUST directly. These services have provided Kantar Public with the full anonymised text of the enquiries (European Commission services) or an excel file summarising and categorising each of the enquiries in the case of European Parliament.

Of all the entries analysed, 823 concerned elections, while the remaining related to other European citizenship issues for which platforms such as Your Europe provide support. When all the entries submitted on the different interfaces are taken into account, queries about elections represent 78%, with the remaining 22% addressing other issues (see Figure 1). Of these, 22% percent constituted a complaint, while 78% of entries were submitted by citizens to enquire about issues concerning elections (see Figure 2).

Percentage of entries related to elections

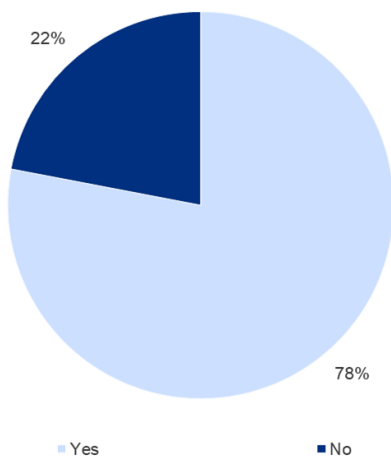


Figure 1 - Share of entries concerning elections¹

Base of 1052 entries

Share of complaints vs enquiries

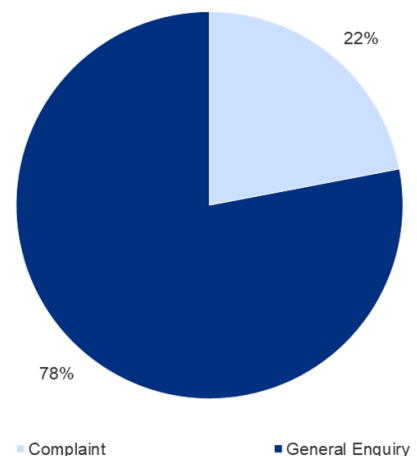


Figure 2 Typology of entries²

Base of 886 entries

¹ Source: Kantar analysis of enquiries received by EU institutions in relation to electoral rights

Most enquiries did not specify the countries of origin (51). Nonetheless, where this was specified, the UK had the highest share of enquiries and complaints with regard to election procedures, both from EU citizens living in the UK (260), and from British citizens living abroad (115). The second most cited country is Germany (219), with 162 queries from EU residents in Germany and a further 57 from German citizens abroad. Italy was involved in a total of 176 enquiries, 95 submitted by Italian citizens living abroad and 81 by EU residents in Italy.

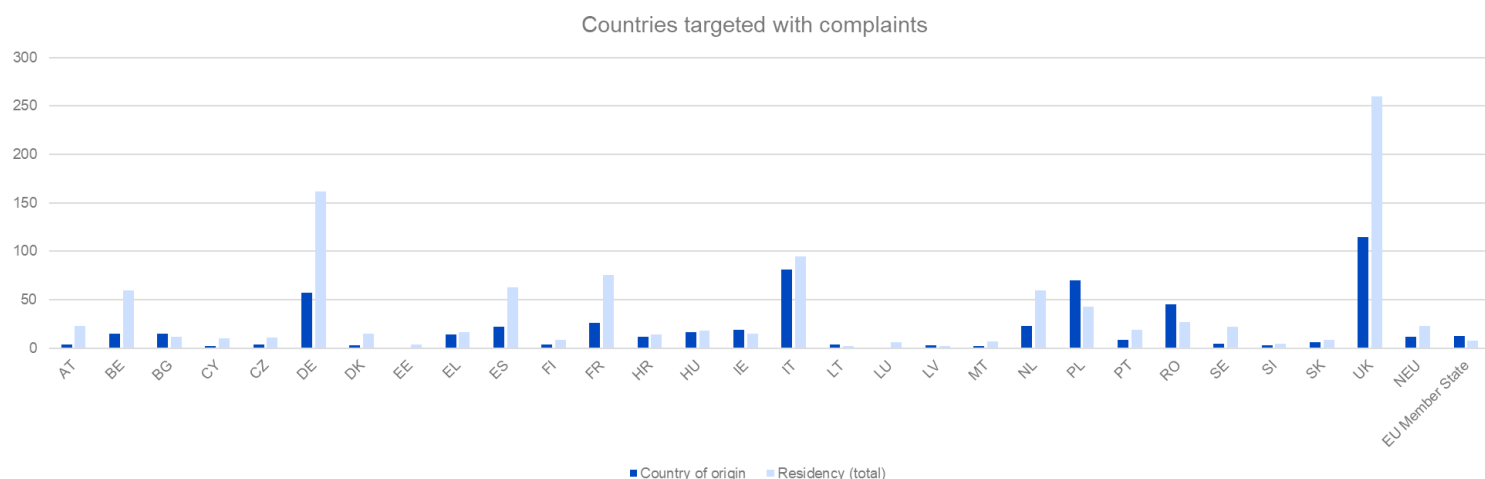


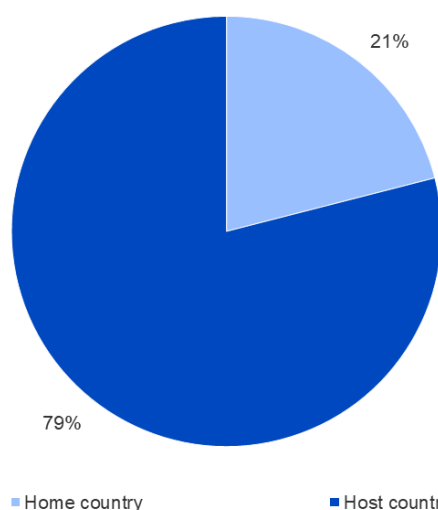
Figure 3 - Countries of respondents making an enquiry (be it country of residence or home country)

Based on the total 1120 complaints³

Country concerned by the enquiries

Citizens' complaints and enquiries mostly concerned election procedures in the country of residence (79%), with the remaining entries relating to the country of origin (21%).

Country concerned by the enquiry



Base of 438 entries⁴

Figure 4 Enquiries about country of origin and residence

³ Source: Kantar analysis of enquiries received by EU institutions in relation to electoral rights

⁴ This information was only analysed based on the entries provided by European Commission services, it was not apparent in the entries provided by the European Parliament

Enquiries made by mobile European citizens

As shown in the chart below, most enquiries came from mobile European citizens. We considered as mobile European citizens those individuals submitting enquiries for whom the country of residence was different from the country of origin. The largest share of mobile European citizens who submitted a complaint or an enquiry were resident in the UK (22%), followed by Germany (17%) and France (8%).

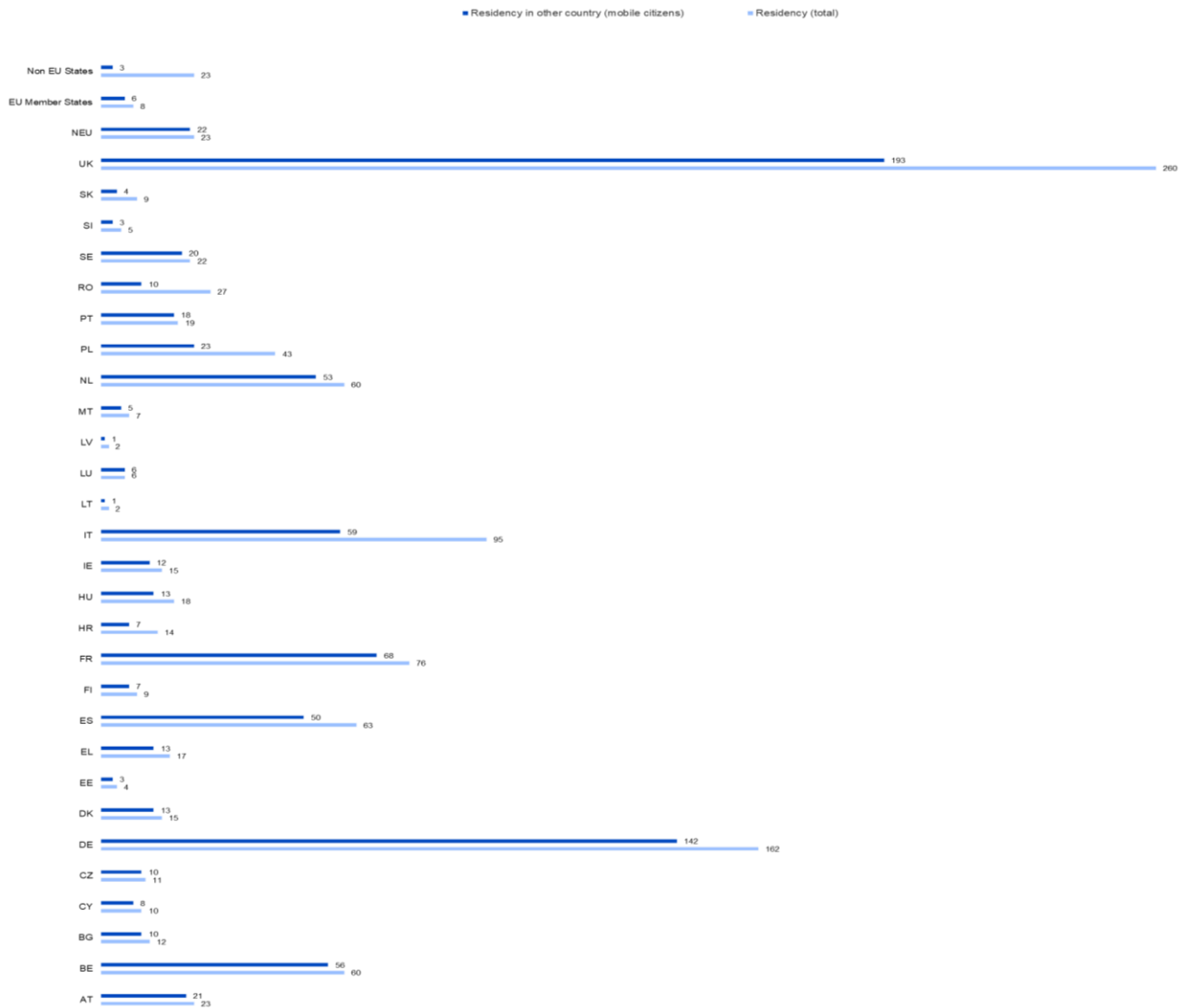


Figure 5 Mobile citizens' enquiries by country - Base of 860

Analysis

To understand and tackle European citizens' concerns and issues encountered vis-à-vis voting procedures at the local, national and European level, the complaints and enquiries are analysed at a general level, looking at the overall data, as well as with a focus on the share of complaints submitted by mobile citizens.

The entries received were analysed according to the level of elections concerned. Most enquiries submitted to the different European Union portals relate to the European Parliament elections (91%), followed by submissions concerning local (7%) and other elections (2%). The last category concerns elections outside the scope of the two directives concerned by this Impact Assessment, such as parliamentary and presidential elections at the national level.

Base of 846 entries

Base of 680 mobile citizen entries

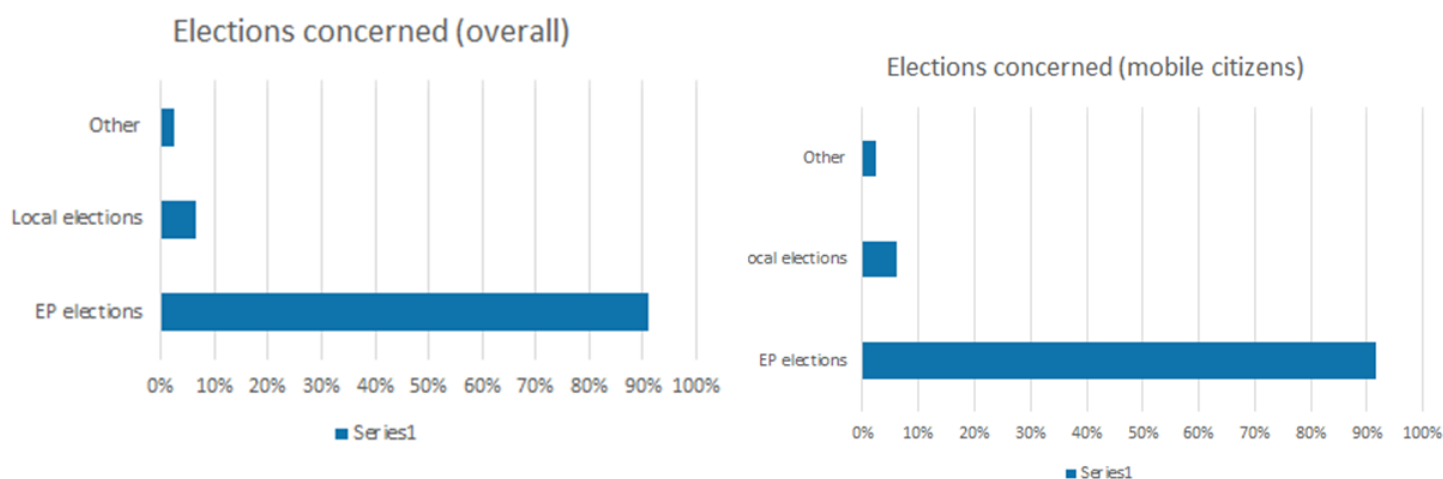


Figure 6 - Types of elections concerned by enquiries

Among these queries, citizens mostly raised issues encountered during the voting process (79%), with a smaller percentage querying candidacy processes (21%). Similarly, mobile citizens' concerns overwhelmingly concerned voting (82%), with candidacy queries constituting 18% of their submissions.

Since most complaints and queries recorded related to the European Parliament elections, it is interesting to observe whether these complaints referred to the host or home country. In most enquiries analysed regarding EP elections, questions covered voting procedures in the host country (79%) rather than the home country (21%).

Enquiries about voting

The complaints and enquiries submitted by European citizens predominantly addressed issues regarding the generic right to vote (39%) and the registration process (constituting 28% of the entries), along with accessibility and voting modalities (7%) and other problems (26%). Among mobile citizens, the dominant issues raised concerned the generic right to vote (40%), the registration process (24%), accessibility and voting modalities (5%) and other issues (30%).

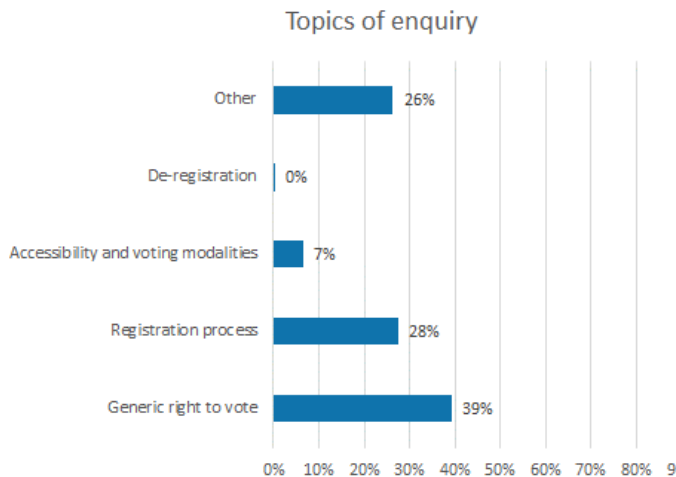


Figure 8 - Topics raised by citizens overall (Base of 727 entries)

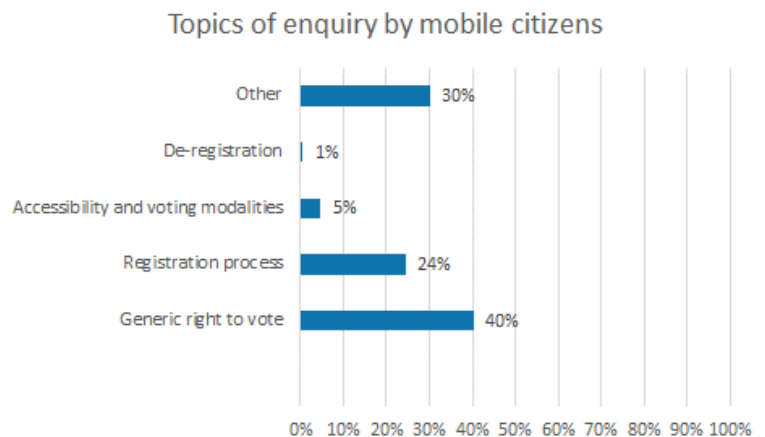


Figure 7 - Topics raised by mobile citizens (Base of 388 entries)

Issues related to the registration process

EP elections

With Brexit looming in the background, many complaints and questions about registration processes and the generic right to vote in the European Parliament elections stemmed from the UK. Both EU citizens residing in the UK and UK citizens residing in other Member States exposed their uncertainties and difficulties in casting their ballots. EU citizens were confronted with processes which prevented them from being able to cast their vote, to the extent that one citizen complained about being subjected to “possible discrimination against EU citizens living in the UK due to substantial differences in the procedures used for voter registration”. Similar complaints alleged that the UK was not following the EU legal basis and rules of subsidiarity, as they felt that Articles 39 and 40 of the European Union Charter of Fundamental Rights, according to which “citizens of the Union have the right to vote and stand as candidates in elections to the European Parliament and in municipal elections in their Member State of residence, under the same conditions as nationals of that State”, were not being respected and their rights not being fulfilled.

Reasons mentioned in the complaints and questions included a lack of organisation by the British authorities which set up too few polling stations, which in turn caused long queues, preventing many voters from casting their ballots. Within the complaints, mentions of “ban on registration”, “lack of transparency” or delays in the registration process by the British authorities which affected their ability to vote on time, meant that difficulties in exercising the right to vote were widespread among mobile citizens. This set off the “#DeniedMyVote” trend as a response.

A French citizen faced difficulties with the UK authorities within the context of the European elections (ban on registration).

The applicant, like many other EU citizens in the UK, was denied a vote in the EU Parliament Elections.

#DeniedMyVote Although registered on the electoral list in York I was refused the right to vote during the 23/05/2019 European Election. I was also misled by York Council to believe that everything was in order for me to vote. See email below sent to The Guardian newspaper and to York Council today.

The postal ballot for voting in the last EP elections did not arrive on time in the UK.

Problem with voting registration system in the UK which made it difficult for citizens of other Member States residing in the UK to cast their votes in the European Parliament elections, as well as possible discrimination against EU citizens living in the UK due to substantial differences in the procedures used for voter registration.

European Elections were poorly planned in the UK.

Lack of organisation at voting stations in the UK meant that the queues were so long most citizens did not get the chance to vote.

Difficulties encountered by EU citizens wishing to register as voters for the European Parliament elections in the United Kingdom. You express concern that such difficulties are liable to result in disenfranchisement on a large scale, as well as in possible discrimination against EU citizens living in the UK due to substantial differences in the procedures used for voter registration.

In another set of entries, citizens revealed problems when registering to vote. Various complaints shed light on episodes where the right to vote was denied.

A Slovakian national was rejected when applying for the certificate of eligibility to vote in the EP elections in Poland, for the reason of not being a Polish national

A Dutch citizen residing in Spain reported that when attempting to register for the European elections, the Spanish authorities told them that they could not do so, leading the citizen to ask whether they could vote via the Netherlands.

Another complaint concerned possibilities for voting for home country lists from abroad. Some complained this was not possible while others asked whether they would only be allowed to vote for host country lists if they register in that country.

A Czech citizen living in Austria asks whether by registering to vote in Austria, they will only be able to vote for Austrian candidates.

Various complaints made by Romanian citizens addressed the problem encountered when registering to vote at Romanian diplomatic and consular missions, specifying that this had occurred in previous elections as well

The question as to whether it is possible to vote for the European Parliament elections from a different country was asked multiple times by citizens of different nationalities.

A frequently reported issue highlights what is perceived as insufficient coordination among EU Member States when a mobile citizen moves to a different Member State and registers as resident. While some countries automatically register mobile citizens on the electoral register, others require separate registration on the electoral register of the host state. This caused many citizens to enquire how it is possible to verify whether or not they are registered to vote in the host country, and even to complain about being unable to vote in the EP elections because they had assumed that when registering in the local community they would automatically be added to the voting register.

A German citizen who is registered in an Austrian commune complains about being unable to vote because they were unaware of the fact that they have to register first for the EP elections.

A Belgian citizen complained that their two sons, who live in the Netherlands, did not receive an invitation to vote in the European elections.

The issue of separate registration is also related to de-registration in the home country. Some citizens enquired whether following registration in the host country, they should declare to their home country that they had registered to vote in a different Member State, to ensure that their removal from the voting register in the home country. This enquiry raises the issue that some countries may record mobile citizens as not having cast their vote in the elections, when in fact they did so from their host country.

Other questions related to the modalities of voting in the European Parliament elections. Some citizens who were abroad at the time of the elections asked whether they could vote from the country in which they found themselves at that time, even though they were registered elsewhere.

Similarly, some mobile citizens who knew they were not going to be in the place of registration at the time of the elections asked how they could cast their ballot from a distance.

Local elections

The enquiries related to local elections included a set of cases where people were denied the right to vote, according to their testimonies.

Some UK citizens residing in Spain complained that when they applied to register to vote in the local elections, the local Town Hall refused to grant them the right to vote on the grounds that citizens needed to present documentation from the local authority in the UK where they were previously resident, despite the fact that they were already registered as resident in Spain.

A Finnish citizen residing in Estonia was told by their friends that they would receive a notification letter for the municipal elections. As the elections approached and the citizen had not received a letter, they turned to the election support portal, which asked for their ID number. The citizen replied saying that they did not have an ID number and that normally it was sufficient to show their passport. Further information never arrived, meaning that the citizen was unable to vote. And when they tried to vote in the municipal elections held shortly after in Finland, they were not able to register there either.

An Italian citizen moved their residence to Cracow, Poland and applied to the competent local authorities to vote in local elections. However, they say that for some unspecified reason they were refused this right.

Issues related to the right to vote in general

EP elections

A common query concerning the right to vote is whether mobile citizens can vote for candidates in their home country at the European Parliament elections, rather than for candidates in their host country.

We kindly would like to inform you that many Hungarian voters could not vote in the 2019 European Parliamentary election at the Hungarian foreign representations

I would like to find a way to report the Romanian Government for restricting the rights of my wife and thousands of other Romanian citizens to vote in European territories.

The citizen's colleague is a Romanian national, residing in Belgium. He would like to know whether Romanian nationals who reside in Belgium may vote in the Romanian elections in Belgium.

A few of the enquiries stated that the persons were denied the right to vote in the EP elections because they did not have the citizenship of the host country. For example,

A Slovakian citizen resident in Poland was refused an electoral vote for the European Parliament elections, on the grounds of not being a Polish national

In the same way,

An Italian national who became resident in Poland was denied their right to vote in both the EP elections and the local elections

In line with these complaints, a Polish national asked for the European Parliament Election results in Poland to be invalidated due to the fact that they were deemed to have unlawfully excluded persons who did not have a permanent address.

In other cases, complaints concerned the fact that citizens from Hungary, residing in Brussels and Berlin for example, who had chosen to vote for the Hungarian lists in the EP elections by casting their votes at the Hungarian foreign representations, were ultimately not able to vote in the EP elections.

Several Hungarian citizens, while residing in other Member States, had chosen to vote for the Hungarian lists in the EP elections by casting their votes at the Hungarian foreign representations in Berlin and Brussels. It is noteworthy that Hungarian law provides for the removal of Hungarian citizens from the national electoral register for European elections where those citizens have been enrolled in the electoral register of another Member State

Other enquiries submitted related to dual nationality. For instance, a citizen with dual citizenship (Hungarian and British) submitted an enquiry as to whether they could vote for both countries at the EP elections, while another citizen voted with both nationalities and subsequently complained about having committed a criminal offence, due to lack of awareness that citizens can only vote once in the same election.

Local elections

Most complaints regarding local elections concerned UK citizens' difficulty in asserting their right to vote in municipal elections in other Member States. One complaint raised the issue that following Brexit, France removed all British citizens from its electoral register, ignoring the fact that some citizens might have had alternative EU citizenship.

An Irish citizen living in France wants to retain her right to vote in all elections while residing there. The Irish citizen's partner is British and understands that due to Brexit he will lose his right to vote, but the Irish citizen has an Irish passport and residence card which clearly states she is Irish. She has been denied a chance to vote recently and has not received any responses to emails and letters from the 'Mairie'.

Following Brexit, France removed all British citizens from its electoral register, ignoring the fact that some citizens might have alternative EU citizenship

Furthermore, some UK citizens residing in Spain complained that when they applied to register to vote for the local elections, the local Town Hall refused to grant them the right to vote on the grounds that citizens needed to present documentation from the local authority in the UK where they had previously resided, despite already being registered as resident in Spain.

UK citizens have resided permanently in Spain for 12 years, holding Spanish registration certificates. The citizens have applied to the local Town Hall in order to register to vote in local elections. This right has been refused on the grounds that the citizens need to present documentation from the local authority in the UK where they used to reside 12 years ago. As the citizens have not resided in the UK for more than a decade, and hold documentation confirming that they have resided legally in Spain for the whole period of time, we consider that the citizens have the right to vote. Article 22 of the TFEU explains that EU citizens residing in another Member State shall have the right to vote. We seek the assistance of SOLVIT ES in order for this decision to be reviewed and be in line with the TFEU.

National elections

The dominant issue in complaints and enquiries about national elections concerns disenfranchisement in the home country and the consequent inability to vote in either the home or the host countries. For example, multiple complaints were submitted by British citizens who do not have the right to vote for parliamentary elections in their host country, while also being removed from the electoral roll in the UK (owing to the UK law which removes the right to vote in national elections from British citizens after residence outside the UK for 15 years or more).

I am one of the thousands of British citizens living in the EU who has no national vote. I have lived in the Netherlands for 16 years but as a British citizen I am not permitted to vote in Dutch national elections. Since I have lived outside the UK for more than 15 years I am no longer allowed to vote in UK elections either. I have no right to vote.

The existence and exercise of the "15 year rule" means that United Kingdom citizens that exercise their rights of EU freedom of movement (including residence in other EU countries) are effectively disenfranchised after an arbitrary period and under arbitrary conditions of residence - in this case 15 years is the arbitrary period set by the United Kingdom.

This issue does not only concern UK nationals: an EU citizen with French citizenship residing in Germany was also denied voting rights in national elections.

The voting registration application of a German national with French citizenship was rejected, thereby effectively leaving her with no voting rights in either France nor Germany

Living in Austria but cannot vote there and has lost voting rights in his home country

Many citizens submitted complaints sharing their discontent about not being able to vote in the host country after many years of being established there and paying taxes.

I am a Dutch citizen, 35 years old, and have lived in Berlin for 9 years. I cannot vote in parliamentary elections in the country where I pay my taxes: Germany. Especially after years where big events unfolded I feel disenfranchised and simply think it's unfair for me not to have a vote.

Furthermore, there were complaints by mobile citizens who were denied a vote in the national elections in their home country, as happened to several Polish citizens living abroad who were unable to vote in the second round of the Presidential elections. This issue brings into play the role of embassies in facilitating or, at times, attempting to obstruct citizens abroad from participating in national elections.

Lack of option for postal vote from Germany to vote in the Polish Presidential elections, since the embassy refused any more registrations

“You explain the practical difficulties that you experienced on the official Polish government website in not being able to vote from Germany in the Polish Presidential elections. You say that the Polish embassy in Germany did not provide any help and did not wish to accept any more registrations.”

Lack of option for postal voting from the Netherlands (and from abroad more generally) for the Polish Presidential elections, since the embassy refused any more registrations, essentially breaching EU law on democracy and human rights

A related issue was encountered in a complaint made by a Romanian citizen, who asked the European Union to investigate the Romanian consulates abroad via the Cooperation and Verification Mechanisms (CVM) in terms of how the presidential elections were carried out.

Problem with registering to vote at diplomatic and consular missions of Romania, as occurred in previous elections organised at Romanian diplomatic and consular missions abroad

Request that Romanian consulates abroad be investigated, via the Cooperation and Verification Mechanism (CVM), into how the elections were organised and ask an independent observer to be allocated by the European Union for the presidential elections in November

Similarly, Hungarian citizens complained about the validity of the election results, alleging that the governing parties cheated in the 2018 national elections and that this might happen again in the European elections in 2019.

Negative comments on how the governing parties allegedly cheated in the 2018 Hungarian national elections and how this will be done in the European elections in May 2019.

Issues related to accessibility and voting modalities (disability, postal vote)

The smaller share of complaints and enquiries about accessibility and voting modalities raised issues such as the difficulty of accessing the polling station for the EP elections experienced by some Italian citizens residing in Germany, due to its remote location.

It was difficult to cast a vote at the 2019 EP elections because of the long distance to the next polling station for Italian citizens residing in Germany.

With regard to voting modality, many complaints addressed the impossibility of voting for MEPs in the home country from the country of residence.

Greek mobile citizens complained about not being able to vote by post from abroad in local, regional and national elections. This obliges Greek citizens to travel to Greece to vote, contravening citizens' democratic rights under EU law.

An Italian citizen living abroad complained that they cannot vote by post in the European elections in Italy.

Similarly, some citizens complained that, especially in light of the travel restrictions implemented during the pandemic, it was unfair that in some countries, such as Romania, mobile citizens could not vote in the municipal elections unless physically present to cast the vote.

In Romania it is not possible to vote in municipal elections via postal vote, meaning that if you cannot be physically present your right to vote is denied. Considering the circumstance of COVID it seems unfair to deny the right to vote from a distance

Enquiries about candidacy

Whilst most complaints and enquiries referred to voting issues, just over one in five of the total 887 election queries concerned candidacy issues (21%).

Share of queries about voting and candidacy

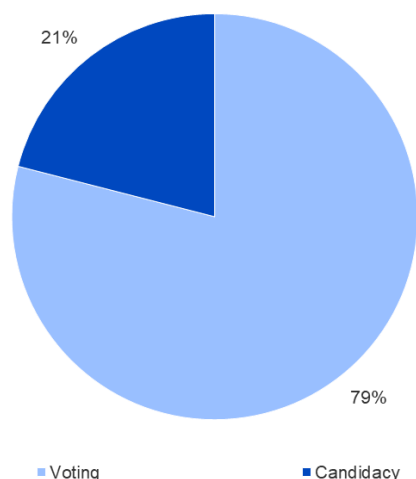


Figure 9 - Share of queries about voting and candidacy
(Base of 887 entries)

European Parliament elections

Most complaints and enquiries related to candidacy ask for details about the procedure for standing as a candidate: for example how and where to register as a candidate, what forms need to be completed and what documents sent in, how far in advance a candidacy should be submitted, etc.

Many mobile citizens also asked for advice on the country where they can stand for election (home or host country).

The enquirer is an Italian citizen who resides in an EFTA country. The person would like to stand as a candidate in European Parliament elections in 2019. The person asks whether s/he needs to move their residence to Italy or if they can remain in the EFTA country.

An EU citizen residing in the United Kingdom in 2019 wanted to stand as candidate in the next European Parliamentary Elections. They were wondering whether, because of Brexit, they had to stand as a candidate in their home country or whether they could only do so in the UK.

In terms of accessibility and inclusion, a candidate with disability who wished to stand as a candidate enquired about what forms of support they could access. Another enquiry concerned the profile of candidates, asking whether citizens with prior criminal charges (in this case, multiple charges of hate speech) were allowed to participate.

Entries about candidacy in local elections mainly contested the fairness of procedures within the cities of residence, as a few mobile citizens felt discriminated against and excluded from the processes. For example:

A German citizen residing in another EU country complained about being unable to stand as candidate in the local elections, due to the fact that they were not aware of having to first register on a candidate list prior to the elections. They maintain that such information was withheld from EU citizens who wished to participate in the elections.

Other enquiries

Other issues that emerged with respect to elections included a query as to why European Parliament election results are announced before the ballots are closed in all EU countries. Another enquiry asked whether citizens are obliged to vote when they receive a registration card.

The citizen is an Italian national, residing in Belgium. The person recently received a voting letter and would like to know whether she is obliged to vote.

A citizen enquired about whether participation is compulsory under electoral law in Germany.

A few other enquiries expressed negative feedback about the perceived lack of information given to citizens in the run-up to the European elections.

Annex 2 – Indicative effort to implement preferred policy option per Member State

Table 1 – Indicative effort to implement preferred policy option per Member State, based on what measures are already in place

| MS | 1. Targeted mail-outs/information re: rights to EU citizens | 2. Voter registration without document proof of EP electoral rights | 3. EU citizens are able to <u>vote</u> for all political positions (0.5 p) | 4. EU citizens are able to <u>stand</u> for or <u>hold</u> all political positions (0.5 p) | 5. Participation in activities and exchanges of best practice, e.g. through ECNE | 6. Use of data exchange tools provided by EC | Indicative score of effort (higher score indicates higher impact of option) Max score = 5 |
|----|---|---|--|--|--|--|--|
| HR | | | X | X | X | X | 2 |
| IT | | / | X | | X | X | 2 |
| CY | | X | | | X | X | 2 |
| CZ | | X | / | | X | X | 1.75 |
| IE | | / | X | X | X | X | 1.5 |
| BG | | X | X | | X | X | 1.5 |
| PL | | X | X | | X | X | 1.5 |
| DE | | X | / | / | X | X | 1.5 |
| FR | | X | X | | X | X | 1.5 |
| EL | | X | X | X | X | X | 1 |
| ES | / | / | X | X | X | X | 1 |
| LU | | X | X | X | X | X | 1 |
| RO | | X | X | X | X | X | 1 |
| MT | | X | X | X | X | X | 1 |
| NL | / | X | X | | X | X | 1 |
| AT | / | X | X | / | X | X | 0.75 |
| HU | / | X | X | X | X | X | 0.5 |
| PT | / | X | X | X | X | X | 0.5 |
| LV | / | X | X | X | X | X | 0.5 |

ANNEXES

| | | | | | | | |
|----|---|---|---|---|---|---|-----|
| BE | X | X | X | | X | X | 0.5 |
| EE | X | X | X | | X | X | 0.5 |
| SI | X | X | X | | X | X | 0.5 |
| SK | X | X | X | X | X | X | 0 |
| DK | X | X | X | X | X | X | 0 |
| FI | X | X | X | X | X | X | 0 |
| LT | X | X | X | X | X | X | 0 |
| SE | X | X | X | X | X | X | 0 |

X = Measure is in place; / = Measure is either partly in place, or applied inconsistently across the territory, or is subject to federal, regional or local variation.

The scoring in the final column should be read as follows: a higher score indicates that more measures need to be implemented. The measures have been weighted by the expected effort and cost of implementing them. These scores are illustrative to allow for a comparison of how the preferred policy option may impact Member States, and does not take into account specific rules and provisions in Member States which may make implementation easier or more difficult.

As they are not mandatory in the preferred option, only recommended, measures 3 and 4 on the voting and candidacy rights of mobile EU citizens score 0.5 points each. All other indicators score 1 point, for a total of 5.

Source: Country fact sheets, national legislation, questionnaires returned by Member States.

Annex 3 – Summary of Member States' existing measures (Status Quo)

Explanatory notes

Within the following tables presented, it can be assumed that all Member States do the following, unless otherwise stated:

- Provide electoral information in English and the official language(s) of the MS;
- Require for registration a sworn statement of retained voting/candidacy rights and that they are not voting/candidating in other MS for the election;
- Allow mobile EU citizens to vote in EU and local elections, as established in their legal provisions;
- Offer the same means of voting to EU citizens as to nationals;
- Limit the right to vote (e.g. due to incapacity or criminal records) on the same grounds for EU citizens as for nationals.

Moreover, the helpdesk/hotline refers to services beyond the provision of information on a website (i.e. where there is a dedicated service available in connection with elections).

Regarding the obtainment of responses from countries, at the time of writing (16th August 2021) questionnaires have not been returned from the following:

- Austria
- Bulgaria
- Cyprus
- Greece
- Italy
- Latvia
- The Netherlands
- Slovakia

The Member States, as well as those where gaps remained after the return of questionnaires from other Member States, have been complemented with information from the following sources:

- Country reports from the FAIR-EU and GLOBAL-CITZEN projects;
- National legislation and sources;
- Direct email contact with electoral authorities.

Finally, In a few isolated cases it has not been possible to locate particular information provisions, despite these efforts. These cells are marked in yellow. This is particularly the case with regards to information required to identify double-registered voters in the MS electoral rolls, as this information is not publicly available.

Please note that the missing information does not substantially affect the categorisation of Member State inclusiveness towards mobile EU citizen voters under the table sheet "Member State categorisation".

Table 2 - Impact on Member States

| MS | Targeted mail-outs/information re: rights to EU citizens | Voter registration without document proof of EP electoral rights | EU citizens are able to <u>vote</u> for all political positions | EU citizens are able to <u>candidate</u> for or <u>hold</u> all political positions | Activities for exchange of best practices through e.g. ECNE | Use of harmonised dataset | Indicative score of effort (higher score indicates higher impact of option, max 5) |
|----|--|--|---|---|---|---------------------------|--|
| HR | | | 1.0 | 1.0 | 1.0 | 1.0 | 2 |
| IT | | 0.5 | 1.0 | | 1.0 | 1.0 | 2 |
| CY | | 1.0 | | | 1.0 | 1.0 | 2 |
| CZ | | 1.0 | 0.5 | | 1.0 | 1.0 | 1.75 |
| IE | | 0.5 | 1.0 | 1.0 | 1.0 | 1.0 | 1.5 |
| BG | | 1.0 | 1.0 | | 1.0 | 1.0 | 1.5 |
| PL | | 1.0 | 1.0 | | 1.0 | 1.0 | 1.5 |
| DE | | 1.0 | 0.5 | 0.5 | 1.0 | 1.0 | 1.5 |
| FR | | 1.0 | 1.0 | | 1.0 | 1.0 | 1.5 |
| EL | | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1 |
| ES | 0.5 | 0.5 | 1.0 | 1.0 | 1.0 | 1.0 | 1 |
| LU | | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1 |
| RO | | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1 |
| MT | | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1 |
| NL | 0.5 | 1.0 | 1.0 | | 1.0 | 1.0 | 1 |
| AT | 0.5 | 1.0 | 1.0 | 0.5 | 1.0 | 1.0 | 0.75 |
| HU | 0.5 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0.5 |
| PT | 0.5 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0.5 |
| LV | 0.5 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0.5 |
| BE | 1.0 | 1.0 | 1.0 | | 1.0 | 1.0 | 0.5 |
| EE | 1.0 | 1.0 | 1.0 | | 1.0 | 1.0 | 0.5 |
| SI | 1.0 | 1.0 | 1.0 | | 1.0 | 1.0 | 0.5 |
| SK | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0 |

ANNEXES

| | | | | | | | |
|----|-----|-----|-----|-----|-----|-----|---|
| DK | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0 |
| FI | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0 |
| LT | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0 |
| SE | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 1.0 | 0 |

Table 3 - Member State Categorisation

| MS | Automatic registration | | Permanent registration | | Targeted mail-outs/information re: rights to EU citizens | Voter registration without document proof of EP electoral rights | EU citizens are able to <u>vote</u> for all political positions | EU citizens are able to <u>candidate</u> for or <u>hold</u> all political positions | Other notable obstacles | Inclusivity of regime towards mobile EU citizens' electoral rights | Motivation for categorisation | Size of EU-28 population in 2019 (based on Eurostat data code migr_pop1ctz) | |
|----|------------------------|-------|------------------------|-------|--|--|---|---|-------------------------|--|---|---|----------------|
| | EU | Local | EU | Local | | | | | | | | 1 000s | % of total pop |
| DK | | X | X | X | X | X | X | X | | High | Overall inclusive; some local variation in extent of targeted information. | 730 | 8% |
| FI | | X | X | X | X | X | X | X | | High | Overall inclusive. | 921 | 8% |
| LT | X | X | / | X | X | X | X | X | | High | Automatic pre-registration in EU elections. English-language elections hotline operated. | 14 | 0.2% |
| LV | X | X | X | X | / | X | X | X | | High | Automatic pre-registration in EU elections. English-language elections hotline operated, but not additional mail circulars. | 118 | 13% |
| MT | | / | X | X | | X | X | X | | High | No targeted information campaigns. | 233 | 2% |
| NL | | X | X | X | / | X | X | | | High | Overall inclusive, but extent of information | 4 384 | 5% |

ANNEXES

| | | | | | | | | | | | | | |
|----|--|---|---|---|---|---|---|---|---|------|--|-------|------|
| | | | | | | | | | | | targeted at EU citizens vary locally. | | |
| SE | | X | X | X | X | X | X | X | | High | Overall inclusive. | 225 | 4% |
| BG | | | X | X | | X | X | | Law requires campaign info in Bulgarian only. | Low | No targeted information campaigns; information only in Bulgarian. | 21 | 2% |
| CY | | | X | X | | X | | | | Low | No targeted information campaigns; not possible to candidate or vote for all positions. | 213 | 2% |
| CZ | | | X | X | | X | / | | Non-nationals must run as independents. Certificate of candidacy rights required for EU candidates. | Low | No targeted information campaigns; some political positions reserved; must run as independents. | 1 967 | 4% |
| EL | | | | | | X | X | X | | Low | Lack of targeted information; repeated and non-automatic registration | 100 | 2% |
| HR | | | | | | | X | X | Notarised documents of ID and voting rights required. | Low | Repeated registration necessary. Registration requires notarised documents, incurring costs. Very limited information. | 1 599 | 2% |
| PL | | | / | / | | X | X | | Non-nationals unable to join parties. | Low | No targeted information campaigns; some political positions | 18 | 0.4% |

ANNEXES

| | | | | | | | | | | | | | |
|----|--|---|---|---|---|---|---|---|---|--------|--|-------|-----|
| | | | | | | | | | | | reserved; ban on joining political parties. | | |
| AT | | X | X | X | / | X | X | / | | Medium | Broadly inclusive, but some political positions reserved. Some (limited) information directly targeted at mobile citizens, varies locally. | 74 | 1% |
| BE | | | X | X | X | X | X | | | Medium | No targeted information (may vary locally); not possible to candidate for all positions. | 449 | 9% |
| DE | | X | X | X | | X | / | / | | Medium | In some localities, can't vote or stand for certain political positions. Information and other electoral measures vary by federal Land. | 1 501 | 3% |
| EE | | X | X | X | X | X | X | | | Medium | Overall inclusive, but some political positions reserved. | 7 | 0% |
| ES | | / | X | X | / | / | X | X | Certificate from CA in home MS may be requested to support retained electoral rights. | Medium | Overall inclusive, registration to vote is required (but not a legal obligation) and generally carried out (by local authorities) or its possibility notified (local and EP) if mobile EU citizen register for | 246 | 40% |

| | | | | | | | | | | | | | |
|----|---|---|---|---|---|---|---|---|---|--------|---|-----|------|
| | | | | | | | | | | | residency. The municipal authorities need to share the information with the Electoral office. If no registration for residence has been done, it may be done in front of a civil servant at Electoral Office or through website. Mailouts before elections are sent with the aim to inform mobile EU citizens not registered for residence on their rights to vote. | | |
| FR | | | X | X | | X | X | | | Medium | Lack of targeted information; some political positions reserved. | 6 | 0.3% |
| HU | | X | X | X | / | X | X | X | Information on rights to vote is sent to mobile EU citizens when register to vote in HU, EN, FR and DE. Registration form only in Hungarian | Medium | Overall inclusive, but registration form only in Hungarian; information on rights to vote is sent to mobile EU citizens on when to register to vote in HU, EN, FR and DE. | 45 | 9% |
| IE | / | / | X | X | | / | X | X | Voter registration must be | Medium | Automatic pre-registration in EU elections (at least | 568 | 3% |

ANNEXES

| | | | | | | | | | observed at police station or by notary or solicitor. | | generally); registration needs witnessing and signature by solicitor or notary. | | |
|----|--|---|---|---|---|---|---|---|--|--------|---|-----|------|
| IT | | | X | X | | / | X | | | Medium | Lack of targeted information; some political positions reserved. | 32 | 0.1% |
| LU | | | X | X | | X | X | X | | Medium | No targeted information campaigns. | 159 | 2% |
| PT | | | X | X | / | X | X | X | | Medium | No targeted information campaigns, but support offices for EU voters are available in large cities. | 60 | 0.3% |
| RO | | X | X | X | | X | X | X | | Medium | No automatic registration; limited information in languages other than Romanian. | 322 | 3% |
| SI | | X | X | X | X | X | X | | | Medium | No automatic registration; not possible to candidate for all positions. | 21 | 1% |
| SK | | X | X | X | X | X | X | X | | Medium | [Unclear how long residency requirement is - will affect categorisation.] | 58 | 1% |

| | |
|---|--|
| X | Criterion fulfilled |
| / | Criteria generally fulfilled, but some federal/municipal variation |
| ? | Still to be established |
| | Criterion not fulfilled |

Table 4 – Summary table on voting per Member State 1

| MS | Voters | | | | | | |
|----|--------------------------------|-----------------------------|--------------------------------------|-----------------------------------|---|--|--|
| | Automatic registration - Local | Automatic registration - EU | Voter registration permanent - Local | Voter registration permanent - EU | Voter registration without document proof of electoral rights | Electronic or mail registration possible | Residency requirement for EU voters (ca. days) |
| AT | Yes | No | Yes | Yes | Yes | | |
| BE | No | No | Yes | Yes | Yes | Yes | N/A |
| BG | No | No | Yes | Yes | Yes | No | 180 |
| CY | No | No | Yes | Yes | Yes | No | 180 |
| CZ | No | No | Yes | Yes | Yes | No | 45 |

ANNEXES

| | | | | | | | |
|----|-----|----|-----|-----|-----|-----|-----|
| DE | Yes | No | Yes | Yes | Yes | No | N/A |
| DK | Yes | No | Yes | Yes | Yes | Yes | |
| EE | Yes | No | Yes | Yes | Yes | Yes | N/A |
| EL | No | No | No | No | Yes | No | |

ANNEXES

| | | | | | | | |
|----|---------|---------|-----|-----|-----|-----|-----|
| ES | Partial | Partial | Yes | Yes | Yes | Yes | |
| FI | Yes | No | Yes | Yes | Yes | Yes | 51 |
| FR | No | No | Yes | Yes | Yes | Yes | N/A |
| HR | No | No | No | No | No | No | N/A |

ANNEXES

| | | | | | | | |
|----|-----|---------|-----|---------|---------|---------|---|
| HU | Yes | No | Yes | Yes | Yes | Yes | N/A |
| IE | Yes | Partial | Yes | Yes | Partial | No | 240 |
| IT | No | No | Yes | Yes | Partial | Partial | |
| LT | Yes | Partial | Yes | Partial | Yes | No | N/A |
| LU | No | No | Yes | Yes | Yes | Yes | 5 years, the last year of which must be uninterrupted |

ANNEXES

| | | | | | | | |
|----|---------|---------|---------|---------|-----|---------|---------------------------------|
| LV | Yes | Partial | Yes | Yes | Yes | Yes | |
| MT | Partial | No | Yes | Yes | Yes | Partial | 6 out of the previous 18 months |
| NL | Yes | No | Yes | Yes | Yes | No | |
| PL | No | No | Partial | Partial | Yes | Yes | N/A |

ANNEXES

| | | | | | | | |
|----|-----|----|-----|-----|-----|-----|-----|
| PT | No | No | Yes | Yes | Yes | No | N/A |
| RO | Yes | No | Yes | Yes | Yes | No | 90 |
| SE | Yes | No | Yes | Yes | Yes | Yes | N/A |
| SI | Yes | No | Yes | Yes | Yes | Yes | N/A |

| | | | | | | | |
|----|-----|----|-----|----|-----|-----|----|
| SK | Yes | No | Yes | No | Yes | Yes | 90 |
|----|-----|----|-----|----|-----|-----|----|

Table 5 – Summary table on voting per Member State 2

| MS | Voters | | | | | | |
|----|---|---|--|---------------------------------------|---|---|--|
| | EU voter registration deadline (ca. days) | Local voter registration or residency deadline (ca. days) | Voter registration comments | Distance and/or early voting possible | Voting modes comment | Possible to vote for all local government positions | Positions for which EU citizens cannot vote (if any) |
| AT | 71 | Automatic | An exception to automatic registration is Burgenland, which requires active registration | No | | Yes | |
| BE | 90 | 90 | Sworn statement | Partial | Proxy voting by prev. application. Mandatory voting. | | |
| BG | 40 | 180 | Residency requirement for local elections can be either in BG or in other MS. For EP elections, residency requirement is 90 days | No | Mandatory voting. | Yes | N/A |
| CY | | | Residency requirement for local elections, refers to CY or any other MS | Yes | Possible to vote in voting stations abroad, subject to prior application. Mandatory voting. | | |
| CZ | 45 | 3 | Sworn statement. Electronic reg. possible for local. | No | EU voters must bring proof of inclusion in voter list and/or residence to polling station. | Yes | |

ANNEXES

| | | | | | | | |
|----|----|------------------------|---|-----|--|---------|--|
| DE | 21 | Varies by federal Land | Three months residence in DE or other MS required for all voters. Oath sufficient to support voting rights | Yes | Distance voting available by application | Partial | Generally can vote for all, but may vary by federal Land as these have individual electoral legislation. |
| DK | 15 | 21 | EP: 4 week limit for recent arrivals. Local voters automatically registered if they reside in the municipality 21 days before | Yes | Early voting available from six weeks to three weekdays prior to election day, at Citizen Service Centres. | | |
| EE | 30 | 30 | Electronic voting lists | Yes | Electronic voting possible. Deadline refers to req. residence in municipality, not just for EU citizens | | |
| EL | 90 | 90 | Approximate enrolment deadline; generally need to have been registered before end of Feb in election year. | No | Knowledge of Greek formally required (but not checked). Mandatory voting. | No | Regional elections |

| | | | | | | | |
|----|-----|-----|--|---------|---|----|--|
| ES | 150 | 150 | Registration required ca. 6 months prior to election. Registration is done at the same time for local and EP. Monthly updates of Electoral roll. | Partial | In person and by post if not able to be present on the date of the poll. Postal voting for citizens living abroad in EP or regional elections is based on confirmation of request to vote in answer to government invitation letter (in process of modification). | | |
| FI | 80 | 51 | Residency requirement for local elections | Yes | Postal voting in place for citizens abroad since 2019 | | |
| FR | 35 | 35 | | Partial | Proxy voting by prev. application. | | |
| HR | 30 | 30 | Registration requires notatised statements of voting rights and ID. | No | | No | Cannot vote for executive positions (municipal mayor, mayor or county prefect) |

| | | | | | | | |
|----|----|----|---|---------|---|-----|-----|
| HU | 16 | 3 | While information is available in many languages, registration form is only in Hungarian | No | | | |
| IE | 14 | 14 | EP pre-registration based on residency records. Registration must be verified by notary or solicitor. Electoral roll based on September residency records, but one can be added up until 14 days prior. | No | Distance voting only possible in a few restricted cases (e.g. military personnel serving abroad), subject to application. | Yes | N/A |
| IT | 90 | 40 | Modes of submitting registration vary by municipality. Certificate of voting rights MAY be requested , but not necessarily. | No | Voting by mail is only available for Italian citizens resident abroad, in specific circumstances | Yes | |
| LT | 26 | 90 | EP pre-registration is automatic, and then needs to be confirmed by EU voters; this is done every election | Partial | Early voting needs to be applied for in advance, if one cannot get to voting station on election day | | |
| LU | 87 | 87 | Residency requirement in place with reference to the fact that more than 20% of the population are EU citizens | Yes | Voting possible in person and by post | | |

| | | | | | | | |
|----|----|----|--|---|---------|---|-----|
| LV | 30 | 10 | EP pre-registration is automatic, and then needs to be confirmed by EU voters | No | | Yes | |
| MT | 15 | | Electoral roll established twice per year, 31 March and 30 September | Residency requirement for local elections. Exemptions can be given for late EU registration. Local registration is automatic, but must be confirmed by written, signed form | No | Not available either for nationals or mobile EU citizens | Yes |
| NL | 42 | 90 | | | Partial | By application, it is possible to vote by proxy. | |
| PL | 5 | 5 | Voter registration can be done for either one election only, or permanently for subsequent elections as well | | Partial | Mail or proxy voting only for those with moderate to severe disabilities, or those in quarantine or isolation | |

| | | | | | | | |
|----|-----|-----|---|---------|--|-----|--|
| PT | 60 | 60 | Proof of legal residence required through Portuguese residence/registration documents. For local, non-nationals cannot vote in PT if PT citizens cannot vote in the respective home state. | Partial | Early voting possible subject to application 10-14 days before election day. This requires a valid reason for not being in the country on election day. | | |
| RO | 60 | 45 | Automatic local registration based on data from General Inspectorate for Immigration; otherwise, active request is needed. | No | Distance voting only possible in some restricted cases of illness or disability, with extensive supporting documentation. | | |
| SE | 30 | 30 | Registration is based on data from the Population Register, meaning no additional supporting identification is required. Voters must reside in a given municipality 30 days before election day. | Yes | Early voting starts 18 days before election day in Sweden, and 24 days in Swedish embassies and consulates abroad. Mail voting available for voters abroad during the election period. | Yes | |
| SI | N/A | N/A | Have not been able to ascertain deadlines. | Yes | Early voting and voting in other constituencies is possible. Mail voting for vulnerable people in SI, and for voters abroad on election day, is available subject to application. | | |

ANNEXES

| | | | | | | | |
|----|----|---|---|----|---|-----|--|
| SK | 40 | 3 | Application to register is possible by mail, but not online | No | Only possible to vote if present on Slovakian territory during polling day. | Yes | |
|----|----|---|---|----|---|-----|--|

Table 6 – Summary table on candidature per Member State

| MS | Candidates | | | | | |
|----|---|---|---|---|---|--|
| | Candidate registration without document proof of electoral rights | Possible to candidate for all local positions | Proscribed positions (if any) | EU candidate registration deadline (ca. days) | Registration possible online or by mail | Candidate registration comments |
| AT | | Partial | Mayor (except in Lower Austria) | Varies by federal Land | | |
| BE | Yes | No | Mayor | 57 | Yes | Personal declaration sufficient. |
| BG | Yes | No | Mayor | 32 | | Candidate must have resided in Bulgaria or another MS for at least six months prior |
| CY | Yes | No | Mayor | | | Need to support registration of residence in Cyprus. |
| CZ | No | No | Mayor, deputy mayor, and Prague city councillors. | 66 | Yes | Candidates must present certificate of candidacy rights from home MS. Candidates must run as independents. |

ANNEXES

| | | | | | | |
|----|---------|---------|--|----|---------|--|
| DE | Yes | Partial | Mayor and County Commissioner (Landrat) in Bavaria; city parliaments | 83 | Partial | Oath sufficient to support electoral rights. Registration is submitted by parties in writing. |
| DK | Yes | Yes | | 28 | | |
| EE | Yes | No | Executive office in local government (indirectly elected) | 50 | Yes | Online registration possible. |
| EL | Partial | No | Mayor or secretary general of a region | | | Need to provide certificate of registration in electoral register of a MS, or any other document supporting right to vote in EU MS |

ANNEXES

| | | | | | | |
|----|-----|-----|------------------------|--|---------|--|
| ES | Yes | Yes | | 9 days (head of list) or 11 days (other candidates in the list) after the call for elections | Partial | Candidates registration is based on a political group list system which need to proof a certain amount of signatures. Candidatures for the head of the list need to be submitted 9 days after the call for elections and 11 days for the rest of candidates in the list. |
| FI | Yes | Yes | N/A | 40 | Partial | Uncertain whether registration done by mail or online |
| FR | Yes | No | Mayor and deputy mayor | 24 | Partial | Personal declaration sufficient. Uncertain whether registration done by mail or online |
| HR | No | Yes | | 45 | | Nominations to be received no later than 14 days after announcement of EP election; this announcement must be made at least 60 days before election day. Hence an estimate of 45 days. |

| | | | | | | |
|----|-----|-----|------------------------|----|---------|--|
| HU | Yes | Yes | N/A | | Partial | Uncertain whether registration done by mail or online, also on candidacy deadline |
| IE | Yes | Yes | N/A | 39 | | In 2019, nominations closed Mon Apr 15, prior to election day Fri 24 May. Deadline for registration is based on this |
| IT | Yes | No | Mayor and deputy mayor | 39 | No | |
| LT | Yes | Yes | N/A | 65 | Yes | Registration forms must be submitted online |
| LU | Yes | Yes | N/A | 60 | Partial | Uncertain whether registration done by mail or online, also on candidacy deadline |

| | | | | | | |
|----|---------|-----|------------------------------|--|---------|--|
| LV | Yes | Yes | | 65 | Partial | Uncertain whether registration done by mail or online |
| MT | Yes | Yes | | Within 9 days of publication of election writ by President | Yes | Registration within 9 days of election writ being issued by president |
| NL | No | No | Mayor, alderman | 43 | | Requires declaration by CA in home MS that, as far as they know, the non-Dutch candidate is not disqualified from standing in elections in that MS. |
| PL | Partial | No | Head of local administration | 40 | No | Five years of EU residency is required. In case of doubt over candidacy rights, a supporting certificate from home MS may be requested. Non-nationals are not able to join political parties. |

ANNEXES

| | | | | | | |
|----|---------|-----|-------|-----|-----|---|
| PT | Partial | Yes | N/A | 41 | No | If candidacy rights are in doubt, court may require that candidate's home MS testifies to this effect. Non-nationals are only able to candidate for local election if PT citizens are able to do so in their home state. |
| RO | Yes | Yes | N/A | 60 | No | Residency in Romania must be supported by documentary evidence. |
| SE | Yes | Yes | N/A | 120 | Yes | Parties submit their list of candidates ca. 4 months in advance. If they are open to additional nominations, this can be submitted at the latest 2 days prior to election day. Registration is done through a signed form. |
| SI | Yes | No | Mayor | 30 | | |

| | | | | | | |
|----|-----|-----|-----|----|-----|--|
| SK | Yes | Yes | N/A | 90 | Yes | |
|----|-----|-----|-----|----|-----|--|

Table 7 – Summary table on information per Member State

| MS | Information measures | | | |
|----|---|--|--|--|
| | Proactive mail-outs to mobile EU citizens on rights | Local elections info proactively sent to EU citizens | Helpdesk/hotline (if in English, "Yes"; if not, "Partial") | Information comments |
| AT | No | Partial | Partial | Much (but not all) information in German. Varies by municipality and federal Land. |
| BE | Yes | Partial | Partial | Municipality in charge of nformation; local variation in extent and form. |
| BG | No | No | No | Regulation that information in electoral campaigns acn only be provided in Bulgarian |
| CY | No | No | No | Information generally provided in Greek, not other languages. |
| CZ | Partial | No | No | Municipalities encouraged, not required, to proactively contact for EU. No special campaign. |

ANNEXES

| | | | | |
|----|---------|------------------------|------------------------|--|
| DE | Partial | Varies by federal Land | Varies by federal Land | Information sent to all registered voters 4-6 weeks prior to the election |
| DK | Yes | Partial | Partial | The website Stem.dk, active around elections, provides up-to-date information (some of it in English). There are also text message reminders (in Danish) sent out. For EP, information on electoral rights sent out by Digital Post 3 months before election to those registered in population register. |
| EE | Yes | Yes | Yes | Information sent 70 days (for EU citizens) and 10 days (for all voters) based on records of Population Register |
| EL | No | No | No | |

| | | | | |
|-----------|----------------|----------------|------------|--|
| ES | Partial | Partial | No | Mobile EU citizens are notified of the possibility to register as voters if they are first registered as residents (notification is technically compulsory, but might not always be done). |
| FI | Yes | Yes | Yes | Voting cards with practical information sent to all eligible voters |
| FR | No | No | No | Questionnaire refers to online information and a few ad hoc campaigns |
| HR | No | No | No | Information overall mainly available in Croatian |

ANNEXES

| | | | | |
|----|---------|---------|-----|--|
| HU | Yes | Yes | No | National Election Office can be reached by email or phone |
| IE | Yes | Partial | Yes | Some local (often civil society) campaigns providing information for EU nationals. Returning Officer in constituencies can act as contact and information point. |
| IT | No | Partial | No | Local campaigns by NGOs or other institutions may provide information, but there are no targeted, national campaigns. |
| LT | Yes | No | Yes | Mainly information on website for local elections |
| LU | Partial | Partial | Yes | Information not sent directly to mobile EU citizens, but centrally coordinated campaigns to raise awareness |

ANNEXES

| | | | | |
|----|---------|---------|---------|--|
| LV | Partial | No | Yes | Campaigns to raise awareness of elections not generally targeted at EU citizens, but EP ones have been available in English. Local elections info sent out to all voters, but generally in Latvian |
| MT | No | No | No | Information only in English and Maltese on official websites. No separate services for mobile EU citizens |
| NL | Yes | Partial | | Municipalities are obliged to send a form to mobile EU citizens requesting registration. Local elections information varies by municipality. |
| PL | Partial | Partial | Partial | Information is provided proactively when an election has been called, but the information is the same for nationals as for non-nationals. No targeting of EU citizens. |

ANNEXES

| | | | | |
|----|-----|---------|-----|--|
| PT | No | No | Yes | Information is provided through Support Offices staffed by multilingual staff in the largest cities. |
| RO | No | No | No | |
| SE | Yes | Partial | Yes | Information is available in 30+ languages from the Swedish Election Authority. Availability for municipalities varies more widely. Voting cards with relevant practical information is sent out to all voters. |
| SI | Yes | No | No | Local election information circulated in the official languages only (Slovenian, Hungarian and Italian). |

ANNEXES

| | | | | |
|----|-----|-----|----|---|
| SK | Yes | Yes | No | Mobile EU citizens sent info by municipality at latest 10 days after election declared. Info on time/date/place of voting is delivered to all households 25 days prior to voting. |
|----|-----|-----|----|---|

Table 8 – Summary table on double voting per Member State

| MS | Double voting | | |
|-----------|--|---|---|
| | Sanctions | Information required to ID nationals | Information comments |
| AT | Imprisonment of up to 2 weeks or fine of up to EUR 218. | [Questionnaire not returned] | |
| BE | Imprisonment 8-15 days; fine of EUR 208-1600. | Belgian national number sufficient. | Notes different deadlines between MS as an issue. |
| BG | Probation and a fine of BGN 500- 2 000 (ca. EUR 250-1 000). | [Questionnaire not returned] | |
| CY | Imprisonment of up to 6 months and/or a fine of up to CYP 450 (ca. EUR 720). | [Questionnaire not returned] | |
| CZ | Fine of ca. EUR 390. | Name, DOB, place of permanent residence | |

ANNEXES

| | | | |
|-----------|--|--|--|
| DE | Imprisonment for up to five years or unspecified fine | Name, DOB, ID card number, previous <i>municipality</i> (not constituency) in DE | Recurring problem that information is gathered on previous constituency rather than municipality; this renders action impossible, as electoral rolls are organised by municipality |
| DK | Unspecified fine. | At minimum date of birth and full name, but ideally also Danish ID number. | |
| EE | Fine of up to 300 fine units (ca. 1 300); unspecified detention | Name, DOB, personal ID number, address | |
| EL | Imprisonment of 3 months-5 years; deprivation of public office for 1 to 5 years. | [Questionnaire not returned] | |

ANNEXES

| | | | |
|-----------|--|---|---|
| ES | Imprisonment of 6 months-2 years, a fine of 6 months-2 years, and a special disqualification for employment or public office from one to three years | Name, personal ID number, DOB, address. To apply for voting: The application form, a photocopy of the passport or ID, or, certificate of nationality/registration in the Consular Registry. When voting: certificate of being registered in the census, passport or ID. | Nationals living abroad need to confirm intention to vote through online tool and then vote by post or in person. |
| FI | Unspecified fine or imprisonment of up to 1 year | N/A | Presumably, Finnish national ID number would be sufficient for nationals |
| FR | Imprisonment of 6 months-2 years and a fine of up to EUR 15 000. | Name (all), sex, age, DOB and place of birth, date of registration abroad | Notes different deadlines between MS as an issue. |
| HR | Fine of HRK 10,000-30,000 (ca. EUR 1 334-4 000). | Personal ID number, names, current address, DOB, gender | Missing Croatian diacritical signs are a substantial problem in identifying citizens in other MS |

ANNEXES

| | | | |
|-----------|--|--|--|
| HU | Imprisonment of up to 3 years. | Name, date and place of birth, ideally national ID | |
| IE | Fine not exceeding EUR 3,174, or imprisonment of up to 2 years, or both. | Name, date of birth and last Irish address. | A reform proposal is currently being considered, which may also include a person's Public Service Number as a unique identifier. |
| IT | Imprisonment of 1-3 years and a fine of EUR 51-258. | [Questionnaire not returned] | |
| LT | Fine of EUR 140-860. | Name, surname, personal ID number | |
| LU | Fine of EUR 251-2 000, imprisonment 8-15 days. | Name, (incl. Maiden), date and place of birth, gender, place of residence, nationality | |

ANNEXES

| | | | |
|-----------|--|--|--|
| LV | Unspecified punishment. | [Questionnaire not returned] | |
| MT | Fine of up to MTL 1 000 (ca. EUR 23 29.73) and/or imprisonment of up to 6 months | Name, surname, DOB | |
| NL | Fine of up to EUR 4 350 and imprisonment of up to 1 month | [Questionnaire not returned] | |
| PL | Unspecified fine | Name(s), father's name, DOB, nationality, passport number, address | |

| | | | |
|-----------|---|---|--|
| PT | Penalty payment up to 50 days, and imprisonment for up to 1 year. | ? | |
| RO | Imprisonment for 6 months-3 years, unspecified fine, restricted exercise of some rights | Name(s), personal ID number, ID number of passport or identity card | Notes that personal ID number is required for identification, and was missing in the vast majority of cases. Diacritics of names was also missing. |
| SE | Unspecified fine or prison for up to 6 months | Personal ID number | |
| SI | Unspecified fine or prison for up to 1 year | N/A | |

| | | | |
|----|---------------------|------------------------------|--|
| SK | Fine of EUR 33-100. | [Questionnaire not returned] | |
|----|---------------------|------------------------------|--|

Table 9 - Member State Categorisation

| Member State | Scope of voting rights of mobile Europeans in host country (other than EP elections) | Procedure and requirements for registering as a voter | | Information required to register as a voter - EU | Information measures about registration and participation | | Procedure and requirements for registering as a candidate | | Modes of voting | Practices relating to the prevention of double voting in EP elections |
|--------------|--|---|-----------------|--|---|-----------------|---|-----------------|-----------------|---|
| | | EP elections | Local elections | | EP elections | Local elections | EP elections | Local elections | | |

ANNEXES

| | | | | | | | | | | |
|----|---|---|---|--|---|---|---|---|--|---|
| AT | Local municipal elections and directly elected mayors (where applicable). | One-off, permanent registration done in person at the municipal offices at least 71 days prior to election day. A signed declaration must be submitted that the voter only intends to vote on the Austrian electoral roll in the elections. | Non-citizen residents are automatically registered for local legislative and mayoral elections (except for the state of Burgenland, which requires one-off registration in person at the local municipality offices). | | Various information campaigns by the Federal Ministry of the Interior, the Office of the Federal Chancellor and the Federal Ministry for Europe, Integration and foreign affairs informed voters on voting rights. Information was communicated both via websites and via mail-outs to all households in Austria. | Information is generally provided in German on the websites of municipalities. In Burgenland, which requires active registration, municipalities must post information about the registration procedure on their billboard 1 month before the election day. | All men and women who are EU citizens whose primary residence is located in Austria; have reached the age of 18 by the day of the election; have not lost their right to be elected in their Member State of origin; have not been convicted by final and binding judgment of a domestic court in respect of one or more judicially punishable premeditated offences to an unconditionally reduced custodial sentence of more than 6 months or to a conditionally reduced | This varies depending on the state. In Burgenland, Carinthia, Salzburg, Styria, Tyrol and Vorarlberg candidates submit an application stating that they have not lost passive electoral rights in their home country. If the municipal election office doubts this, they may contact the competent authorities in the home Member State for verification. | | [Awaiting information from questionnaire s] |
|----|---|---|---|--|---|---|---|---|--|---|

ANNEXES

| | | | | | | | | | | |
|--|--|--|--|--|--|--|---|--|--|--|
| | | | | | | | custodial sentence of more than 1 year; and are listed in the European electoral register of an Austrian municipality on the date of election are eligible to stand as a candidate. A sworn declaration is submitted with regard to biographical details, the last place of registration in their Member State of citizenship, that they are only standing as candidates in Austria, and that they have not lost electoral rights | | | |
|--|--|--|--|--|--|--|---|--|--|--|

| | | | | | | | | | | |
|----|----------------------------|---|--|--|---|--|--|--|---|--|
| BE | Local municipal elections. | One-off, permanent registration ca. three months prior to election day. Registration can be made in person or by mail, post, etc., and must be accompanied by ID documents. | One-off permanent ca. three months before election day. A signed declaration must be made that the voter retains their voting rights in their Member State of citizenship. Registration can be made in person or in some cases by email. | Personal details: Full name; Address; Nationality; The Belgian municipality in which they want to register; The electoral district in which they were registered as voters in the last election . Also a sworn statement that (i) they have not been deprived of their voting rights in their country of nationality, and (ii) that they will vote only for the Belgian lists for the EP | Personalised letters are proactively sent to eligible EU citizens , inviting them to register as a voter ca. 1 month before the finalisation of the voter list. Additional campaigns may be carried out by municipalities . Information is also permanently available in the 24 EU languages on a website . The impacts of registration on electoral rights elsewhere are mentioned on the original registration form. | Information is provided by the municipalities and regions that organise the municipal elections. The exact format and extent of proactive information activities therefore varies. | A signed declaration must be submitted in which the candidate lists their nationality, address, that they retain voting rights in home MS, and that they are not at the same time standing as a candidate in another EU Member State. | Signed declaration that they do not hold elected offices in local government in other Member States, hold other positions which would be incompatible with elected office, and that they have not lost their electoral rights. Non-nationals cannot stand for the position of mayor or alderman. | EU: Same day voting in person or by proxy. Proxy vote requires justification (illness, work, travel abroad, study, imprisonment). | Information gathered at the moment of registration is exchanged with Member States of origin via the EC crypto tool. Double voting is punishable by imprisonment of 8-15 days and a fine of EUR 208-1 600. |
|----|----------------------------|---|--|--|---|--|--|--|---|--|

| | | | | | | | | | | |
|----|--|---|---|---|--|--|---|---|--|---|
| BG | Local legislative and mayoral elections. | One-off permanent registration at least 40 days prior to election day. A statement must be included that the voter retains voting rights in their Member State of citizenship, and that they will only exercise this vote on the Bulgarian election roll. Non-national EU citizens must have been resident in an EU Member State at least three months immediately prior to the election day. | A one-off registration is required in person at the municipality at least 40 days prior to election day. Voters (regardless of nationality) must have been resident in the municipality for three months immediately prior to election day. | Personal information, citizenship, residence address in Bulgaria, last constituency in which they were registered, the date from which they've resided in a MS, and a declaration that they (i) retain electoral rights in their home MS and (ii) will only vote in Bulgaria. | Information campaigns are generally limited, in part because Art. 181(2) of the Electoral Code mandates that political campaigns be carried out in the Bulgarian language. | Information campaigns are generally limited, in part because Art. 181(2) of the Electoral Code mandates that political campaigns be carried out in the Bulgarian language. | When registering to stand as a candidate, the declaration must include: • Citizenship, date and place of birth • Residence address in Bulgaria • A statement that they have not been interdicted and therefore lost their electoral rights • That they are only standing as a candidate in Bulgaria • The last constituency in which they were registered to vote in their home Member State, and their address there • Identity card or passport data and personal | When registering as a candidate, the statement they submit must testify that they have not lost their electoral rights, that they are only standing as a candidate in Bulgaria. | | [Awaiting information from questionnaire s] |
|----|--|---|---|---|--|--|---|---|--|---|

ANNEXES

| | | | | | | | | | | |
|-----------|------------------------------|--|--|--|---|---|---|--|--|---|
| | | | | | | | number • A statement that they have not been deprived of their electoral rights in in their Member State of citizenship by a judicial decision | | | |
| CY | Local legislative elections. | One-off permanent registration ca. two months prior to the election. In addition to personal details and ID, the registration must include a statement that the voter has not lost voting rights | A one-off registration is required. The registration must include the voter's nationality, their address in Cyprus, and the date of their arrival, and proof of identity (e.g. with a passport). Non-national EU citizens must have been | | Information about the voting system, parties and other matters of the electoral contest is available on the website of the Ministry of Interior, and also distributed through media channels. Most of this information is provided only in Greek. | <i>[Awaiting information from questionnaires]</i> | | When registering, the candidate must include a solemn declaration on their personal details, their last address in their home Member State and that they have not been deprived of their electoral rights in that state. | | <i>[Awaiting information from questionnaires]</i> |

| | | | | | | | | | | |
|-----------|---------------------|--|--|--|--|--|---|---|---|--|
| | | and that they only intend to vote on the Cypriot electoral roll. Non-national EU citizens must have been resident in an EU Member State for six months immediately prior to the election data, and be habitually resident in Cyprus on election day. | resident in an EU Member State for six months immediately prior to the election data, and be habitually resident in Cyprus on election day | | | | | Non-nationals cannot stand for the position of mayor. | | |
| CZ | Municipal councils. | <p>One-off permanent registration no later than 45 days prior to the election. Registration is made in-person at the local authority.</p> <p>Non-national EU citizens must have been resident in the Czech Republic for</p> | <p>A one-off permanent registration is required to be included on the list of voters. This needs to be submitted at least 2 days before election day to the municipal council.</p> <p>Permanent residence in the Czech Republic must be supported by documents when</p> | Solemn declaration must be made of their personal details, the address they were last registered on in their Member State of citizenship, and that they will only cast their vote in the Czech Republic. | Information on the conditions of voting is published 80 days before the election on the websites of the Ministry of Interior in English, French and German language and the information on the principles of voting is available at every polling station, regional and municipal office in all languages of the MS of the EU. | Same information as for national citizens, no particular campaign towards EU citizens. | The declaration to stand as a candidate must include confirmation of citizenship, a statement in which they agree to only stand as a candidate in CZ, that they are not legally prevented from standing as a candidate, and their | Non-national EU citizens must run as non-partisans, i.e. as independents. They are also unable to stand for the positions of mayor, deputy mayor and as city councillors in the city of Prague. | EU and local: Same day voting in person, proxy or early voting not possible. | Data is collected according to Directive 93/109/EC, and accordingly transmitted to the home Member States of non-national EU citizens. This is done through tools provided by the European Commission. |

ANNEXES

| | | | | | | | | | | |
|--|--|--|--------------|--|---|--|--|--|--|--|
| | | at least 45 days prior to the elections to vote on the Czech electoral roll. | registering. | | Municipalities called upon by the Ministry of Interior to directly contact non-national EU citizens about the possibility to vote in EP elections. Basic information on the voting in EP elections must be available at every polling stations in all MS. | | address at the last electoral unit they were registered at in their Member State of residence. | | | |
|--|--|--|--------------|--|---|--|--|--|--|--|

| | | | | | | | | | | |
|----|----------------------|---|---|--|--|---|---|---|---|--|
| DE | Municipal elections. | One-off permanent registration through submitting an application in written form. This must arrive at the relevant local authority at least 21 days before the election and shall contain the following information: first and last names, birth date, birthplace, and it must be completed and signed by the applicant. The applicant must also swear under oath that the conditions of eligibility are fulfilled. The residence requirement that applies to electoral registration in general (for German | EU citizens can vote in municipal elections in almost all Länder, except in the city-states of Hamburg and Berlin. In these two city-states, EU national residents can vote for the communal organs of government, which are mostly in charge of administration. EU residents cannot vote for the city-state parliaments, which are considered to be the Länder level of the 16 constitutive states of the German Federation. However, in Bremen electoral laws were reformed to allow EU nationals resident there to vote for the city parliament. | In their registration, mobile EU citizen must offer in writing a signed declaration including their nationality, address in Germany, the political unit in which they were last registered, and must further testify that (1) they have not been excluded from voting rights in their home Member State, (2) will only exercise their vote in Germany, and (3) that they have lived in Germany or another EU Member State uninterrupted for three months prior | The Federal and District/Town Returning Officers publicly announce the conditions and details of Union citizens voting rights prior to elections. Legal bases are published in English, and election calls are published in all official EU languages on the website of the Federal Ministry of the Interior, Building and Community, and generally in at least English and German on the websites of cities and communal administrations. Some local authorities also organise information events to inform eligible citizens on the candidates in the local elections. | Information both in English and German is available on the website of the Federal Ministry of the Interior, Building and Community, as well as on the websites of cities and communal administrations. Some local authorities also organise information events to inform eligible citizens on the candidates in the local elections. Varies depending on federal Land, as they all have their own election laws. | A declaration must be made under oath that their personal information is correct, that they are only standing as a candidate in Germany, and that they have not been deprived of electoral rights in their Member State of citizenship. The candidate must also provide a declaration by a German municipality that they are habitually resident there. | EU nationality and permanent residence required. In local legislative elections, EU citizens are eligible to stand as candidates, except in Bavaria and the city-states of Hamburg, Berlin and Bremen. In local mayoral elections, EU citizens are eligible to stand as candidates, except in Bavaria and Sachsen, where the position of Mayor is reserved to German citizens. Varies depending on federal Land, as they all have their own election laws. | It is possible to vote early by postal ballot following an application. This opportunity is available to all registered EU voters, whether German or not. | According to the electoral authority in Germany, the German communes inform the federal electoral authority of the list of EU citizen residents in Germany. This authority, in turn, sends this information to their home countries. |
|----|----------------------|---|---|--|--|---|---|---|---|--|

| | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|
| | | and non-German voters) follows federal law, and requires three months of residency in Germany or another Member State prior to the election. | Registration is automatic except in Bavaria and Saxony, which require a proactive request to register. | to the election (this also goes for German nationals). | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|

| | | | | | | | | | | |
|----|---------------------------------|--|---|--|--|---|--|--|--|--|
| DK | Municipal councils and regions. | One-off permanent registration no later than five weeks prior to the election. Registration is done through submitting a form to the local municipality. Registration must be supported by ID and documentation indicating that the voter is legally resident in Denmark, e.g. through a lease, property, employment or self-employment contract, or offer of admission to a higher education institution. | Registration is automatic and based on the population register. Residents are automatically included on the list of voters for elections in which they have voting rights based on their nationality and residency status. Voters must have been permanent residents in Denmark at least three weeks immediately prior to the election. | For residents that are already registered in the central population register (Civil Registration System), no additional information is required beyond identification. Residents who are not yet registered need to provide proof of name, DOB, citizenship (through passport, ideally), proof of date of entry into Denmark, and proof of residence (e.g. through a lease agreement). | Many municipalities additionally arrange election meetings in English to inform non-national EU citizens about voting matters, but this varies by locality. Information from the Ministry of Interior and Housing is sent out in Danish, English, French, German and Polish. | Information is provided in English on the dedicated website Stem.dk in the lead-up to elections. General information is available in English from the Danish Ministry of Economy and Domestic Affairs, with some municipalities also providing English-language information services. | When registering as a candidate for a party list, a non-national EU citizen must submit a formal declaration in which they state: • Their nationality, date and place of birth, latest address in their home country, and their address in Denmark; • That they do not intend to stand as a candidate for the European Parliament in any other Member States of the EU; • The electoral district or municipality in their home state in which they most recently entered on the electoral | The procedure and requirements are the same as for national citizens, requiring (i) intact voting rights, (ii) residence in the relevant municipality or region, and (iii) a certain number of nominating signatures from other registered voters. | Early voting is possible in EP elections from six weeks to three weekdays before election day. | Procedures of data exchange as specified and coordinated by the European Commission. |
|----|---------------------------------|--|---|--|--|---|--|--|--|--|

| | | | | | | | | | | |
|----|---------------------|---|---|---|--|--|---|---|--|---|
| | | | | | | | register for the EU Parliament; and • That they have not been deprived of their electoral eligibility in their home state as a result of a judicial or administrative decision | | | |
| EE | Municipal councils. | One-off permanent registration no later than 30 days before election day. | Registration is automatic and based on the population register. Voters must have been entered into the population register in the relevant municipality at least 30 days prior to the election to be included in the | In addition to ID, the application to be included shall contain a statement that the voter wishes to exercise their right to vote only on the Estonian electoral list, as well as details of their last | The controller of the population register is responsible for sending out information to EU citizens with the right to vote no later than 70 days before the election. They furthermore must send an election information sheet no later than ten days before the | The Municipal Election Act mandates that non-national EU citizens are informed of their right to vote and stand in local elections. This must be shared at the latest 70 days prior to the election. No additional, national | A sworn declaration is submitted which states their citizenship, place and date of birth, last residential address and electoral registration in Member State of citizenship, | The right to stand as a candidate in local elections is residence-based, with no further requirements for non-national EU citizens. In their application, the only additional information to be entered by non-nationals is | Possible to vote in-person on the day, early in polling stations, or by electronic e-voting. | The CIRCABC mediated process for information exchange, provided by the European Commission, is used for transmitting the data that is gathered on non-national EU citizens, incl. |

| | | | | | | | | | | |
|--|--|--|-----------------|---|--|---|--|--|--|--|
| | | | list of voters. | place in which they were registered on the electoral roll in their Member State of citizenship. They must also indicate that they have not been deprived of the right to vote | election to voters who have a registered email address in the Estonian data portal. An English-language election hotline, is available from two weeks before election day. | campaigns were organised to specifically inform or mobilise non-national EU voters. An English-language elections hotline is also available from two weeks before election day. | and that they have not been deprived of their right to stand as candidates in their home Member State. | citizenship. Non-nationals may not hold executive offices in local government. | | their nationality and previous electoral registration in their Member States of citizenship. The Estonian electoral list is entirely electronic. |
|--|--|--|-----------------|---|--|---|--|--|--|--|

| | | | | | | | | | | |
|----|---------------------|---|---|--|--|--|--|---|--|--|
| EL | Municipal councils. | Registration is required ca. three months before election day. The registration is not permanent and must be renewed for each election. An application is submitted in person at the local municipality together with ID. Elementary knowledge of the Greek language must be demonstrated in order to vote – however, in practice this is not controlled. | Registration is required with the municipality prior to each election. Voters must have been enrolled in the special electoral lists at least three months before the election. A solemn declaration must be signed, but additional supporting documents are not required. Elementary knowledge of the Greek language must be demonstrated in order to vote – however, in practice this is not controlled at the polls. | | Information is generally provided in Greek and English on the websites of electoral institutions. No further large-scale information or communications campaigns have been identified. | [Awaiting information from questionnaires] | Candidates must provide supporting documents of their biographical details. They must also make two formal declarations: 1. That they registered as voters in Greece and have not been deprived of the right to vote 2. Their nationality and personal details, that they have not been deprived of candidacy rights in their Member State of citizenship, the last electoral register on which they were registered, and that they are only standing as candidates in | Registration as a local elections candidate requires that candidates provide supporting documents on i. Their registration in the electoral register in an EU Member State, ii. A Solemn Declaration that they have not been deprived of their electoral rights in their Member State of citizenship, iii. A tax collection certificate proving residence and payment of a fee, and iv. A second Solemn Declaration incl. their nationality, retained electoral rights, that they do not hold political office in other states, and that they are not candidates elsewhere. | | [Awaiting information from questionnaires] |
|----|---------------------|---|---|--|--|--|--|---|--|--|

ANNEXES

| | | | | | | | | | | |
|--|--|--|--|--|--|--|---|--|--|--|
| | | | | | | | Greece Formally, candidates standing in Greece must have sufficient knowledge of the Greek language, but no formal control mechanisms are in place to ensure this. | Non-national EU citizens can run for the posts of municipal and local councillors, but not for regional positions. | | |
|--|--|--|--|--|--|--|---|--|--|--|

| | | | | | | | | | | |
|----|----------------------|--|---|---|--|---|--|---|--|---|
| ES | Municipal elections. | One-off permanent registration. The registration must contain an 'official declaration of will' in which the voter promises to refrain from voting in their Member State of origin, and must be supported by ID documents. Registration in the municipal census and possession of a foreign national identification number is required to register as a voter. In 2019, voters had to have registered their interest in voting between 30 November 2018 and 30 | No additional requirements befall non-national EU voters compared to nationals (i.e. being legally resident and registered in the relevant municipality), but the registration process differs. Registration to vote can be made either when registering for residence on the municipal census, or when contacted by the Office of the Electoral Census (based on the residence registry). Registration is required ca. 6 months prior to the election. The registration form contains substantially the same information as the municipal census, with an added signed | Spain requires together with the submission of documents required to residents, a formal declaration stating: a) Their nationality, as well as their domicile in Spain. b) That they do not stand simultaneously as candidates in elections to the EP in any other Member State. c) municipality or district of the Member State of origin in whose electoral roll they were last registered. They must also present a certificate from the | Municipal authorities may, but are not universally required to inform voters about the possibility to register on the electoral roll at the same time as they register for the municipal census. The two applications can be filled in and submitted simultaneously. The municipal authorities should transfer this information to the Office of Electoral Census to ensure automatic registration. If it does not happen, mobile EU citizens residents can request registration to vote or wait for the Electoral office to contact them in connection with EP/local elections. The Office of the Electoral Census sends personalised letters to all EU | Information on rights should be provided in the point of registration for residence and it is available in several languages. The municipality should get the EU citizen the declaration to sign and should send it to the Electoral Census office. Prior to EP or local elections, EU citizens who are registered as residents in a Spanish municipality are contacted by the Office of the Electoral Census and informed of their right to register, where and how to vote. These communications are circulated in Spanish, English and French. | EU citizens enjoy the right to passive suffrage in EP elections under the same conditions as Spanish citizens. That is, requirements for registering as a candidate are the same with the same deadlines for registering the list of candidates 9 or 11 days after the call for elections and a formal declaration stating: a) Their nationality, as well as their domicile in Spain. b) That they do not stand simultaneously as candidates in elections to the EP in any other | EU citizens enjoy the right to passive suffrage in local elections under the same conditions as Spanish citizens. That is, requirements for registering as a candidate are the same, and, in principle, the same clauses of ineligibility apply including members of the royal family, judges, and other high public officials. | Voting is possible in-person or by post for those unable to vote in-person on the day of the poll or residing abroad during elections. | Following the Directive, Spain requires together with the submission of documents required to residents, a formal declaration stating: a) Their nationality, as well as their domicile in Spain. b) That they do not stand simultaneously as candidates in elections to the EP in any other Member State. c) municipality or district of the Member State of origin in whose electoral roll they were last registered. They must also present a certificate |
|----|----------------------|--|---|---|--|---|--|---|--|---|

| | | | | | | | | | |
|--|--|---------------|--|---|---|--|---|--|--|
| | | January 2019. | declaration that the voter will only vote in Spain. EU citizens not registered for residence will not be contacted and will not be able to vote. | competent administrative authorities of the Member State of origin, proving that the eligible community member is not deprived of the right to vote in that State. The Central Electoral Board may also require that they present an unexpired identity document and that they indicate from which date they are nationals of a Member State. | citizens enrolled in the municipal census informing them how to proceed with registration to vote. Non-national EU citizens who are already registered on the electoral register will receive a notification of where they can cast their vote. | | Member State. c) municipality or district of the Member State of origin in whose electoral roll they were last registered. 2. They must also present a certificate from the competent administrative authorities of the Member State of origin, proving that the eligible community member is not deprived of the right to vote in that State. The Central Electoral Board may also require that they present an unexpired identity document and that they | | from the competent administrative authorities of the Member State of origin, proving that the eligible community member is not deprived of the right to vote in that State. The Central Electoral Board may also require that they present an unexpired identity document and that they indicate from which date they are nationals of a Member State. |
|--|--|---------------|--|---|---|--|---|--|--|

| | | | | | | | | | | |
|--|--|--|--|--|--|--|--|--|--|--|
| | | | | | | | indicate from which date they are nationals of a Member State. The same clauses of ineligibility apply including members of the royal family, judges, and other high public officials. | | | |
|--|--|--|--|--|--|--|--|--|--|--|

| | | | | | | | | | | |
|----|--|---|---|------------------|--|--|--|---|---|---|
| FI | Municipal elections. Regional government is being implemented - when in place, EU citizens have voting rights there too. | One-off permanent registration 80 days before the elections. Registration can be done online. By signing the form, the voter agrees to only use their right to vote on the Finnish electoral roll in the elections. Non-national EU voters must have been resident in Finland for three months prior to the election to be entered onto the electoral roll. | Registration is automatic based on information contained in the Finnish Population Information System. For the 2021 local elections, the deadline to be included on the electoral register was 51 days before the election. | Personal details | Finnish Digital and Population Data Services Agency inform non-national EU citizens in good time about their eligibility to register as voters and exercise their vote. Eligible voters are identified through information contained in the Population Information System. | All registered voters are sent a polling card informing them of their right to vote in local elections, the period of advance voting, the location of the polling station, and contact information for election authorities. | Non-national EU citizens must indicate that they have not lost the right to stand as a candidate in their Member State of citizenship, but additional requirements do not apply. | Candidates are nominated by parties or constituency associations established by eligible voters. Non-national EU citizens do not have additional requirements to qualify as candidates than do national citizens: they must retain electoral rights and be registered as voters resident in the municipality. | Voting is possible in-person or in advance of the election at polling stations; from 2019, postal voting was made available for those residing abroad during elections. | After registration for the EP elections with the Digital and Population Data Services Agency, the data is transmitted to the relevant authority in the voter's Member State of citizenship so that they can be removed from the electoral roll in that state. |
|----|--|---|---|------------------|--|--|--|---|---|---|

| | | | | | | | | | | |
|----|----------------------|---|---|--|--|--|--|---|--|--|
| FR | Municipal elections. | One-off registration made at the latest 35 days before the elections, either in person in the town hall or online. The application must include a certificate of residence in France and a sworn statement that they will only exercise their voting rights on the French electoral roll. | A one-off registration is required through submission of a form (in person, by mail or online) indicating their personal details, and in the process swearing that they are not deprived of their electoral rights in their country of origin and are not registered to vote in another French municipality. Non-national EU citizens must have been resident in the municipality for at least six months prior to election day , or be able to show that they pay local taxes. | Personal details, nationality and address, the last registered constituency or local authority in which they were registered in MS of citizenship, that they retain electoral rights, and that they will vote only in France | Detailed information is given online (in French) on the website of the Service Public. Generic campaigns are also generally held in the lead-up to EP elections to increase turnout, but without directly targeting non-national EU citizens. However, some local initiatives such as the INCLUDE campaign in Paris have sought to include non-national EU citizens in the political conversation and promote the rights associated with EU citizenship. | Detailed information is given online (in French) on the website of the Service Public. Generic campaigns are also generally held in the lead-up to EP elections to increase turnout, but without directly targeting non-national EU citizens. However, some local initiatives such as the INCLUDE campaign in Paris have sought to include non-national EU citizens in the political conversation and promote the rights associated with EU citizenship. | A formal declaration is required that the candidate retains candidacy rights in their Member State of citizenship. Registration as a voter in France needs to be supported with documentation. | The declaration of candidacy must include a statement to the effect that the candidate is not running in another municipality as well, and that they retain their electoral rights in their Member State of citizenship. Non-national EU citizens may only run for the position of municipal councillor, and cannot stand as mayor or vice-mayor. | | |
| | | | | | | | | | | |

| | | | | | | | | | | |
|----|---|--|--|---|--|--|---|---|--|--|
| HR | Local elections. Non-national EU citizens are not able to vote for executive offices at local or regional level (municipal chiefs, mayors, head of counties, or deputies to these positions). | An in-person one-off registration is made at the latest 30 days prior to the election. When registering, non-national EU voters must indicate the last electoral unit where they were registered in their Member State of citizenship, along with a statement that they have not been deprived of voting rights and only intend to vote on the Croatian list of the EP elections. Registration is done in person at the competent administrative body of the county, and requires a | Registration must be made no later than 30 days before election day. This is a short time frame, as governments are mandated to call elections no less than 30 and no more than 60 days in advance, leaving a very short window for registration. Registration is done in person at the police station and requires a notarised statement of nationality, proof of residence, and a statement that the voter retains voting rights in their Member State of citizenship. Registrations are only valid for one election, and needs to be repeated for subsequent electoral contests. | Name, citizenship, address of residence, the constituency or district of last electoral registration in their home Member State, and statements that they retain electoral rights and will only vote in Croatia | The European Parliamentary Elections Act mandates that the National Elections Commission notifies non-national EU citizens of their electoral rights via public media. Special notices regarding the electoral participation of non-nations are published on the website of the State Electoral Commission in connection with elections. However, no national campaigns specifically targeting non-national EU voters has been identified. | No significant information campaigns were identified, although there may be local variation. | Each candidate list which includes a citizen of another EU Member State must also provide statements on (i) the candidate's citizenship, date and place of birth, last address in country of EU Membership, residence address, and the place and electoral unit in their country of citizenship where their name was most recently included in the electoral register; (ii) confirmation that they are not also running in another Member State; and (iii) that they have not been denied | Registration requires a notarised declaration which states their citizenship, address in Croatia, and a declaration that they have not been deprived of their right to vote in their Member State of citizenship. Non-national EU citizens are not able to stand as candidate for executive offices at local or regional level, but are not faced with further requirements to stand as candidates. | Voting is only done in person at the polling station | [Awaiting information from questionnaires] |
|----|---|--|--|---|--|--|---|---|--|--|

| | | | | | | | | | | |
|-----------|---------------------------------|---|--|--|---|--|---|--|---|---|
| | | notarised statement of nationality, proof of residence, and a statement that the voter retains voting rights in their Member State of citizenship. | | | | | candidacy rights in their country of citizenship by a court or by an administrative decision. | | | |
| HU | Municipal elections and mayors. | One-off registration submitted at the latest 16 days before the election. Registration can be made in person, online, or by post. In their registration, they need to indicate that they will only vote in Hungary, personal information, | Enrolment in the electoral register is automatic based on data in the national address registry. | Name, place of birth, national ID number as printed on residence cards, and if applicable, the last electoral district in their home Member State where they were registered to vote | The National Election Office is obliged to inform non-national EU citizens about their right to register on the electoral register at the latest 21 January the year of European elections, and will proactively send them their registration form to fill in. When registered, voters are informed at least 48 days prior to | [Awaiting information from questionnaires] | In their notification to stand for election, non-national EU candidates must indicate their citizenship, address, place and date of birth, last address in Member State of citizenship; a certification that they are only standing for election in | Non-national citizens face the substantially same requirements when standing for office as do national citizens. [Awaiting complementary information from questionnaire] | Generally in-person; mobile ballot box also sometimes available | Using the data collected when registering voters, the National Election office informs the competent authorities of other Member States when their citizens have registered as voters in Hungary. |

| | | | | | | | | | | |
|----|---|---|--|--|---|---|---|--|---|---|
| | | and the last electoral district in their Member State of citizenship in which they were registered to vote. | | | the election about the location of their polling station and the ID required when casting their vote. | | Hungary; the settlement in their home Member State where they were last registered; and a statement that they are not subject to measures excluding candidacy in their home Member State. | | | This information is shared at the latest 15 days before the election. |
| IE | Local authorities (variously titled County Councils, City Councils, or City and County Councils). | One-off registration. The voter must then ensure their details are up to date. Registration is open between November 1 and November 25, the electoral register is published February 1, and voters must have been resident in Ireland since September 1 | One-off registration. Registration is open between November 1 and November 25, the electoral register is published February 1, and voters must have been resident in Ireland since September 1 the previous year to register. The registration is made in person. It is also possible to apply for registration on | Non-national EU citizens must fill in an EP1 form including their personal details, the last place in their Member State of citizenship in which they were registered as a voter, and a declaration that they will only vote on the Irish list. Following reforms currently making their | Mobile EU citizens are 'flagged' upon entry into the electoral register. The local authorities then instruct the Department of Housing and Local Government to contact non-national EU citizens in their area and encourage the submission of the EP1 form. In addition to this information is communicated on CA website. Following reform | Information is available via the local authorities and the CA. Following reform proposals currently making their way through the legislature, a centralised Electoral Commission is expected to provide additional targeted communication, possibly electronically. | Voters must declare that they have not been deprived of their right to stand as a candidate in their Member State of citizenship. | Non-national EU citizens who are permanently resident in Ireland are able to stand as local government candidates in the same way as national citizens. Persons who stand for election in other states, have been deprived of their electoral rights in their Member State of citizenship, or hold certain positions (e.g. | Voting is done in person at the polling station, except for a few exceptions. | The information contained within the EP1 form is shared by the Irish authorities with the competent authority in the voter's Member State of citizenship. Different information may be collected in the EP1 form depending on the Member State of |

| | | | | | | | | | | |
|--|--|---|---|---|---|--|--|---|--|--|
| | | the previous year to register. The registration is made in person, and must be witnessed either by a notary public, a member of the Garda (police), or a solicitor. It is also possible to apply for registration on a Supplementary Register at the latest 14 working days prior to the election. This needs to be witnessed by a member of the Garda. | a Supplementary Register at the latest 14 working days prior to the election. This needs to be witnessed by a member of the Gardaí (police), a notary or a solicitor. | way through the Irish legislature, they may in the future additionally require the voter's Public Service Number to act as a unique ID. | proposals currently making their way through the legislature, a centralised Electoral Commission is expected to provide additional targeted communication, possibly electronically. | | | judge, comptroller, or as serving members of the Garda, Defence Forces or civil service) are not able to stand as candidates. | | citizenship, and the data they require to identify voters. |
|--|--|---|---|---|---|--|--|---|--|--|

| | | | | | | | | | | |
|----|--------------------------------------|---|---|--|--|--|---|--|--|---|
| IT | Local elections and local referenda. | One-off registration submitted at the latest 90 days before the elections. This request is submitted to the Mayor and must clearly state the will of the non-national EU citizen to vote exclusively in Italy; they must also enclose relevant biographic information and documentation which demonstrates that they have not been deprived of their electoral rights in their Member State of origin. Submission can be done in person, by mail or fax, or online (if submission | One-off registration submitted at the latest 90 days before the elections. This request is submitted to the Mayor and must clearly state the will of the non-national EU citizen to vote exclusively in Italy; they must also enclose relevant biographic information and documentation which demonstrates that they have not been deprived of their electoral rights in their Member State of origin. Registration must be done separately to EP elections, as different electoral lists are used. Submission can be done in person, by mail or fax, or online (if submission is | | General information on the timing and process of electoral contests is generally shared close to the election via media such as television or the websites of municipalities, in multiple languages. | General information on the timing and process of electoral contests is generally shared close to the election via media such as television or the websites of municipalities, in multiple languages. | Voters must declare their relevant biographic information; that they enjoy full electoral rights in their Member State of origin; the last constituency where they were enrolled in their Member State of origin; and that they will not stand as candidates in any other Member State. This declaration is submitted to the Court of Appeal. | A formal declaration must be submitted to the Court of Appeal, containing personal details; last address in Member State of origin; the municipality where they are standing as candidate; that they are only standing as candidate in Italy; and that they have not been deprived of their electoral rights in their Member State of citizenship. Non-national EU citizens can run for positions on the City Council and District Council, with the exception of the positions of Mayor and Deputy Mayor. | | When non-national EU citizens have been added to the Italian electoral roll, this information is communicated by the Ministry of the Interior, through the Ministry of Foreign Affairs, to the voter's Member State of citizenship. |
|----|--------------------------------------|---|---|--|--|--|---|--|--|---|

| | | | | | | | | | | |
|--|--|---|--|--|--|--|--|--|--|--|
| | | is not done in person, a copy of one's Italian ID is required). The exact practices may vary slightly between municipalities. | not done in person, a copy of one's Italian ID is required). The exact practices may vary slightly between municipalities. | | | | | | | |
|--|--|---|--|--|--|--|--|--|--|--|

| | | | | | | | | | | |
|----|--------------------------------|---|---|---|---|---|--|---|---|--|
| LT | Local legislative and mayoral. | Based on Population Register data, a preliminary electoral roll is drawn up which includes all those who have the right to vote (non-nationals must have been declared resident for 90 days prior to the election to be included). It is at this point that non-national EU citizens need to make their declaration to be included on the final electoral roll. | Registration is automatic based on residency registers. | Registration is required prior to every election. This includes a declaration that the voter will only vote in Lithuania, that they have not been deprived of their voting rights in their Member State of citizenship, and the last electoral unit in which the voter was registered in their Member State of citizenship. | The Central Electoral Commission contacts the non-national EU citizens with a letter which invites them to participate in elections and informing them about the necessary declarations that need to be submitted. Information is also provided on the website of the Central Electoral Commission. Information is also provided by the Commission through a specific 'voters' page', and via a hotline available in Lithuanian and English. Social and civil initiatives aimed at strengthening democracy and civil society are also involved in the dissemination of information. | Information is mainly available on the website of the Central Electoral Commission. | Requirements are the same as for nationals, with the addition that non-national EU citizens must also declare that they have not been deprived of electoral rights in their Member State of citizenship and they will not stand for election in other Member States. | Candidates for municipal councillor or mayor can either declare themselves, or be declared by a part or election committee. To stand, they must be permanently resident in the municipality (i.e. since at least 90 days prior to polling day) and must not have lost their right to stand as a candidate in their Member State of citizenship. | Generally in-person, proxy or distance voting must be applied-for and motivated | |
|----|--------------------------------|---|---|---|---|---|--|---|---|--|

| | | | | | | | | | | |
|----|----------------------|--|--|--|--|--|---|--|--|---|
| LU | Municipal elections. | One-off permanent registration to be submitted before the 87th day preceding the elections. The signed and dated application can be made either electronically via MyGuichet.lu or on paper. In this case and if the application for registration is accompanied by the required documents, a receipt is issued by the commune of residence of the person concerned. Secondly the non-national EU-citizen has to hand in a formal declaration with a current valid identity | A citizen of another State may either submit this request or submit a written application in person at the communal administration. The application for registration must be submitted the 87th day before the election at 17.00 at the latest. Foreign nationals must also complete, date and sign a formal declaration, with a current valid identity card, stating nationality, date and place of birth, last address and information about their right to vote and eligibility in country of origin. Registration is automatically renewed for the subsequent elections. Non-nationals | | Authorities, NGOs and the European Parliament Liaison Office in Luxembourg proactively inform EU citizens about their electoral rights. Brochures are edited in the 23 official languages of the EU. The website jepeuxvoter.public.lu provides explanation about voting rights and the importance of participation in elections. | Authorities, NGOs and the European Parliament Liaison Office in Luxembourg proactively inform EU citizens about their electoral rights. Brochures are edited in the 23 official languages of the EU. | For EP elections, non-national candidates must produce in support of his application: (1) a formal statement specifying: (a) his nationality, date and place of birth, his last address in the Member State of origin and his address in the Grand Duchy of Luxembourg; (b) where applicable, on the electoral roll of which local authority or constituency in the Member State of origin it was last entered; (c) that he is not simultaneously a candidate in the European | All non-citizen residents have the right to stand as candidates. To stand as a candidate only the last year of residence, out of the 5 years of residence, preceding the filing of the candidacy must be continuous. | | <i>[Awaiting information from questionnaires]</i> |
|----|----------------------|--|--|--|--|--|---|--|--|---|

| | | | | | | | | | | |
|--|--|---|---|--|--|--|--|--|--|--|
| | | document. To be eligible to vote, these citizens shall also specify in the formal declaration that they will only exercise their right to vote in Luxembourg and not in the Member State of their nationality. | must have resided in Luxembourg for at least 5 years: the last year of residence prior to the application for registration on the list of voters must be uninterrupted. | | | | elections in another Member State; (d) that he is not deprived of the right to stand as a candidate in the Member State of origin by an individual court decision or an administrative decision; and (2) a valid identity document | | | |
|--|--|---|---|--|--|--|--|--|--|--|

| | | | | | | | | | | |
|----|----------------------|---|---|--|---|--|---|--|--|--|
| LV | Municipal elections. | Prior to EP elections, all eligible permanent residents (incl. non-nationals) are entered onto a preliminary Voter Registry based on information in the Registry of Residents. To be included on the final electoral roll, non-national EU citizens must submit a request electronically or by mail to the Central Elections Commission 1 month prior to the election. They must in this declare that they are an EU citizen, that they are registered permanent residents in | Prior to local elections, all eligible permanent residents (incl. non-nationals) are entered onto a preliminary Voter Registry based on information in the Registry of Residents. | | The Central Elections Commission publishes general information on their website in multiple languages, and also host an elections hotline in Latvian and English. | At least 70 days before the election, the Office of Citizenship and Migration Affairs (OCMA) sends individual letters to eligible voters with information about the timing of elections and location of polling stations. This information is also available from the OCMA website. Other than this, most communication on local elections is only available in Latvian. | Voters must declare that they have not been deprived of their right to stand as a candidate in their Member State of citizenship. | Candidates must be submitted by a registered political registration in municipalities which have more than 5 000 residents. Non-national EU citizen candidates must not have lost their right to be elected in their Member State of citizenship. A signed declaration to this effect (and other personal details) are submitted at the time of nominations. | | [Awaiting information from questionnaires] |
|----|----------------------|---|---|--|---|--|---|--|--|--|

| | | | | | | | | | | |
|----|---------------------|---|---|---|---|---|---|--|---|--|
| | | Latvia, and that they retain voting rights in their Member State of citizenship. | | | | | | | | |
| MT | Municipal councils. | One-off registration is required ca. 2 months before the election. Non-national EU citizens must declare in their registration that they will only exercise their right to vote in Malta, and that they have not been deprived of their electoral | Registration for local elections is automatic and based on residency records, but needs to be confirmed by a signed, physical form. | Personal details and honourable declaration (retains voting rights, and will only vote in Malta). | Information is communicated by the Electoral Commission through their online portal. This includes English-language information on how to verify eligibility for voting and candidacy, where and how to register to vote, and whether dual citizenship affects voting right. No special campaigns are in place for mobile | Information is communicated by the Electoral Commission through their online portal. This includes English-language information on how to verify eligibility for voting and candidacy, where and how to register to vote, and whether dual citizenship affects voting right. No | A person shall qualify to stand for election to the European Parliament if such a person is registered as a voter in the Electoral Register or in the European Union Electoral Register. They must also not hold political functions elsewhere; | To candidate, a non-national EU citizen needs to be registered as a voter on the Electoral Register. They must not have been deprived of their right to be elected in their Member State of citizenship. | Voting in Malta is done in person at the polling station. | [Awaiting information from questionnaires] |

ANNEXES

| | | | | | | | | | | |
|----|--|---|---|--|--|--|--|---|--|--|
| | | rights in their Member State of citizenship. | | | EU citizens. | particular campaigns or channels are available to mobile voters. | have been deprived of their right to stand as candidates in their Member State of citizenship; or stand as a candidate in another country. | | | |
| NL | | Registration is automatic based on residency records. To be included on the 2019 electoral list, non-national EU citizens needed to have been registered between 26 February and 9 April 2019. An active opt-in is however also required to make use of voting rights in EP elections. The request to register must include | Voting registration is automatic, based on residential records. No additional registration is required. | | Local municipal executives are tasked with pre-emptively contacting non-national European citizens who settle in the municipality, providing them with a form with which they can request registration of their franchise. Exact information measures vary between municipalities: A 2018 evaluation found that 74% of municipalities provided specific information for non-citizen residents on their website; 55% with | Generally, municipalities do not provide specific information targeted at non-residents, but this varies between localities. Broader voting rights are detailed in English on the websites of electoral authorities. | In addition to the information that needs to be submitted when registering as a voter (cf. 3a), they must also indicate their nationality, the place where they were last registered to vote in their Member State or nationality, and a statement from the authorities in their Member State of nationality | Non-national EU citizens must be resident in the municipality where they are standing for election, whereas for national citizens it is sufficient that they indicate their intention to settle there if elected. | | [Awaiting information from questionnaires] |

| | | | | | | | | | | |
|--|--|---|--|--|--|--|---|--|--|--|
| | | the voter's address in the Netherlands; the electoral unit where they were last registered in their Member State of citizenship; and a statement that they have not been disqualified from voting in their Member State of citizenship and will only exercise their right to vote in the Netherlands. | | | posted circulars; 33% with personal letters including information on upcoming elections; and 8% on local television. | | that they have not to the knowledge of the authorities been disqualified from standing for election in that Member State. | | | |
|--|--|---|--|--|--|--|---|--|--|--|

| | | | | | | | | | | |
|----|--|--|--|--|---|---|---|---|---|---|
| PL | Local municipalities and local mayors. | Registration needs to be completed 5 days before election day. Non-national EU citizens can choose whether to be entered on to the Register of Voters, in which case they are registered for subsequent elections as well, or on the List of Voters, which only enters them for the upcoming election. Registration on the List of Voters can be done as late as 5 days before the election. | An application needs to be filed for inclusion in the permanent electoral register, which is maintained also outside of the voting period. Applications must be submitted before the election, with no specified deadline - a response on inclusion is given within 5 days. If included on the permanent register, the voter is also included on the electoral roll for the relevant election. | Valid ID document and proof of permanent residence in the municipality where they register | Information on the means of voting, provisions for disabled voters, and details on the electoral commission and voting circuits of the municipality are provided by the mayor at least 30 days before election day. Since 2016, the electoral commissioner also produces, 21 days before the elections, information to voters on the date of the election, voting time, method of voting, and possibilities of correspondence and proxy voting for disabled voters. | Information on the means of voting, provisions for disabled voters, and details on the electoral commission and voting circuits of the municipality are provided by the mayor at least 30 days before election day. Since 2016, the electoral commissioner also produces, 21 days before the elections, information to voters on the date of the election, voting time, method of voting, and possibilities of correspondence and proxy voting for disabled voters. | The formal declaration must state that they are not running as a candidate in another EU Member State; their prior address of residence within the EU; and must provide a specific declaration that they have the right to stand for office in their Member State of citizenship. Non-national citizens are not able to participate as members of political parties, making it difficult for them to garner sufficient support to stand as a candidate or get elected. Five years of EU residence | Candidates must be able to demonstrate residence in the locality, and that they enjoy electoral rights in their Member State of citizenship. Non-national EU citizens cannot be elected to the position of mayor. Non-national EU citizens not being able to participate in political parties. Effectively, this means they are largely closed out of the political process, as candidates for municipal councils are generally nominated by political parties. Five years of EU residence is required. Documents in languages other than Polish must be submitted with a sworn | Voting is done in person at polling station. Mail or proxy voting is available only for those with moderate or severe disabilities, or those subject to compulsory quarantine or isolation. Applications for this must be supported, in the case of mobile EU citizens in the form of a sworn translation of a document from their home MS. | [Awaiting information from questionnaire s] |
|----|--|--|--|--|---|---|---|---|---|---|

| | | | | | | | | | | |
|-----------|--|--|--|--|---|---|--|--|--|---|
| | | | | | | | is required. | translation accompanying. | | |
| PT | City council, municipal assembly and parish council. | One-off permanent registration is required 60 days prior to the election at the local Census Commission. | One-off permanent registration is required ca. two months prior to the election at the local Census Commission. Non-national citizens are subject to a 'principle of reciprocity' which means that they only have the right to vote in Portuguese local elections, | In addition to ID, the application must include proof of legal residency in Portugal through a valid residence card, a Certificate of Registration, or a Certificate of Permanent Residence. | The High Commission for Migration, which is responsible for migrant integration, has a website with information in Portuguese and English with information on who can vote, and how registration works. They also operate field offices for voter registration, where non-national citizens can receive | As for European elections, non-national residents benefit from Support Offices set up and managed by the High Commission for Migrants. This provides information about voting rights, practicalities of voting and standing as a candidate, and | A non-national EU citizen must submit a formal statement indicating their nationality, place of residence in Portugal and last residence in the country of origin, and evidence that they have not been debarred | To stand as a candidate, non-national EU citizens must supply a formal declaration which includes their nationality and address of regular habitation in Portugal; their last residence in their Member State of citizenship; and evidence that they have not been deprived of passive | Voting is generally done in-person. For those who are travelling abroad on election day for valid reasons (illness, displacement due to official functions, research purposes within the scope of research or studies, | <i>[Awaiting information from questionnaires]</i> |

| | | | | | | | | | | |
|----|--|--|--|--|--|--|---|---|---|--|
| | | | if Portuguese citizens have the right to vote in the respective Member State of citizenship. Within the EU this should generally not limit voting rights, however. | | information on rights and duties (incl. how to stand as a candidate) in Portuguese or 12 other languages from guides of a similar background. | more broadly provides information on the political rights of non-nationals in a variety of languages. | from the right to be elected in their home country. If in doubt, the competent court may require that the country of origin authorities testify that the candidate retains their passive electoral rights, or at least that they are not aware of any impediment. | electoral rights in that country. The principle of reciprocity also applies for candidacy rights. | representing sports teams, or accompanying someone from these categories), advance voting is possible. | |
| RO | Local legislative and mayoral elections. | One-off permanent registration at the latest 60 days prior to the election, delivered in person to local authorities. To register, a form must be submitted stating their biographical details, the electoral unit in which they were last registered to | Non-national EU citizens need to have held residence in the relevant municipality at least three months before the election takes place. The electoral list for each election is established maximum 45 days before election day. If these provisions are fulfilled, registration is | Full name; Gender; Nationality; Place and date of birth; Personal address in Romania; and the municipality or electoral register in which the person was last registered on the electoral list in their country of citizenship. By | Generally, awareness campaigns have been directed at increasing voter awareness and participation in general, and not specifically towards non-nationals – they are also fewer in number than campaigns targeting non-resident nationals, as this is a much larger group of potential voters . | No significant communications or information campaigns targeted at non-national voters have been identified. | A written declaration must be submitted which states that they will not stand as a candidate in another EU Member State, along with a signed form from the competent authority in their Member State of citizenship which proves that they have not | The formal declaration must state that they have not been deprived of their candidacy rights in their Member State of nationality and that they do not hold a public office in their home country which would be incompatible with holding public office in Romania (e.g. judges, political | Generally in-person at polling station. Distance voting only possible in some restricted cases of illness or disability, with extensive supporting documentation. | [Awaiting information from questionnaires] |

| | | | | | | | | | | |
|----|-----------------------------|---|---|---|--|---|---|--|---|--|
| | | vote in their Member State of citizenship, and a statement that they (i) do not intend to vote in another country and (ii) have not been deprived of the right to vote in their country of citizenship. | automatic based on residency records from the Romanian Immigration Office | submitting the form they declare that they will not vote in another EU Member State, and that they have not been deprived of the right to vote in their country of citizenship. | | | been deprived of their candidacy rights there. | officials, members of the Armed Forces). They must also support their residency in Romania, either through e.g. a rental or sales contract or a signed declaration from their landlord, or through a document issues by the Romanian Immigration Office. | | |
| SE | Municipalities and regions. | One-off permanent registration at the latest 30 days prior to the election, either by own initiative or following contact by the Swedish Election Authority. Registration is done by submitting a form by mail. | Registration is automatic based on population records from the Swedish Tax Agency. No further action is required on behalf of voters. In order to be included for a particular election, the voter must have been resident in the relevant municipality or region at least 30 days prior to election day. | None - this is already included in the Population Register. However, when submitting the form, they need to indicate that they only intend to vote in Sweden. | EU citizens are contacted by the Swedish Election Authority in advance of elections if they are not already on the electoral roll. As this information is retrieved from the Population Register, EU mobile citizens can be directly targeted and invited to submit forms to register for the electoral roll without requiring further | If entitled to vote, the non-citizen resident will receive a voting card in the post ca. three weeks before the elections, which details the location of their polling station and procedure of voting. National advertising campaigns by the Swedish Election Authority may also occur, in | Candidates indicate their nationality and address in Sweden, their date and place of birth, and their latest address in their home country; the constituency or area in their home country in which they were most recently registered on the electoral | Non-national EU citizens are able to stand for election in the same way as national citizens. Candidacy rights are tied to residency, not nationality. | In-person and early voting are both possible. Mail voting is available for Swedish voters who either reside abroad or are abroad during the election. Early voting starts 18 days before election day in Sweden, and 24 days in Swedish | [Awaiting information from questionnaires] |

ANNEXES

| | | | | | | | | | | |
|-----------|---------------------------------|--|---|--|---|---|--|--|---|--|
| | | | | | proof of identity (as this is already required for the initial registration in the Population Register). | addition to information held in ca. 30 languages on their website. | roll; and swear that they are not standing as an EP candidate in another MS, and that they have not through a judicial or administrative decision lost their right to be elected | | embassies and consulates abroad. | |
| SI | Municipal councils and mayoral. | One-off registration is required. This must indicate that the non-national EU citizen has not lost their electoral rights in their Member State of citizenship, and sign a statement that they will not vote in another EU Member State. | Non-national EU citizens with residency permits and a registered permanent residence in Slovenia are automatically registered as voters in local elections. | Name, ID (or DOG + gender), citizenship, address, any residence abroad, their last registration in a constituency in their home MS, and signed statements to the effect that they will only vote in Slovenia and that they retain the right to vote in their home MS | The Ministry of Interior informs non-citizen EU residents about their electoral rights and how the voting system is arranged within ten days of the election being called. This is done by a posted circular in Slovenian and English. Information is also available in English and a variety of other languages on the website of the State Election Commission. | No particular information activities are required for local elections by law. There are no campaigns directly targeting non-citizen EU residents, and locally disseminated information is presented in the official language(s) of the area (variously Slovenian, Hungarian and Italian). | The non-national EU citizen must enclose a statement of citizens with temporary or permanent residence address in Slovenia, as well as a statement that she/he is not standing for European Parliament in another EU Member State. | | Early voting is possible 2-5 days before polling day, and voters can also vote in other districts' polling stations. Postal votes are possible for old, ill and vulnerable individuals, and for voters who are abroad on polling day (who also can vote at embassies and consulates). For mail voting and | [Awaiting information from questionnaires] |

| | | | | | | | | | | |
|----|--|---|--|--|---|---|---|--|--|--|
| | | | | | | | | | voting abroad, application is required. | |
| SK | Local legislative and mayoral, and regional elections. | One-off permanent registration, submitted at the latest 40 days before the election. When registering as a voter, a declaration must be submitted which states their nationality; the electoral unit or constituency in which they were last registered in their Member State of nationality; that they have not been deprived of | If a voter is permanently resident in Slovakia they are entered on the electoral roll. To be included for a specific election, this must occur at least 40 days prior to election day. | | The Electoral Act mandates that municipalities share with all electors in its territory information about the conditions for the right to vote and to be elected, the time of polling and district, the polling station and information on how to prove one's identity. This must be shared no later than 25 days before the election. Information about the conditions for the right to vote and right to be elected must be shared no later than 10 days after the declaration of | Prior to every local election, municipalities send information packages to non-nationals to explain their electoral rights. | Voters must declare that they have not been deprived of their right to stand as a candidate in their Member State of citizenship. To gain electoral rights, they must also have been resident in Slovakia for five years. | [Awaiting information from questionnaires] | [Awaiting information from questionnaires] | [Awaiting information from questionnaires] |

| | | | | | | | | | | |
|--|--|---|--|--|------------|--|--|--|--|--|
| | | their electoral franchise in their Member State of nationality; that they will vote only in Slovakia in European elections; details of a valid travel document supporting their identity; and details of their permanent residence in Slovakia. | | | elections. | | | | | |
|--|--|---|--|--|------------|--|--|--|--|--|

Annex 4 – Analysis of targeted survey of mobile European citizens

Methodology

A targeted online survey of mobile EU citizens was carried out to ensure that sufficient numbers of the target audience would be reached in order to evaluate their experiences of political participation as mobile EU citizens, as well as the variety of factors that influence their participation.

The recruitment methodology replicated that used in 2019 for the European Parliament, when large numbers of mobile EU citizens had to be reached. Equal diversity in terms of age, gender, occupation and education levels were sought. The main target countries of residence were:

- Belgium
- Germany
- Spain
- France
- Italy
- Austria
- Finland
- Luxembourg
- Ireland
- The Netherlands

These Member States were chosen as the main target countries due to their number and variety of resident mobile EU citizens. However, the survey was open to mobile EU citizens residing in any Member State in order to ensure a diversity of experiences.

Online advertising on social media was used to recruit as many mobile EU citizens as possible, advertising in various expatriate groups. Therefore, the sampling methodology used a non-probabilistic approach, yet one that was considered feasible at a reasonable cost, allowing conclusions to be drawn on an otherwise niche population.

Purpose of the survey

The purpose of the online survey can be considered as two-fold:

- There is a very limited amount of data available on reasons for participation and abstention in local elections. This is particularly the case when it comes to mobile EU citizens. Therefore, one of the uses of this survey was to collect data on this matter.
- The survey was also used as key input to assess the impacts of policy options aimed at increasing the political participation of mobile EU citizens.

Testing policy options with respondents

The second point, identifying which policy options are likely to result in the greatest increase in participation, along with the characteristics of the target population which they work for, is one of the key aims addressed by this survey.

A small-scale experimental component was integrated into the survey in order to carry out this assessment. Respondents were split randomly into four equally sized samples, and each sample was shown a letter received from the municipality containing information on voting and registration. These letters were as follows:

- A letter explaining that the recipient was automatically registered, and as a result could vote directly in the upcoming local elections;
- A letter explaining that the recipient would have to actively register in order to vote in the upcoming local elections;
- A letter using formal, straightforward administrative language explaining the recipient's eligibility to vote as a mobile EU citizen in the upcoming European Parliament elections, with the option to do so either for host-country party lists or home-country party lists;
- A letter using emotional language that called on the recipient's sense of civic duty, explaining their eligibility to vote as a mobile EU citizen in the upcoming European Parliament elections, with the option to do so either for host-country party lists or home-country party lists.

Respondents were also asked some pre-experiment questions within the questionnaire to establish:

- Their registration status
- Electoral turnout history
- Their perception of various types of elections (local, national, European parliament)
- Patterns of political participation and civic engagement
- Awareness of the required registration procedure
- Recall of any reminders received, their attitude towards these reminders and their potential self-declared impact.

After answering the questions in the pre-experiment module, and random allocation into one of the four groups, respondents were asked to evaluate on a scale from 0 to 10, 0 meaning "I will certainly not vote" and 10 meaning "I will most certainly vote", how likely they were to vote in the election corresponding to the letter they received.

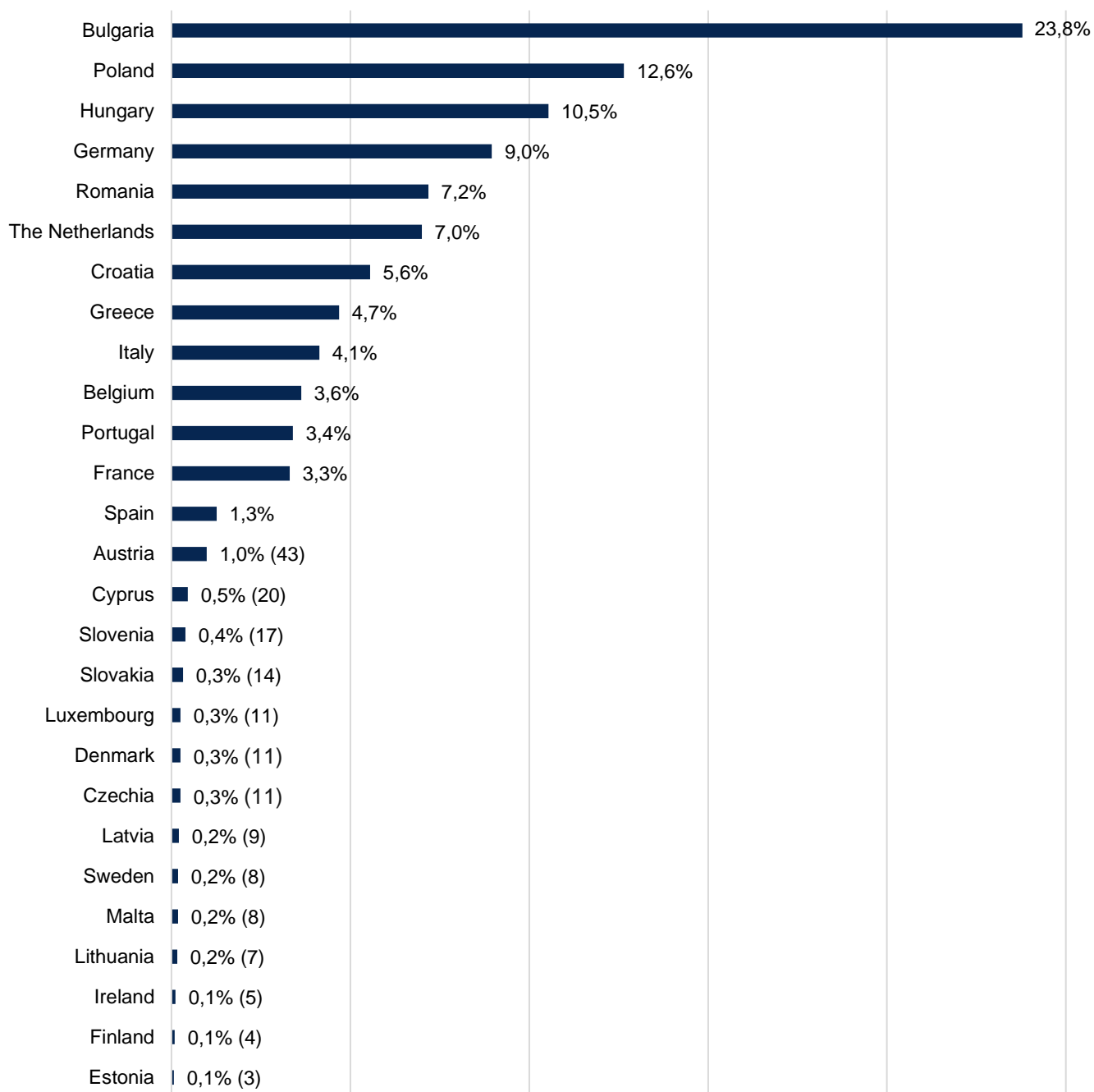
By comparing the answers on voting likelihood across all four groups, using a between-subject design, and by considering the real-life history of participation and likelihood to vote in various types of elections from the information elicited in the pre-experiment questionnaire, we were able to estimate the potential impact of each of the scenarios concerned.

Although the approach might have had the scientific rigour and robustness of results of a field experiment, the survey has gone beyond the simple use of self-reported measures to evaluate the likelihood of election turnout, in this way avoiding some degree of social desirability effect.

Profile of Respondents

D2 What is your nationality? Please select the country or countries that apply...

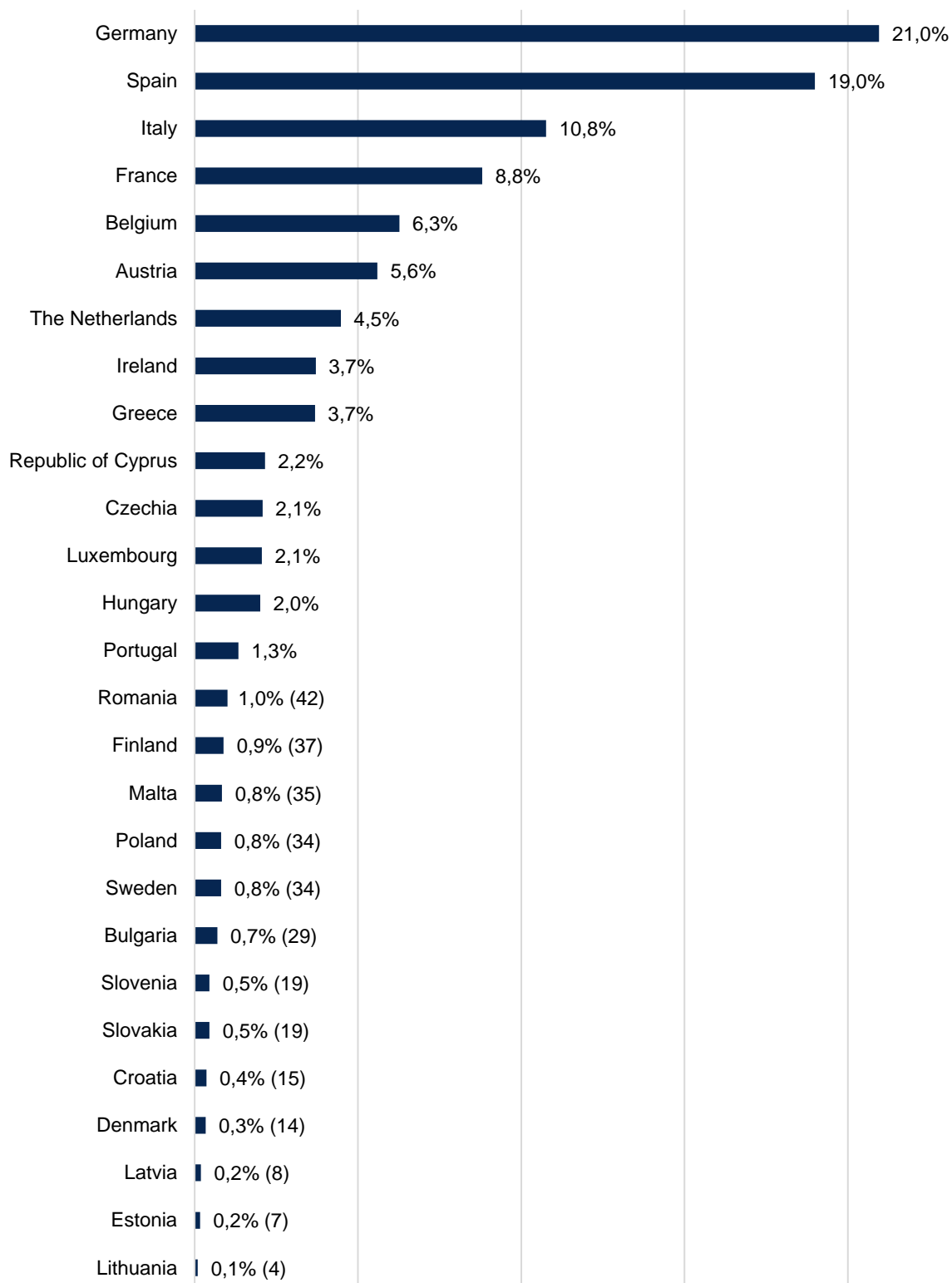
MULTIPLE ANSWERS POSSIBLE



All respondents (n = 4,356)

D3 In which country do you live?

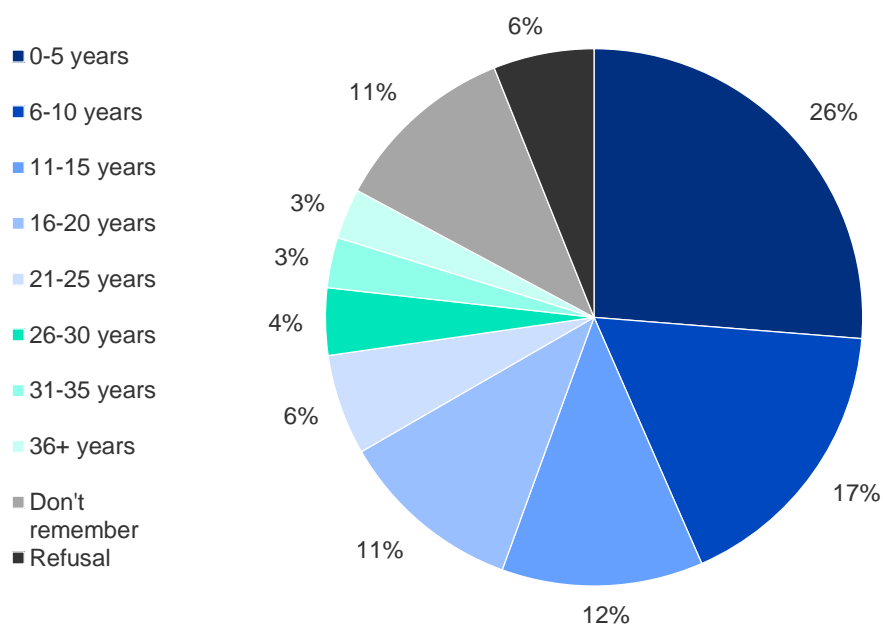
ONE ANSWER ONLY



All respondents (n = 4,180)

D4 How long have you been living in your country of residence? Please enter the number of years.

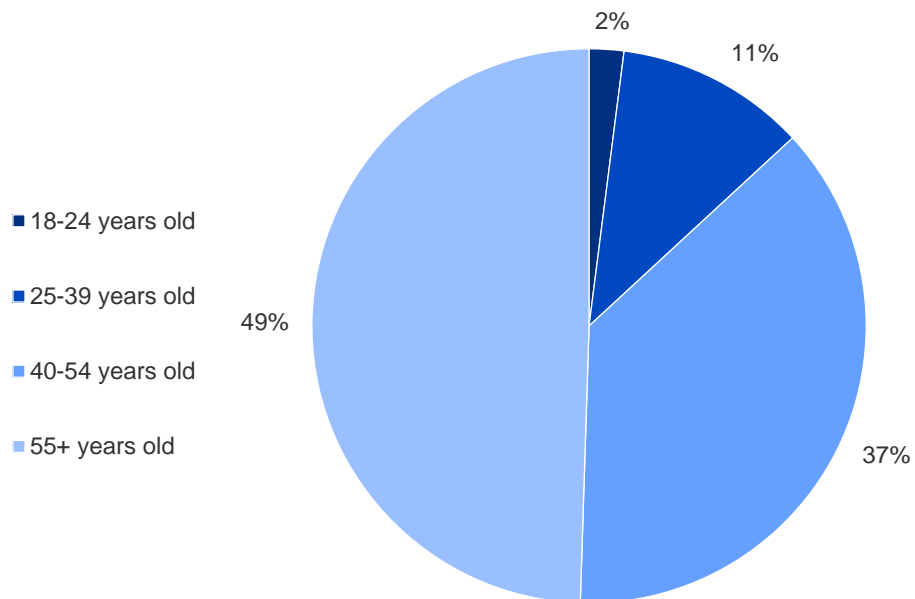
ONE ANSWER ONLY



All respondents (n = 4,039)

D5 How old are you?

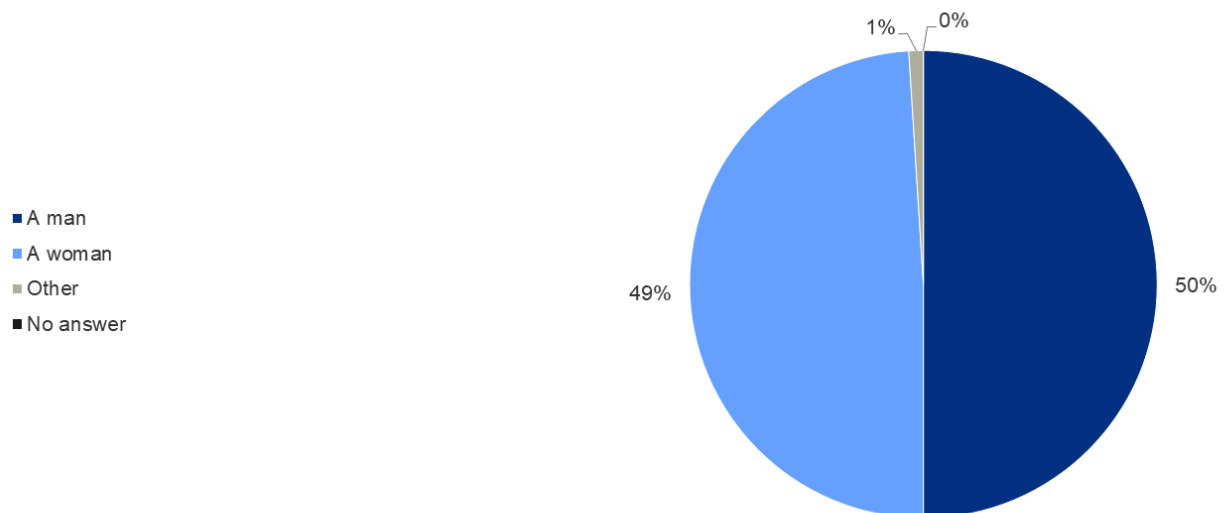
ENTER VALUE



All respondents (n = 3,897)

D6 Are you...?

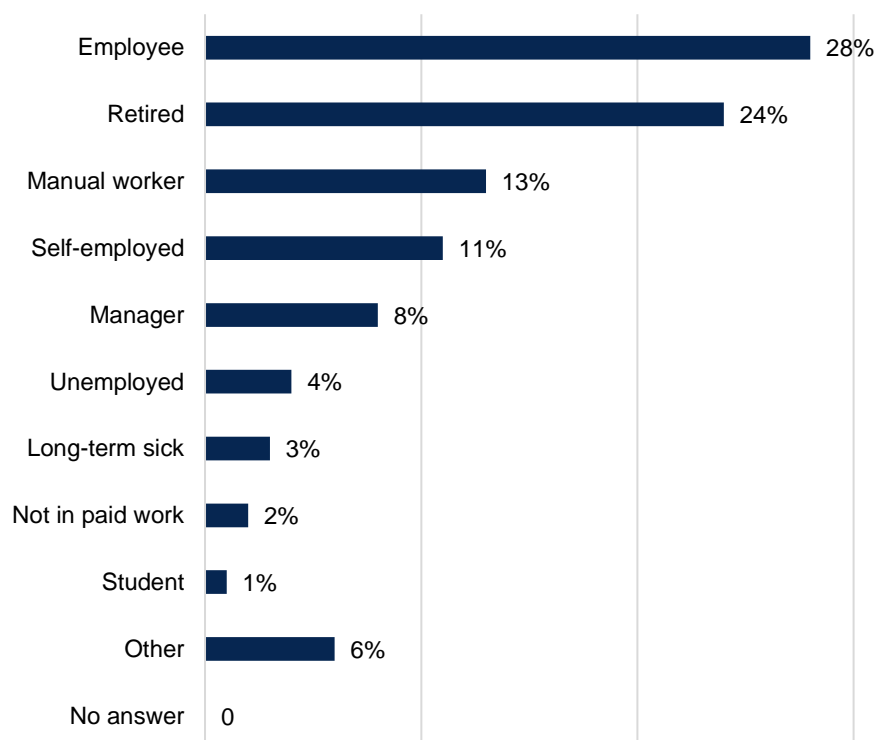
ONE ANSWER ONLY



All respondents (n = 2,359)

D7 What is your current occupation? Are you...

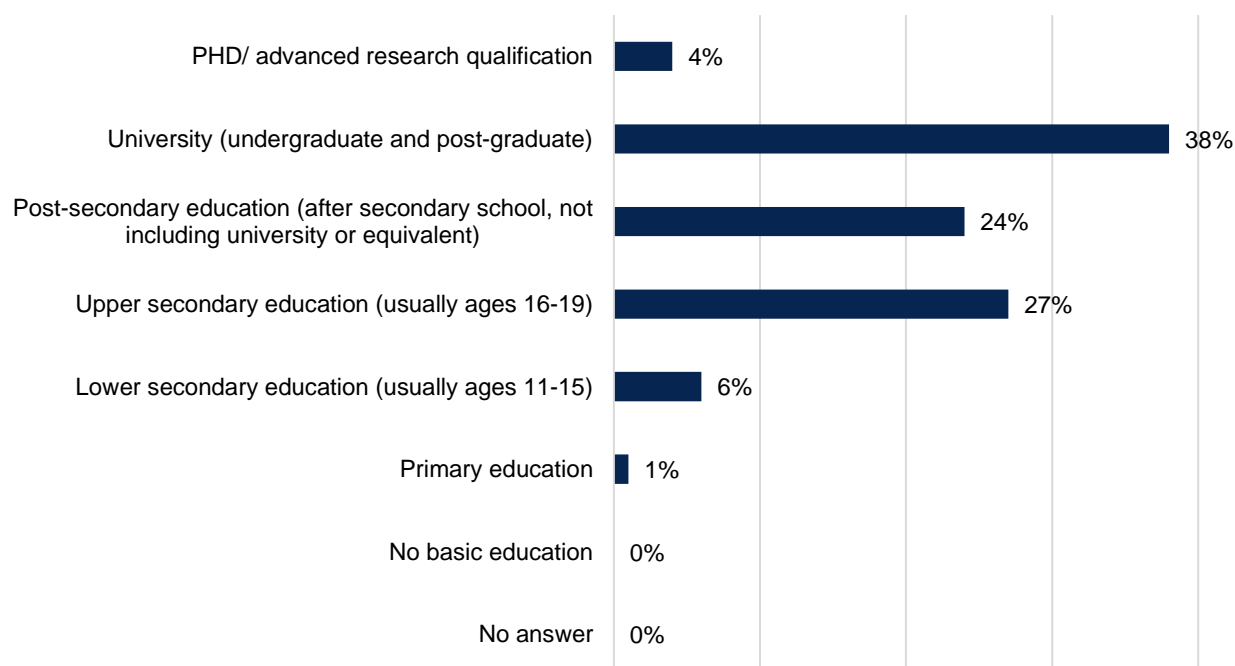
ONE ANSWER ONLY



All respondents (n = 2,358)

D8 What is the highest level of education you have completed?

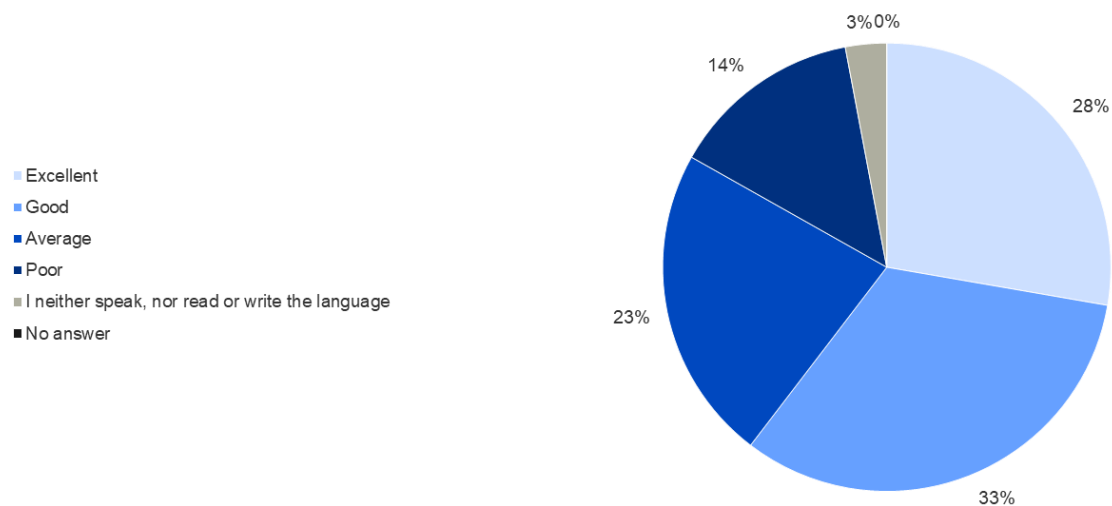
ONE ANSWER ONLY



All respondents (n = 2,355)

D9 How would you rate your command of the main language(s) spoken in your country of residence? If there are several main languages in your country of residence, please answer on the basis of the one used for official communication in the area where you live.

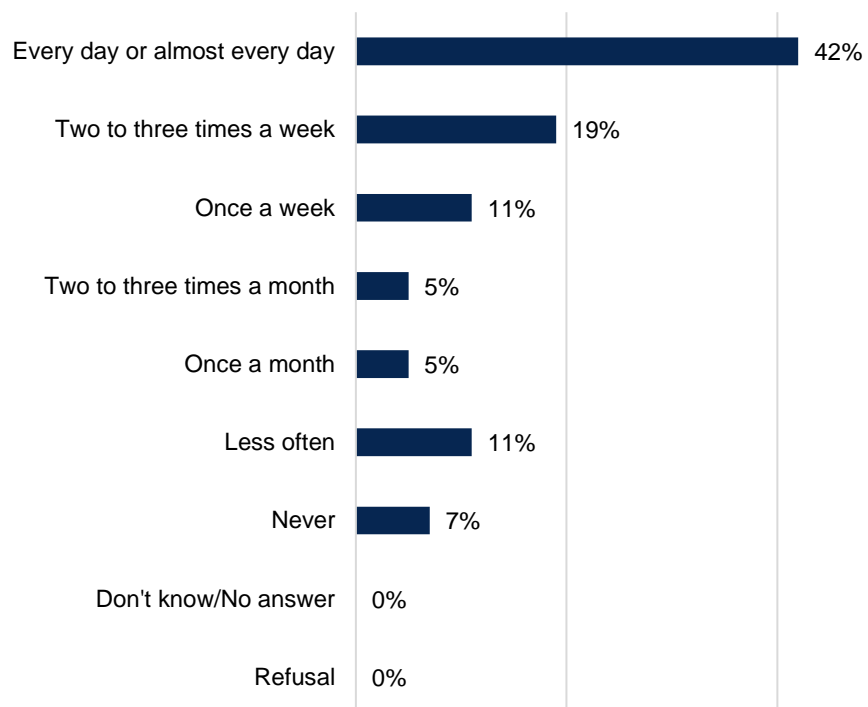
ONE ANSWER ONLY



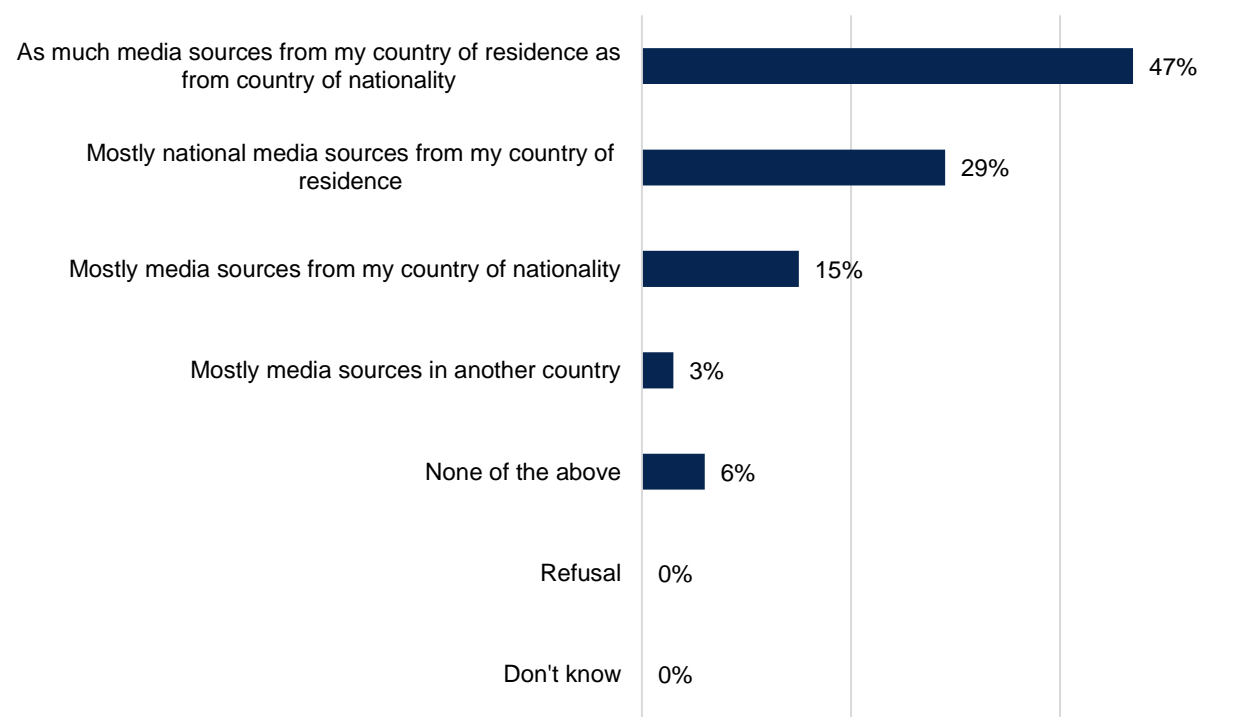
All respondents (n = 2,354)

D10 How often do you consult the news about political matters in the local area where you currently live?

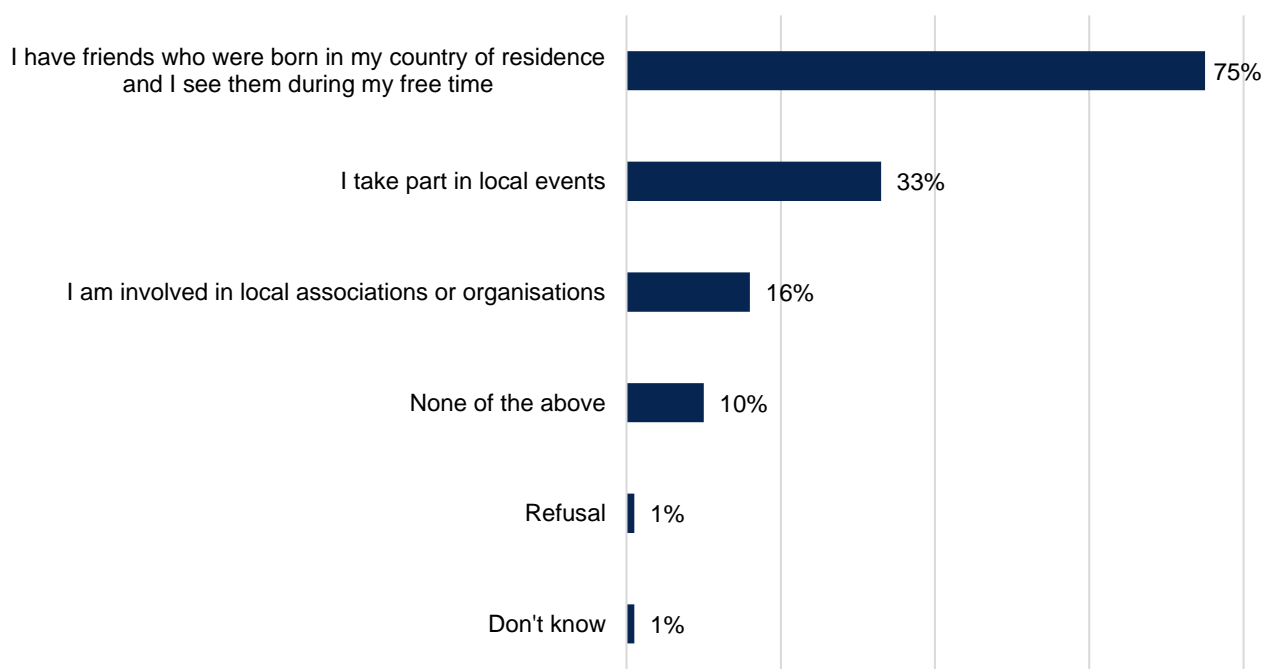
ONE ANSWER ONLY



All respondents (n = 2,354)

D11 Where do you get your news or information from?**ONE ANSWER ONLY**

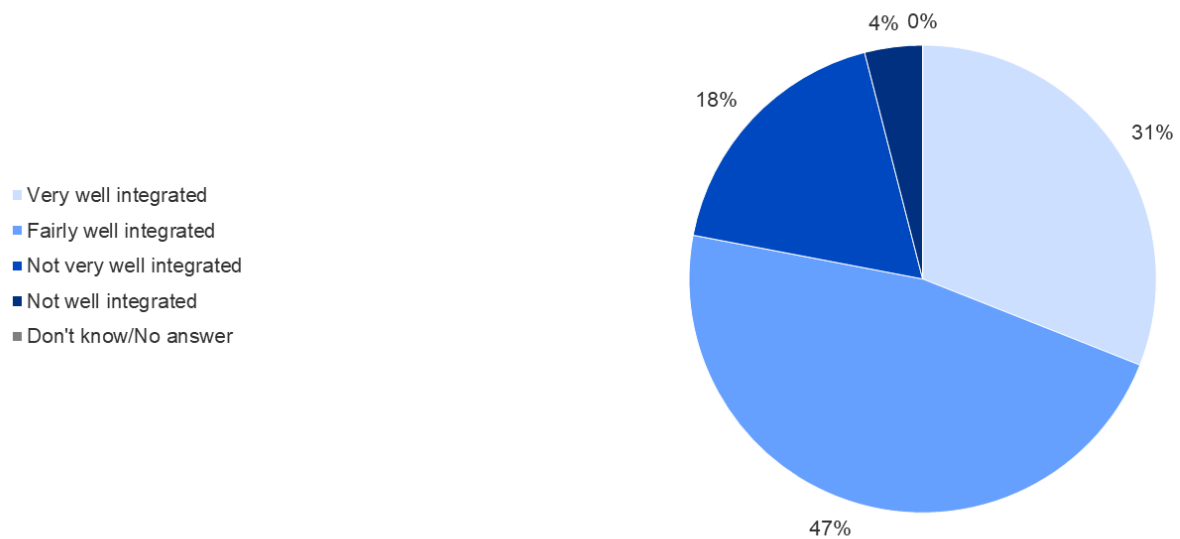
All respondents (n = 2,351)

D12 Which of the following statements apply to your life in the city or town you live in?**MULTIPLE ANSWER ONLY**

All respondents (n = 2,342)

D13 Overall, how well integrated do you feel you are in the local community where you live?

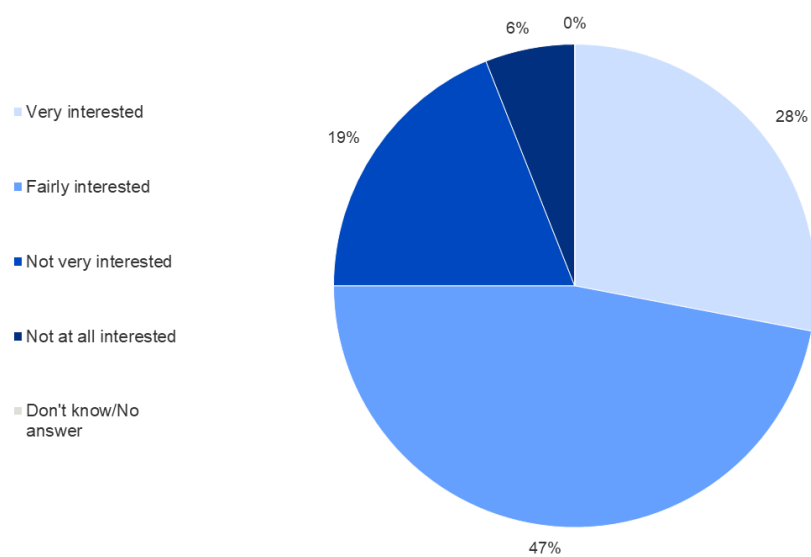
ONE ANSWER ONLY



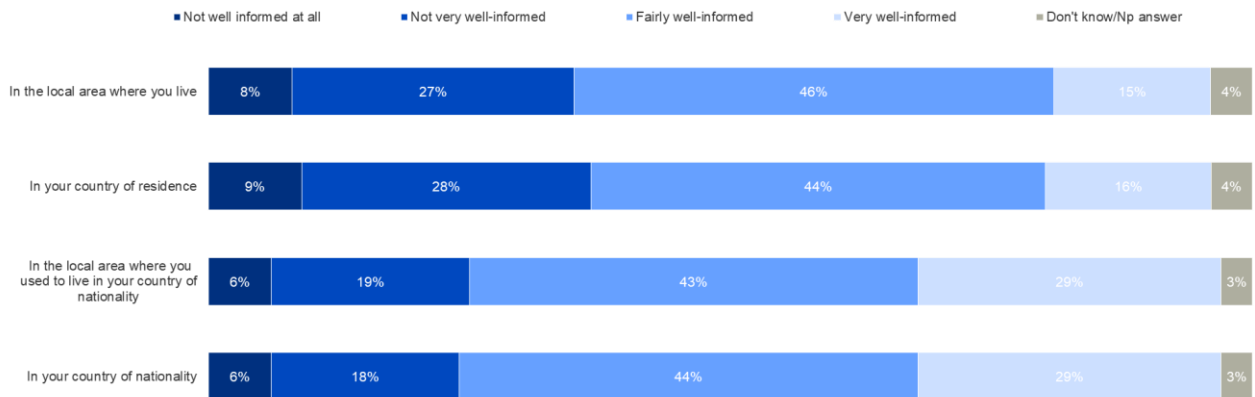
All respondents (n = 2,338)

Q1 How interested are you in politics in general?

ONE ANSWER ONLY



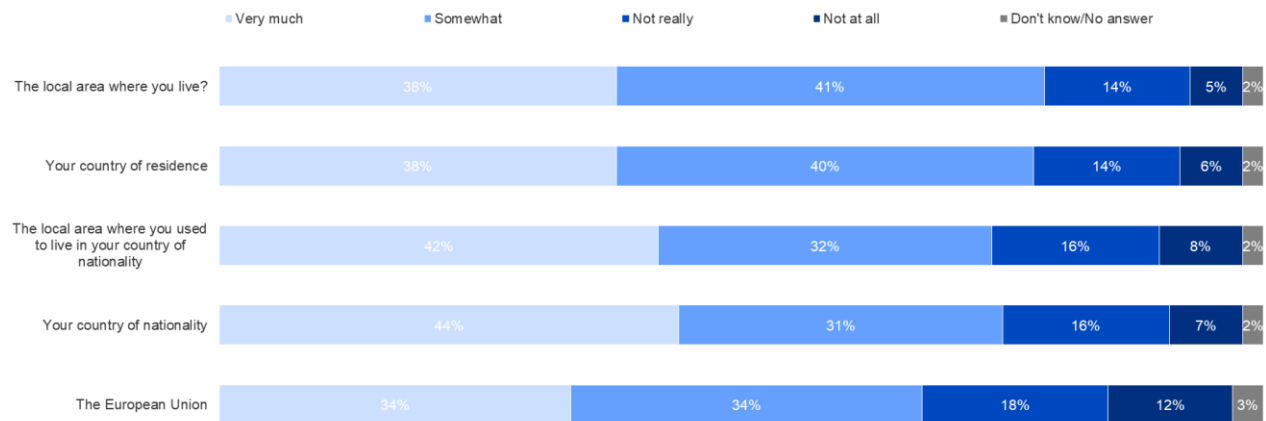
All respondents (n = 3,796)

Q2 How well-informed do you feel you are regarding political life...?**ONE ANSWER PER LINE**

All respondents (n = 3,654)

Q3 And how attached do you feel to...

ONE ANSWER PER LINE

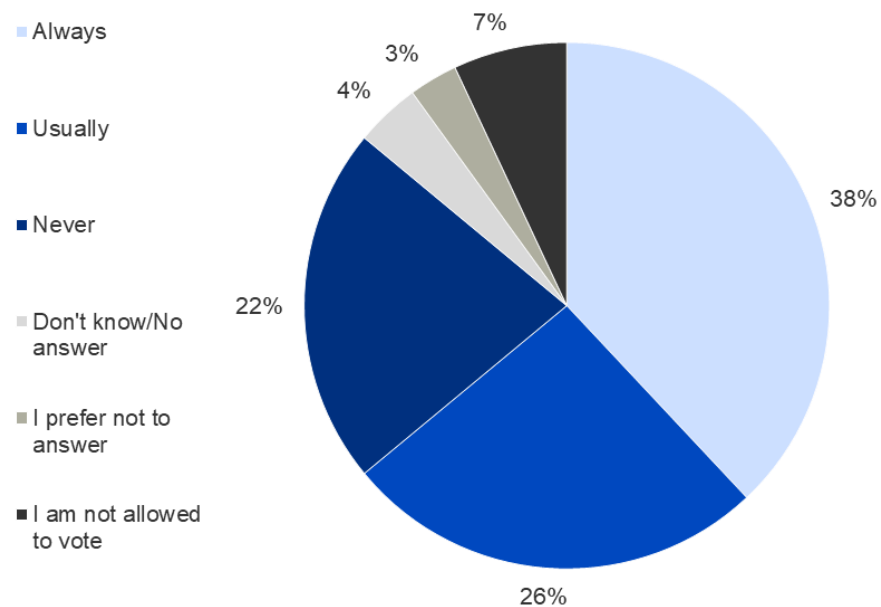


All respondents (n = 3,547)

Q5.3 How often do you vote at elections held at the following levels?

National elections

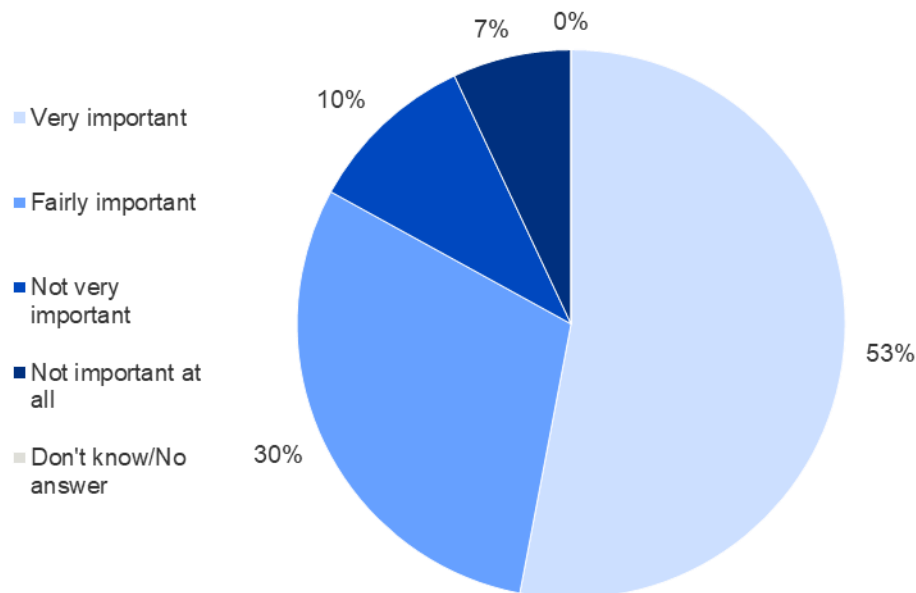
ONE ANSWER ONLY



All respondents (n = 3,172)

Q6 Some people think that voting is an important civic duty while others do not. How important is voting in elections for you?

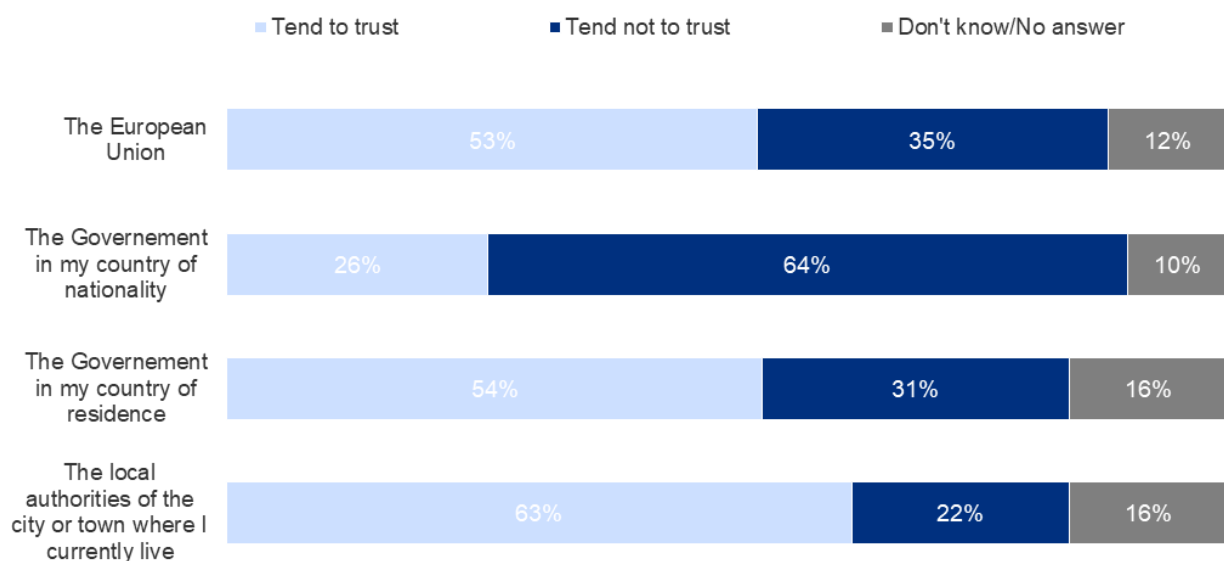
ONE ANSWER ONLY



All respondents (n = 3,141)

Q33 Please indicate whether you tend to trust or tend not to trust these institutions.

ONE ANSWER PER LINE



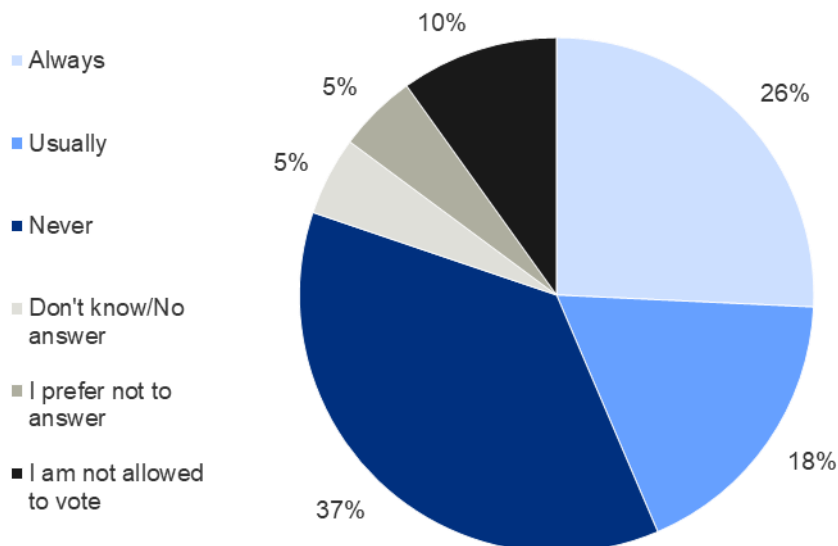
All respondents (n = 2,366)

Past Participation of Mobile EU Citizens in Local Elections and Reasons for not Participating

Q5.1 How often do you vote at elections held at the following levels?

Local elections in my country of residence

ONE ANSWER ONLY

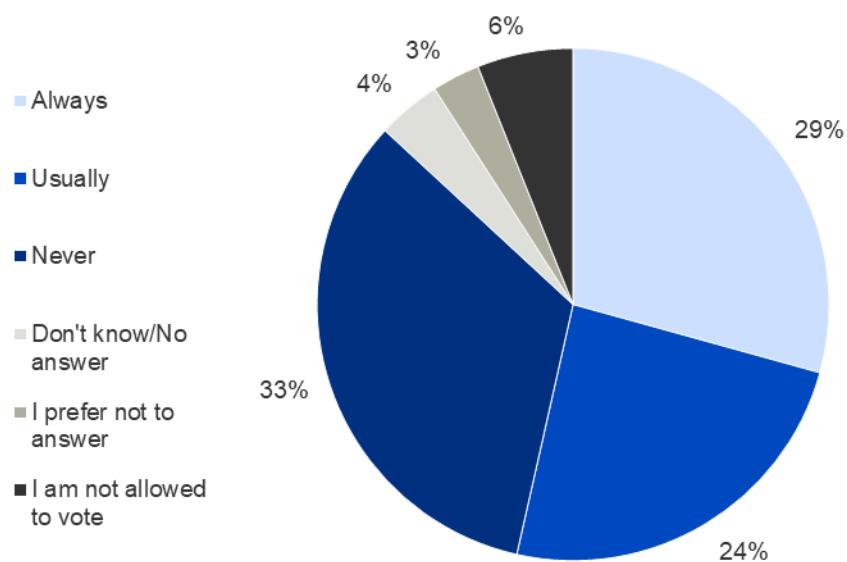


All respondents (n = 3,172)

Q5.2 How often do you vote at elections held at the following levels?

Local elections in my country of nationality

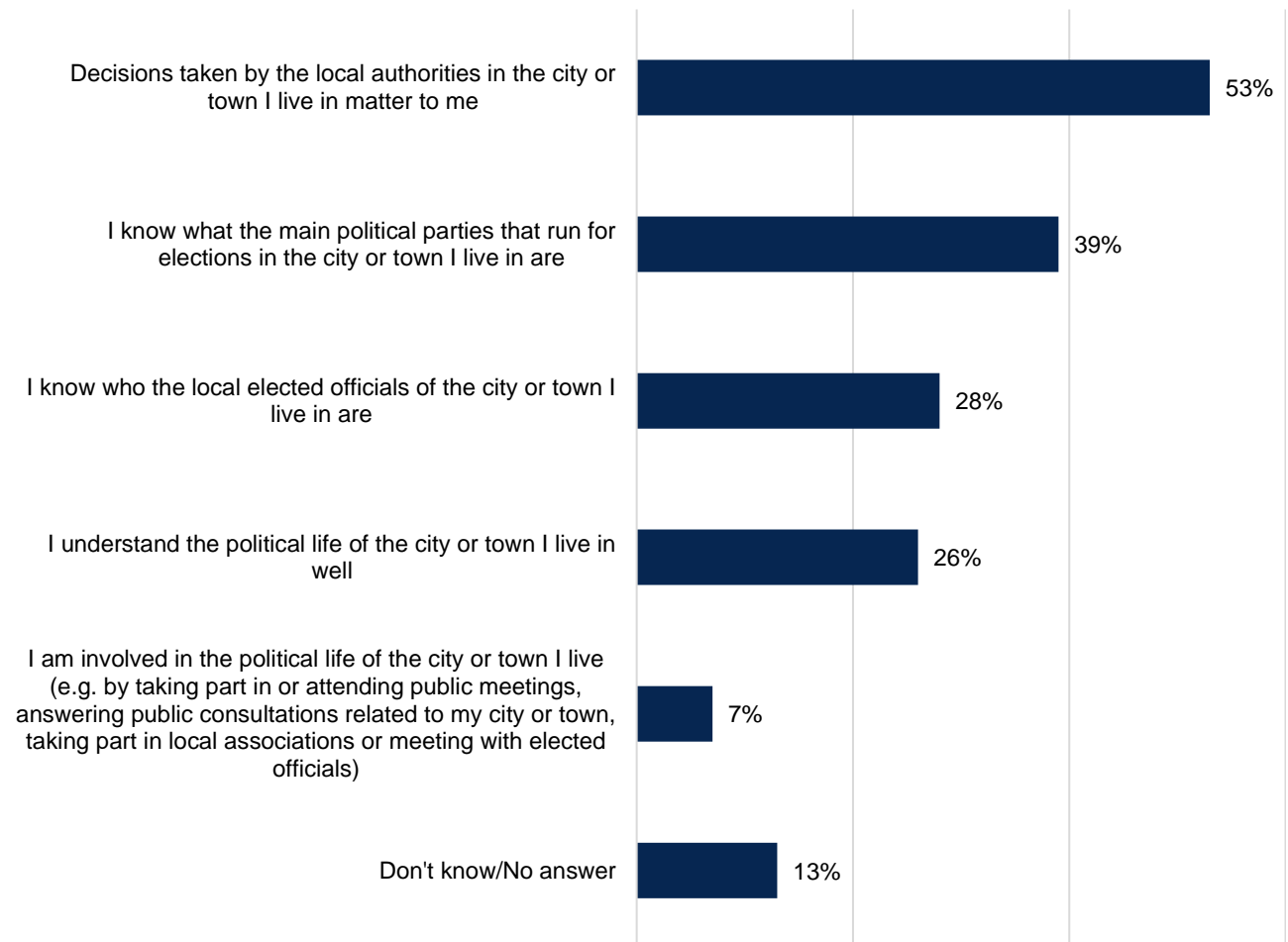
ONE ANSWER ONLY



All respondents (n = 3,172)

Q7 Which of the following statements apply to you?

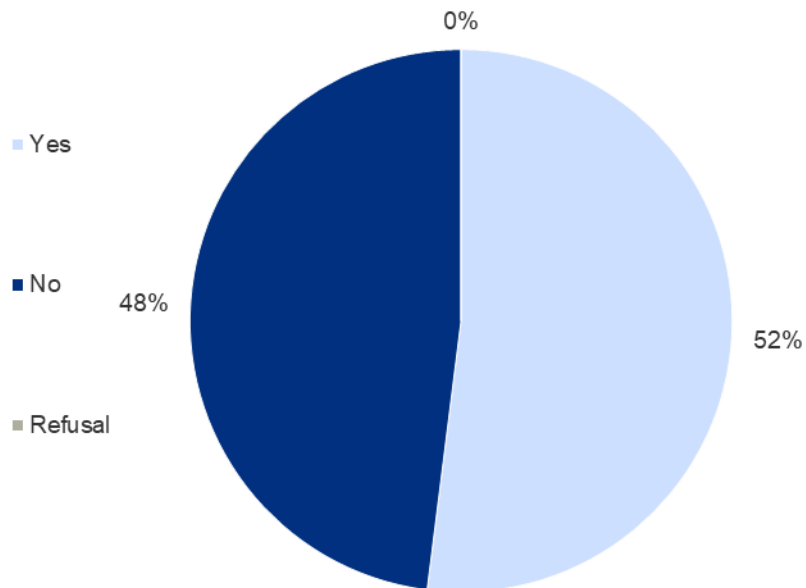
MULTIPLE ANSWERS POSSIBLE



All respondents (n = 3,024)

Q8 Are you registered to vote at the local elections in the city or town where you currently live?

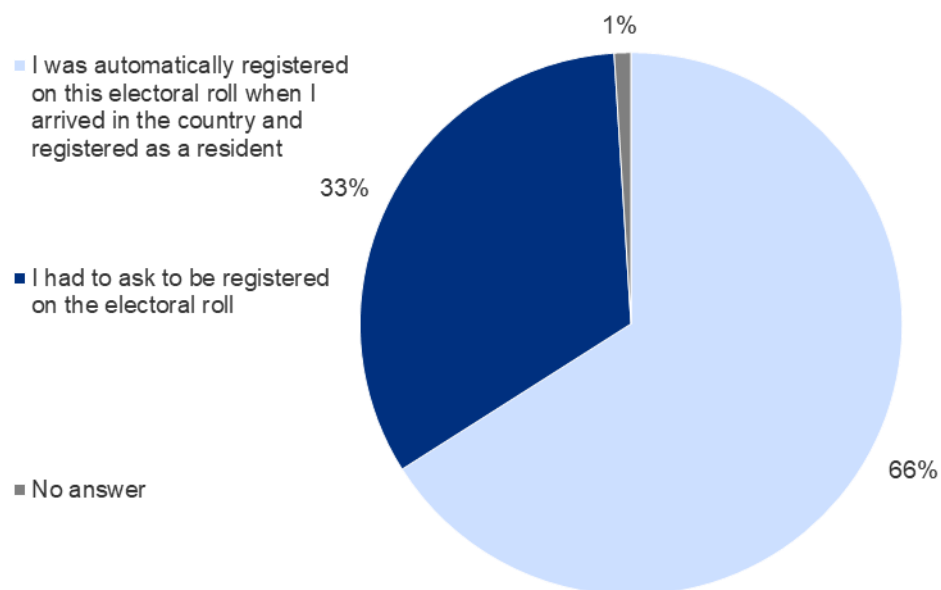
ONE ANSWER ONLY



All respondents (n = 3,009)

Q9 How did you register on the electoral roll of the city or town where you currently live?

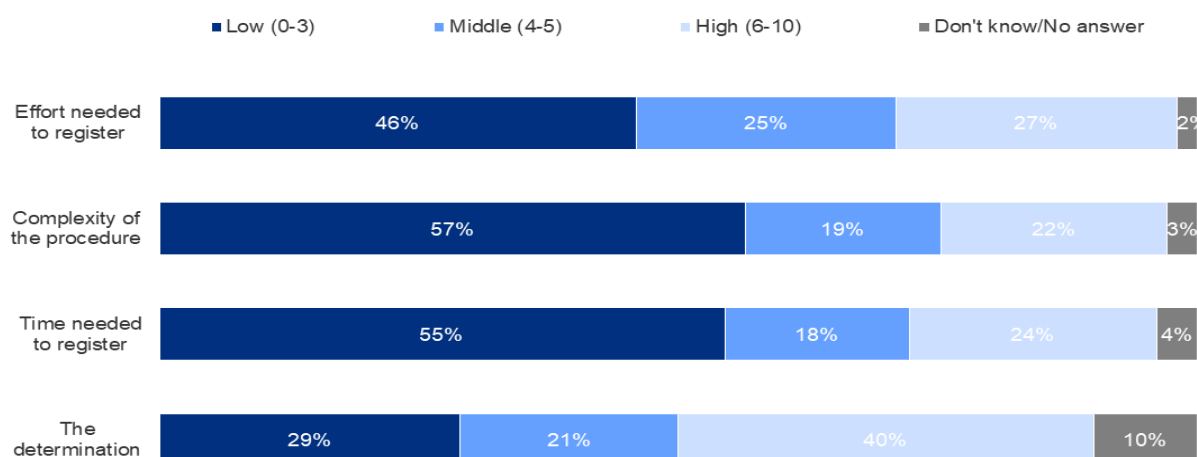
ONE ANSWER ONLY



Respondents who are registered on the local electoral rolls (CODE 1 IN Q8) (n = 1,551)

Q10 How would you rate the following items when it comes to the process of registering for local elections? Please answer using a scale from 0 to 10, where “0” means it is “very low” and “10” means it is “very high”.

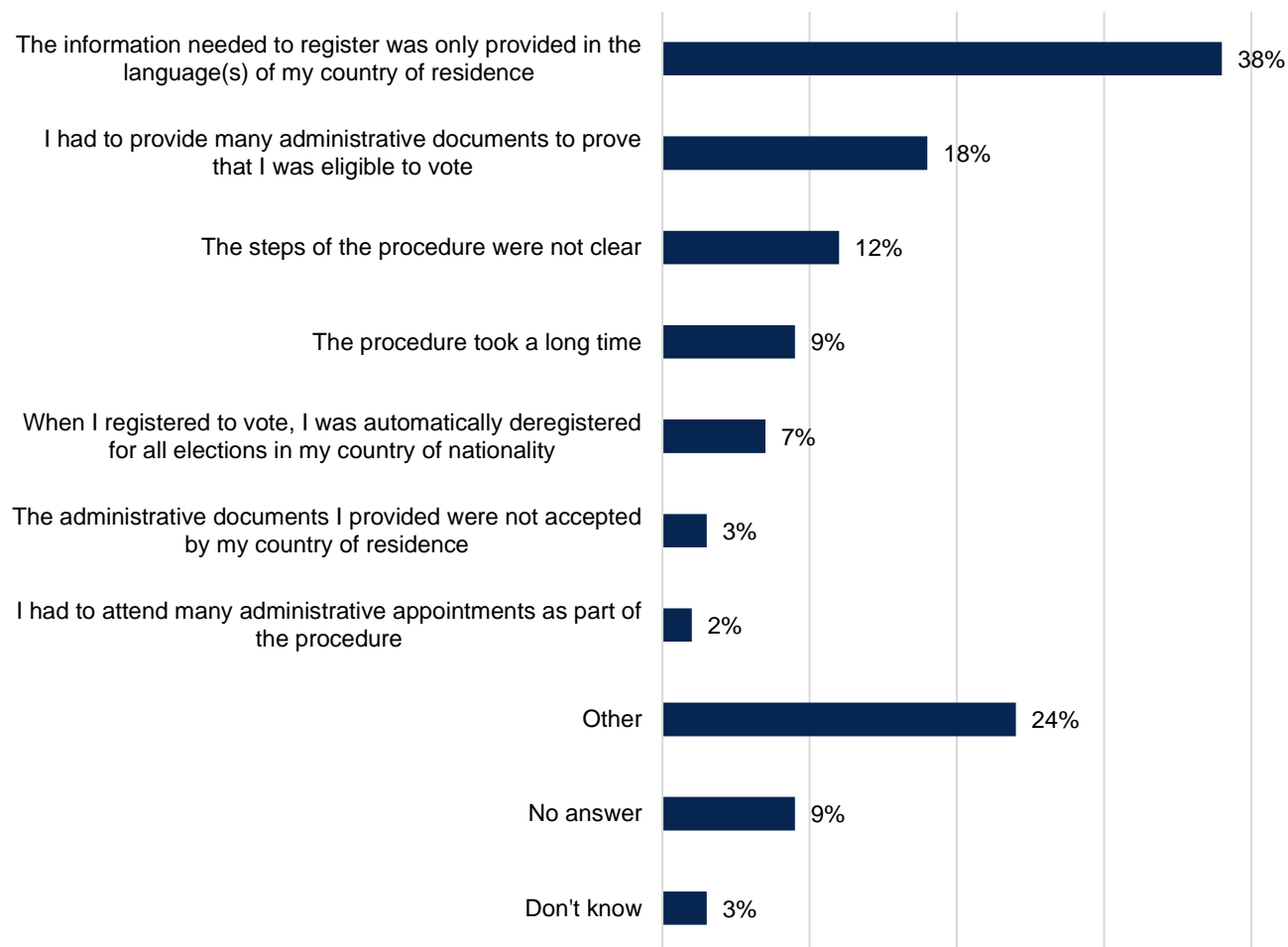
ONE ANSWER PER LINE



Respondents who had to ask to be registered on the local electoral roll (CODE 2 IN Q9) (n = 505)

Q11 Did you encounter any of these challenges? You may select all the answers that apply to you.

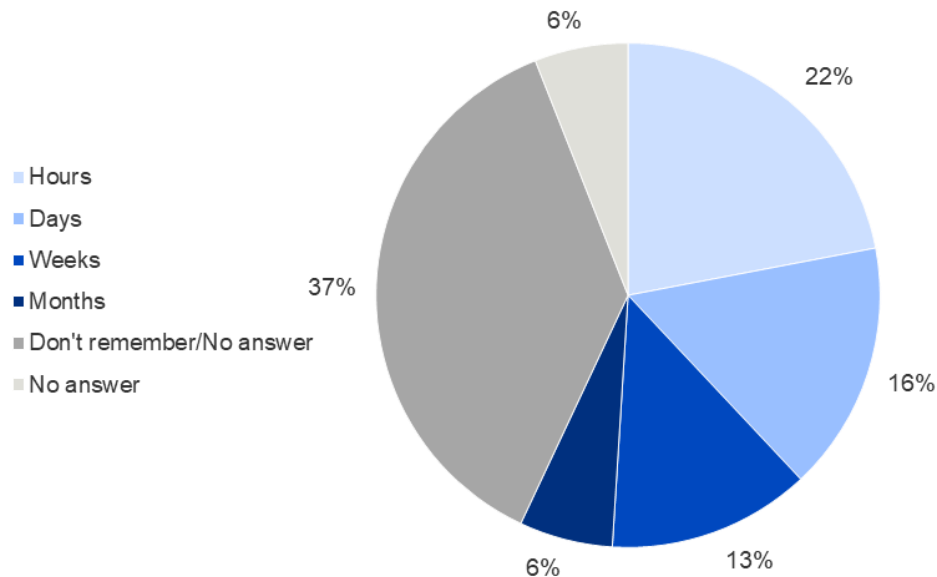
MULTIPLE ANSWERS POSSIBLE



Respondents who had to ask to be registered on the local electoral roll (CODE 2 IN Q9) (n = 487)

Q12 How long did the registration process take (from the moment you applied to the moment when your registration was confirmed)?

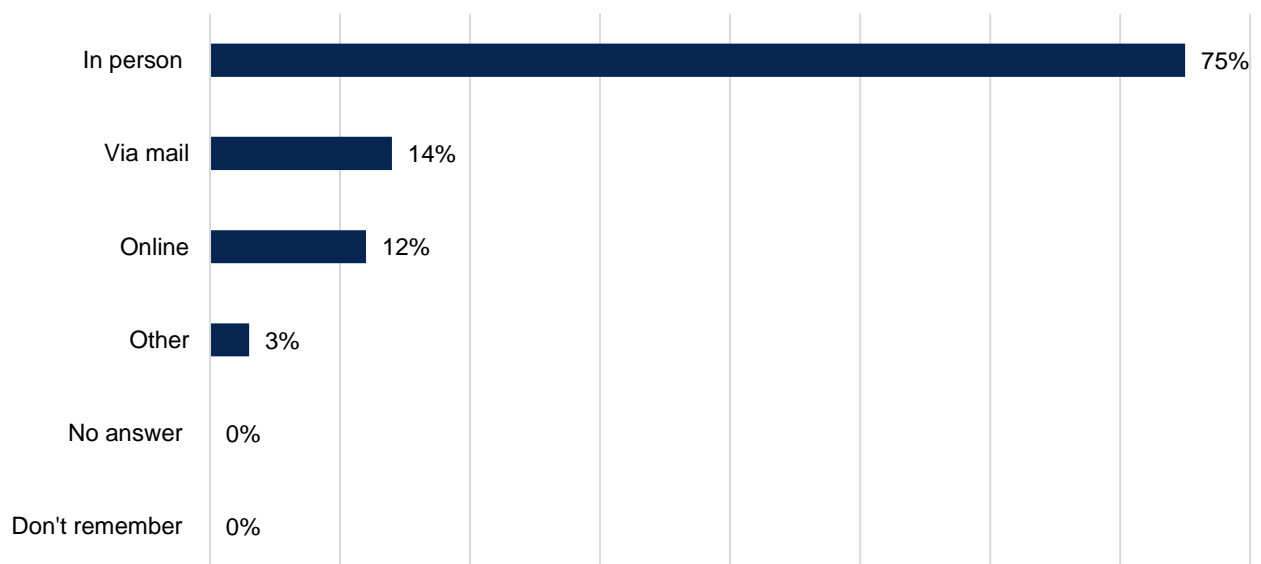
ONE ANSWER ONLY



Respondents who had to ask to be registered on the local electoral roll (CODE 2 IN Q9) (n = 515)

Q13 Was the registration process carried out...?

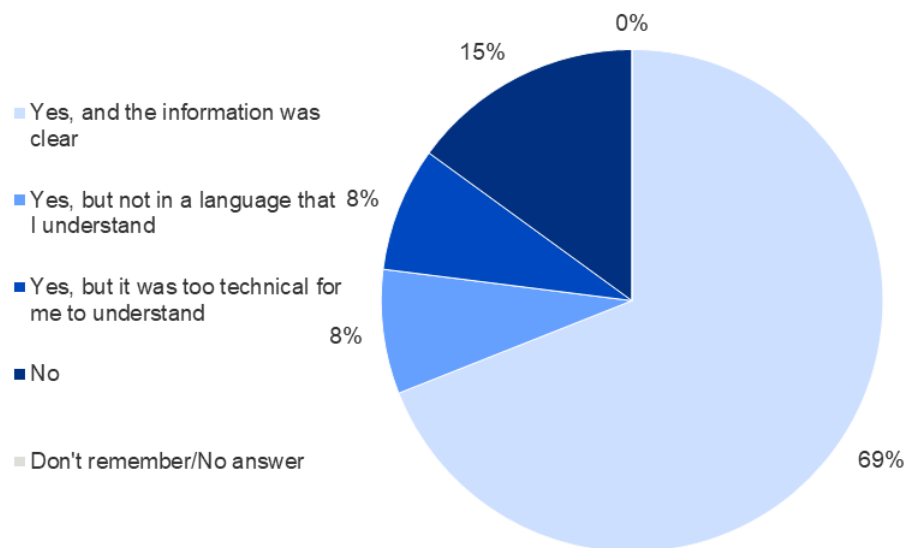
MULTIPLE ANSWERS POSSIBLE



Respondents who had to ask to be registered on the local electoral roll (CODE 2 IN Q9) (n = 465)

Q14 When you started the registration process, was information readily available for non-nationals?

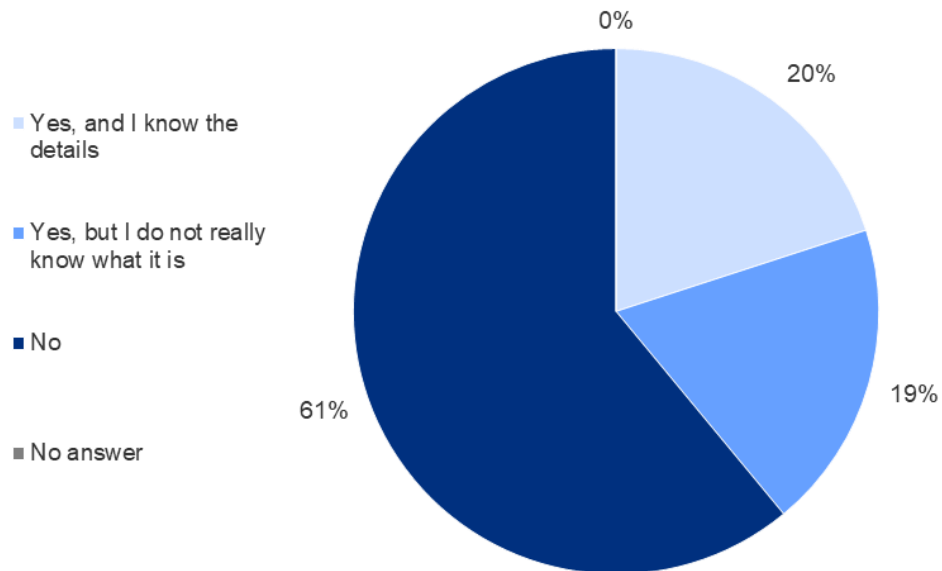
ONE ANSWER ONLY



Respondents who had to ask to be registered on the local electoral roll (CODE 2 IN Q9) (n = 462)

Q15 Are you aware of the process for registering to vote in the local elections in the city or town where you currently live?

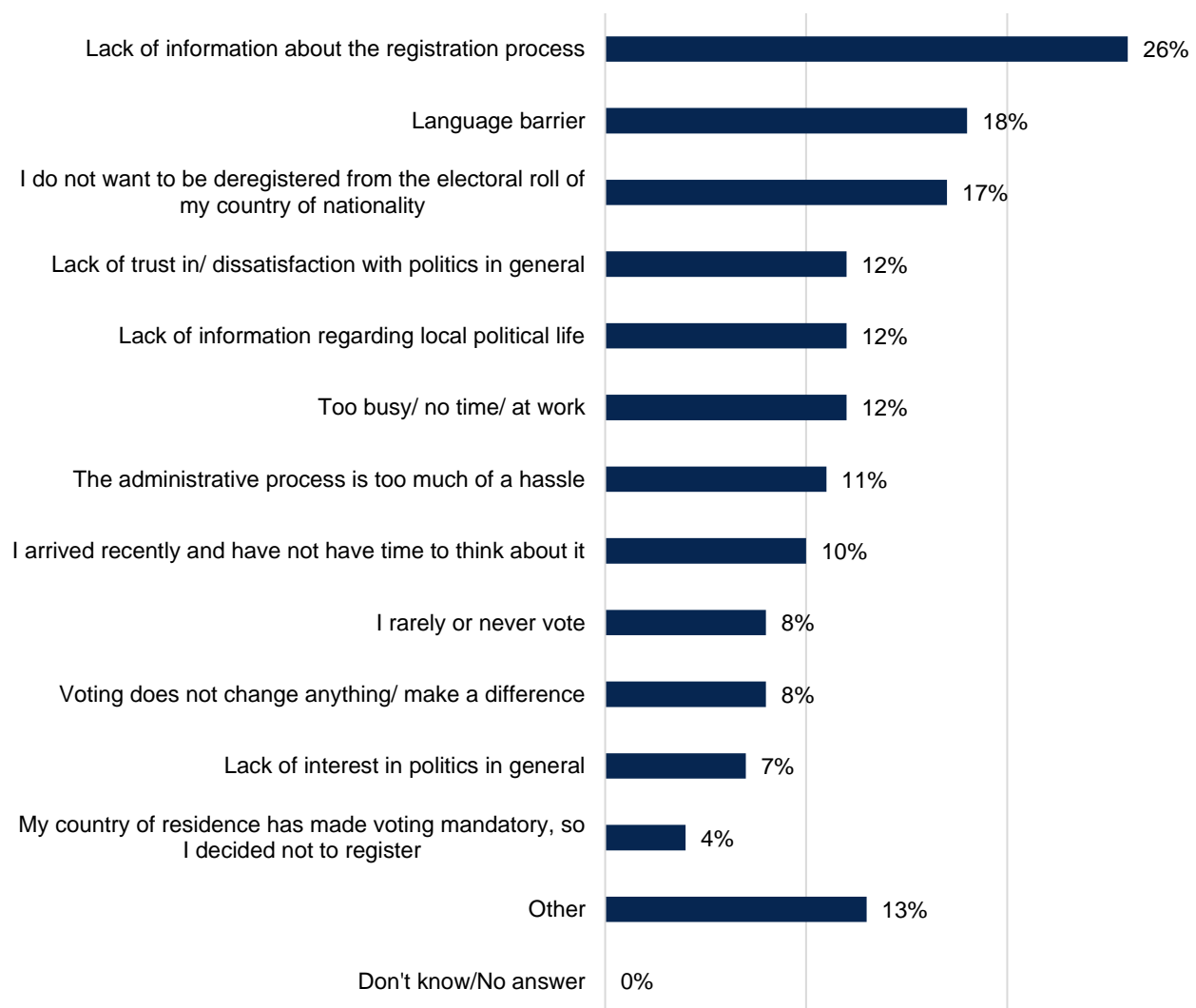
ONE ANSWER ONLY



Respondents who are NOT registered on the local electoral rolls (CODE 2 IN Q8) (n = 1,428)

Q16 Why are you NOT registered on the electoral roll of the city or town where you live?
Please select all that apply.

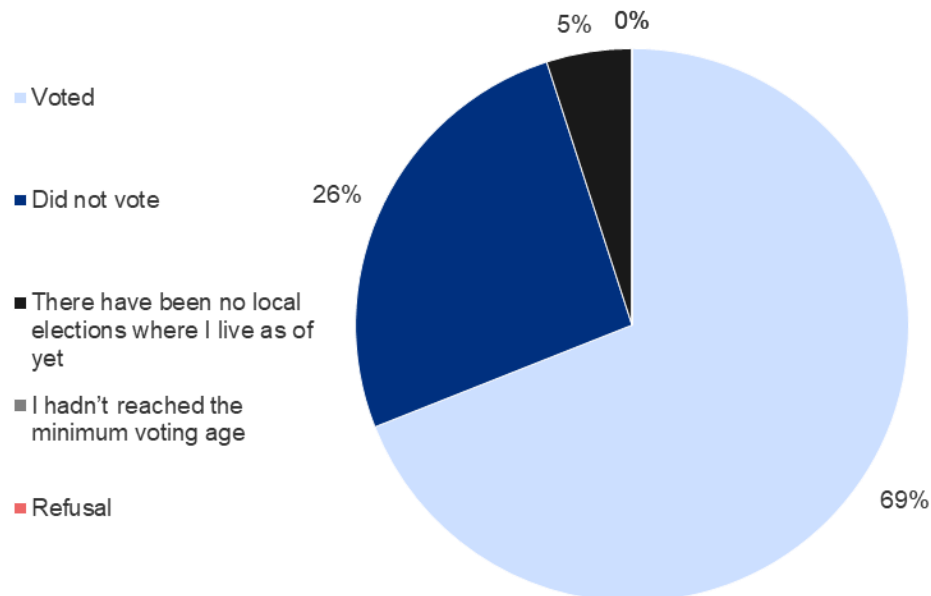
MULTIPLE ANSWERS POSSIBLE



Respondents who are NOT registered on the local electoral rolls (CODE 2 IN Q8) (n = 1,395)

Q17 For one reason or another, some people do not vote in local elections. Did you yourself vote in the last local elections where you currently live?

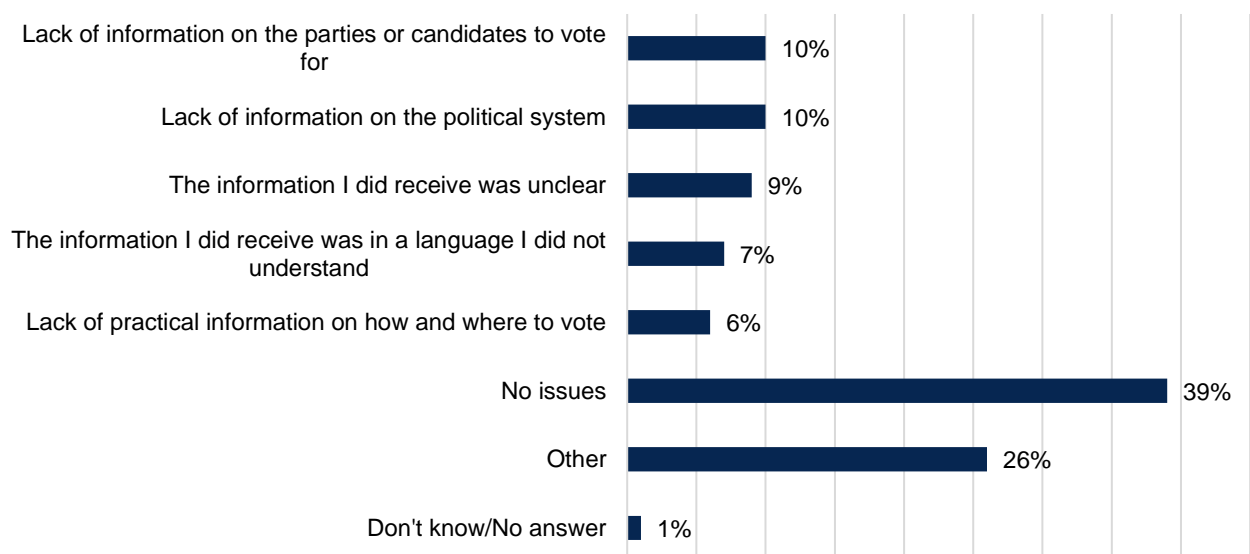
ONE ANSWER ONLY



Respondents who are registered on the local electoral rolls (CODE 1 IN Q8) (n = 1,498)

Q18 When you voted in the last local elections, did you face any of the following difficulties? Please select all that apply.

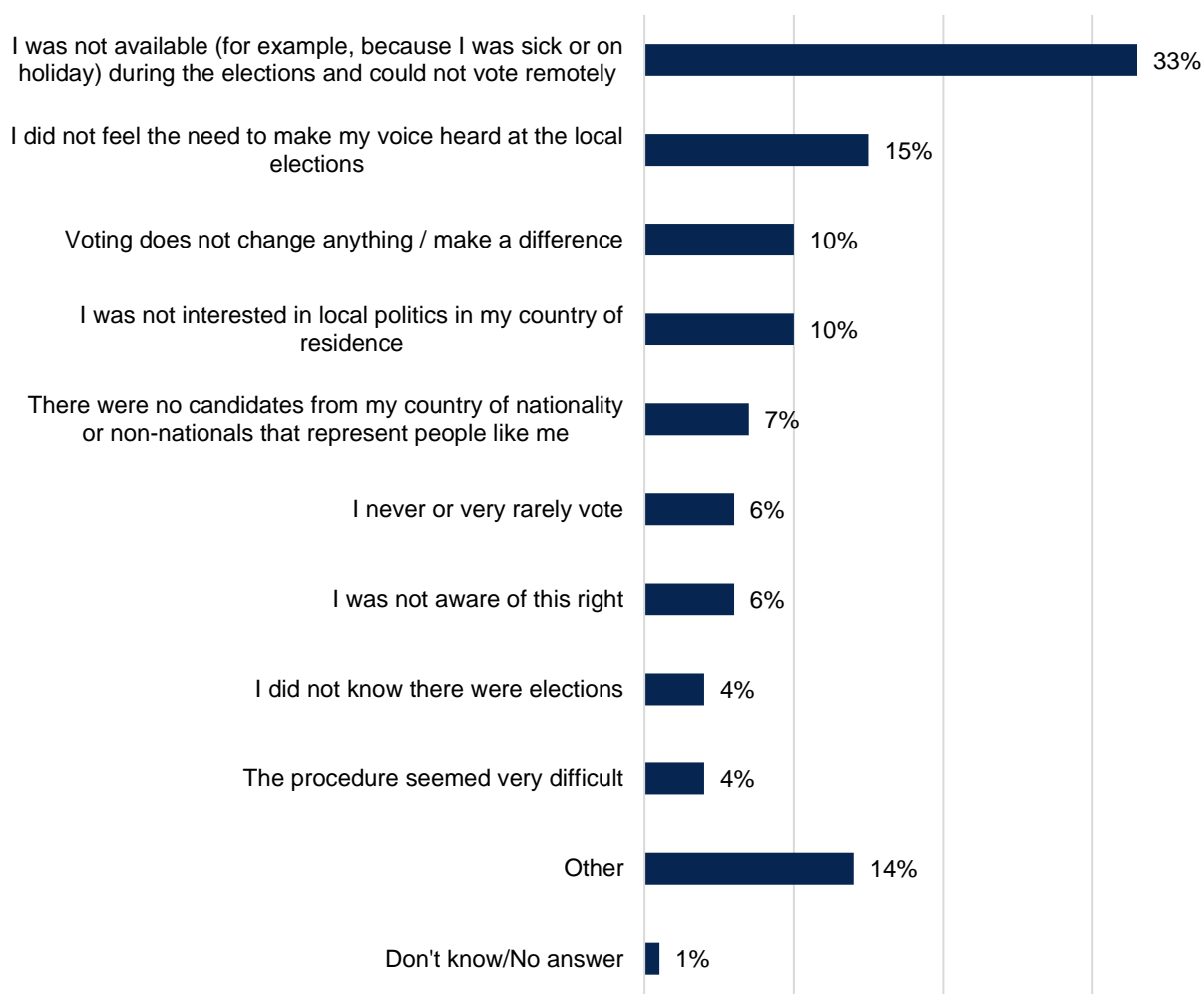
MULTIPLE ANSWERS POSSIBLE



Respondents who voted in the local elections (CODE 1 IN Q17) (n = 1,013)

Q19 Why did you NOT vote in the last local elections? Please select all that apply.

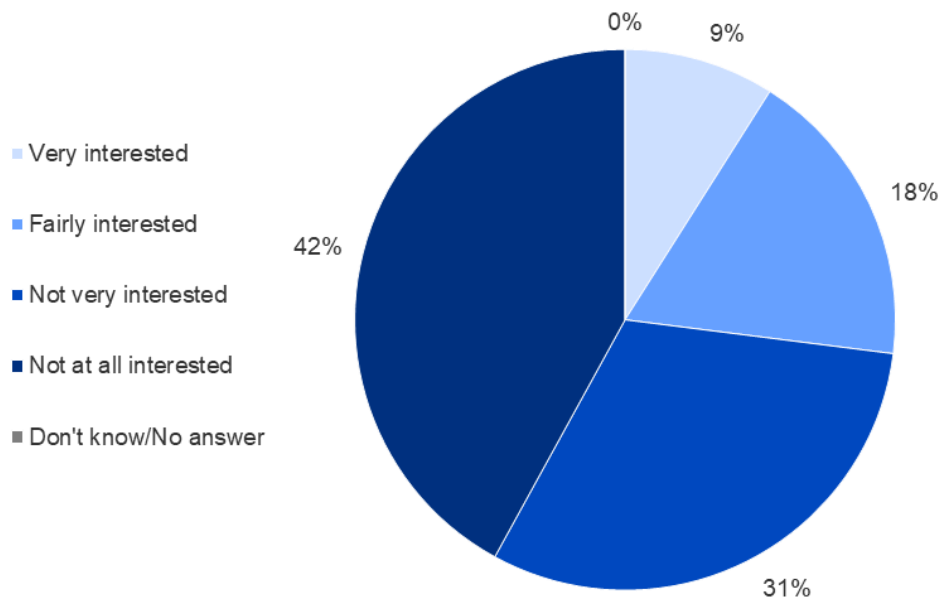
MULTIPLE ANSWERS POSSIBLE



Respondents who DID NOT voted in the local elections (CODE 1 IN Q17) (n = 386)

Q21 How interested would you be in standing as a candidate in local elections in the city or town where you live?

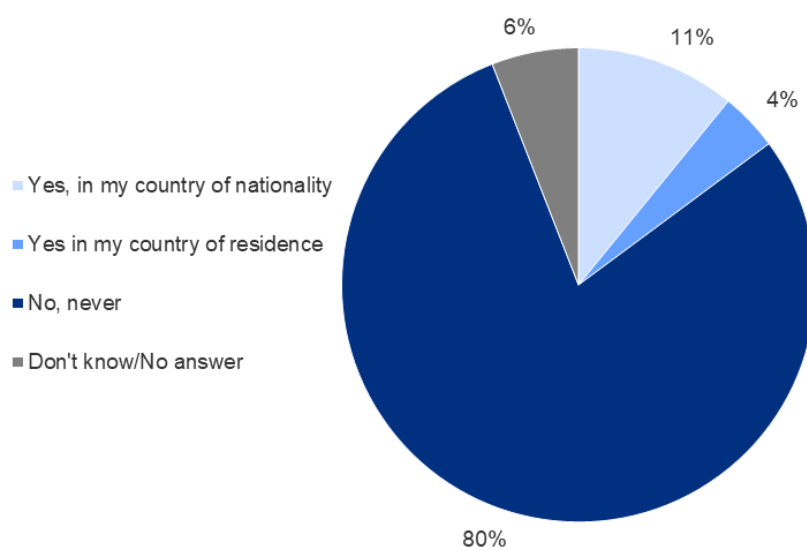
ONE ANSWER ONLY



All respondents (n = 2,566)

Q22 Have you ever stood as a candidate in local elections?

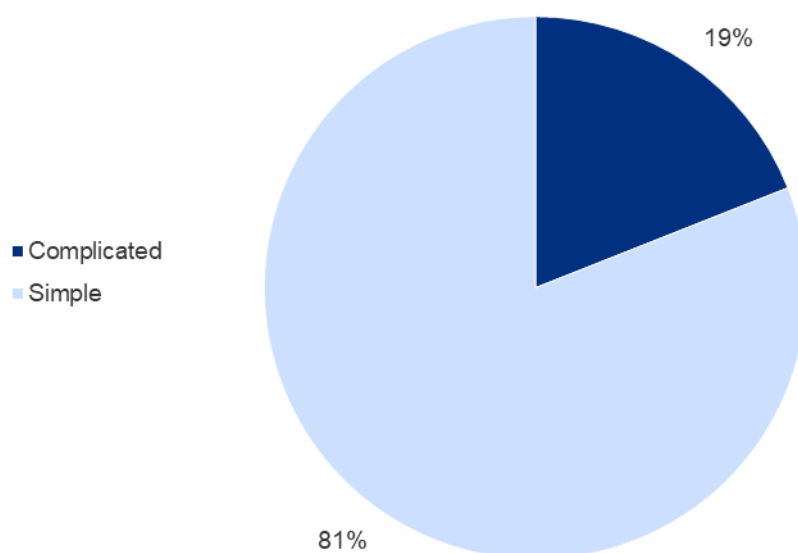
MULTIPLE ANSWERS POSSIBLE



All respondents (n = 2,541)

Q23 How would you describe the process for registering to stand as a candidate in your country of residence? Please tell us what comes to mind to describe the process.

OPEN-ENDED



Respondents who had stood as a candidate in local elections in country of residence in the past (CODE 2 IN Q22) (n = 42)

- Participants in the survey who had found the registration process complicated highlighted the cumbersome bureaucracy as well as high costs, specifically.
- Other feedback on the registration process mainly revolves around the difficulties encountered by mobile citizens who experienced reluctance from local people to accept their candidacy, as they are often perceived as “outsiders”.
- Other responses pointed to the existence of established local networks which made it difficult for external people to be included. In fact, in smaller municipalities especially, local policy is predominantly determined by dominant families or networks which exert influence on progress and quality of life within these communities.

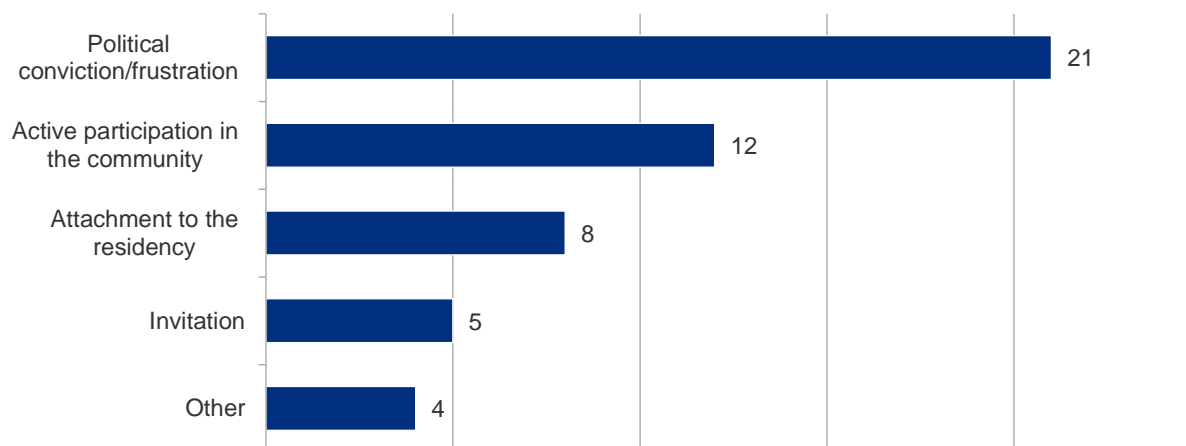
Examples of negative comments on the registration process

- “Complicated”
- “There is quite a lot of resistance locally to foreign candidates.”
- “Nepotism”
- “Very complicated”
- “Too complicated and bureaucratic”
- “Extremely costly and complicated”
- “Complex and expensive”
- “As an EU citizen, I have been asked for far more documents and declarations than the other Hispanic candidates...”

- “Heavy and impossible”
- In most cases, however, mobile citizens made positive remarks about the registration process, saying that information provided was clear and easy to understand. A common theme is that many candidates were asked to stand for election by the political formation or party of which they were part.
- Aside from internal recruitment, one citizen mentioned that they, as a foreign person, were selected because they were known within the community through their association work.

Examples of positive comments on the registration process

- “I was asked to run for office, and I didn't have any problems with that.”
- “Very easy. They wanted me, a foreign person, because I was known in the community through my association work.”
- “Easily as a candidate on the electoral roll of a political party”
- “I was asked and I said yes.”
- “I was approached to become a councillor, became a candidate and was elected (on a list other than the majority)”
- “First you become active and go to meetings, input of ideas to improve certain things or change them in the place of residence. Then candidates are elected to the assembly, I was 5th on a list of 21. Then you will be registered with the electoral board in the capital of the province. After handing in all the data on site, you have to sign them and everything goes on automatically. Furthermore, every candidate of my party also had to sign with the notary for loyalty to the party.”
- “I’m well integrated, so I didn’t encounter any problems”
- “Trouble-free registration with the clear knowledge that the party that promoted my candidacy relied on the selection of the top two candidates on the list. So my candidacy had mostly symbolic significance both for the party I was not a member of and for me.”

Q24 What motivated you to stand as a candidate in your country of residence?**OPEN-ENDED**

Respondents who stood as a candidate in local elections in country of residence in the past (CODE 2 IN Q22) (n = 50)

Political motivation

- The most common reason for mobile citizens to stand as candidates was to pursue their interest in politics and help tackle problems within the community. In particular, citizens mentioned being discontent with the local executive politics and wanting to improve local conditions.
- Other than political convictions and a sense of civic duty, citizens also mentioned ideological reasons, such as tackling social issues, implementing a left-wing party programme, and the desire to help immigrants.
- Importantly, one participant said they were motivated to stand as a candidate by the desire to represent foreigners in the community, pointing to the widespread crossborder mobility of citizens in the EU and their increased need for political representation, as they encounter specific issues as mobile citizens..

Examples of comments related to mobile citizens' political motivation

- "Discontent with executive politics"
- "Interested ... in politics since always ... in Belgium, France, Rwanda (friend of Agathe Uwilyimana), Bolivia and now Germany ..."
- "Political conviction"
- "Working for people's wellbeing"
- "Interoperability and impact"
- "Trying to exert some influence on local politics. In small municipalities, there are often dominant families that determine local policy and therefore often influence progress and quality of life."
- "Social issues, implementation of the left-wing party programme"

Active participation in the community

- The second most common theme explaining mobile citizens' reasons for standing as candidates derives from the desire to play an active part in the community of residence.
- This not only indicates a social motivation in sharing experiences of collective interest, but also encompasses a political urge to participate in decision-making processes to influence progress and contribute to improving the quality of life for everyone within the communities.
- In line with this, mobile citizens seek to broaden the spectrum of inhabitants represented in local politics, and render them more representative of the configurations which fast-paced changes have generated and of the transformations which European societies are undergoing.

Examples of comments related to mobile citizens' desire to actively engage in the community

- "Have the opportunity to participate in the decision-making process and therefore influence progress and contribute to improving the quality of life for all residents of our village."
- "Wanted to fully integrate"
- "Doing something for your country/place of residence for the sake of the social progress of society."
- "I have always participated in the life of the village, associations, local community halo, volunteer and parades of associations"
- "Involvement in local life"
- "Interest in what is happening in the community."

Attachment to place of residence

- Many comments referred to their motivation for standing as candidates as being guided by their attachment to their place of residence. For example, the reasons mentioned included "love for the country of residence", "interest in the place".
- Several participants related their motivation to run for election with the desire to feel integrated in the country of residence, mentioning that they "want to fully integrate".
- In this sense, there is a strong association between active participation in political life and the feeling of belonging to a community and consequent acceptance by local residents.

Examples of comments related to mobile citizens' attachment to their host community

- "Because this is where my whole life takes place."
- "Feeling integrated in my country of residence"
- "Love for the country of residence"
- "Interest in the place"
- "Integration"
- "Attachment to the place"

Invitation

- A few entries explained that mobile citizens' motivation to run for candidacy was prompted by a request from someone involved in politics asking them directly. For

example, one citizen was invited by the local mayoral candidate to join the municipal list.

Examples of comments related to mobile citizens' motivation to stand following invitations

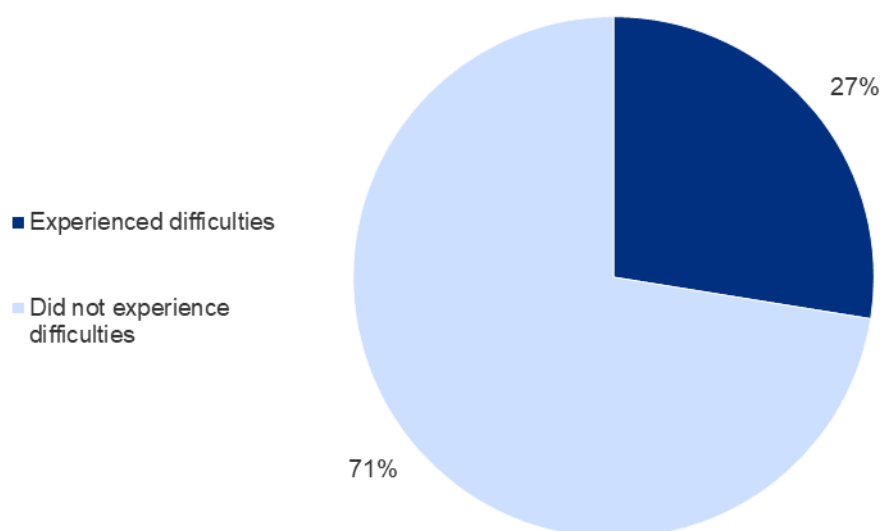
- "I was asked"
- "I was invited by the local mayoral candidate to join the municipal list"
- "The debates of the Citizens' Council of which I am a member"
- "The SPOe local group chairwoman (and current mayor) has asked me, as well as some others, to be able to stir up in case of doubt, if one of our selected community councils should fail."

Other

- One comment mentioned being motivated by a wish to invest locally, suggesting reasons that are not solely political.

Q25 What difficulties, if any, did you experience when standing as a candidate in your country of residence?

OPEN-ENDED



Respondents who had previously stood as a candidate in local elections in country of residence (CODE 2 IN Q22) (n = 49)

- The main difficulties identified by the mobile citizens interviewed included the struggle to overcome the language barrier, lack of integration by the mobile citizen within the local community, bureaucratic layers complicating the process and other reasons.
- The most-mentioned reason concerned mobile citizens not being accepted as candidates by the local community, as they were viewed as outsiders.
- A further common difficulty experienced is linked to the heavy bureaucratic procedures, described as entailing “a lot of paper work”, making it “unbearable”. One citizen was even asked to provide more documents and declarations at the last minute in order to be put on the list.
- The high cost associated with registration as a candidate was also mentioned by many participants.

Examples of difficulties encountered by mobile citizens during the candidacy process

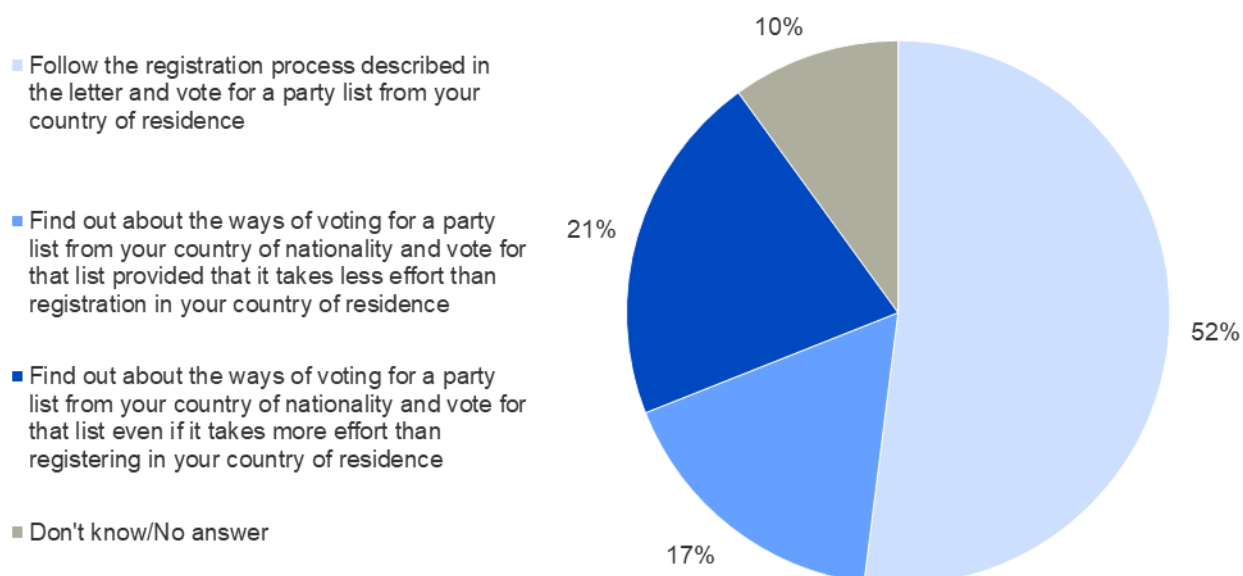
- “Especially a lot of paperwork. Unbearable”
- “Bureaucracy”
- “The voting system in France encourages corruption, so it is difficult to join existing clusters, families as a foreigner. The ranks are closing fast. New ideas, or changes, are received suspiciously.”
- “Acceptance by the local population and mobilisation of the Portuguese community to participate in the elections”

- “In the Ciudadanos party I was not on the list, they probably did not want foreigners. The list was filled with non-party members, eliminating active party members. At a local level, I met with xenophobia and machismo in the Ciudadanos party. A foreign woman with a non-Hispanic name has no chance of being a candidate in Ciudadanos. Democratic bulo, ciudadanos xenophobe”
- “It comes at a cost that I can't afford.”

Past Participation of Mobile EU Citizens in European Parliament Elections and Reasons for not Participating

Q4.2 Which of these ways of voting are you most likely to choose for voting in European Parliament elections?

ONE ANSWER ONLY

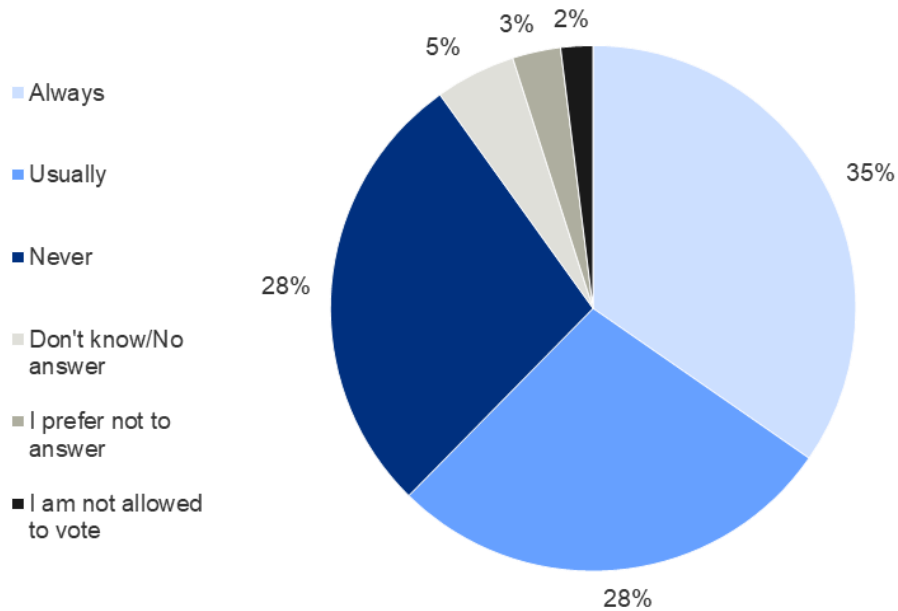


Respondents who are likely to vote in European elections (1-5 IN 4.1b) (n = 1,106)

Q5.4 How often do you vote at elections held at the following levels?

European elections

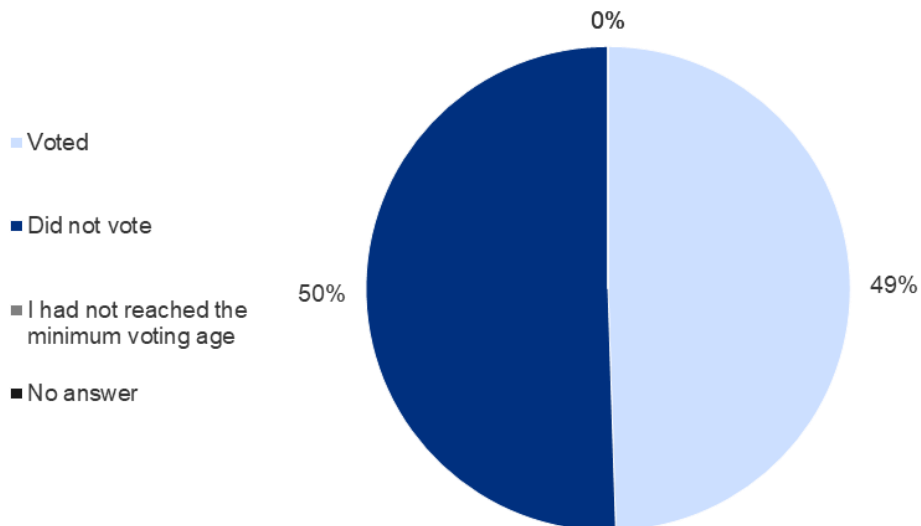
ONE ANSWER ONLY



All respondents (n = 3,172)

Q27 European Parliament elections were held between 23 and 26 May 2019. For one reason or another, some people did not vote in these elections. Did you yourself vote in the European Parliament elections?

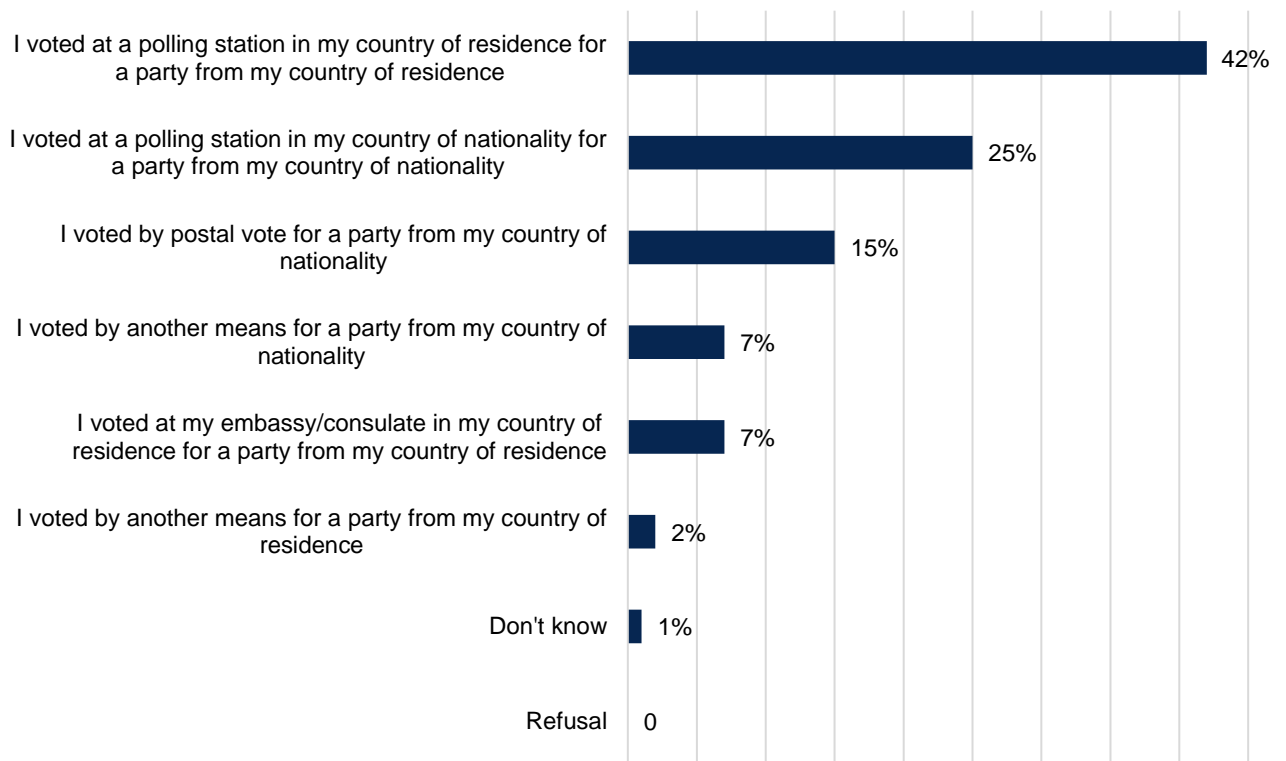
ONE ANSWER ONLY



All respondents (n = 2,519)

Q28 What means did you use when you voted in the European Parliament elections in May 2019?

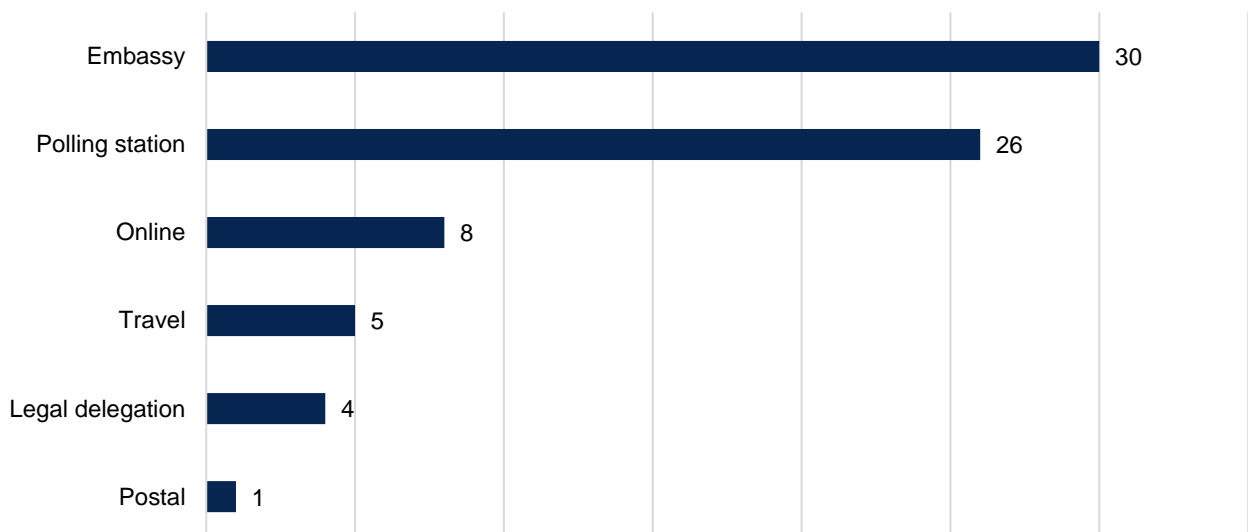
ONE ANSWER ONLY



Respondents who voted in the EE2019 (CODE 1 IN Q27) (n = 1,220)

Q29 Could you please specify the means by which you voted in the European Parliament elections in May 2019?

OPEN-ENDED

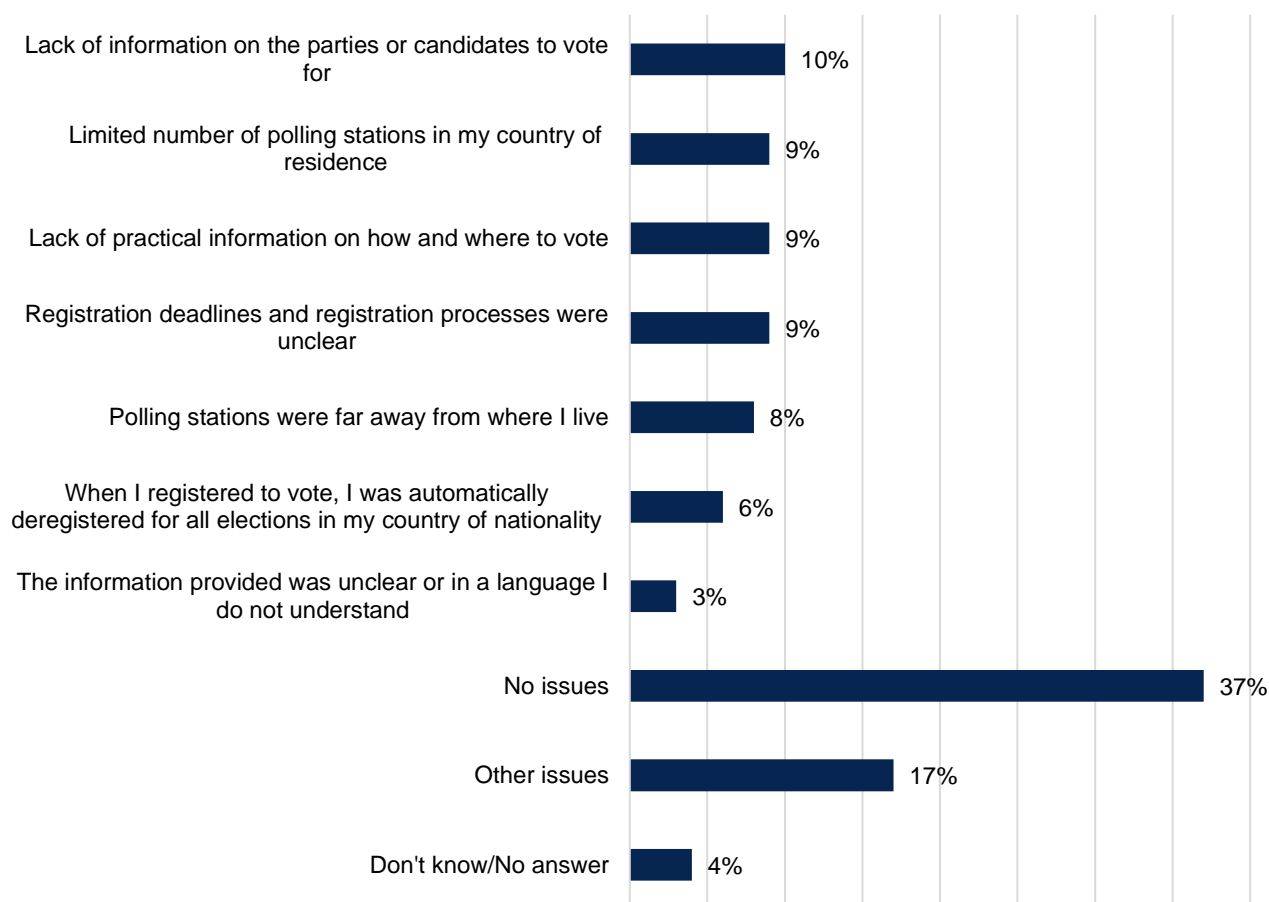


Respondents who said that they voted by another means in EE2019 (CODE 5 OR 6 IN Q28) (n = 74)

- The most common voting modality among mobile citizens is that of casting the ballots at the embassy, indicating that most respondents chose to vote for candidates in their home country.
- A slightly lower share of mobile citizens cast their vote at polling stations in their country of residence.
- Further ways used by mobile citizens include online voting and legal delegation, through conceding the power of attorney to a friend or relative.
- Some participants travelled back to either their home or host country to cast their ballot in person, while others used the postal option.

Q30 When you voted in the recent European Parliament elections, did you face any of the following difficulties as a result of living abroad? Please select all that apply.

MULTIPLE ANSWERS POSSIBLE



Respondents who voted in the EE2019 (CODE 1 IN Q27) (n = 1,180)

- Most participants stated that all the information was available and clear and that the process was well organised.
- Nonetheless, the issues raised included the fact that there was “not so much lack of information as lack of knowledge”.
- Another participant raised the fact that some parties only published their political programmes in the local language. This comment was reinforced by another respondent, who mentioned their knowledge of the local language as a reason for not facing problems, since the information required was available in that language.

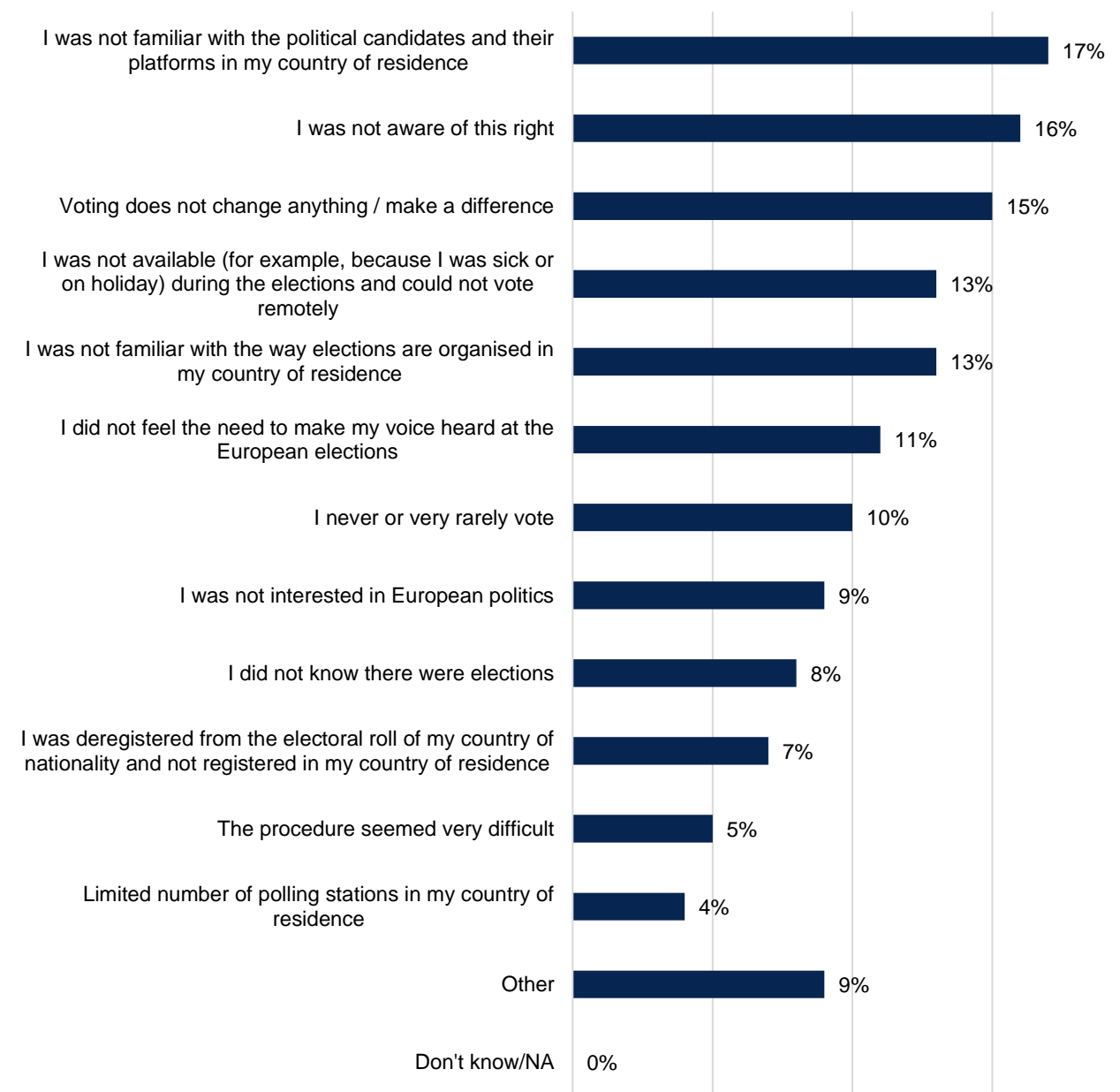
Examples of comments on voting difficulties

- Not so much lack of information as lack of knowledge”
- “Everything was clear”
- “I didn't have any problems.”
- “I received all information”
- “I speak the language and understood everything”
- “I have no problem, there is information and you need to know the language.”

- “No problems, everything clear and I speak French”
- “Some parties only publish their programmes in Luxembourgish...”
- “They didn't find me on the list and wouldn't let me vote.”

Q31 Why did NOT you vote in the recent European Parliament elections? Please select all that apply.

MULTIPLE ANSWERS POSSIBLE

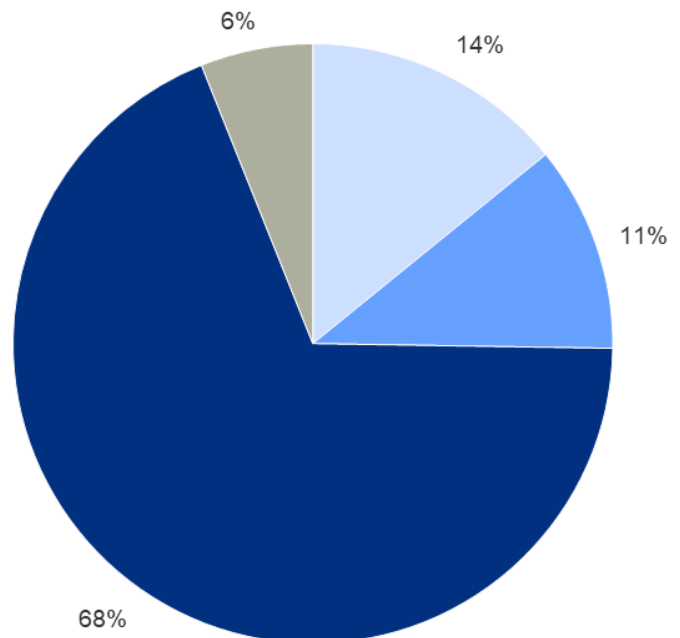


Respondents who DID NOT vote in the EE2019 (CODE 2 IN Q27) (n = 1,244)

Q32 Thinking about people like you who are residents of another EU country than their country of nationality, please indicate which statement you think is true regarding elections to the European Parliament.

ONE ANSWER ONLY

- ☐ It is possible for them to vote in these elections twice, both in their country of residence and their country of nationality, AND it is not punishable by the law
- ☐ It is possible for them to vote in these elections twice, both in their country of residence and their country of nationality, BUT it is punishable by the law
- ☒ It is not possible for them to vote in these elections twice, both in their country of residence and in their country of nationality, as they are automatically not registered or deregistered in one of the two countries
- ☐ Don't know/No answer



All respondents (n = 2,383)

Measures to Increase Participation

Q4 In the following section we will show you a hypothetical scenario. Try to imagine the situation described as vividly as possible.

| Vignette A – Automatic registration local elections | Vignette B – Active registration local elections |
|--|--|
| <p>You have been living in your country of residence (Country name) for the past two years.</p> <p>The municipality where you live will hold local elections in six months.</p> <p>Today you found a letter in your mailbox with the following information.</p> <p>LETTER</p> <p>Dear Madam or Sir</p> <p>On Sunday 28 November 2021, your city will hold local elections. As an EU citizen and resident of this country (country name), you have been automatically registered to vote in these elections. This means that you do not need to take any further action and may cast your vote after presenting your residence permit on election day. You will receive more information regarding the ways of voting in the coming months.</p> <p>Yours sincerely, The municipality</p> | <p>You have been living in your country of residence (Country name) for the past two years.</p> <p>The municipality where you live will hold local elections in six months.</p> <p>Today you found a letter in your mailbox with the following information.</p> <p>LETTER</p> <p>Dear Madam or Sir,</p> <p>On Sunday 28 November 2021, your city will hold local elections. As an EU citizen and resident of this country (country name), you have the right to vote in local elections.</p> <p>We would like to inform you that to vote in these elections, you need to be registered on the electoral roll in our municipality. You can apply to be registered on the electoral roll in person at the town hall. For this, you will need to provide the following documents:</p> <ul style="list-style-type: none"> - Your ID card/Passport; - Your residence card. <p>The opening hours of the town hall election service are:</p> <ul style="list-style-type: none"> - Monday 8.00 – 12.00 13.00 -17.00 - Tuesday 8.00 – 12.00 13.00 -17.00 - Wednesday 8.00 – 12.00 13.00 -15.00 - Thursday 8.00 – 12.00 13.00 -18.00 - Friday 8.00 – 12.00 13.00 -15.00 <p>You do not need to make an appointment but can simply come at any time during these office hours. The last day for registration is 24 September 2021.</p> <p>Yours sincerely The municipality</p> |
| Vignette C – Simple administrative language – EP elections | Vignette D – Emotional language appealing to sense of civic duty – EP elections |

You have been living in your country of residence (Country name) for the past two years.

European Parliament elections will be held in six months

Today you found a letter in your mailbox with the following information.

LETTER

Dear Madam or Sir

The European Parliament elections will be held on Sunday 28 November 2021. As an EU citizen and resident of this country (Country name), you have the right to vote in the European Parliament elections for a list of candidates standing in this country (Country name) at a polling station close to your home.

We would like to inform you that to vote in these elections for a list of candidates standing in this country (Country name), you need to be registered on the electoral roll of this country (Country name). You can apply to be registered on the electoral roll in person at the town hall. For this, you will need to provide the following documents:

- Your ID card/Passport;
- Your residence card

The opening hours of the town hall election service are:

- Monday 8.00 – 12.00 13.00 -17.00
- Tuesday 8.00 – 12.00 13.00 -17.00
- Wednesday 8.00 – 12.00 13.00 -15.00
- Thursday 8.00 – 12.00 13.00 -18.00
- Friday 8.00 – 12.00 13.00 -15.00

You do not need to make an appointment but can simply come at any time during these office hours. The last day for registration is 24 September 2021.

Yours sincerely,

The municipality

You have been living in your country of residence (Country name) for the past two years.

European Parliament elections will be held in six months

Today you found a letter in your mailbox with the following information.

LETTER

Dear Madam or Sir,

The European Parliament elections will be held on Sunday 28 November 2021.

On 28 November 2021, you can vote for the people who will make decisions about the future of the European Union in the next five years. By voting, you choose the party and the candidates whom you believe to be best suited to represent you.

The European Parliament votes on rules that directly concern you, including minimum rules for social protection, consumer rights, and EU investments in your country. You can find more information about the roles and responsibilities of the European Parliament on its website.

As an EU citizen and resident of this country (Country name), you have the right to vote in the European Parliament elections for a list of candidates standing in this country (Country name) at a polling station close to your home.

We would like to inform you that to vote in these elections for a list of candidates standing in this country (Country name), you need to be registered on the electoral roll of this country (Country name). You can apply to be registered on the electoral roll in person at the town hall. For this, you will need to provide the following documents:

- Your ID card/Passport;
- Your residence card

The opening hours of the town hall election service are:

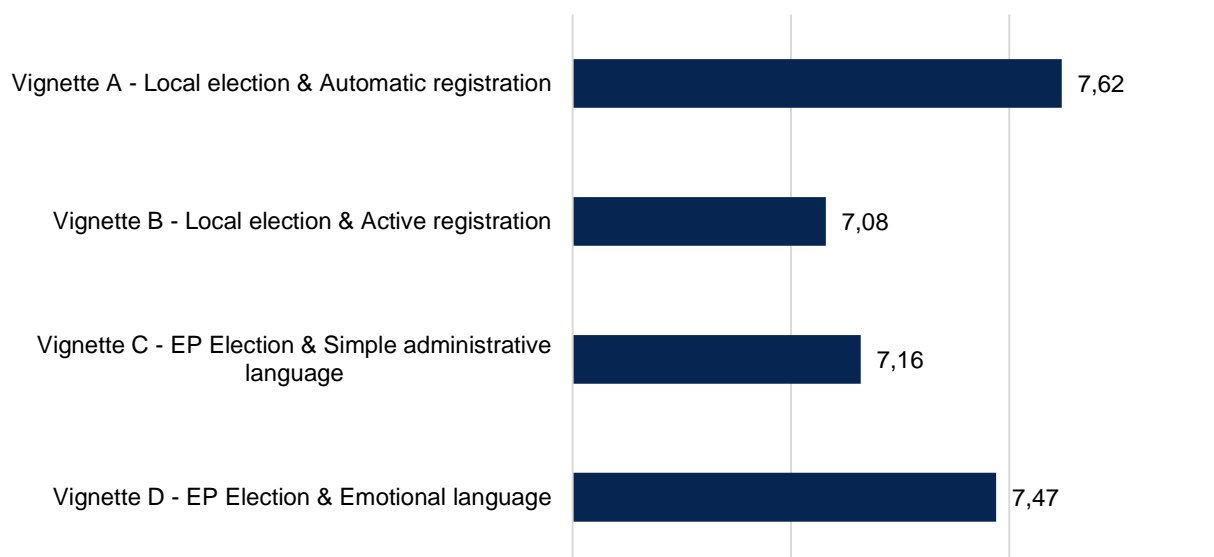
- Monday 8.00 – 12.00 13.00 -17.00
- Tuesday 8.00 – 12.00 13.00 -17.00
- Wednesday 8.00 – 12.00 13.00 -15.00
- Thursday 8.00 – 12.00 13.00 -18.00
- Friday 8.00 – 12.00 13.00 -15.00

You do not need to make an appointment but can simply come at any time during these office hours. The last day for registration is 24 September 2021.

Yours sincerely,

The municipality

Mean scores for likelihood to vote by treatment



Respondents presented Vignette A – Local election & Automatic registration (n = 879)

Respondents presented Vignette B – Local election & Active registration (n = 918)

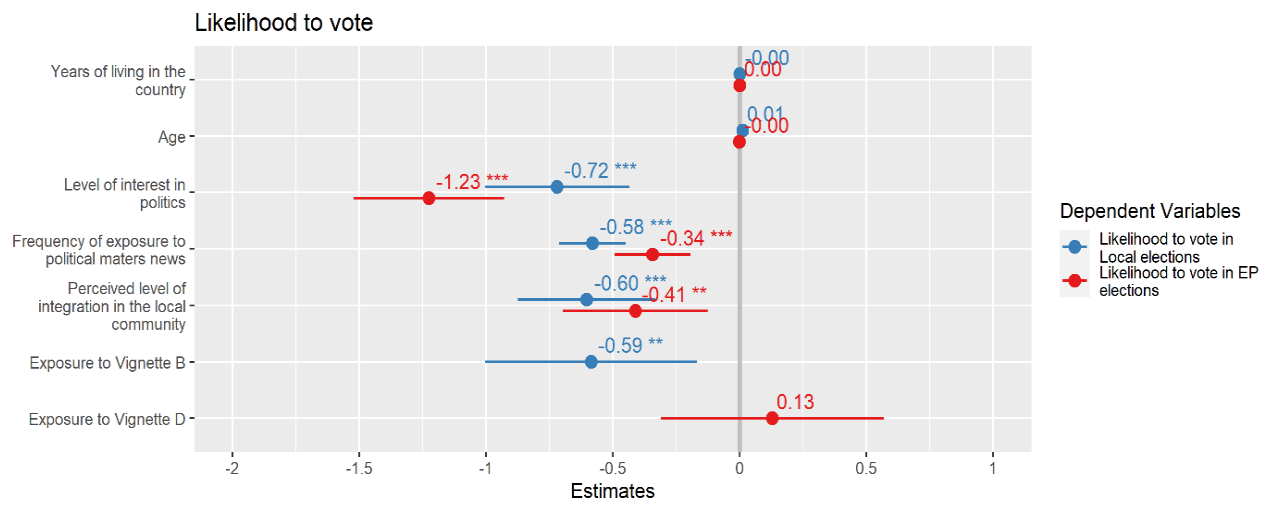
Respondents presented Vignette C – EP Election & Simple administrative language (n = 852)

Respondents presented Vignette D – EP Election & Emotional language (n = 886)

Effect size estimates (Cohen D)

| Scenario | Effect size estimate (Cohen's D) | Effect Meaning |
|----------------------|----------------------------------|----------------|
| Letter A vs Letter B | 0,1445 | Negligible |
| Letter C vs Letter D | -0,0835706 | Negligible |

Effect of treatments on likelihood to vote - multivariate regression estimates

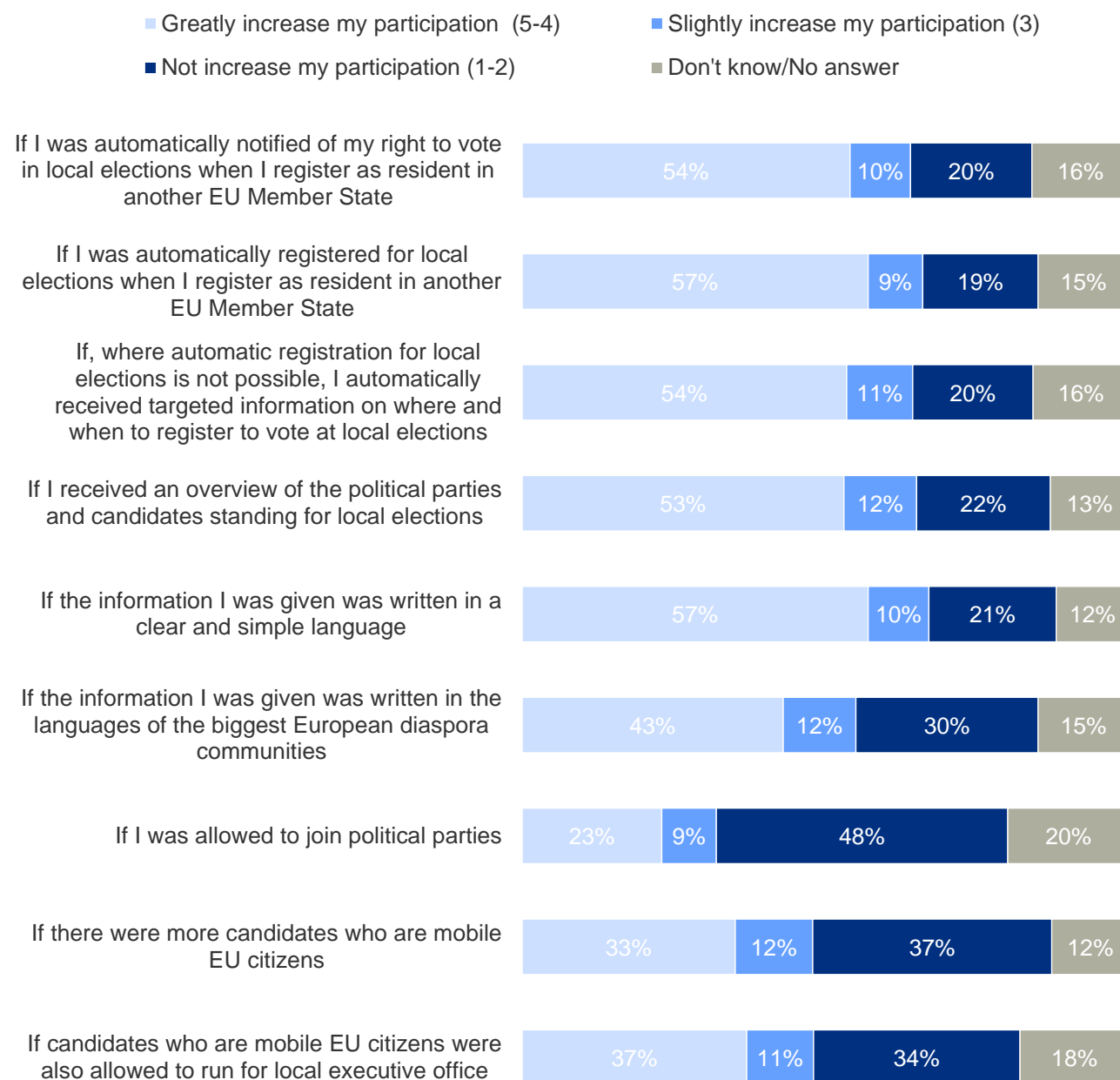


Explanatory models for Likelihood to vote – complete results

| <i>Predictors</i> | Likelihood to vote in Local elections | | | Likelihood to vote in EP elections | | |
|---|---------------------------------------|---------------|------------------|------------------------------------|---------------|------------------|
| | <i>Estimates</i> | <i>CI</i> | <i>p</i> | <i>Estimates</i> | <i>CI</i> | <i>p</i> |
| Intercept | 11.45 | 10.16 – 12.74 | <0.001 | 11.60 | 10.24 – 12.97 | <0.001 |
| Years of living in the country | -0.00 | -0.00 – 0.00 | 0.868 | 0.00 | -0.00 – 0.00 | 0.854 |
| Age | 0.01 | -0.01 – 0.03 | 0.180 | -0.00 | -0.02 – 0.02 | 0.880 |
| Level of interest in politics | -0.72 | -1.01 – -0.43 | <0.001 | -1.23 | -1.52 – -0.93 | <0.001 |
| Frequency of exposure to political matters news | -0.58 | -0.71 – -0.45 | <0.001 | -0.34 | -0.49 – -0.19 | <0.001 |
| Perceived level of integration in the local community | -0.60 | -0.87 – -0.33 | <0.001 | -0.41 | -0.70 – -0.13 | 0.005 |
| Exposure to Vignette B | -0.59 | -1.00 – -0.17 | 0.006 | | | |
| Exposure to Vignette D | | | | 0.13 | -0.31 – 0.57 | 0.565 |
| Observations | 937 | | | 935 | | |
| R ² / R ² adjusted | 0.191 / 0.186 | | | 0.137 / 0.131 | | |

Q20 Which of the following measures would make you, as a mobile EU citizen, more likely to participate in the next local elections? Please place yourself on this scale where '1' indicates that you believe it would "not increase my participation", 5 indicates that you believe it would "greatly increase my participation" and the remaining numbers indicate something in between these two positions.

ONE ANSWER PER LINE



All respondents (n = 2,590)

Annex 5 – Summary of EU-level interviews

Interview methodology

A total of 11 EU-level interviews have been carried out with a range of stakeholders. The stakeholders interviewed were previously agreed upon with DG JUST. The interviews fell into three categories:

- Interviews with organisations that have understanding and data about the current nature and scope of problems.
- Interviews with respondents who are in charge of the current system for information exchange and data exchange and those in charge of solutions that can be compared with those envisaged as part of the policy options in order to collect the data that will be needed for the estimation of costs and effects at EU level.
- Other EU-level respondents who can provide relevant insights about the effects of the policy options at EU level in terms of both costs and resources and benefits (increasing European citizenship).

The EU-level stakeholders interviewed were the following:

- DG EMPL – Eures
- DG COMM – EDIC
- EP – Citizen's Enquiry Unit
- JRC
- FRA
- Committee of the Regions
- DIGIT
- Group of the EPP
- S&D Group
- Group of the Greens
- European Mobile Youth

Although a range of other stakeholders were contacted to conduct an interview, not all had availability or believed they had any specific insights to add to this issue. Additionally, other stakeholders shared reports and other documents pertaining to the political participation of mobile EU citizens, yet stated that they would not be available for an interview.

The interviews were semi-structured, seeking to gauge respondents' views on the problems set out in the impact assessment, and on the policy options proposed. Furthermore, the interviews focused on the knowledge that the respondent could provide within the context of their work.

Analysis

Interviews have been analysed individually, although the analysis will be presented at a general level, combining the perspectives of respondents where there are shared views on a specific issue, and presenting divergent opinions where applicable. This approach has been taken in order to present respondent perspectives in an anonymised manner. Hence specific views are not tied to any one stakeholder.

The interviews began with introductions from all respondents, during which they were asked to present their work in relation to mobile EU citizens' political participation. This enabled the interviewer to tailor questions that were most appropriate to the respondents' professional and personal knowledge, as well as further understand the context through which they provided their individual perspectives.

Respondents' professional experience was varied in order to cover as many of the factors affecting the political participation of mobile EU citizens as possible. They worked within the following fields:

- Communication services directed at informing EU citizens of the work carried out by the European Commission, monitoring information on social media and other public information platforms where EU citizens obtain information on these matters. A substantial aspect of this task is to fight disinformation found in the general public, as well as understanding what information is communicated at a local level;
- Management of communication between departments within the European Commission, ensuring proper alignment of political priorities;
- Production of research publications within the European Parliament;
- Production of reports capturing frequent questions that EU citizens have in relation to their fundamental rights;
- Information services regarding both professional and social integration for EU citizens considering relocation to a Member State other than their country of origin;
- Creation and evaluation of key performance indicators for the revision of EU-level policies;
- Representatives of specific political groups within the European Parliament, holding a range of positions including political communication experts and political advisors;
- Processing of citizens' initiatives presented to the European Parliament;
- Academic research aimed at understanding the experiences mobile EU citizens have in their political participation abroad, covering analysis of problems experienced and the presentation and testing of policy options aimed at easing and increasing their participation;
- Research projects analysing situations of unequal treatment from a fundamental rights perspective within the European Union;

Due to the varied nature of their professional and personal experience of the political participation of mobile EU citizens, respondents had had more or less experience of the topic. Respondents' views are presented following the structure outlined within the interview guide.

Perceptions of the status quo

As a starting point, respondents were asked how they viewed the current ability of mobile EU citizens to vote in local and European Parliament elections in their country of residence, as well as their opinions of the most common obstacles that they face when doing so. A similar question was presented regarding candidacy in order to establish a baseline perspective of the problems from respondents' points of view.

Ability to vote as mobile EU citizens

Legislative and administrative factors

When asked about mobile EU citizens' ability to vote in local and European Parliament elections in their country of residence, respondents spontaneously cited various factors that condition this. As an overarching theme, it was apparent to them that the heterogeneity of rules for mobile EU citizens' eligibility to vote in differing Member States created a difficulty in defining the scope of their access to the ballot. In particular, it was mentioned that this is due to the fact that EU level directives establishing this fundamental right are not exhaustively defined at a legislative level, creating a basis for political participation but without establishing fixed rules or indicator cut-offs for facilitation. Hence, various considerations come into play when evaluating the possibilities open to mobile EU citizens for political participation.

One such set of factors that was identified top of mind were the administrative procedures through which a mobile EU citizen could be entered on an electoral roll. More often than not, Member States require a newly arrived mobile EU citizen to actively register on the electoral roll, aside from having to register at their local public office. Although several respondents mentioned that expert and academic opinion diverges as to whether active registration truly deters citizens from voting compared with automatic registration, most felt that the latter provides easier access to the voting booth. However, administrative considerations affecting the propensity of mobile EU citizens to vote did not end at this point.

Respondents also pointed out that when active registration is in place, some Member States demand documentation for successful registration. Such documents could be hard to come by or have approved, especially if a notary were to be involved. Another more legislative but associated aspect identified was the existence of differing deadlines for registration prior to an upcoming election. The timing of these means that mobile EU citizens with inadequate information on the need to register and registration procedures, or who may have difficulties accessing specific documents for doing so, might not be able to register in due time.

A final legislative aspect, mentioned by one respondent, was that the type of local elections that mobile EU citizens could vote in could also affect their propensity to vote. Some Member States, or localities within them, do not allow mobile EU citizens to vote at all levels of local political decision-making. The main example provided was that of cities giving mobile EU citizens access to vote in district level elections, but not at the municipal level. The respondent mentioned that due to the differing weight such electoral races had in their immediate community, mobile EU citizens could be affected by lacking access to the most significant elections.

Long-distance voting

Although more closely related to European Parliament elections, the question of voting for home party lists did arise for a few respondents. The possibility to do so from abroad was considered as a crucial for mobile EU citizens wanting to vote for a party in their country of origin. Respondents mentioned that the degree to which Member States allow their nationals living abroad access to the ballot would surely affect turnout for such voters, with a variety of long-distance voting options available. These were also seen as varying widely between Member States.

Effects of information

A second set of factors spontaneously raised by respondents was linked to the information that mobile EU citizens have regarding their participatory rights. This was further broken down into three categories: knowledge of the existence of the fundamental right in question, having the necessary information for successful registration on the electoral roll, and possessing information relating to the political choices existing in Member States.

Beginning with the knowledge that these EU level directives exist, most respondents observed that having this knowledge is an obvious precondition to using this right. Furthermore, they explained that such information may not be immediately obvious to mobile EU citizens, which would certainly limit participation in local and European Parliament elections abroad.

Turning to information on registration procedures, respondents noted that how easy it was to register on the electoral roll would also affect the likelihood of participation. If more complex documentation were needed for successful registration, combined with deadlines for doing so, poorly informed mobile EU citizens would be stymied and demotivated by a lack of information.

The last of these aspects, but of relative importance in the political engagement of mobile EU citizens, is knowledge about political parties and politics in general within a host country. Without information allowing mobile EU citizens to identify with the political situation in a Member State, and the political choices that they can make, respondents stressed that it would understandably be difficult for mobile EU citizens to participate meaningfully.

Interest in politics

A final aspect raised was the level of actual interest in politics, and particularly in political events in a Member State that is not their home country. A few respondents observed that this varies from individual to individual, and that although it may be out of the scope of what can be achieved through the revision of the directives, it is partially linked to the level of information and education mobile EU citizens have on their civic rights and on the politics of a Member State where they are residing.

With the extensive range of factors conditioning mobile EU citizens' participatory capacity, all respondents explained that it depends on how both Member States and EU institutions facilitate issues revolving around accessing the ballot, access to information, and generating interest in politics across the EU. Differing perspectives were held regarding which of these factors needed more attention and why, although the overarching message from all

respondents was that in order to fully increase the political participation of mobile EU citizens, all the possible angles had to be addressed.

Common obstacles to voting for mobile EU citizens

After an initial discussion gauging respondents' views of mobile EU citizens' capacity for political participation, they were asked which barriers they felt were most obstructive. Respondents' views directly reflected their initial evaluations of the factors in play, giving differing weight to barriers depending on their professional and personal exposure to them.

Legislative and Administrative Barriers

Many of the issues identified by respondents came down to the heterogeneous practices of Member States in applying the directives. Hence, variation in the legislative interpretation of these not only complicates the definition of the capacity to vote, as explained above, but also conditions the barriers that are encountered in each Member State. One clear example directly related to the definition of the directives, is that no cut-off indicator is defined for what can be considered an excessively long residence requirement in order to be eligible to vote. The case of Bulgaria was used as an example, where mobile EU citizens had to have lived in their respective localities for the previous 12 months. Although the imposition of such a requirement is considered legitimate by the Venice Commission and the European Court of Human Rights, the Constitutional Court ruled it a violation of the constitutional principle of proportionality⁵. This is one of several examples that show how establishing whether a Member State has limited a mobile EU citizen's fundamental right to vote is difficult from a legislative perspective.

Next, although not related directly to the interpretation of the directives, but rather to the sovereignty that has been left to Member States on some aspects, is the issue of registration practices. Active registration is currently the most common procedure for mobile EU citizens' access to electoral lists, which most respondents saw as a significant barrier from a fundamental rights perspective, as well as a behavioural one. In terms of fundamental rights, respondents highlighting this point stated that it cannot be considered an equal application of the directives if automatic registration is in place for national citizens of a Member State, while mobile EU citizens are simultaneously obliged to actively register. In behavioural terms, respondents also observed that active registration represents an extra hurdle that discourages mobile EU citizens from casting a vote. A report from the European Commission illustrates registration rates of around 51% in Member States with automatic registration, compared with 19% in those that have active registration in place⁶.

Furthermore, where active registration exists, respondents confirmed that the registration process poses additional barriers. A first issue identified was that communication explaining registration procedures, if present at all, is generally in the native language of the host Member State. Therefore, mobile EU citizens who do not know the language are directly limited in their possibilities to register. On this point, one respondent observed that European expat hubs, such as Brussels, could be expected to more readily present these communications in shared languages, but that these were unrepresentative of the rest of Europe.

⁵ European Commission (2018)

⁶ *Ibid.*

Closely linked to the previous point, respondents explained that mobile EU citizens often do not know what the administrative procedures are in order to register on the electoral roll. They further stated that the issue lies in fact that there are no automatic information procedures, as well as no guidance as to how to access such information. In particular, one respondent observed that, in their research, questions were commonly asked by younger and older cohorts who, for differing reasons, did not know what the registration procedures were. The former tended to ask questions related to the general functioning of the political system, whilst the latter's questions arose from technical issues related to the digitalisation of certain registration procedures.

Another administrative barrier identified by respondents is the request for an excessive amount of documentation from mobile EU citizens wanting to register on the electoral roll. Respondents stated that, in some Member States, documents presented at the time of registration had to be signed off by a notary in order to be accepted. A specific example provided was that of a case in France, where a mobile EU citizen's registration on the electoral roll had been refused because they had not provided an attestation indicating that they had not been stripped of their voting rights in their country of origin⁷.

As a final note on legislative barriers, one respondent stated that Member States reserve the right to grant participatory access only to certain levels of local elections. They gave the example of the City of Vienna, where mobile EU citizens are currently only allowed to vote in district level elections, but not those that pertain to the entire city. Although the right to vote in local elections still exists, the respondent observed that such actions limit the voice that mobile EU citizens feel they have when attempting to participate in their locality of residence. Limitations of this nature can discourage mobile EU citizens from casting their votes.

Long-distance voting barriers

Although more directly related to voting for home-country party lists in European Parliament elections, a few respondents raised the issue of disproportionate costs (in terms of time or direct costs) that mobile EU citizens experience in doing so at a distance.

One such limitation is often due to a lack of accessible voting stations, as well as problems where existing ones are difficult to access for specific nationalities. Respondents gave the example of Member States that do not allow their citizens abroad to cast a vote within a reasonably flexible set of dates surrounding the election, instead opting to only allow them to do so on the established day of election. Respondents explained that unexpected yet common difficulties, for example work or health reasons, that do not allow a mobile EU citizen to attend on the established date would severely restrict their ability to vote.

Another difficulty with long-distance voting, also related to having a small selection of voting stations, is that there may be long queues at scarce polling stations, which is also a deterrent to voting. One respondent gave the example of the 2019 European Parliament elections, where Romanians across Europe had extreme difficulties in accessing polling stations as waiting lines lasted several hours. They observed that mobile EU citizens experiencing such delays would understandably be dissuaded from voting.

Finally, a few respondents stated that the lack of long-distance voting options in many Member States - such as postal voting, proxy voting, and the more controversial e-voting

⁷ France, Court of Cassation (Cour de cassation, Chambre civile 2), Appeal No. 08-60266, 13 March 2008.

option - is a direct barrier to facilitating voting for mobile EU citizens. They further noted that it is often national parties that oppose the standardisation of such methods for political reasons, which results in unequal treatment for citizens abroad wishing to voice their political preferences.

Information Barriers

Aside from legislative and administrative barriers, respondents cited several limitations related to the information mobile EU citizens are provided in order to access their participatory rights. A first set of such hindrances relates to the general awareness that such a right exists within the European Union, whilst another has to do with the knowledge mobile EU citizens have about political matters in the host Member State. This political knowledge is necessary in order to allow them to identify the options available.

Starting with knowledge of the two directives, most participants observed that mobile EU citizens, as well as EU citizens more generally, are not aware that they have participatory rights in Member States where they are not nationals. It was obvious to respondents that the lack of such information directly leads to the inability to exercise this right. In particular, one respondent was astounded that they themselves were not aware of this right, being directly engaged in politics. Consequently, they observed that mobile EU citizens with less engagement in politics would undoubtedly be less aware of the existence of the directives.

A directly related issue raised by respondents was that the sources of information provided to mobile EU citizens are often not accessible to them. One reason is that there are too many sources from which information on participatory rights can be obtained. Through their research, one respondent found that the information mobile EU citizens sought from differing sources often was mismatched, creating confusion as to what was correct. Other respondents explained that the wide variety of information points converted the information seeking procedure into a daunting task. Moreover, although certain EU-level information platforms do exist, such as the Your Europe Website, respondents said that it does not contain all of the relevant information, which needs to be more country-specific, for accessing electoral rolls.

They elaborated further on the existence of EU-level resources for such information, stating that, although they exist, little is being done in terms of outreach to specific target groups. In other words most of the information provision is passive and accessible to those searching for it, but there is little in the way of active outreach efforts. Therefore, many mobile EU citizens would not know of the existence of this information. One respondent explained that outreach campaigns conducted by specific European institution divisions are often tied to their mandate, which does not aim to target mobile EU citizens but rather the more general EU population.

In terms of outreach at the national level, respondents also said that Member States do not do enough to inform their mobile EU citizens about the registration procedures they have to undertake in order to vote. Either because the information is not readily available at the time of registration, is provided only in the national language of the Member State, or is simply not provided at all, mobile EU citizens receive no help locally in accessing what they need to know. One respondent explained that they had had to search out the information for themselves when they wanted to register on the electoral roll in their host country and observed that it was odd that such information provision practices were not digitalised.

As a final point on information, respondents alluded to the need for voters to create a political identity for themselves so as to participate meaningfully. The issue that most respondents raised was that mobile EU citizens are often not sufficiently informed about the political situation or options in Member States that are not their own. Political engagement may therefore be expected to be lower under such circumstances. Although respondents accepted that it is not within the remit of European institutions to provide information on the national political affairs of individual Member States, they felt that more had to be done to engage mobile EU citizens locally.

Overall, respondents pointed out an intrinsic link between the variety of legislative practices that Member States have for electoral roll registration and access, and the difficulty mobile EU citizens have accessing the information necessary to register. So long as registration practices and minimum access conditions are heterogeneous between Member States, there will be a high incidence of communication pitfalls regarding required documentation and procedures. Although easing administrative costs was often considered as crucial to mobile EU citizens' political participation, most participants felt that tackling all of them would be largely unfeasible, preferring to recommend harmonisation where possible, alongside optimised information provision services.

Indeed, administrative barriers were considered as only one angle from which problems could arise. Access to centralised information and more targeted outreach campaigns would also play a significant role in activating mobile EU citizens. Combined, these barriers were considered to deter mobile EU citizens from accessing the ballot both in a literal sense, creating an external barrier, and subjectively, with behavioural impacts.

Candidacy as a mobile EU citizen

It was more difficult to come by respondents' perspectives on the capacity to stand as a candidate as a mobile EU citizen, as political participation in the form of candidacy is generally less widespread than voting. Nonetheless, a few respondents had personal experiences of running as candidates as mobile EU citizens in their current localities of residence.

An overarching reason for the reduced frequency of candidacy was that mobile EU citizens are less likely to want to engage politically in this manner. Respondents observed that the scarcity of candidature experiences is to be expected, as it calls for much more involvement in the political matters of their community than casting a vote. They added that this would also be the case for nationals living within their home communities, rendering it even less likely for mobile EU citizens due to the extent to which many feel disengaged from political identity in their host Member States. In this respect, respondents' perspectives on candidacy are in line with the data suggesting that very few mobile EU citizen candidates run as independent candidates, often doing so through the invitation of an established local party.

Expanding on this, they explained that the mobile EU citizens who do engage in candidacy independently more often do so within localities with a significant expatriate community, either of their own or a variety of nationalities, as candidacy often goes hand in hand with representational capability. One respondent pointed to the example of "expat-hubs", such as Brussels, where mobile EU citizen candidacy may be more frequent due to the salience of engaging with a European identity. A similar example can be found in the larger British diasporas within Spain or France. The capacity to feel that one's candidacy is representative within the community was also identified as a crucial starting point by a respondent who had

decided to run as a local candidate in their home locality from afar, even though they had been residing in another Member State for an extended period of time.

In addition to this, and in a similar fashion to voting registration, registering as an independent candidate is also contingent on the minimum criteria and administrative procedures set by Member States. Respondents with experience of doing so observed that these are also often complicated, demanding much documentation some of which had to be signed by a notary in order to be legitimised. One respondent said that accessing the necessary documents and depositing them at the public office where they were attempting to run as a candidate was excessively difficult. Moreover, they explained that there were linguistic barriers, as documents had to be presented in the locally spoken official language, and no guidelines were offered in a shared language. Due to this, the respondent did not have time to obtain the necessary signatures to be eligible to stand.

As a result of such difficulties in running independently, respondents mentioned that mobile EU citizens wanting to run as candidates would have considerably more opportunities to do so through an established local party. One of the reasons identified was that they would be able to “fast-track” many of the administrative hurdles experienced as independent candidates. Additionally, obtaining support would be easier through the campaigning efforts of established parties, whereas doing so individually necessitates a degree of resources many do not have. As an example, one respondent explained that their experience of candidacy had not been complicated, as a result of being invited by a local party to represent their locality. At the same time, they admitted that their case was not common, and that they had been engaged in their community of residence for an extended period of time.

Altogether, it was apparent to respondents that candidacy could be eased by providing information on registering as a candidate in languages other than that of the host Member State, as well as by easing the documentary requirement for eligibility. However, respondents observed that, although an integral aspect of political participation, candidacy is only considered by mobile EU citizens with a more long-standing engagement with their respective communities, and tends to be taken up by citizens, regardless of mobility, who are considerably more engaged with politics. Moreover, independent candidacy was seen as close to impossible due to the high entry barriers which respondents said faced local and mobile EU citizens alike. Therefore, respondents felt that candidacy was more realistic through the representation of local parties.

Questions and Complaints Received from Mobile EU Citizens

Where respondents were involved in addressing enquiries received from European citizens on a variety of topics, they were asked to outline the types of questions that mobile EU citizens had asked in relation to their political participation in host Member States.

Generally, enquiries pertained to the European Parliament elections, rather than local elections. Respondents observed that this is partly due to the fact that citizens look to national authorities for local matters, rather than EU institutions. However, many of the questions and difficulties mobile EU citizens encountered were also applicable to local elections. Lastly, respondents explained that most enquiries come in the three to four months preceding elections.

One of the most common types of enquiries are those relating to a lack of knowledge of voting rights. As was outlined in other interviews, mobile EU citizens are frequently unaware that they can participate politically within their host Member States. Although enquiries may not directly address the question as such, they often indicate a lack of knowledge of political participatory rights within the European Union. As an example, mobile EU citizens often ask whether they have to vote for European Parliament elections in their country of origin, as well as how to do so from afar, apparently unaware that they have the option to vote within their country of residence.

A second set of enquiries concerns the voting modalities available to mobile EU citizens. These can be in relation to voting within their Member States of residence, as they commonly assume that they do not have the same voting rights as national citizens. However, they also have to do with the available modalities for distance voting for home party lists, such as postal, proxy and electronic voting. Respondents explained that there is much confusion as to the effects that registering in the locality of residence has on voting procedures. In particular, mobile EU citizens are sometimes unaware that registering to vote and registering to establish a new residence can be separate processes. As a result, they presume that the two processes are inherently linked, creating confusion as to the effects it has on their voting rights. Many questions thus concern where they must cast their vote.

Where mobile EU citizens are aware of their right to vote in a host Member State, questions tend to be on the procedures for registration on electoral rolls, asking where and how to do so, and what deadlines are in place. However, there are also questions about who they are voting for, since they may not be familiar with the parties standing in their country of residence.

Respondents were also asked whether they receive any questions pertaining to multiple voting. They explained that such enquiries are often tied to the question of where mobile EU citizens should cast their vote, rather than a direct query about the possibility of casting two votes. Respondents further explained that this is connected to the same reason outlined before: mobile EU citizens do not know what effects changing residence has on their enfranchisement. However, in the few instances where enquiries were about the possibility to vote twice, these concerned the extent to which national authorities communicate with each other about their electoral rolls.

A final set of enquiries, although much rarer, had to do with candidacy. Respondents explained that mobile EU citizens are much more likely to want to vote than to run as a candidate, which accounts for the difference in quantity. Nonetheless, where there had been questions, these were often about the minimum criteria necessary for standing in elections, including issues such as age limits, specific documentation or minimum residency periods. Moreover, these were the only types of enquiries that pertained more often to local than to European Parliament elections.

Evaluating the current legal framework

Assessing the capacity of mobile EU citizens to exercise their political participation from a fundamental rights perspective was seen as less clear-cut by respondents, especially those with legal expertise. As mentioned, judging whether a Member State infringes its obligation to facilitate the political participation of mobile EU citizens is primarily difficult due to the flexible interpretation of parts of the directives. Issues include the level of local government at which mobile EU citizens can vote, requirements in terms of length of residence in order

to register on the electoral roll, and the documents necessary to be eligible to vote. However, many of the barriers that respondents identified have not officially been considered a violation of mobile EU citizens' fundamental rights.

Beginning with some of the barriers that were identified early on in interviews, most respondents did comment that the fact that these hinder mobile EU citizens from accessing the ballot already brings into question the legitimacy of the rights outlined by the directives. For example, the lack of information many mobile EU citizens have regarding their capacity to vote, and the procedures they must undertake in order to do so, were seen as limitations on their political voice. A respondent observed that in ahead of 2019 European Parliament elections there were significant debates on mobile EU citizens' access to their political rights, during which such issues were discussed. Nonetheless, respondents with professional legal experience observed that these were not regarded as infringements from a fundamental rights perspective, but rather as the suboptimal application of the directives.

Indeed, although respondents considered that such limitations impede the satisfactory political engagement of mobile EU citizens, they are hindrances rather than direct breaches. However, certain cases had been identified as possible threats from a fundamental rights perspective. One such case had to do with restrictions imposed on the level of local elections mobile EU citizens have access to. In Germany, one respondent had brought a case in which mobile EU citizens were unable to vote in state level elections. However, the case was not considered a breach of the directives, the Constitutional Court of Bremen explaining that federal states have no obligation to allow mobile EU citizens to vote in state elections⁸.

Another set of cases, more common than the last, are those related to administrative requirements for eligibility to vote as a mobile EU citizen. In particular, it seems that the definition of the required length of residence is wide open to interpretation. A case in Bulgaria, previously presented, was considered to violate the principle of proportionality due to the excessively long period of residence required to vote and stand as candidates in local elections. The period in question was a minimum was 12 months. This is an example a respondent gave of an obstacle that was considered too grave. Another was that of Czechia, where permanent residence was required in order to register on the electoral roll of a municipality. In this case the issue lay in the definition of "permanent residence" in Czechia, which is acquired through registration within the locality, while it is more complicated to achieve in other Member States. Hence the Regional Court of Brno considered that the directive had been incorrectly transposed⁹.

Finally, a third set of cases presented by respondents had to do with the documentation required in order to register on the electoral roll. As mentioned previously, some Member States require excessive documentation from mobile EU citizens wanting to register. As an example, there was a case in France where a mobile EU citizen was prevented from registering on the electoral roll for local elections because they had not provided an attestation confirming that they had not been stripped of their voting rights in their country of origin. This case was settled when the Court of Cassation ruled that signing a form explicitly

⁸ Germany, Constitutional Court of Bremen (Staatsgerichtshof der Freien Hansestadt Bremen, StGH), Case No. St 1/13, 31 January 2014.

⁹ Czech Republic, Regional Court in Brno (Krajský soud v Brně), Case No. 64 A 6/2014 – 20, 19 September 2014.

stating this was sufficient proof¹⁰. Such examples show that in some Member States the barriers to accessing the ballot are considered a breach from a fundamental rights perspective.

Overall, respondents with professional legal experience explained that officially considering barriers as an infringement of mobile EU citizens' fundamental political rights is a difficult matter, often approached on a case-by-case basis. The examples presented above demonstrate that the interpretation of the directives is still flexible. Hence, although all respondents considered that the barriers they identified constituted infringements from a fundamental rights perspective, establishing this is more complicated. Nonetheless, all were in agreement that in order to advance the cause of mobile EU citizens' participatory rights, the barriers identified had to be addressed.

Multiple voting and deregistration

Respondents' accounts of multiple voting or deregistration were relatively fewer than for other aspects related to mobile EU citizens' political participation. However, this was not due to a lack of knowledge regarding both issues, but rather to a scarcity of available data. Some respondents had encountered both instances in their research, but admitted these were neither detailed nor in-depth, rather being anecdotal, while others had never done so.

With regard to multiple voting in European Parliament elections, most respondents observed that mobile EU citizens do not typically intend to do so, or even to consider it as a possibility. As outlined in the previous section, the most typical concern mobile EU citizens have when registered in more than one place of residence is where they should vote. This indicates that they are often unaware that they can vote for a host country party if they wish to do so, mostly thinking only in terms of voting for home country party lists.

However, some mobile EU citizens are aware of the possibility of voting twice in European Parliament elections, and although such instances are quite scarce, they have demonstrated this by asking how thorough national authorities are in exchanging such information. On the other hand, most respondents suggested that if mobile EU citizens do vote twice, it would most likely be because they do not know it is prohibited. One respondent mentioned the case of an Italian-German journalist with dual nationality who had voted twice in the 2014 European Parliament elections and explained as much during a live interview. The journalist admitted during the interview that he was completely unaware that his actions could constitute electoral fraud, saying that he would not have admitted such a thing during a live interview if he had known¹¹.

Turning to deregistration, most respondents had not come across such cases through their work. Respondents who had experience of working in enquiry services within EU institutions reported that some mobile EU citizens had asked whether they would be deregistered, and hence unable to vote, in the home country. However, this was not necessarily a question regarding disenfranchisement from other elections; rather, these citizens wanted to know if they could still vote in European Parliament elections at home if they wanted to do so, rather than in their country of residence. One respondent observed that they had come across some instances of deregistration in their research, but that these were rather anecdotal.

¹⁰ France, Court of Cassation (Cour de cassation, Chambre civile 2), Appeal No. 08-60266, 13 March 2008.

¹¹ See article: <https://www.bbc.com/news/blogs-news-from-elsewhere-27587714>

Overall, respondents reported that instances of multiple voting in European Parliament elections were generally not the result of any actual desire to commit electoral fraud, although a few mobile EU citizens may have such intentions. Rather, where this occurs it seems to be the result of an innocent misunderstanding of the way European Parliament elections work. Respondents saw this as a consequence of the lack of knowledge mobile EU citizens have about their political rights, rather than an actual threat. Another type of query about deregistration concerns mobile EU citizens asking about being deregistered from the electoral roll at home as a matter of convenience, rather than the fear of disenfranchisement in other elections.

Exchange of information between Member States

It was not possible for all the respondents to evaluate the effectiveness of information exchange between Member States, as this requires quite specific technical knowledge. Nonetheless, a few respondents had knowledge regarding the infrastructure in place for data exchange at the European level. Its current status has been developed over time through its necessity in European Parliament elections, among other uses.

Heterogeneity of identification data

Respondents explained that, although during the 2014 European Parliament elections Member States had to exchange information on newly registered mobile EU citizens by email, the 2019 elections saw the introduction of an encryption system. The encryption system mitigated the logistical drawbacks of having to follow up email chains, but national authorities in charge of carrying out the exchange still had to encrypt the data themselves. This meant that mistakes were made at the time of encryption; some Member States did not fully follow the established guidelines for secure data exchange, and encryption keys were sometimes lost. Additionally, many of the issues regarding the lack of harmonisation of data points on national citizens across Member States still presented complications during the 2019 elections. In particular, home Member States are sometimes unable to match the list of nationals who have recently registered in another Member State's electoral roll, sometimes frustrating the system's purpose of preventing double voting.

Respondents observe that the current lack of a European unique identifier for EU citizens is one of the most prominent barriers to streamlining citizen matching on electoral rolls between Member States. This directly translates into a difficulty in systematically preventing multiple voting in European Parliament elections. For example, if a newly registered mobile EU citizen has an uncommon name, they may be easily identifiable by their home Member State, but this would not be the case for mobile EU citizens who have relatively common names. Respondents observed, therefore, that issues in matching electoral rolls are not so much a result of the encryption tool itself, but rather the specific annex file each country has outlining the data they need in order to identify a citizen, which greatly varies between Member States.

Additionally, respondents noted that discussions on the introduction of a European unique identifier have been taking place for several years, but that Member States have been reluctant to accept this due to changes this would require to their national IT systems. At the same time, respondents mentioned an initiative in Luxembourg that refers to the eIDAS regulation, which provides a cross-border unique identifier, also known as an eID number, for EU citizens. The eIDAS regulation was originally introduced so that EU citizens could utilise social services in other Member States in a more seamless manner. It is seen as the

first step towards a pan-European unique identifier, and 19 Member States have so far notified such schemes. However, five of these Member States are currently at the pre-production phase of implementation, and 14 are in production mode. Respondents stated that the only precursor is the provision of national eIDs by national governments.

Respondents further explained that the eIDAS number would be directly linked to the national eID that Member States have already introduced for their citizens. In the case of a mobile EU citizen, upon registering in the locality of a host Member State, the eIDAS unique identifier would be used to send information to the home Member State's authorities. Therefore, all that national authorities would have to do is to locate the national eID linked to the cross-national eIDAS number in order to identify its citizens living across the European Union, which would make prevention of multiple voting much more effective.

Centralising the encryption tool

With respect to the mistakes that national authorities in Member States made when encrypting data, respondents said that some thought had been given to centralisation of data management to the EU institutions. Under this proposal, EU institutions would be responsible for encrypting, storing, receiving and sending the data. This approach was seen as risky from a data privacy perspective, as it would have to be carried out strictly within the standards of the GDPR.

Respondents explained that this solution was not currently contemplated, as many Member States themselves are not on board with the idea of allowing their citizens' data to be processed externally. Moreover, it would also require the consent of informed citizens, which would be another difficult barrier to overcome in its implementation.

Special characters

Respondents were also asked about the difficulties surrounding the use of special characters in the sharing of information between Member States. They explained that these issues do not have much to do with encryption, or the tool itself, but rather that local municipalities cannot cope with all of the differing characters existing in the European Union. In part this is due to language differences; it would be unreasonable to expect these to be handled by all public servants, and there is also an issue of keyboards not being able to reproduce all characters.

Respondents referred back to the eIDAS unique identifier, explaining that it would provide a simple solution to this problem. Member States would only need to link their citizens' national identity numbers to the eIDAS unique identifier in order to match them in their registers.

Costs and feasibility of options

When asked about the costs of the encryption tool, respondents were not aware of its production costs, but they did mention maintenance costs. In terms of exact numbers, maintenance of the encryption tool for European Parliament election was said to be €30,000 per year. Although this sum is not high, respondents claimed that maintenance was not a lot of work, and that it was only used for this purpose during the elections, once every five years.

Nonetheless, respondents also mentioned that development costs, although unknown, would certainly be higher than the costs of maintenance. As a result, respondents pointed out that, due to its occasional use, and the fact that it currently works as it is, the tool needs no further development along the lines of centralisation. This would incur many costs, not

least in the management of centralised information. Instead, they suggested that the most feasible improvement would be to expand the use of the eIDAS unique identifier. Systematising its use would go a long way towards solving issues related to the heterogeneous data used in Member States, the use of special characters, and to some extent problems related to data encryption. Its only drawback was the time it would take to establish fully in all Member States.

Evaluating policy options

Towards the end of the interviews respondents were presented with some of the policy options under consideration to address the barriers that were identified. Due to differing degrees of expertise with regard to the options presented, these were also tailored to each participant. To a great extent, respondents were most likely to mention policy options related to the provision of information to mobile EU citizens, partly due to their knowledge of such issues, but mainly because it was seen as one of the most crucial elements to tackle. This was followed by policy options related to registration and administrative procedures. However, information provision and the lessening of administrative burdens were often seen as conjoint solutions to increase the political participation of mobile EU citizens. Lastly, other policy options were also mentioned, although to a lesser extent.

Information provision

Several issues were raised by respondents in relation to the provision of information to mobile EU citizens. In particular, this is due to the fact that information barriers arise from several angles that respondents believed to necessitate simultaneous action. Therefore, information provision as a whole was segmented into EU-level institutional actions, national-level actions, and campaigns on other platforms. Additionally, suggestions targeted both the content and accessibility of information presented, as well as its outreach.

EU-level information provision

In considering the role that EU institutions could play in informing mobile EU citizens of their participatory rights, the consensus amongst respondents seemed to be that the tools already existed. They did not suggest that such tools were not present in the first place. As examples, most respondents were aware of the Digital Single Gateway, the Your Europe website, and the Citizens' Enquiry Unit.

Although respondents acknowledged the existence of these tools, they did bring up the variety of information that could be found in each. One respondent mentioned they had come across participant statements in their research describing the information provided by the tools as mismatched and irregular. Due to this, mobile EU citizens seeking to inform themselves would have a hard time discerning what they needed to know in order to exercise their voting and candidacy rights. Other factors, such as a lack of clear language, and incomplete information on deadlines and the documents required in each Member State, were also identified as pitfalls. Hence, in addition to completing the country-specific information that mobile EU citizens need, respondents said that information tools at the EU level should be centralised into one. This way, mobile EU citizens seeking to inform themselves on such matters could access a single website where they would be linked to the information they need.

Several platforms were discussed when considering information dissemination, but the platform that was considered best by respondents was the Your Europe website. Not only is the tool already in place, but it was seen as the most accessible, with the most practical necessary information. Other supporting tools were also considered, such as the EDICs, the Digital Single Gateway, and the Citizens' Enquiry Unit, but these were seen as limited by their mandate, which often gives them a specific purpose other than information provision. Nonetheless, they were considered as appropriate supporting tools that could redirect mobile EU citizens seeking information to a more centralised source.

Aside from the type of information provided, and the simplification of tools available at EU level, respondents mentioned that one of the most prominent issues is the unfamiliarity of EU citizens with such tools. This was perhaps seen as the most concerning aspect of EU-level tools. Due to this, respondents urged that such tools, or rather a single centralised one, would have to be made much more visible through outreach actions specifically targeted at mobile EU citizens. A few respondents observed that a dedicated social media website for such a tool could be a good way to publicise it. Local public offices could also inform mobile EU citizens of this tool during registration.

National-level information provision

Respondents also considered it crucial that national authorities take responsibility for informing newly arrived mobile EU citizens about their political participatory rights. This was particularly important in the case of country-specific information. Furthermore, participants stated that the information should be provided either at the moment of registration, or shortly thereafter.

Aside from providing newly registered mobile EU citizens with the necessary information to register to electoral rolls or as candidates, such as the documents they would be asked for, deadlines, and renewal procedures, respondents said that Member States should provide information in a shared language of the European Union. Other options included using the language that mobile EU citizens use depending on their home Member State, but respondents acknowledged that this may be more difficult and resource-heavy. Additionally, a few respondents stated that the information would be best presented in a step-by-step manner, rather than all at once.

In terms of outreach, respondents observed that this should not be difficult for local public offices, as they often obtain newly registered mobile EU citizens' emails or phone numbers. Using digitalised services to disseminate information seemed to be the preferred method for respondents, some explaining that in Sweden, such practices were already in place. However, a few respondents suggested that letters would also work, as long as recipients were aware that the contents were important and coming from the local public office.

As a final point, although respondents felt that such an action is crucial, they said that it cannot be made mandatory for Member States to carry out information provision actions because many already are doing so. The problem respondents found was that the actions tended to be more passive than active; information was posted on a website, but with no actual dissemination. Due to this, they proposed that such a policy option be presented as a soft measure, creating pressure on Member States to improve their information provision practices.

Targeted communication campaigns

A final point made about communication was the creation of targeted communication campaigns at an EU level specifically for mobile EU citizens. In particular, these were thought of as awareness raising actions, rather than information provision per se. Respondents felt that targeted campaigns were important, especially if carried out in sufficient time for mobile EU citizens to register prior to an election, yet not too far ahead to be salient. This option seeks to address the fact that many mobile EU citizens, as well as EU citizens more generally, are unaware of the possibility to participate politically in a host Member State.

Indeed, the lack of knowledge of political rights in the European Union was considered one of the most prominent barriers to their exercise. However, although information pertaining to European Parliament elections can and should be communicated by the European Union, this was not seen to be the case for country-specific local elections. Respondents observed that Member States' practices could not be communicated by EU institutions, as it would amount to an infringement of their sovereignty. Municipalities, universities (in the case of younger mobile EU citizens) and NGOs were seen as better channels for communicating this information.

Regarding the content of the communication, the most important aspect was thought to be raising awareness of the political rights of mobile EU citizens, but also advice on where to obtain country-specific information by providing the link to a centralised information portal. Finally, respondents described the best campaigns as those that spanned across a variety of platforms. Although more resources would be necessary, well-funded campaigns would be able to reach a variety of audiences through the combination of more modern and digitalised platforms, such as social media, and more traditional ones that could be paper based.

Easing Administrative Procedures

The second most discussed set of policy options were those pertaining to the easing of the administrative procedures mobile EU citizens have to undertake in order to be eligible to vote. Although respondents felt that the lack of information provision is more pervasive, many administrative procedures were seen as more directly due to individual Member State legislation. This suggests that more drastic changes to the administrative procedures applied in Member States would be regarded as hard measures, increasing the likelihood that Member States reject them. However, soft measures that push for an improvement of administrative procedures were considered feasible

Automatic registration

Having to register on the electoral rolls in host Member States was seen by all respondents as an administrative hurdle in itself for mobile EU citizens. Administrative procedures are often burdensome and complex, hence having to take additional steps in order to enjoy one's political participatory rights could only be considered a barrier. Additionally, respondents stated that administrative hurdles only serve to exacerbate the demotivation of more politically apathetic mobile EU citizens. Therefore, making registration automatic could only be seen as a positive step.

Nonetheless, an important point that a few respondents mentioned was that automatic registration would facilitate rather than guarantee more participation. In fact, any such easing of administrative barriers was considered to be beneficial only if accompanied by actions to raise awareness and provide information. Otherwise, the easing of such measures would

only minimally serve to increase participation. Conversely, making registration automatic would also facilitate awareness raising efforts, as all communication regarding administrative procedures would be simplified.

At the same time, all respondents were acutely aware that it would not be feasible to enforce automatic registration through hard measures. They explained that registration procedures are directly linked to the national legislation Member States have for enfranchisement, making such changes costly not only from a legislative perspective, but also politically. Moreover, in some cases national legislation does not provide automatic registration on the electoral roll for its own citizens, which would create unequal circumstances in favour of mobile EU citizens if enforced. As a result, any improvements made in attempting to make registration automatic would have to be carried out through soft measures, encouraging Member States to move towards automatic registration where possible.

Easing of registration procedures

Where active registration is in place, respondents also considered that easing the amount of documentation needed in order to register can only be beneficial. This could be done by reducing the number of documents needed to register, especially documents that are more complicated to obtain. It could also be achieved by harmonising the type of documentation requested across Member States. However, whichever method was discussed presented similar limitations to automatic registration.

Much of the documentation that Member States request for electoral roll registration is directly linked to their legislation on enfranchisement. Therefore, changing the legislation on necessary documents, or insisting on harmonisation across Member States seemed quite unfeasible to respondents. Instead, urging Member States to ease the amount of documentation requested and monitoring the situation were seen as more viable solutions to the problem at hand.

Finally, as was mentioned in the case of automatic registration, reducing the documentation required to register would facilitate mobile EU citizens' access to the ballot, but would not necessarily serve to increase it. Those who are not inclined to participate politically, or are ill-informed on their rights, may still not do so. Respondents stressed that policy options related to the reduction of documents would have to be paired with information provision and awareness raising actions, which would serve to motivate potential voters. At the same time, providing information would be simpler if less complex procedures were in place.

Enhancing the exchange of information between Member States

Relatively few respondents had the opportunity to comment on the enhancement of information sharing between Member States, due to a lack of knowledge of how the system works currently. However, a few did have perspectives on this matter. The most prominent points shared had all to do with improving the digitalised system used for sharing information in order to increase the likelihood that newly registered mobile EU citizens are matched by their home Member States. However, a few respondents also recommended that the information shared on mobile EU citizens be harmonised, as well as deadlines for registration, allowing for an easier and more timely exchange.

Respondents who had the most experience with data exchange systems at a pan-European level explained that an entirely new information-sharing platform would be unnecessary. So far, the data encryption tool managed by the Commission has served its purposes well,

allowing Member States to share information on its citizens in a secure and encrypted manner. Its main drawback is that national authorities themselves have to encrypt the information they wish to share and upload it, which sometimes leads to mistakes. Respondents mentioned that centralising the system so that the encryption and data management is carried out at an EU level has already been discussed. Although this might work, it would place much of the responsibility for privacy maintenance on EU institutions. Moreover, not all Member States have been in agreement with allowing their citizens' information to be handled by an external centralised system.

Aside from addressing the security concerns surrounding data exchange, a key issue still remains. This is the fact that Member States use differing data points to register their own citizens, and that this system applies to mobile EU citizens as well. This means that data shared with home Member States is sometimes not sufficient to match the shared registers, which results in some mobile EU citizens appearing on more than one register for European Parliament elections. Although the optimal solution would be to harmonise the data needed to identify citizens across the European Union, respondents were quick to point out that Member States would not support such an initiative. The same would apply to any attempt to harmonise the registration deadlines across all Member States so that the data exchange could be done in a timely manner.

As a result, respondents observed that the best way to address issues related to citizen matching in electoral rolls would be to push forward the use of the eIDAS regulation in order to create a cross-border eID. The eIDAS identifier would be unique to every European citizen and be linked directly to the national identification number national authorities provide to their citizens. Therefore, when a mobile EU citizen registers on a new electoral roll, the host Member State can use their eIDAS unique identifier to send the information to the home Member State. In turn, this would bypass the issue of mismatched registers due to differing data points. However, the systematisation of the eIDAS regulation to all Member States is still likely to take some time, so that some European Parliament elections will still have to use the existing encryption tool.

Exchange of best practice

Although not significantly echoed by all respondents, the exchange of best practices in the application of the directives was also identified as an important initiative to pressure Member States, specifically when it comes to information provision and registration practices. From a fundamental rights perspective, the differing applications of the directives stemming from their interpretation could be significantly reduced through best practice and reporting, especially if approached systematically.

However, some respondents explained that even with such monitoring some Member States might still not improve registration procedures, and that additional and more solid mechanisms may have to be used in order to create additional pressure. As a result, although possibly less feasibly, the directives may have to be made slightly more concrete in their application so as to reduce the possibility of flexible interpretation. However, respondents taking this view also acknowledge that it is unlikely Member States would ratify any drastic or overly costly changes to legislation, whereas a best practice database could provide a softer method of achieving this end.

Improving the opportunities for mobile EU citizens to join political parties and stand as candidates

Respondents explained that many of the issues surrounding candidacy could be tackled through the easing of the administrative procedures for registration as a candidate, as well as providing information on how to do so. However, a few respondents explained that candidacy would be much more feasible for mobile EU citizens if they were to join an established political party in their Member States of residence. This would allow them to have greater access to funding, as well as mitigating the difficulties of running as an independent candidate. It would also legitimise them as a more integrated resident in their localities.

At the same time, respondents were unable to suggest specific ways in which to pressure Member States into making political parties more accessible to mobile EU citizens. They observed that such matters were sensitive due to their political nature, and that any hard measures stemming from the EU could be seen as a direct challenge to the sovereignty of Member States. Respondents explained that one possibility was to advocate for improvements on this front through the aforementioned exchange of best practice, as a soft measure.

Increasing long-distance voting modalities

Respondents also acknowledged that another issue to tackle was easing the difficulties mobile EU citizens experience in voting for home party lists from abroad. None of the respondents were in any doubt that Member States' current provisions required improvement. They advocated an expansion of long-distance voting modalities. As with many of the previous policy options, respondents felt that Member States could not be forced to improve on these. However, those that do not allow mobile EU citizens to vote from abroad should be tackled through harder measures, as this was considered a direct infringement of fundamental rights.

Respondents also stated that younger cohorts would benefit from digitalised long-distance voting modalities, such as e-voting. Nonetheless, they were wary of the concerns that surround e-voting, noting that many political parties are not in favour, as it is considered unsafe currently. Respondents also explained that some argue e-voting would remove much of the culture around having a specific voting space, as well as the communitarian aspect of political engagement. Due to this, they felt that Member States would be unlikely to accept it just yet. Lastly, in a similar fashion to automatic registration, e-voting was expected to facilitate long-distance voting, but not necessarily to increase turnout if unaccompanied by strong information campaigns.

Extending the capacity to vote to more intermediate-tier elections

Most respondents observed that extending the right to vote to higher tier intermediate elections to mobile EU citizens would increase their participation. In some localities, elections are only open at the district level for mobile EU citizens, which respondents felt could be considered as a limitation to their voice. As a result, extending the right to vote and stand as a candidate to municipal, and even regional, elections was seen as a feasible goal, as long as it was advocated for through best practice and soft measures. Moreover, this would heighten the meaning of holding European citizenship. However, a few respondents

remarked that for political and sometimes even legislative reasons, Member States do not open their elections to non-citizens.

Early voting age and political education

Finally, although out of scope of the current impact assessment, one respondent stressed the importance of reducing the voting age across the European Union to 16 years of age. They explained that this was considered a sufficiently mature age to begin to engage with politics within an educational environment. If carried out, education in schools for young voters should be enhanced so as to involve them from an early age, creating a culture of political participation. This was seen as greatly enhancing political literacy, which would tackle much of the lack of information seen in relation to citizens' fundamental rights.

Furthermore, such educational practices should occur around all types of elections, including European Parliament elections, in order to erode the distance that much of the European population feels towards politics at the supra-national level. The respondent also explained that linking local national parties with European level politics would strengthen the link younger EU citizens feel with the European Union. In their research, they had found that political apathy was not an issue amongst younger cohorts, but rather that civic education was generally lacking, not only for students but for teachers as well. Hence, they suggested that material for individuals working within the education sector should be further developed and shared, as well as holding training courses.

The respondent agreed that it would be useful to create an EU level helpdesk channel that could help teachers obtain the necessary information for classroom use, subject to following some of the suggestions that they had made. Moreover, the helpdesk should also be accessible to stakeholders, and be accompanied by the suggested awareness-raising activities. Lastly, they felt that student unions would benefit from supporting and obtaining information from such a tool.

Annex 6 – Summary of expert online community

Methodology

A total of five experts took part in an online community that spanned over the period of a week and a half. The profile of respondents and the organisations and persons invited was a combination of:

- Academics who had worked on previous research projects in the area of the electoral participation of mobile EU citizens;
- NGOs and organisations representing mobile EU citizens; and
- Representatives of local authorities or countries that have experience with good practices in facilitating participation of mobile EU citizens.

The community was divided into five activities, each covering several tasks. Each activity sought to gauge experts' opinions on differing aspects of the impact assessment. These were:

- The problem analysis
- The policy options
- The targets and how to measure success

The experts involved were the following:

- Christine Leitner - Senior Adviser at the Centre for Economics and Public Administration (CEPA), and leader of the European Mobile Youth (EMY) project;
- Irina Ciornei – MSCA fellow at the Barcelona Institute of International Studies, currently researching social policy within the European Union;
- Fiona Ferbrache - a professor and researcher in Human Geography at the University of Oxford focusing on the migration of UK citizens to France, including their political participation before and after Brexit;
- Jeremy MacClancy - A professor and researcher in Social Anthropology at Oxford Brookes University focusing on the involvement of British residents in southeast Spain in municipal politics, including the consequences of Brexit they have experienced and their attitudes towards it;
- Anna Zaremba - An EU Rights Coordinator at ECAS, having been responsible for several projects in the field of political participation of mobile EU citizens, including the FAIR EU and IMPEU projects.

A range of experts were invited to participate in the online community, but not all had availability.

Finally, the online community met across five days, one for each task. Its proceedings were entirely in English.

Analysis

The analysis has been divided using the themes that were discussed within the online community. A first section addresses the problem analysis, followed by the analysis of policy options, and finally the targets and recommendations for measuring success.

Problem Analysis

The first activity presented to respondents concerned the different problems that were identified. Put together into tasks, six different options were shown to respondents, from which they had to choose two or more to comment on. The problems presented were the following:

- Administrative burden
- Double voting in European Parliament elections
- Unclear duration and effects of registration
- Insufficient communication
- Mobile EU citizens are not empowered enough
- Lack of comparable data

Administrative burden

The administrative burden was one of problems for discussion chosen by most participants. When introduced to the relevant task, they were first shown a set of examples of problems mobile EU citizens face in their countries of residence when registering to vote. These had to do with:

- Registration periods being too short
- Requirements for excessive documents for registration
- A lack of electronic document submission systems

They were also shown obstacles mobile EU citizens face when wishing to stand as candidates:

- Inability to join an existing party
- Not being able to stand for executive office

Respondents were then asked the extent to which they feel such issues adversely affect the number of mobile EU citizens who vote in local and European Parliament elections.

Administrative barriers to voting

Regarding the problems mobile EU citizens may experience when attempting to register to vote, respondents held divergent views as to whether the current administrative procedures do in fact reduce turnout. Rather, many felt that issues related to registration procedures had more to do with a lack of information than the procedures themselves. At the same time, some did report that the administrative burden in itself was a barrier.

As an example, one respondent presented a case from their research in Austria, where the deadline for registering on the electoral roll was set for early March, a few weeks before election campaigns began. Their research found that mobile EU citizens were not aware of the deadline, and that some had only learned about it afterwards. Similarly, a respondent explained that in their research into UK citizens participating in French local elections, mobile EU citizens who had been adversely affected cited a lack of clear and timely information about registration. Finally, a respondent who raised cases of UK citizens residing in Spain, where it is necessary to re-register after a specific period of time, explained that those who had not done so were unaware of this procedure.

Overall, these respondents found that short registration periods, excessive documentation and active registration did not cause a lack of participation in themselves. Rather, it was the lack of available information.

A few respondents also explained that registration varies between differing municipalities, and even more so between different Member States. One observed that, in some, registration is in fact rather easy, but that others do not provide information in a shared language. They also explained that many mobile EU citizens are not motivated to register or vote due to absence of interest in politics. Therefore, these could not be considered as directly affected by issues pertaining to administrative burdens.

At the same time, respondents identified the lack of information given to mobile EU citizens on administrative procedures as a burden in itself within this category. Moreover, one respondent explained that they had come across reports from mobile EU citizens claiming that active registration is a barrier to their political participation, where inadequate deadlines, inaccurate registries, and cumbersome procedures were all demotivating factors.

Administrative barriers to candidacy

When it came to assessing the administrative barriers mobile EU citizens face in order to become candidates, respondents had differing accounts, depending on the Member State of residence. However, a few do state clearly that there are administrative, and even legislative, barriers that strongly deter candidacy.

Referring back to the examples of UK citizens in France before the Brexit referendum had taken place, mobile EU citizens who stood as candidates managed to do so through invitations from the local office. The respondent said this showed the importance of such invitations, usually extended by the incumbent or candidate mayor. At the same time, they explained that the case of France is particular, because local elections are apolitical. A different example, stemming from cases of candidacy researched in Spain, found that many mobile EU citizens complained that pre-existing political parties, especially those with nationwide organisations, obstruct their entry and exclude them. Unlike France, local elections in Spain are politicised, as evidenced by the fact that mobile EU citizens are invited to stand as candidates when the municipal branch of a party wishes to win votes from foreign residents.

The research from Spain shows that some mobile EU citizens overcame the difficulties created by pre-existing parties by forming their own political organisations. In this way, if elected, they can form coalitions with other parties and gain some control over decision-making at a local level. However, the respondent found accounts of slow and burdensome bureaucratic processes in the registration of newly formed political organisations. Similar instances of difficulties in forming an independent party were echoed by another respondent,

who explained that the laws in some Member States reserve party formation to nationals, imposing limits on the share of members that can be non-nationals. They gave the examples of Czechia and Poland, where rules restrict mobile EU citizens from joining domestic political parties, and as a result from standing as candidates.

Double voting in European Parliament elections

When introducing the problem of double voting in European Parliament elections, it was first explained to respondents that this is forbidden, followed by a presentation on its prevention through the exchange of electoral roll information. It was also explained that matching the data exchanged between host country and home country registers poses a number of challenges, resulting in only around one third of records being matched in the 2019 European Parliament elections. Lastly, they were told that around 14% of mobile EU citizens surveyed believe that voting more than once in European Parliament elections is possible and not punishable.

The respondent who had commented on this issue that it was a low-level problem. They explained that the issue only creates a real risk of double, or multiple, voting when it is communicated to a wide public. Furthermore, they observed that this was not the case during the 2019 European Parliament elections. However, they admitted that it might become a more salient threat to the integrity of the European Parliament elections in the future if double voting were to become a widely discussed topic, and technical problems with the data exchange were not resolved quickly enough.

Unclear duration and effects of registration

A third problem that respondents could comment on was the unclear duration and effects of registration on the host country electoral roll, particularly for the right to vote in elections that do not concern the European Parliament. It was explained that some Member States establish only temporary registration for their residents, leading to a greater administrative burden. Also, respondents were told that the threat of incorrect deregistration discourages mobile EU citizens from registering in their host countries. Finally, they were told that, in a recent survey of the 2019 European Parliament elections, 17% of mobile EU citizens did not register due to fear of deregistration from the electoral roll in their country of nationality.

One respondent suggested that the figure of 17% represented only a minority of mobile EU citizens, deducing that the percentage who would want to vote in their home countries was not very high. Although they admitted that deregistration in the home country could slightly depress participation in European Parliament elections in host countries, it would not have a significant impact in the end. However, aside from the issue of scale, the question as to whether it poses a detriment to the legitimacy of democracy still remains.

Insufficient communication

Lack of communication to mobile EU citizens was the issue on which respondents made most comments, logically enough since they see it as the greatest barrier to political participation. To conceptualise the problem, they were presented with some of its main causes, these being:

- There is a lack of knowledge about parties and candidates in host Member States;

- Many do not know they have the right to participate politically in host Member States;
- There is a lack of information about the political system of host Member States;
- There is a lack of practical information on how to vote, or this information is only available in the national language of the host Member State;
- Finally, European Union institutions receive numerous requests from mobile EU citizens asking questions on how to vote from abroad.

Most respondents observed that the lack of accessible information about the right itself, and the absence of the practical information needed to exercise that right, were a major hindrance to the political participation of mobile EU citizens. Almost all stated that this is the most pressing issue when it comes to European Parliament election participation abroad, while all respondents observed that this was the case for local elections in host Member States. They began by noting that mobile EU citizens are largely unaware of their rights to participate politically in the European Union, even those who have been mobile for several years. One respondent observed that more than a quarter of mobile EU citizens said they were unaware of their right to vote abroad in a survey they conducted, while another reported that their research indicates that mobile EU citizens are not always aware of the wider set of rights associated with EU citizenship. A few respondents also made the point that such a right does not even cross the mind for many mobile EU citizens.

On the other hand, one respondent had found that those mobile EU citizens who were aware of their right to vote appeared to have taken the initiative in informing themselves about the process, overcoming some of the information barriers highlighted. This is in line with another respondent's perspective that obtaining information oneself requires a proactive approach by voters or candidates. Nonetheless, they also state that public authorities should target mobile EU citizens in their communication. Other research had found anecdotal evidence that language barriers remain problematic. The final point made was that mobile EU citizens living outside urban centres and in rural areas are the least likely to be informed, making it necessary to extend outreach to this cohort.

Although there was agreement that access to information for local elections in host countries was critical, one respondent challenged the notion that it was the only barrier to voting in European Parliament elections. For example, they explained that their research found most young mobile EU citizens do not consider voting in their host country, but that this may be a result of being more accustomed to following home country news and information channels. They also stressed the importance of having stronger civic education on the European Union, its rights, and its political endeavours from a younger age, as they said that a major barrier to participation at this level came from a lack of early education.

Mobile EU citizens are not empowered enough

Aside from issues of practical information, respondents were presented with the problem that mobile citizens have a weaker political identity, less understanding of the election stakes, and less perceived involvement in the community within host Member States. A recent survey of mobile EU citizens showed that 16% of those who did not vote in local elections said it was because they did not feel the need to make their voice heard, and 10% said they believed voting does not make a difference. Hence, there is a need to actively motivate and encourage mobile EU citizens to vote.

Respondents addressing this issue stated that it has a direct impact on the political participation of mobile EU citizens. One mentioned that it is not something that solely affects mobile EU citizens. At the same time, they observed that it is related to a perceived lack of integration in the local community, which necessarily means citizens are not motivated to vote in order to influence local politics. Furthermore, they explained that this is a structural issue that would not be addressed through voting rights. Another respondent stated that a lack of awareness of the local political system, associated with the fact that mobile EU citizens are rarely the target of political campaigns, maintains the barrier. Therefore, they believed that, aside from being informed of their voting rights, mobile EU citizens should be told about the importance of voting, and that citizens more generally should be made aware of this from an early age through civic education.

Lack of comparable data

As a final problem, it was explained to respondents that the data on the electoral participation of mobile EU citizens in local elections is incomplete, as many countries do not systematically report such data. Moreover, data on European Parliament elections is even more problematic, due to the option mobile EU citizens have to choose to vote for home country or host country party lists.

Respondents agreed that non-comparable data creates difficulties in establishing a baseline with which to compare participation levels. They explained that this is a barrier to the understanding of mobile EU citizens' political participation that should be addressed.

Other significant problems

Respondents were also given the opportunity to identify any problems that had not been considered within the impact assessment. They reiterated the importance of some of the issues outlined previously, as well as providing new insights. The points that were mentioned include:

- One of the key issues is that mobile EU citizens are biased towards being more interested in the politics of their home Member State. This is closely related to the fact, previous discussed, that politicians do not target mobile EU citizens sufficiently in their campaigns, as well as a lack of awareness of the ability to vote in a host country;
- Education on EU citizenship rights from an early age, and teacher training, are inadequate. Such education would allow European citizens more generally to understand their rights within the European Union, heightening awareness of its purpose;
- The emergence of transnational parties for European Parliament elections was considered an important step in representing mobile EU citizens, highlighting the cross-border nature of the EU;
- Although less supported by national authorities and parties, e-voting options would facilitate voting for mobile EU citizens, which could be facilitated by the planned EU-eID developments in the future;

- Much of the literature on the participation of mobile EU citizens suggests that there is a communication channel mismatch, meaning that there is much information available, but that the information is not reaching its intended target audience;
- A broader challenge to the study of the electoral participation of mobile EU citizens is posed by the various different operating systems Member States have. This applies particularly to local elections, which tend to have different meanings across the European Union;
- Finally, political participation is much more challenging for mobile EU citizens who live and/or work in two or more Member States, moving frequently between them.

Policy option analysis

Another set of activities shown to respondents related the policy options under consideration. These were first divided into two separate activities that together contained a total of 12 policy options respondents could comment on. The last activity asked respondents to rank the policy options depending on their effectiveness in addressing differing aspects of the problems analysed. To begin with, the policy options shown were the following:

- Influencing Member States by publicising excessive requirements for registration through reporting;
- Establishing a Recommendation on the automatic registration of mobile EU citizens;
- Establishing an exchange of good practices among Member States on provision of information to mobile EU citizens;
- Creating targeted social media campaigns to proactively inform mobile EU citizens;
- Strengthening the legal obligation for Member States to inform mobile EU citizens;
- Setting up a multilingual helpdesk at the EU level to respond to the queries of mobile EU citizens about their electoral rights;
- Influencing Member States by publicising excessive requirements for standing as a candidate through reporting;
- Amending existing legal provisions to clearly state that mobile EU citizens should be able to join political parties under the same conditions as nationals;
- Addressing issues related to the exchange of data between Member States with a view to preventing double voting;
- Requiring Member States to avoid the deregistration of mobile EU citizens from the electoral roll for national elections in their home Member States when they register for European Parliament elections;
- Encouraging Member States to open up voting at other intermediate tiers of government to mobile EU citizens;
- Encouraging Member States to implement additional remote voting options for mobile EU citizens voting in European Parliament elections.

Influencing Member States to ease registration requirements

The policy option shown to respondents stated that the European Cooperation Network on Elections and the expert group on electoral matters would report once every five years on the administrative requirements placed on mobile EU citizens registering to vote in another Member State. The report will include an overview of the documentation needed to register to vote and the deadlines for presenting this documentation. It will also feature a summary of complaints received from mobile EU citizens in this regard. The idea is that national summary reports will be issued and excessive requirements will be identified, thus putting pressure on Member States to lower the thresholds.

Respondents were asked how far they would expect this reduce administrative barriers for mobile EU citizens, and whether this in turn would result in higher turnout.

Those who commented on this policy option felt that the measure would indeed create pressure on national administrations to improve their performance. They further added that this would be particularly the case if the reports were to be published and discussed at a wider EU political level. It was also suggested that both good and bad practices could be addressed, with the intention of collecting these for further research. One respondent suggested that the European Ombudsman, as well as the network of National Ombudsmen, could play significant role within this policy option.

Although respondents explained that it would allow Member States to have a clearer view of existing requirements across the EU, one mentioned that the information should reach all administrative levels, since responsibilities were fragmented across local authorities and central governments. They added that this is because central governments often cannot impose rules on local authorities. At the same time, respondents also said that the policy option should be backed up by other additional incentives or mandatory rules in order to achieve maximum impact, lending to the idea that softer influence would not suffice.

In terms of increasing mobile EU citizens' turnout, one respondent explained that it would not have a direct short-term impact, rather seeing long-term benefits due to improved registration conditions. However, they added that it cannot be a standalone option, but needs bottom-up initiatives to support it. Their argument was that better-informed mobile EU citizens are more likely to demand that their rights are respected, which would further impact national administrations and politicians. Nonetheless, this would entail the improvement of early age civic educational efforts.

Establishing a Recommendation on automatic registration

For this policy option, respondents were told that the European Commission would issue a Recommendation on automatic registration for mobile EU citizens as part of its 2024 Electoral Package. It was explained that a Recommendation is a soft legal measure that is not binding on the Member States, but which does have to be approved by the European Parliament and the Council, therefore creating political momentum. Furthermore, it would be subject to regular monitoring and reporting. Overall, the Recommendation aims to incentivise Member States to automatically register all mobile EU citizens on the electoral roll, thus removing the administrative barrier of registration procedures.

With the policy option defined, respondents were asked the extent to which they believe automatic registration would result in a higher turnout of mobile EU citizens.

Everyone who decided to discuss this policy option stated that automatic registration would increase turnout, some noting that this has been proven in research on various types of elections. Moreover, it would address the challenges of not knowing when or how to register, as well as the need to inform mobile EU citizens about such procedures. The reporting aspect of the policy option would have the long-term effect of nudging Member States, as long as reports were given sufficient visibility in order to have an impact.

At the same time, respondents felt that the policy option would not directly increase turnout if implemented alone. They presented different points that were considered to be crucial information for mobile EU citizens. Firstly, automatic registration was seen as facilitating a higher turnout, rather than resulting in it, if not coupled with persuasive campaigns that encourage mobile EU citizens to vote. The campaigns would have to address the benefits of voting or standing as a candidate, as well as what individuals and communities gain, among other compelling messages. A second point respondents mentioned was the need to properly inform mobile EU citizens that they would not lose the right to choose to vote for home party lists, which many still prefer to do. Finally, it would be best if mobile EU citizens were made aware that Member States should provide this option, and if there were an improved way of filing complaints.

One respondent also observed some questions arising from the policy option:

- First, they asked whether Member States that do not apply automatic registration to nationals would extend it to them if it were introduced for mobile EU citizens, in order to avoid inequality;
- They also asked how such a policy option would be delivered in practice if it is uncertain how many mobile EU citizens are resident, giving the example of France where there is no systematic registration as such;
- Lastly, they asked whether this option would simply create an administrative burden at an alternative moment in time.

Exchange of good practices on information provision

Under third policy option presented to respondents, it was explained that the European Cooperation Network of Elections experts would discuss how best to inform mobile EU citizens of registration deadlines and requirements. This would include clear communication in advance to ensure that mobile EU citizens have sufficient time to register ahead of an election. They were also told that this is a soft measure that promotes learning from best practices in other countries.

With this description in mind, respondents were then asked the extent to which they believe the policy option would result in the adoption of effective procedures to inform mobile EU citizens on how to exercise their rights, as well as whether it would be sufficient to increase turnout.

Those who commented on the option held divergent opinions as to its effectiveness. One respondent observed that exchanges of good practices can have very positive effects, having implemented several such initiatives in the area of political participation of mobile EU citizens in their organisation. They stated that local authorities often participated willingly and felt inspired by learning from each other. The only precautionary point they raised was that participants in these initiatives frequently mention that they lack the financial or human

resources to adapt the practices they have learned. As a result, the respondent recommends that the exchange of best practices be coupled with financial resources, from the EU or Member States themselves, in order to enable local public offices to implement the expected results.

The final point that the previous respondent made leads on to the reason why another respondent feels that the option may not be effective. They explain that a significant limitation on the adoption of a best practice procedure would be the relevance of such practices in a given Member State. They added that local elections vary significantly across Member States, and that if this is not adequately recognised, procedures may not be suited to some. However, they did say that such an option could work better in the case of informing mobile EU citizens about European Parliament elections. Finally, the respondent observed that this policy option would not be sufficient to increase turnout by itself, and that additional measures would need to be employed alongside it.

Social media campaigns targeted at mobile EU citizens

Respondents were told that this policy option consists of launching a systematic series of public service announcements on social media platforms, informing mobile EU citizens of registration deadlines and requirements in their country. Through social media targeting, it would be used to deliver a tailored message to mobile EU citizens on how to register and when. Furthermore, it was explained that these campaigns would be organised for both local and European Parliament elections.

Respondents were then asked the extent to which they believe it would be an effective way to inform mobile EU citizens on how to exercise their rights, as well as the likelihood of increasing turnout.

Overall, respondents felt that targeted social media campaigns were potentially a very effective way to inform mobile EU citizens of the practical information needed for registration, and to raise awareness of their rights. They added that it would even have positive effects on registration and turnout rates. However, one stated that it would not reach all mobile EU citizens, notably those with no access to social media, or who are not comfortable with digital information sources. Therefore, they suggested that the option should include other methods of offering targeted information, such as radio and the traditional press, as well as being paired with other options.

Strengthening the legal obligation for Member States to provide information

Respondents were told that the policy option would consist of clarifying and making more specific the obligation to inform mobile EU citizens that exists in the current Directives. It would require the use of simple language, use of languages other than the official language of the country, and possibly other aspects. Moreover, they were told that Member States would be required to tailor the communication and notification materials that mobile EU citizens receive about European Parliament and local elections so that they address the barriers they face, and which are unlike those faced by local citizens.

Respondents were then asked the extent to which they believe the option to be an effective way to inform mobile EU citizens on how to exercise their rights, and whether it would increase turnout.

Those who answered were generally positive about the extent to which sending information to mobile EU citizens, especially by the Member States themselves, would raise awareness of the fundamental right to participate and the political options available. Moreover, they felt it would be crucial that the language is simplified and that the information is presented in a common language, as it had been found that it was often presented in a very technical and legalistic manner. A few respondents felt that it would also have a direct impact on turnout. However, they were also aware that complexities exist within differing communication channels, even if the correct ones are used in relation to the target group. Aside from recommending that digital channels are not solely relied on for the sake of cohorts that feel less confident using them, the complexity of information-sharing itself can often be an obstacle.

One respondent found in their research that even if the assumed correct channels are used to inform specific target groups, these are not always effective. As an example, even if social media are utilised to target younger cohorts, the algorithm system they use can be a barrier to outreach. Due to this, the respondent suggested more reliance on key stakeholders for targeted groups in order to use their channels and networks to communicate more effectively, such as student unions for younger cohorts. These, in essence, would be stakeholders who have direct and regular contact with the target group, associated with them through work, studies, or leisure activities.

Set up a multilingual EU-level helpdesk

Respondents were told that this policy option would involve a single integrated service to answer the queries of mobile EU citizens about their participation in European Parliament elections. It would provide country-specific information on how to register and where, including information on deadlines. Additionally, the service would be available in all European Union languages.

Respondents were then asked the extent to which they believe this would be an effective way to inform mobile EU citizens of how to exercise their rights, as well as the extent to which it would increase turnout.

Those commenting on this option observed that it would have a beneficial effect on the information that mobile EU citizens possess regarding their rights. Moreover, they considered that it could also increase turnout. One respondent felt that the option is much more tailored and detailed than others since it is country-specific, multilingual, and has the potential to address questions on an individual basis. They recommended, however, that the helpdesk should not only have a chat option, as these can be a bit off-putting. Instead, they suggested that Zoom or Google Meet appointments could be offered. Lastly, respondents felt that the service would be most effective if accompanied by information outreach, such as social media campaigns.

Influence Member States to ease candidacy requirements

For this policy option, it was explained that the European Cooperation Network on Elections and the expert group on electoral matters would report once every five years on the administrative requirements imposed on mobile EU citizens who wish to stand as candidates in another Member State. The report would include an overview of the restrictions on candidacy and the documentation needed to register as candidate. Finally, national reports

would be summarised, identifying any excessive requirements, thus creating soft pressure on Member States to lower the thresholds.

Subsequently, respondents were asked how far this it was likely to result in a reduction in restrictions on candidacy for mobile EU citizens, as well as result in higher turnout.

A few who commented on this policy option felt that it would raise awareness of the restrictions on candidacy, and that it might have a positive impact on the candidacy of mobile EU citizens. Moreover, they also felt it would help put pressure on Member States to remove the barriers to candidacy. Respondents said that it is important to raise awareness of such differences because comparative studies on the topic are not widely available. At the same time, one mentioned that it would be best to impose mandatory measures if this were possible.

On the other hand, one respondent mentioned that their research had uncovered no statements from mobile EU citizens to the effect that they had encountered restrictions when registering as candidates in France. This is because of the specific cases they had studied, where those who did stand as candidates did so because they were invited, as well as for more personal reasons. However, the policy option would still help expose the challenges that are faced by mobile EU citizens in other Member States, creating a systematic comparative basis between them. They also stated that, since the time between local elections varies across Member States, a five-yearly report may not be flexible enough to capture changes between one election round and the next.. Finally, no respondent was completely convinced that such a measure would increase the turnout of mobile EU citizens.

Clearly state that mobile EU citizens should be able to join political parties

Respondents who commented on this policy option were told that it would entail amendments to the existing legal provisions in order to make it more explicit that obstacles preventing mobile EU citizens from joining political parties should be removed. It would clearly state that mobile EU citizens should be able to join political parties under the same requirements as nationals.

Respondents were then asked the extent to which this would likely reduce restrictions on candidacy. They were also asked whether it would result in higher turnout for mobile EU citizens.

All who discussed this policy option agreed that, if feasible, it would reduce the hindrances preventing mobile EU citizens from standing as candidates. Many had found through their research that it is often complicated for mobile EU citizens to join established political parties, citing infringement procedures launched against Czechia and Poland due to the limitations they impose. Respondents also fully supported this policy option, as they felt that it would have an impact on equality within the European Union. Also, they all felt that it would increase the turnout of mobile EU citizens in the medium to long-term.

The only reservation that one respondent expressed is that abuse by undemocratic movements may arise as a result. Therefore, an analysis of the potential adverse effects, and the inclusion of a mechanism to deal with such problems, should accompany this policy option.

Address issues related to the exchange of data between Member States

The policy option was presented to respondents through two broader sets of measures, each with sub-options.

The first set referred to registration deadlines, containing the following sub-options:

- Harmonising the deadlines for closing the electoral rolls for European Parliament elections across Member States so as to enable the timely exchange of information between Member States;
- Establishing clearer deadlines for the timely exchange of data between Member States;

The second set of sub-options concerned the type of data exchanged:

- It would streamline the type of data that Member States need in order to identify mobile EU citizens in their electoral rolls;
- There would be clearer requirements for host Member States to provide this data.

Respondents were then asked their view on the extent to which this would improve the prevention of double voting, as well as whether it would better safeguard the integrity of European Parliament elections.

Those commenting on this option observed that both sets of measures would certainly improve data transparency, as well as the exchange of data itself. One respondent further stated that transparent data exchange is a requirement in any democratic elections. Another explained that the first set of measures, on registration deadlines, would be beneficial for both administrations and citizens, providing more procedural clarity. For streamlining the type of data, the respondent said that the efforts and funds available for the EU recovery plan should be used to digitise the process, including the use of pan-European eIDs based on the eIDAS framework. Finally, such measures would improve the integrity of European Parliament elections, resulting in greater trust in the electoral system.

Require Member States to avoid the deregistration of mobile EU Citizens from national elections

Respondents were presented this policy option as a requirement for Member States to avoid the deregistration of mobile EU citizens from the electoral roll for national elections. It would aim to address the issue whereby mobile EU citizens are sometimes deregistered from their home country electoral rolls when they register to vote in their country of residence, which ultimately prevents them from voting at a distance in national elections. Through this option, any deregistration would solely apply to European Parliament elections.

Respondents were asked to share their views on the extent this would empower mobile EU citizens more generally, and boost their electoral participation.

Comments were less frequent for this option, as respondents were not all aware that deregistration from other electoral rolls was an issue that mobile EU citizens encountered. However, they explained that if this were to be the case, then it would be crucial to establish a mechanism that prevents it from happening, as it would clearly discourage mobile EU

citizens from registering in their countries of residence. This would make such a procedure clearer and less burdensome.

Encourage host Member States to extend voting to other intermediate elections

Respondents were told that the European Commission would encourage Member States, through a Recommendation and the exchange of good practices, to open up voting at other tiers of government to mobile EU citizens. This would be accompanied by reporting on which countries allow EU citizens to vote at what levels of government.

They were then asked to express their views on the extent to which this would empower mobile EU citizens, and increase their electoral participation.

All respondents felt that this policy option was crucial in empowering mobile EU citizens' political participation. Many stated that the current inability to vote in higher tier elections within Member States of residency, especially national elections, is a direct challenge to the principle of equality and non-discrimination enshrined in EU treaties. Moreover, respondents stressed the importance of the increased pressure mobile EU citizens could bring to bear on national reforms in the host Member State, giving further meaning to the idea of a European citizenship.

One respondent explained that they had found that mobile EU citizens who have resided more than five years in a Member State were especially interested in having the right to participate in elections for other tiers of government. Another also had researched this topic, finding that mobile EU citizens in France were frustrated by their inability to vote in national elections whilst paying taxes in the country. Finally, as mobile EU citizens would feel empowered, many expected that the option would indeed increase turnout.

At the same time, one respondent observed that a Recommendation may be unevenly applied across the European Union. They explained that existing EU electoral legislation was significantly contested in some Member States, which had long based electoral rights on nationality. They further stated that had Member States not been legally required to adopt the legislation, it is uncertain that they would have done so. They believe that this is a risk that would have to be controlled for. As a last point, the respondent added that the measure would entail the further exclusion and relative disempowerment of third country nationals living within the EU.

Implement additional remote voting options for European Parliament elections

The final policy option shown to respondents explained that the European Commission would issue a Recommendation to Member States asking them to establish distance voting options where they are lacking, and to increase them where they are limited.

Respondents were asked for their views on the extent to which this would boost electoral participation in European Parliament elections for mobile EU citizens.

A respondent observed that this policy option would make it easier to participate in European Parliament elections for mobile EU citizens. They added that this was confirmed by a majority of participants within their own project. At the same time, they stressed that distance voting systems need to be secure, reliable, and respect the principles of confidentiality and

data protection set by the GDPR regulation. If not, the adverse impact would severely damage the image of the European Union institutions. Lastly, the respondent stated that although studies from Estonia confirm that e-voting options do not automatically increase voter turnout, it would simplify voting greatly for a target group such as mobile EU citizens.

Other Suggested Policy Options

Respondents were also given the opportunity to identify any policy options that had not been considered within the impact assessment. The proposals they made include:

- Advertise to mobile EU citizens concrete examples of how their vote, both locally and at the European Union level, has effected positive change;
- Early education in EU citizenship, as part of the civic education curriculum for students and teachers, promoted throughout the European Union. The programme would include, but would not be limited to, the European Union in general, policymaking, voting, multiculturalism, and EU political citizenship rights. Furthermore, teachers should be provided with the necessary training and resources to make the subject accessible and attractive to students. Lastly, particular attention would have to be given to first time voters, or students nearing the minimum voting age;
- EU funding for mobility programmes should be paired with conditional democratic and integration activities. These would include, but would not be limited to, information materials, a welcome and farewell package, host country intercultural training, and electoral information campaigns. Overall, the idea would be that future mobility programmes and projects should not only promote mobility, but encourage more host-country engagement, including getting to know the political and cultural specificities of the host country;
- Content and communication management for specific target groups should be improved and include information about EU citizenship rights, as well as about the civic values, liberties and achievements of the EU. The content disseminated would include, but would not be limited to, targeted ads, personalised posts, and targeted election campaigns. Communication management should ensure that the information is relevant, timely and properly packaged for the target groups in terms of language and content.

Policy option ranking

On the final day of the online community respondents were asked to rank the policy options previously discussed, taking account of their four differing aims. For each goal, respondents were given a set of policy options to rank, and were then asked to provide their reasoning. All of the options were randomly presented to respondents in order to avoid bias when ranking.

Increasing mobile EU citizens' likelihood of voting

The first set of policy options shown to respondents aimed at increasing the turnout of mobile EU citizens in local and European Parliament elections. Therefore, they were asked to rank them to reflect the impact they felt they would have on this goal.

Additionally, they were given the chance to add another personalised option and rank it as well. Once done, respondents provided their reasoning. The ranking was as follows:

1. Strengthening the legal obligation for Member States to inform mobile EU citizens;
2. Creating a Recommendation on the automatic registration of mobile EU citizens through reporting;
3. Creating targeted social media campaigns to proactively inform mobile EU citizens;
4. Setting up a multilingual helpdesk at the EU level to respond to queries on electoral rights in the EU from mobile EU citizens;
5. Requiring Member States to avoid the deregistration of mobile EU citizens from the electoral roll for national elections in their home Member States when they register for European Parliament elections;
6. Encouraging Member States to remove excessive requirements for mobile EU citizens to stand as candidates through reporting;
7. Encouraging Member States to open up voting to mobile EU citizens at other intermediate tiers of government;
8. Encouraging Member States to implement additional remote voting options for European Parliament elections;
9. Facilitating membership of political parties for mobile EU citizens under the same conditions as nationals through a revised legal provision;
10. Addressing issues related to the exchange of data between Member States with a view to preventing double voting;
11. Establishing an exchange of good practices among Member States on the provision of information to mobile EU citizens;
12. An additionally proposed policy option.

Respondents felt that all policy options presented were crucial in increasing the voter turnout of mobile EU citizens. However, they gave these options different weight. As an example, most respondents felt that the lack of information and knowledge mobile EU citizens possess about EU citizenship rights would have to be addressed as a priority. They added that much needs to be done to persuade national administrations to inform mobile EU citizens and engage with them more proactively. For these respondents, this was followed by the easing of registration procedures, which may include the issue of deregistration.

On the other hand, a few respondents stated that automatic registration was the most crucial policy option on the list, as it could have a significant impact on participation. They explained that active registration has frequently been reported by mobile EU citizens as one of the key barriers to their political participation, along with inadequate deadlines, inaccurate registries, and cumbersome registration procedures. Automatic registration would eliminate many of these issues. Additionally, they stated that coupling this with the provision of information would effectively improve political involvement.

Aside from policy options directly related to the provision of information, or the easing of registration procedures, those having to do with adding remote voting options, candidacy, the exchange of data between Member States, and softer measures related to the exchange of good practices were considered less effective ways of increasing turnout. Nonetheless, as mentioned before, these were not seen as unimportant.

Lastly, respondents added some of their own policy options, explaining that registration procedures, if retained, should be digitalised in order to facilitate them. A second suggestion, mentioned before by the respondent, was to increase early education on EU citizenship rights.

Increasing candidacy of mobile EU citizens

The second set of policy options presented to respondents had to do with increasing the ability of mobile EU citizens to stand as candidates. As for the previous list, respondents had to rank the options to reflect their effectiveness. The list was shorter than the previous one, as fewer policy options were relevant to candidacy.

The ranking was as follows:

1. Strengthening the legal obligation of Member States to inform mobile EU citizens;
2. Enabling mobile EU citizens to join political parties under same conditions as nationals through a revised legal provision;
3. Creating targeted social media campaigns to proactively inform mobile EU citizens;
4. Setting up a multilingual helpdesk at the EU level to respond to queries on electoral rights in the EU from mobile EU citizens;
5. Encouraging Member States to remove excessive requirements for mobile EU citizens to stand as candidates through reporting;
6. Establishing an exchange of good practices among Member States on information provision to mobile EU citizens.

Overall, respondents again felt that strengthening the legal obligation for Member States to inform mobile EU citizens of their rights is the most important option. Being a harder and more legally binding option, respondents were more confident that it would have an impact when compared with the softer approach of attempting to influence Member States through reporting. In a similar fashion, respondents rank the policy option seeking to enable mobile EU citizens to join political parties highly. This is also seen as crucial because respondents' accounts of mobile EU citizens running as candidates have been mainly based on those who did so through political parties.

Options that stand in the middle, such as the setup of a multilingual helpdesk, and the use of targeted social media campaigns were also considered important, but were not seen as being as effective as those ranked in first and second place. Additionally, one respondent said that, in their view, Your Europe functions as a centralised helpdesk that should be further publicised.

Preventing double voting in European Parliament elections

The third set of policy options ranked by respondents was aimed at preventing double voting in European Parliament elections. Respondents were also able to add a policy option that had not been previously mentioned and add it to the ranking.

The results were the following:

1. Addressing issues related to the exchange of data between Member States with a view to preventing double voting;
2. Strengthening the legal obligation for Member States to inform mobile EU citizens;
3. Creating a Recommendation on automatic registration of mobile EU citizens through reporting;
4. Establishing an exchange of good practices among Member States on information provision to mobile EU citizens;
5. Requiring Member States to avoid deregistering mobile EU citizens from the electoral roll for national elections in their home Member States when they register for European Parliament elections;
6. Creating targeted social media campaigns to proactively inform mobile EU citizens;

7. Encouraging Member States to implement additional remote voting options for European Parliament elections;
8. Setting up a multilingual helpdesk at the EU level to respond to queries on electoral rights in the EU from mobile EU citizens;;
9. An additionally proposed policy option;
10. Enabling mobile EU citizens to join political parties under same conditions as nationals through a revised legal provision.

When it came to assessing the effectiveness of these policy options in addressing double voting, all respondents clearly stated that improving the exchange of data between Member States was the best way of doing so. Additionally, the planned introduction of the European eID through the revised eIDAS regulation was seen as a good solution to this issue. Some respondents also explained that the information provision options would be able to provide an immediate remedy, as mobile EU citizens would be informed that they should not vote more than once in European Parliament elections. However, most observed that they did not see much use for other policy options.

Reducing administrative costs for Member States

Finally, respondents were asked to assess the effectiveness of a set of policy options reducing the administrative costs of Member States. Respondents were also able to add policy options they believed to be important, and that had not previously been mentioned.

The ranking was as follows:

1. Creating a Recommendation on automatic registration of mobile EU citizens through reporting;
2. Requiring Member States to avoid deregistering mobile EU citizens from the electoral roll for national elections in their home Member States when they register for European Parliament elections;
3. Strengthening the legal obligation for Member States to inform mobile EU citizens;
4. Addressing issues related to the exchange of data between Member States with a view to preventing double voting;
5. Establishing an exchange of good practices among Member States on information provision to mobile EU citizens;
6. Creating targeted social media campaigns to proactively inform mobile EU citizens;
7. Encouraging Member States to remove excessive requirements for mobile EU citizens to stand as candidates through reporting;
8. Encouraging Member States to implement additional remote voting options for European Parliament elections;
9. Setting up a multilingual helpdesk at the EU level to respond to queries on electoral rights in the EU from mobile EU citizens;
10. Enabling mobile EU citizens to join political parties under same conditions as nationals through a revised legal provision;
11. Encouraging Member States to open up voting to mobile EU citizens at other intermediate tiers of government;
12. An additionally proposed policy option.

Most respondents considered that easing registration procedures for mobile EU citizens, for example by establishing automatic registration, would be equally effective at reducing administrative costs for Member States. However, one participant explained that this policy option would result in an extremely high cost for Member State administrations, especially in

countries where there is no systematic registration of mobile EU citizens. Those who believed that automatic registration was a lower-cost option stated that adding mobile EU citizens to the electoral roll at the time of their residency registration could only prove to be an easier administrative procedure.

Taking a longer view, one respondent observed that improving the exchange of information would also reduce costs for national administrations, for example through the use of the European eID. On the other hand, respondents were unsure whether the multilingual helpdesk would necessarily reduce costs, although most were convinced that, as an EU level policy option, it would not increase national costs.

As a final point, the exchange of good practices and the creation of targeted social media campaigns were considered to be more costly by respondents, especially if these were to be implemented in a manner that would ensure their effectiveness.

Analysis of targets and measuring success

The fourth online community activity concerned the analysis of targets and how success could be measured when seeking to increase the political participation of mobile EU citizens. Three tasks were presented to respondents in which they had to discuss the extent to which objectives are well captured, and whether the proposed indicators for these are appropriate. The tasks were structured as follows:

- An evaluation of the general objectives within the impact assessment;
- An evaluation of how well the proposed success indicators measure the improved voting participation of mobile EU citizens;
- An evaluation of how well proposed success indicators measure increases in candidacy amongst mobile EU citizens.

General objective evaluation

For the first task, respondents were presented with the general objectives of the revised legal framework. These were the following:

- To increase voting participation of mobile EU citizens in local and European Parliament elections;
- To facilitate the participation of mobile EU citizens as candidates in both local and European Parliament elections;
- To preserve the legitimacy of European Parliament elections by preventing multiple voting;
- To safeguard mobile EU citizens' rights to vote in the national elections of their home country by making sure that any deregistration from electoral rolls is proportionate and only applies to European Parliament elections.

Two questions were then asked, the first regarding the extent to which respondents believe the objectives capture the challenges and problems that currently exist regarding the electoral participation of mobile EU citizens. The second question asked whether they saw any significant gaps in the way the objectives are formulated.

Most respondents felt that the general objectives did capture the challenges and problems that currently exist for mobile EU citizens' political participation. Those who felt this way explained that these would be adequate steps towards improving political participation, saying that tailored information and reducing administrative procedures would be the most effective.

At the same time, a few respondents stated that the formulation of the general objectives was incomplete. One mentioned that the most important gap in mobile EU citizens' political rights is the fact that they cannot vote in national and regional elections, and that this should be promoted as a general objective. A similar point was made by some regarding the need to increase mobile EU citizens' knowledge and awareness of their political rights and the administrative barriers they face, improving their civic education on the European Union. They suggested that these specific objectives be made general objectives in themselves, while another recommendation was to rephrase the objective on increasing mobile EU citizens' voting participation using the verbs "facilitate", "enhance access", or "encourage and support".

Evaluation of voting participation success indicators

The second task sought to analyse the success indicators related to the voting participation of mobile EU citizens. Respondents were asked to propose what indicators they would use in order to measure the success of policy options designed to increase voter turnout. Additionally, they were asked what quantitative target they would set.

Respondents offered various indicators to measure the success of policies to increase mobile EU citizens' voter turnout. Many made the point that a baseline first had to be established, as the data is currently not collected systematically across most Member States. One respondent explained that they had encountered significant difficulties gathering data for their own research in this respect. They continued by stating that there is often no data on the size and structure of mobile EU citizen populations, which can vary significantly across Member States and localities. Through establishing a baseline, comparable data could be obtained, not only over time to compare elections, but to compare turnout between Member States if harmonised across the EU.

On this first point, one respondent felt that it would be very difficult to achieve for European Parliament elections, if not completely unfeasible for local elections. They provided the example of France, where accurate data would need to be gathered from more than 35,000 communes where local elections take place. Furthermore, quantitative indicators would likely become estimates given the likelihood of counting errors, and the current lack of accurate data on how many mobile EU citizens reside in each Member State. However, they felt that rough estimates, taking these limitations into account, would still provide useful insights.

Regarding the indicators used to measure turnout, respondents observed that data on actual turnout would be optimal, although data on registration rates would provide a good starting point. In addition, they also said that it would be important to gather socio-demographic data on mobile EU citizens in order to break this down by categories and have a more detailed analysis. Some of the indicators suggested for this were nationality, gender, age, ethnicity, and level of mobility. Through this, areas of improvement could be analysed and tailored to specific cohorts. One respondent also mentioned that systematic feedback on the perceived quality of information and support at all relevant levels of administration could provide accurate data on the specific goals set within the impact assessment.

Finally, in setting quantitative targets, respondents felt that the most intuitive measure would be to compare turnout or registration rates in current and previous elections. However, setting a target applied to all Member States was not seen as feasible due to the differing rates of participation and registration and diverse contexts. Again, this would be difficult to carry out for European Parliament elections, but even more so for local elections. Hence, data collection should be tailored to each context. The targets could be further broken down by socio-demographic groups. As a final point, a respondent observed that it would be crucial to make such data public regularly, and ideally in a centralised manner, communicating proactively with citizens and the media.

Evaluation of candidacy success Indicators

The third task was similar to the previous one, although it was directed at success indicators for making it easier for mobile EU citizens to stand as candidates in both local and European Parliament elections. Respondents were first asked to discuss possible indicators for measuring the success of policy options aimed at increasing candidacy, followed by the appropriate quantitative targets they would set.

As in the case of voter turnout, respondents observed the need to establish a baseline. For this, systematically gathering data on the different populations of mobile EU citizens across different localities in Member States would be an important starting point. Optimally, this would also take account of demographic data, such as nationality, gender, age, ethnicity, and level of mobility.

When it came to establishing indicators, there were variations in respondents' answers. One observed that it would be interesting to analyse the number of non-national candidates on the electoral lists of different Member States. Another option might consider the number of administrative steps to be taken by a mobile EU citizen wanting to stand as a candidate, compared with a national citizen, which would more closely reflect facilitation. A different suggestion was that the number of mobile EU citizen candidates and their success rates be measured in order to establish a sense of proportionality. Lastly, a respondent proposed that measuring facilitation could be achieved by examining what new or improved measures Member States have been put in place.

Setting targets, however, was more complicated. One suggestion was to take into account the number of mobile EU citizen candidates as a proportion of their population in the locality in question. A certain target rate of improvement would have to be established, which would most probably have to be tailored to each locality and Member State. As a final point, as was recommended with voter turnout, it would also be of interest to take into account differences based on socio-demographic categories in order to see how facilitation could be tailored better to the individual.

Annex 7 – Analysis of the Open Public Consultation

Introduction

The open public consultation (OPC) on inclusive participation in municipal and European Parliament elections for mobile European citizens was carried out to support the revision of the Directives [93/109/EC](#) and [94/80/EC](#) establishing the rights of mobile European citizens to participate in these two types of elections in their country of residence. Citizens, civil society, researchers, businesses and governments at all levels were invited to contribute to the impact assessment for this review in the period 19 April – 12 July 2021.

This document summarises the responses to the OPC questionnaire as well as the position papers received.

The consultation consisted of three questionnaires depending on the respondent profile. These were:

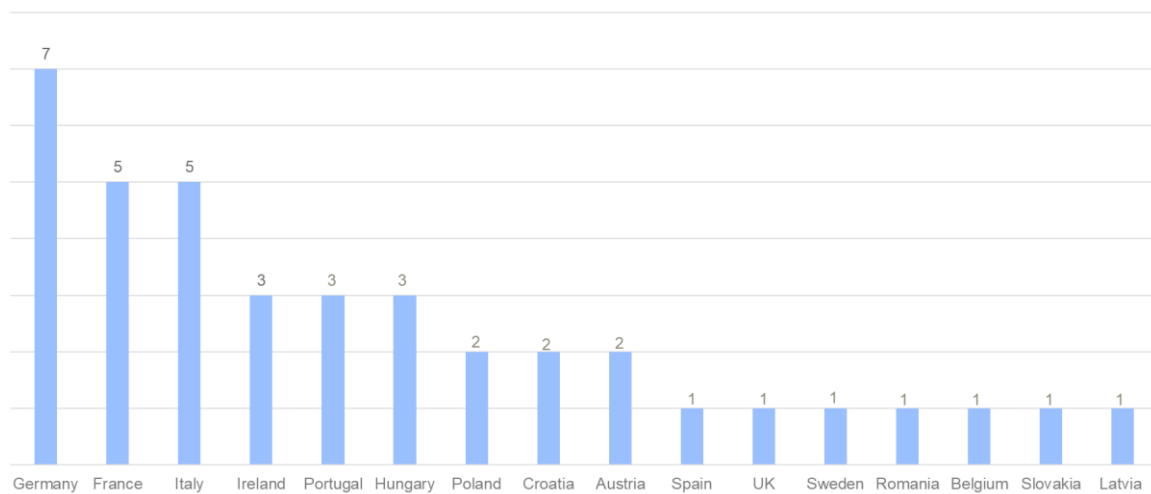
- A questionnaire for citizens which had certain questions that were directed specifically at mobile European citizens and others that were directed at all citizens;
- A questionnaire for civil society organisations; and
- A questionnaire for local, regional or national government organisations.

The questionnaires for civil society organisations and governments contained a number of questions that were identical. Where that was the case, we analysed the responses together given the low number of respondents to this consultation. There were also a few questions that were common to all respondent groups and in this case again we analysed the responses together.

In total 61 responses were received; however not all respondents answered all the questions. There were 39 responses from citizens, ten from civil society organisations and eight from local and national authorities. More precisely, 38 respondents are EU citizens, and one is reported as citizen of a country outside the EU, ten represent Non-Governmental Organisations (NGO), one represents an authority other than a public one, and 11 responses are from public authorities. Six citizens who responded to the question about citizenship have a second citizenship and 32 do not¹².

¹² Question A2 Do you have a second citizenship? (n=38)

Figure 10 Respondent's country of origin Q: Country of origin? (n=61)



Source: OPC data manipulations

Respondents to the consultation reside in 22 Member States. Germany is the most represented MS alongside Belgium with nine respondents.

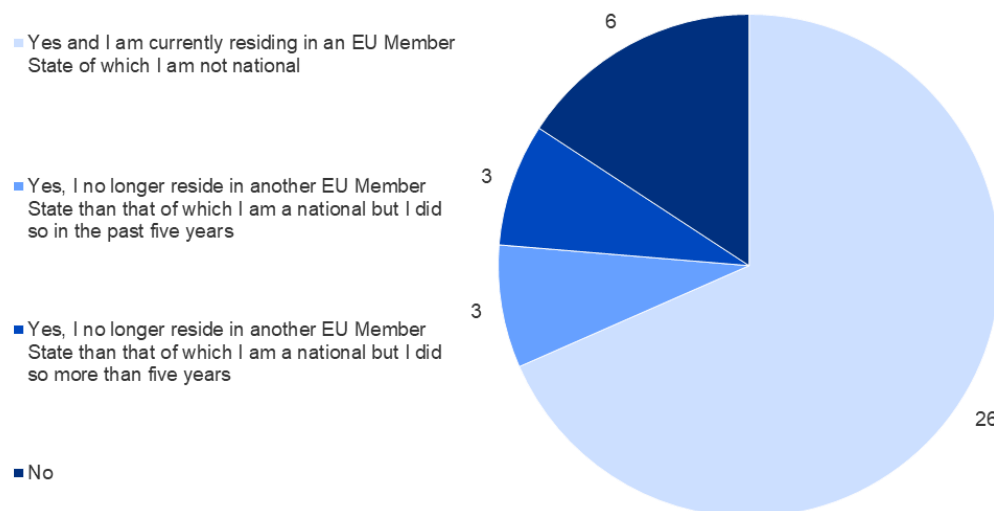
Experience of voting in the country of residence

Local elections

The Citizens' questionnaire had a section covering personal experience of living and voting from abroad analysed here.

The vast majority of respondents had experience of residing in another Member State for three months or more. Only six did not (16%).

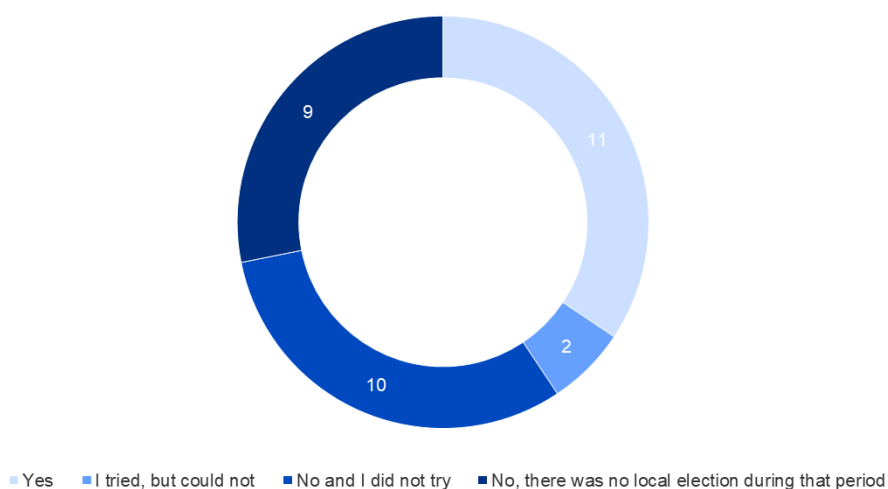
Figure 11 Q: Have you ever resided in an EU Member State of which you are not a national for longer than 3 months? (n=38)



Source : OPC data manipulations

Among those that had lived or are living in a MS of which they are not nationals, most responded to the survey as Belgian residents. In fact, 19 of 31 respondents mentioned responding as residents of Belgium, six as residents of France, two as Spanish residents and one as Luxembourgish, Dutch, English, and German residents¹³.

Figure 12 Q: While residing in another EU Member State, have you ever voted at local elections in that country? (n=32)

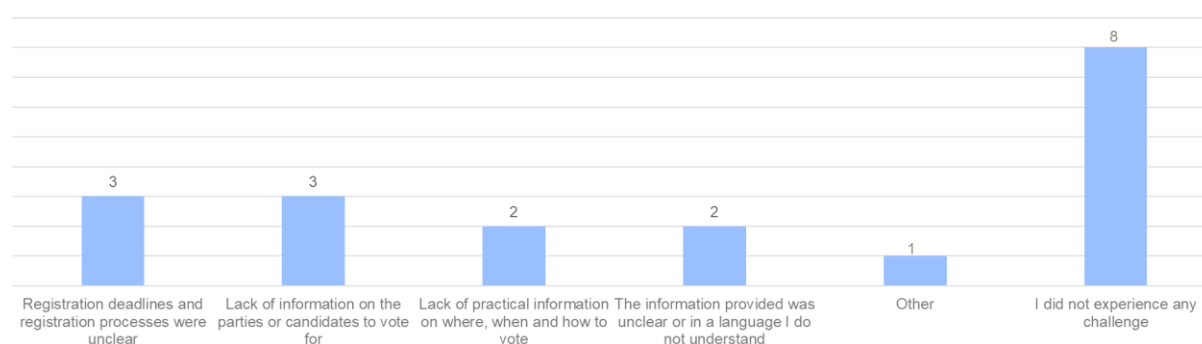


¹³ Question A3.1 The survey will ask you about your experience while residing in another Member State. When answering these questions, which Member State of residence will you be thinking of: (n=31)

Source: OPC data manipulations

While residing in another EU MS, most of the respondents had not voted in local elections. For nine (28%) of them the reason for not voting was the fact that there were no elections (that they would know about) while they were in the country of residence. Of the remaining respondents who had the opportunity to vote, roughly (10) half did not try to vote and the rest voted (11). Only two respondents tried to vote but could not do so.

Figure 13 Q: Did you ever experience any of the following challenges when voting at local elections in another EU Member State? Please select all that apply (n=13 – only respondents who voted or tried to vote, multiple choice)



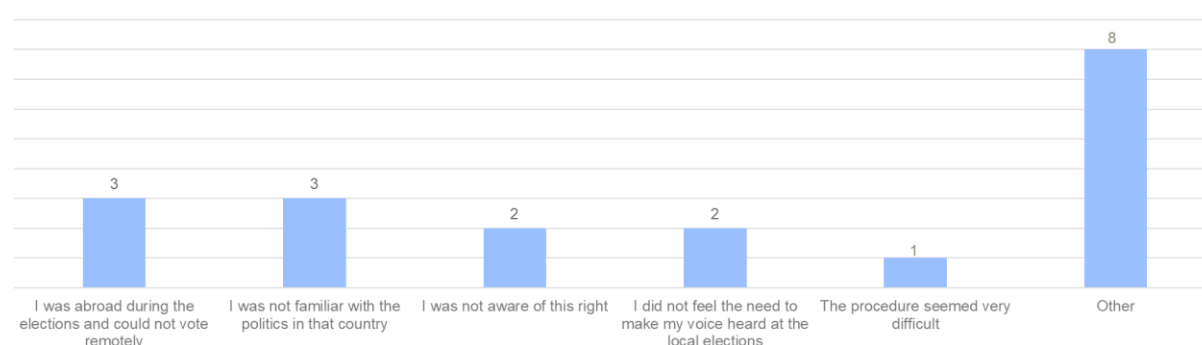
Source: OPC data manipulations

Most of the respondents who had voted or tried to vote did not experience any challenges (eight of 13).

Three mentioned that registration deadlines and registration processes were unclear. Three also stated that there was a lack of information concerning the parties or candidate to vote for. One respondent mentioned experiencing issues regarding early deadlines when attempting to vote at local elections in another EU MS.

In the comment box two respondents said that they had missed the deadline to register. One missed it because it was a long way ahead of the elections (one needed to register more than five months before voting). The other said that they had not been notified.

Figure 14 Q: Why did you decide not to vote at the local elections in another EU Member State? Please select all that apply. (n= 10, multiple choice, only asked to those who did not vote)



Source: OPC data manipulations

Of the 10 respondents who decided not to vote in the local elections in another EU MS, three mentioned being abroad during the elections, and unable to vote remotely. Also, three were

not familiar with the politics in the country they reside in. Only one was discouraged by the seemingly difficult local procedure.

The following additional comments were provided:

One stated that the deadline for registration had passed;

Another was missing documents;

One person spoke about being unaware of the right to vote;

One discussed the fact that they had made no effort to inform themselves of local politics and wanted to stay connected to the political system of their home country and vote there;

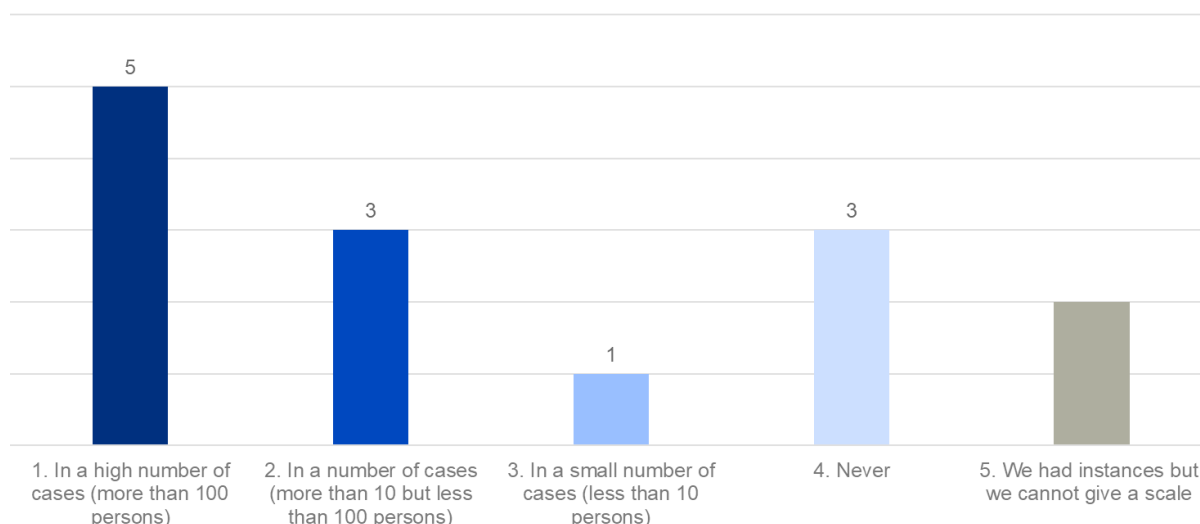
One respondent stated that they were registered but did not take part as the elections coincided with the respondent's departure from the country; the respondent felt it was inappropriate to vote while no longer living there.

Lastly, another respondent reported uncertainty regarding what to declare to the home country authorities, along with not being sufficiently informed of the local political situation and voting procedure.

When asked whether they had ever attempted to run for election locally, citizen respondents mostly said they had not¹⁴. The remainder did not respond.

The perspective of public authorities and civil society

Figure 15 Q: EU citizens who live in another Member State than their country of origin are also called “mobile EU citizens”. In the past five years (2015-2021), how frequently did your organisation engage with mobile EU citizens who experience challenges in exercising their right to vote at local elections? (n=12)

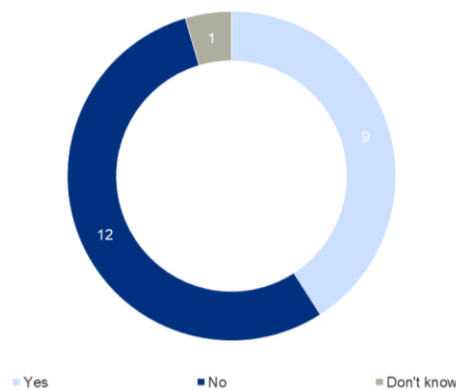


Source: OPC data manipulations

¹⁴ Question A5 While residing in another EU Member State, did you ever stand for candidate in local elections in that country? (n=32)

Seven organisations that responded had engaged with a high number of cases (affecting more than 100 persons) of mobile EU citizens who had experienced challenges in exercising their right to vote at local elections. Of these organisations, three were NGOs and two were public authorities. Four organisations had more than ten but less than 100 cases and one organisation had only a small number of cases (less than ten). On the other hand, four of the 22 organisations that responded had never had any cases, and six had had some instances but could not place that number on a scale.

Figure 16 Q: Have you researched the challenges mobile EU citizens experience in exercising their right

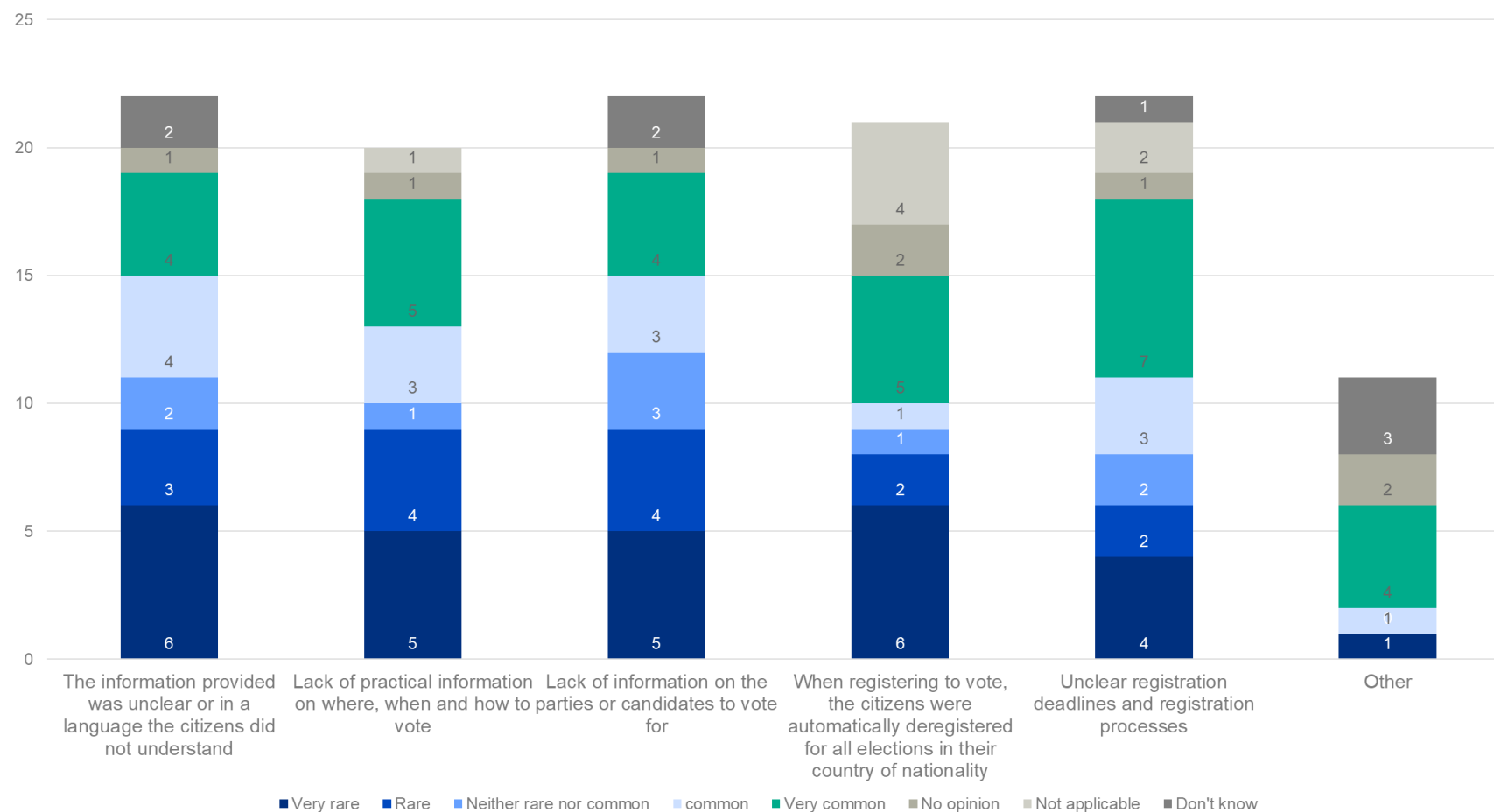


to vote at local elections? (n= 22)

Source: OPC data manipulations

Of the 22 responding organisations 41% (9) stated that they had researched the challenges mobile citizens experience in exercising their right to vote at local elections. Links to the specific research were shared by four respondents. Most of these were from civil society – only one public authority reported having done some research on this matter. The research cited was either EU-funded projects or feedback gathered from mobile Europeans received by the organisation.

Figure 17 Q: To your knowledge, which of these complaints in relation to voting in local elections are most frequent? Please place yourself on this scale where '1' indicates that you believe this complaint in relation to voting at local elections was "very rare", '5' indicates that you believe this complaint was "very common" and the remaining numbers indicate something in between these two positions. (n=22)



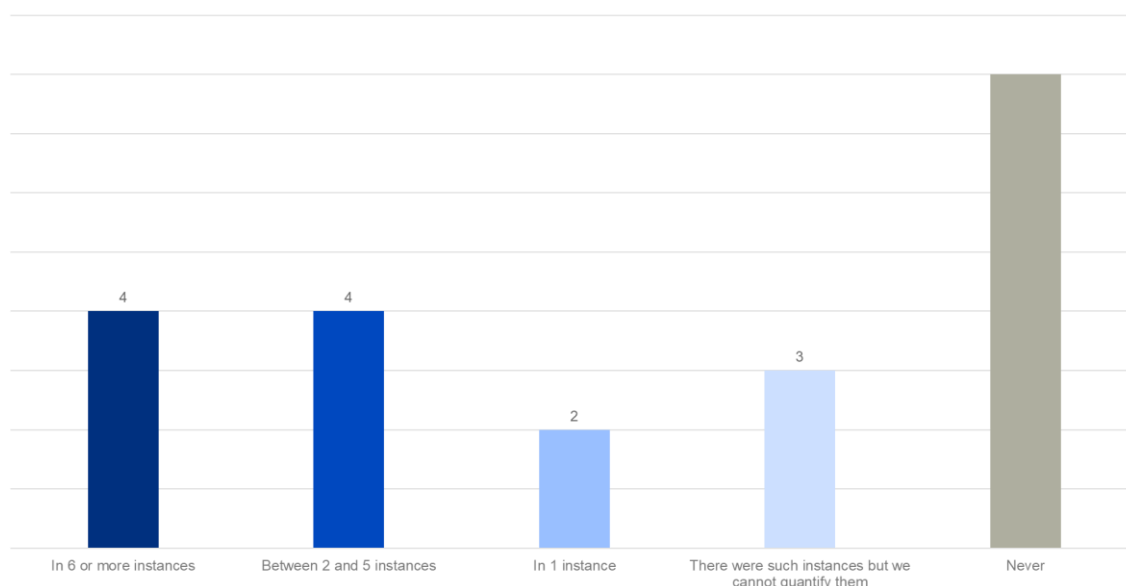
Source: OPC data manipulations

Opinions on the frequency of complaints are very diverse among respondents. Indeed, there is an almost even split between those that reported these complaints as rare and those that said they were common. For instance, nine answers described the complaint that the information provided was unclear or in a language the citizens did not understand as either very rare or rare, and eight answers described it as either common or very common. More respondents reported that unclear registration deadlines and registration processes formed a common complaint. Indeed, ten respondents mentioned it as either very common or simply common and six said it is either rare or very rare. When looking more specifically at respondent type (NGO or national authority) we can see that national authorities tend to believe there are significantly less complaints than do NGOs.

For those who mentioned “other” as a common frequency, four NGOs gave more detail on what kind of complaints had come up. One NGO mentioned that the lack of communication and outreach from local and national authorities was perceived as a key obstacle to the political participation of mobile EU citizens. Another mentioned the lack of access and flexibility for people with physical disabilities while another cited the inability to vote or stand in local elections of people with mental disabilities as they are deprived of legal capacity. Finally, another NGO added that mobile EU voters with disabilities cannot exercise their right to vote in 14 Member States because of deprivation of legal capacity and other discriminatory legal barriers, whereas in the other 13 Member States this is not the case.

When offered the opportunity to give more information four respondents did so. The issue that there is no central European-level population or voter register for the European elections was raised. The fact that mobile EU citizens must produce the same documents and information as voters who are nationals and these requirements vary considerably across the EU, in particular regarding residence requirements, was also raised. One respondent used the FaireEU project to provide the following information: some MS require voters to have their domicile or usual residence within the electoral territory (EE, FI, FR, DE, PL, RO, SI), to be ordinarily resident there (CY, DK, GR, IE, LU, SK, SE, UK), or to be listed in the population register (BE). Some Member States stipulate a minimum required period of residence (CY, CZ). Another respondent mentioned the issue of language in French municipal elections; the fact that the programmes are rarely translated was seen as an issue. Lastly, a Spanish national authority raised the fact that most issues come from the formation of the Municipal Register managed by the Town Councils and the cancellations that occur therein; and also that complaints are made about the closing date of the electoral roll being so far removed from the date of the elections, dates that are specifically mentioned in the electoral regulations.

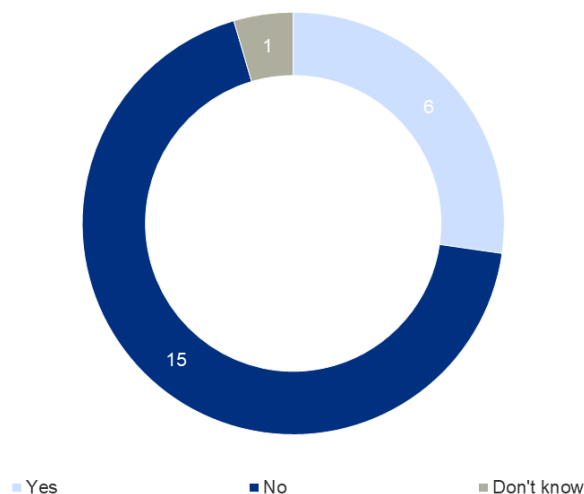
Figure 18 Q: In the past five years (2015-2021), in how many instances did your organisation engage with mobile EU citizens who experience challenges in exercising their right to stand for candidate at local elections? (n= 22)



Source: OPC data manipulations

Over the period of 2015 through 2021 only four organisations had six or more instances where they engaged with mobile EU citizens who experienced challenges in exercising their right to stand as candidates at local elections. Similarly, only four had recorded between two and five of these instances. On the other hand, eight organisations had not had one of these instances over the past five years.

Figure 19 Q: Have you researched the challenges mobile EU citizens experience in standing for candidate at local elections? (n=22)



Source: OPC data manipulations

Of the 22 organisations that responded to the question regarding whether they have researched the challenges mobile EU citizens experience in standing as candidates at local elections, 72% (15) said that they had not researched this matter. However, 29% (6) did research this and two of them provided links to the specific research – one focused more generally on the exclusion of persons with disabilities or mental health exclusion (not specific to elections or mobile Europeans) and the other report cited concerned the FairEU project. Only one respondent did not know whether their organisation had done research on this or not.

Figure 20 Q: Which of these complaints are you aware of when it comes to mobile Europeans standing for candidates in local elections (n=21)



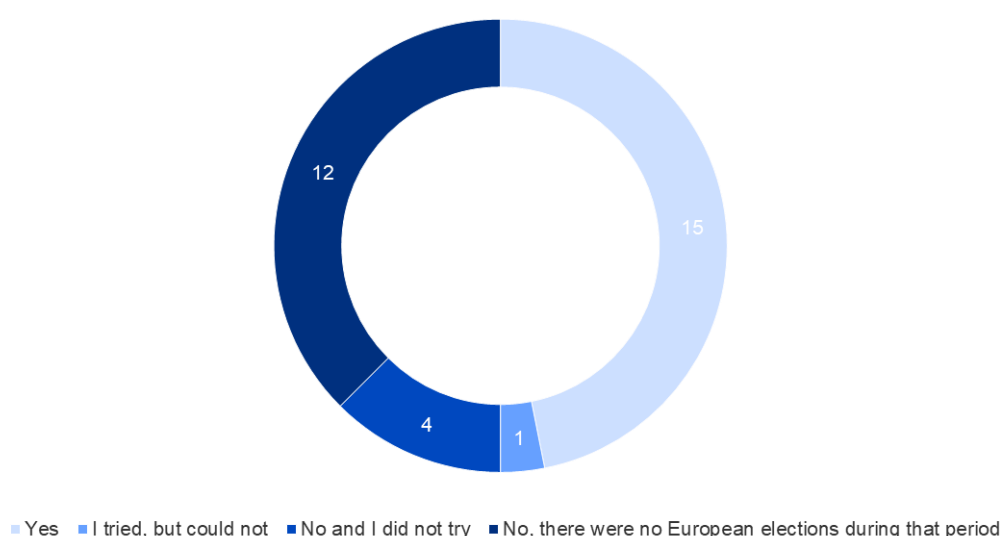
Source: OPC data manipulations

When it comes to mobile Europeans standing as candidates in local elections, the complaint that NGO and national authorities were most aware of was the lack of practical information on how to do so. The second most commonly raised involves unclear requirements for standing as a candidate. Five respondents mentioned that none of these issues raised complaints that they are aware of. The complaint of which organisations were least aware is the inability to join or found a political party.

European Parliament elections

The perspective of citizens

Figure 21 Q: While residing in another EU Member State, have you ever voted in European Parliament elections? (n=32)

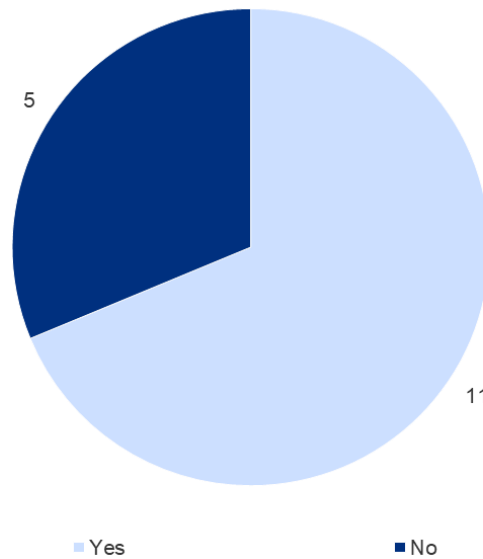


Source: OPC data manipulations

In total, 15 of the 32 responding EU citizens had voted in European Parliament elections and 12 were unable to vote as there were no European elections while they were living abroad. However, four respondents had neither voted nor tried to do so while living abroad and one had tried but was unsuccessful. Three of the four that did not try to vote explained this by reasons such as early deadlines, lack of familiarity with local European politics and the inability to vote remotely when abroad at election time¹⁵.

¹⁵ Question A6.1 Why did you decide not to vote at the European elections while residing in another EU Member State? Please select all that apply. (n=3)

Figure 22 Q: While residing in another EU Member State, did you ever vote or try to vote in European Parliament elections for a list of candidates in your country of nationality? (n=16)

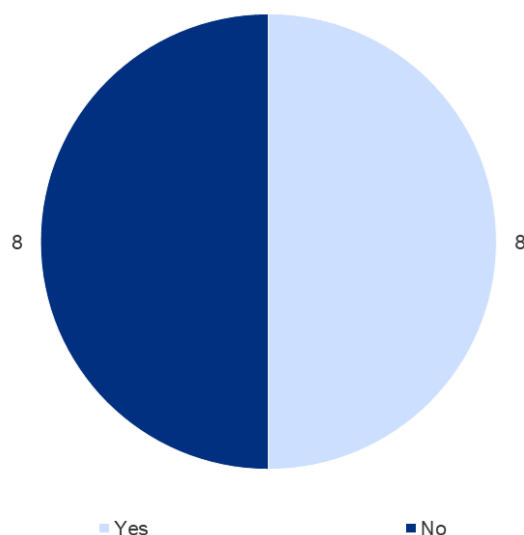


Source: OPC data manipulations

Most EU citizens who had voted or tried to vote in European Parliament elections while residing in another MS tried to vote for a list of candidates in their country of nationality. Indeed, 69% (11 of 16) had attempted this successfully. On the other hand, five respondents had not. When asked about the challenges facing those that did try to vote for a home country list of candidates in the European Parliament elections while residing in another MS¹⁶, four respondents stated they had faced no challenges. However, four also mentioned insufficient access to remote voting options, and two mentioned unclear registration deadlines. One respondent gave another reason and mentioned the requirement to travel back to their home country in order to vote. Note however that one of the persons who answered “no” also said in the comment box that they had voted in their home country.

¹⁶ Question A7.1 Did you experience any of the following challenges? Please select all that apply. (n=11)

Figure 23 Q: While residing in another EU Member State, did you ever vote or try to vote in European Parliament elections for a list of candidates in your country of residence? (n=16)



Source: OPC data manipulations

There is an even split between those that had tried to vote at least once in EU Parliament elections for a list of candidates in their host country (country of residence) and those that had never tried. Four of the eight respondents who had voted for a list of candidates in their host country had experienced none of the challenges tested. On the other hand, three reported challenges regarding registration deadlines and unclear registration processes¹⁷.

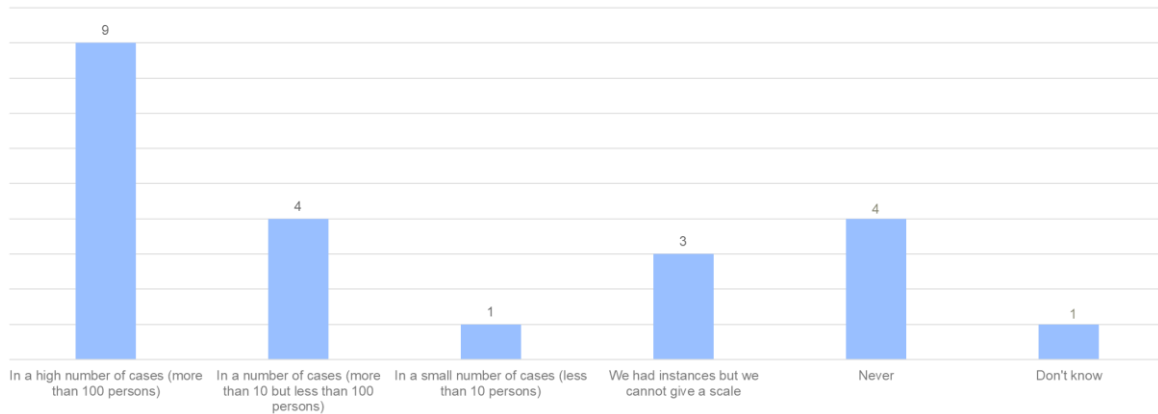
The vast majority of citizen respondents, 31 of 32, said they had neither stood nor tried to stand as a candidate in European parliamentary elections while residing in another MS¹⁸. One respondent, however, had tried and mentioned not being able to join or found a political party¹⁹.

¹⁷ Question A8.1 Did you experience any of the following challenges? Please select all that apply. (n=8)

¹⁸ Question A9 While residing in another EU Member State, did you ever stand for candidate in European parliamentary elections? (n=32)

¹⁹ 9.1 Did you ever experience any of the following challenges when standing for candidate in European elections in another EU Member State? Please select all that apply. (n=1)

Figure 24 Q: In the past five years (2015-2021), how frequently did your organisation engage with mobile EU citizens who experience challenges in exercising their right to vote at European elections,

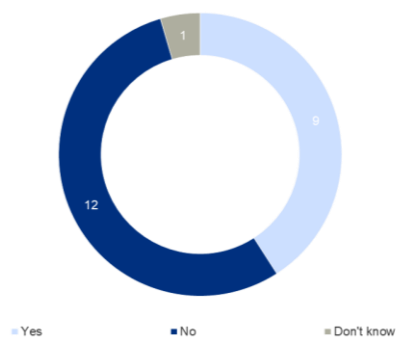


either in their country of residence or in their country of nationality? (n=22)

Source: OPC data manipulation

Over the period of 2015 through 2021 nine of the responding organisations had engaged with more than 100 cases involving mobile EU citizens experiencing challenges in exercising their right to vote at European elections either in their country of residence or in their country of nationality. Four organisations had had more than ten but less than 100 of these types of cases. Four organisations had never had any cases of this type over the past five years.

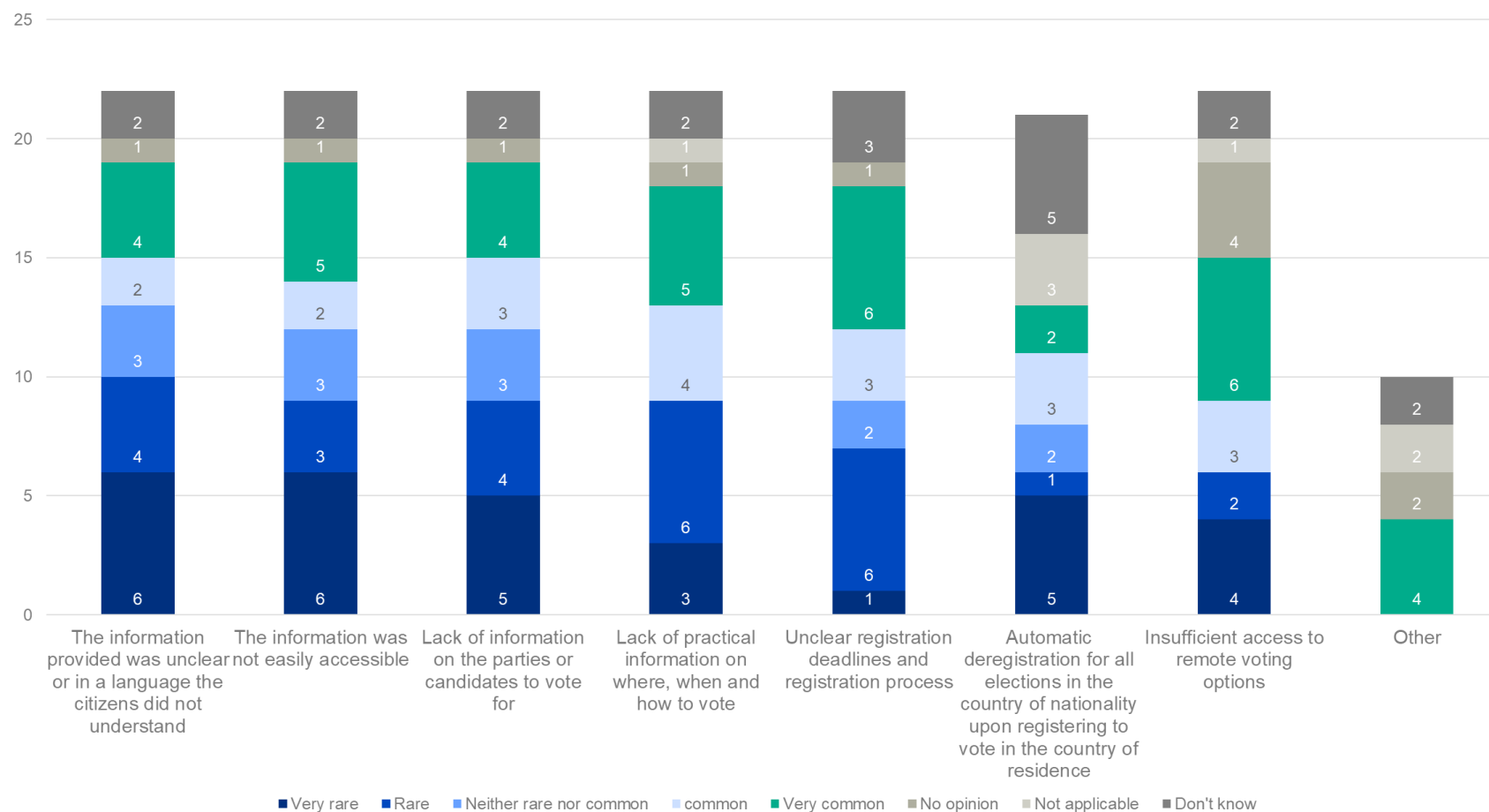
Figure 25 Q: Have you researched the challenges mobile EU citizens experience in exercising their right to vote at European elections? (n=22)



Source: OPC data manipulations

Of the 22 responding organisations 41% (9) stated that they had researched the challenges mobile citizens experience in exercising their right to vote at European elections. The majority, 55% of respondents (12) however stated that they had done no research on the subject and one organisation said it did not know. Those organisations that said they had used such insights were more likely to be civil society respondents. Links to the specific research were shared by five organisations and referred to studies that have been used in the impact assessment.

Figure 26 Q: To your knowledge, which of these complaints in relation to voting in European parliamentary elections are most frequent? Please place yourself on this scale where '1' indicates that you believe this complaints in relation to voting at European parliamentary elections was “very rare”, '5' indicates that you believe this complaint was “very common” and the remaining numbers indicate something in between these two positions. If you have not received complaints, please, select “Not applicable” (n=22)



Source: OPC data manipulations

The frequency of complaints seems to vary a lot with organisation type. Indeed, most NGOs report that the complaints identified by the questions are very common, while national authorities mostly report that these complaints are rare. There is an almost even split in the approximation of complaint type frequency. It is however worth mentioning that complaints about both the lack of practical information on where, when and how to vote, and unclear registration deadlines and registration processes were reported as rare or very rare by nine respondents.

In open-ended questions, respondents from public authorities provided this additional information:

One pointed out that complaints they received were not due to that country's procedures actually being unclear, but to the differences between the legislation of that country and the laws of other Member States. The country also stated that information is provided to all citizens (mobile and nationals) via press releases

The most common complaint (approx. 15-25 received) was about not knowing that the voter must actively register first time around. This arises despite the fact that the ministry sent individual letters to all voters to their official digital mailbox.

In 2019, one country stated it had received complaints related to the fact that some citizens missed the registration deadline.

The Electoral Administration of one country was repeatedly confronted, on the days when European Parliament elections are being held, with complaints from its own citizens and voters who, despite being registered in the home country electoral register, cannot exercise their right to vote in this election because the respective electoral rolls included a note that they had chosen to elect Members of the European Parliament from another State of the Union. This situation usually occurred with citizens who had emigrated to other EU countries, chosen to vote in the host country in previous elections and then returned to reside in their home country assuming they would be able to vote for home country lists.

Civil society organisations made the following comments in the open-ended questions:

One organisation pointed to the need to make elections accessible to persons with disabilities and specifically those under guardianship (deprived of the right to vote in 18 EU Member States)

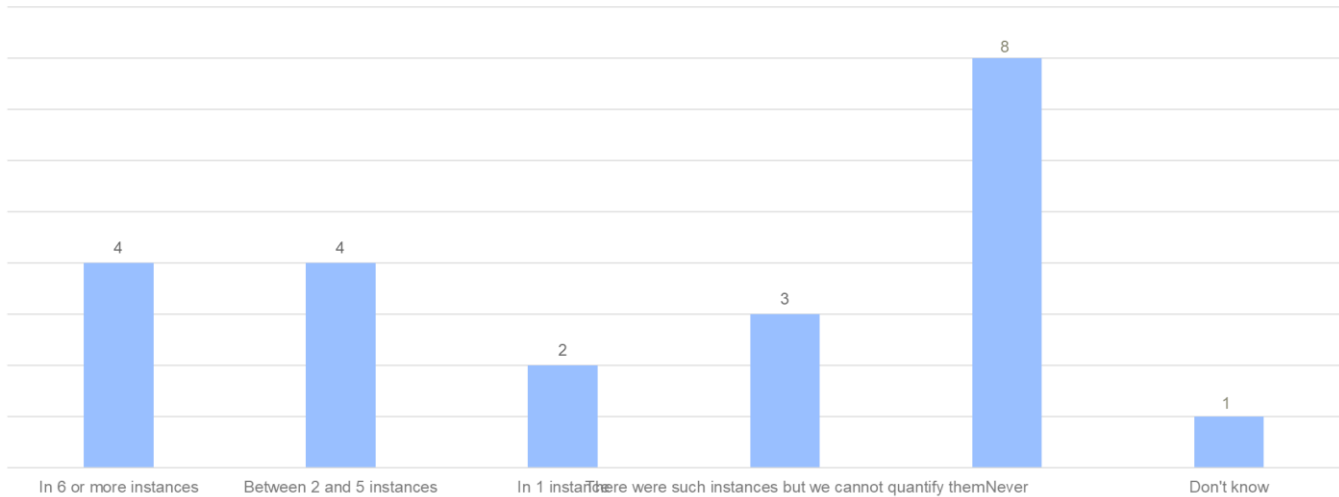
Another stated that it was not clear which law applies when there is a denial of legal capacity in one country and a person who wants to vote has two or more nationalities;

Another also listed these barriers: deprivation of the right to vote and stand as candidates, accessibility of information and voting procedures, and lack of solutions and alternative means of voting for mobile voters with disabilities.

One organisation discussed the fact that information about parties and elections – as well as the information in the media – was primarily in the language of the host country and hence not always accessible to mobile European citizens. Also, the voting system is not easy to understand for people who come from simpler electoral systems.

Finally, one stated that the lack of communication and outreach from local and national authorities had been perceived as a key obstacle to mobile EU citizens' political participation. As a result of this, many citizens had never been informed about their right to participate in local and EU elections or had been wrongly informed that they were not eligible to participate.

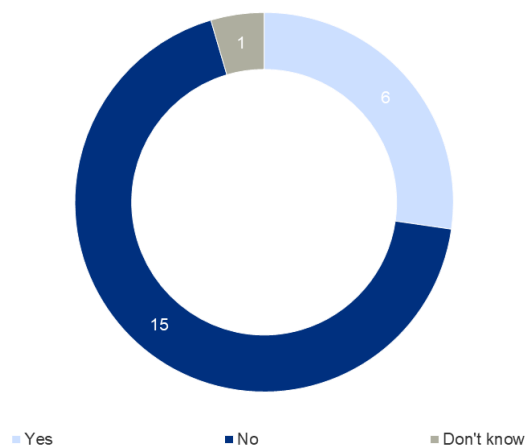
Figure 27 Q: In the past five years (2015-2021), in how many instances did your administration engage with mobile EU citizens who experience challenges in exercising their right to stand for candidate at European elections? (n=22)



Source: OPC data manipulations

Over the past five years, three responding organisations had had over six instances where they engaged with mobile EU citizens who had experienced challenges in exercising their right to stand as candidates at the European elections. Nine organisations said they had never had this type of engagement over the period 2015-2021.

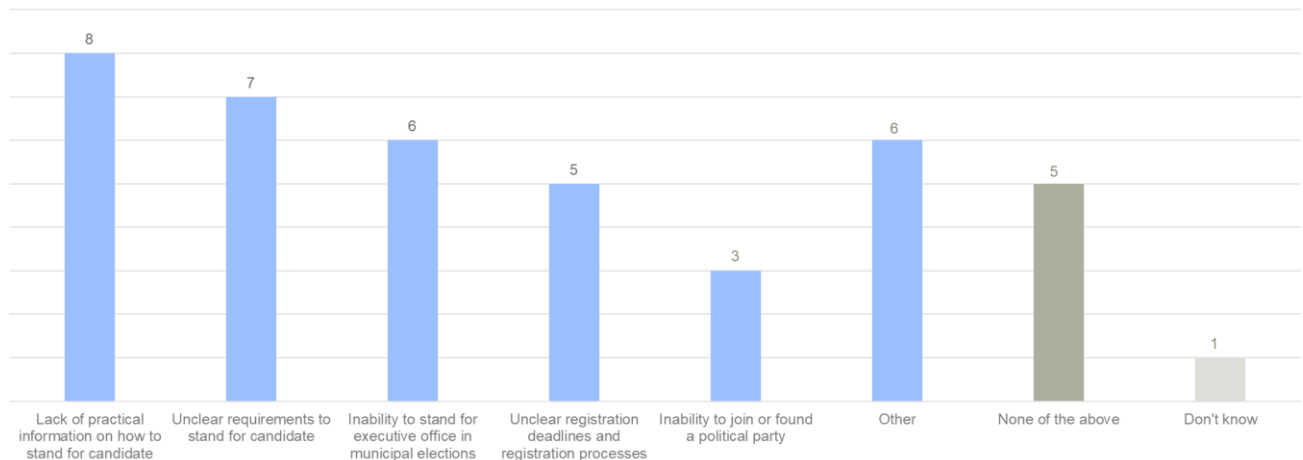
Figure 28 Q: Have you researched or commissioned research on the challenges mobile EU citizens experience in standing for candidate at European elections? (n=22)



Source: OPC data manipulations

Most of the organisations had neither researched nor commissioned research on the challenges mobile EU citizens experience in standing as candidates at the European elections. Four organisations had researched or commissioned research on the subject, and two did not know. Most of the organisations that said they had done research on this referred to the testimonials of people who had been through the process of trying to stand as candidates.

Figure 29 Q: Which of these complaints are you aware of when it comes to mobile Europeans standing for candidates in European Parliament elections (n=22)



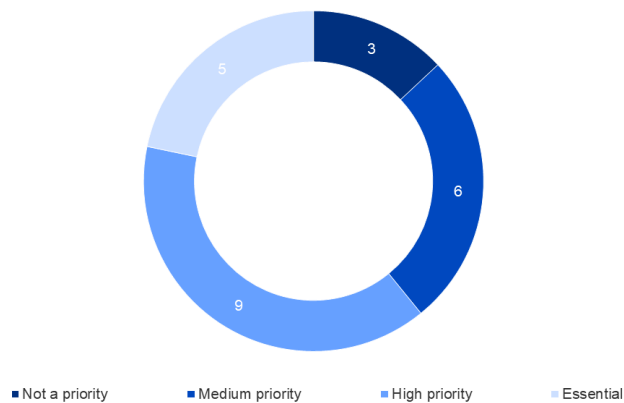
Source: OPC data manipulations

The complaint of which respondents were most aware in terms of mobile Europeans standing as candidates in European Parliament elections was the lack of practical information on how to do so. This complaint was reported by six different respondents. Five respondents were aware of people complaining about unclear candidacy requirements. Six respondents said they were unaware of any of the proposed complaint types in the survey question.

The issues raised under “other” are the same as those for mobile European citizens voting in EP elections.

Support or its absence for EU action

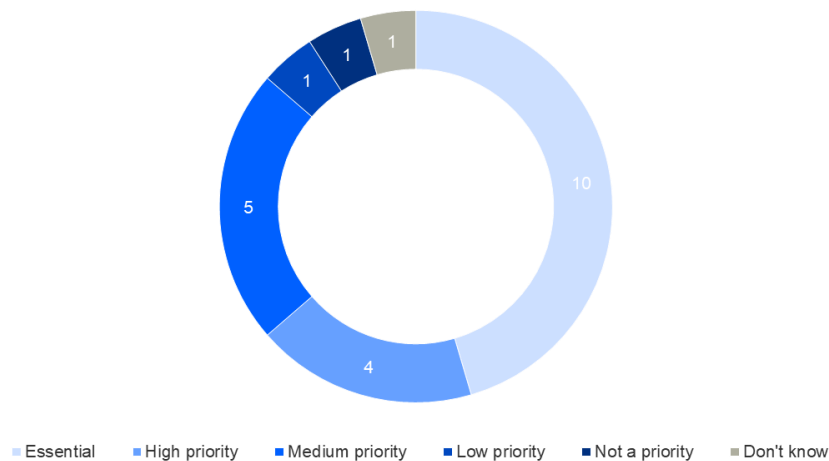
Figure 30 Q : EU citizens who live in another Member State than their country of origin are also called “mobile EU citizens”. To what extent do you believe that the EU should further reduce barriers for mobile EU citizens in exercising their electoral rights. (n=39)



Source: OPC data manipulations

Most respondents (30 out of 39) considered it either essential (21) or of high priority (9) that the EU should further reduce barriers for mobile EU citizens in exercising their electoral rights. Six said this was a medium priority and three consider it not to be a priority for the EU.

Figure 31 Q: To what extent do you believe that the EU should further reduce barriers for mobile EU citizens in exercising their electoral rights? Please place yourself on this scale where '1' indicates that "reducing barriers for mobile EU citizens in exercising their electoral rights should not be a priority", '5' indicates that "reducing barriers for mobile EU citizens in exercising their electoral rights should be essential" and the remaining numbers indicate something in between these two positions. (n=22)



Source: OPC data manipulations

Ten of the 22 organisations considered it essential for the EU to further reduce barriers for mobile EU citizens in exercising their electoral rights. Only one organisation stated that they did not see this as a priority. Four and five organisations mentioned this as a high and medium priority respectively.

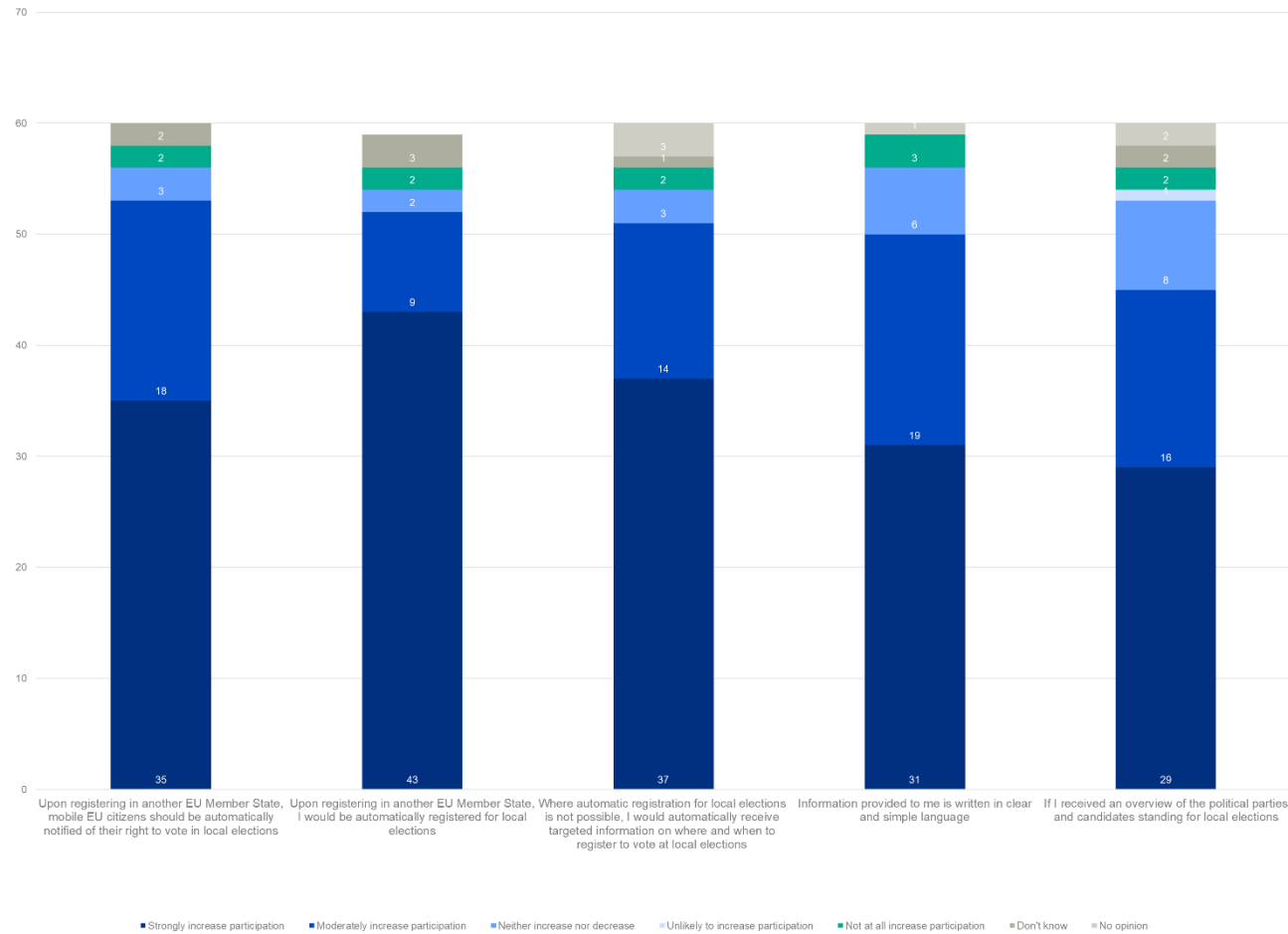
Feedback on policy options

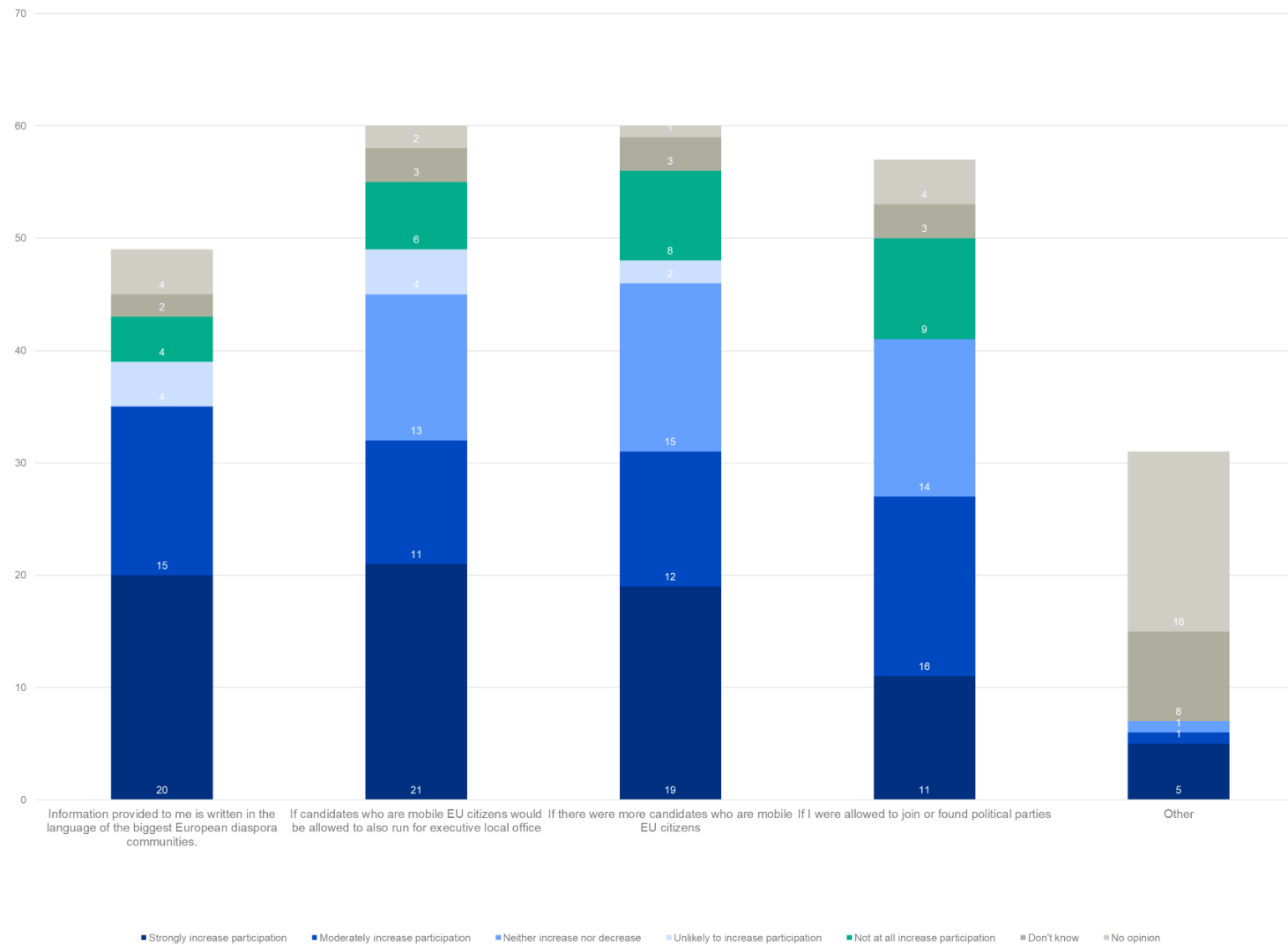
The following section discusses the feedback provided by citizens, civil society and public authorities about the policy options they were asked about.

The response scales were standardised across the three questionnaires so they could be shown in the same charts when the same question was asked of citizens as well as organisations, but a different answer scale was used:

1. Original scale: Not at all increase my participation -> Recoded as: 1. Strongly decrease participation
3. Original scale: Neutral -> Recoded as: 3. Neither increase nor decrease
4. Original scale: Increase my participation -> Recoded as: 4. Moderately increase participation
5. Original scale: Strongly increase my participation -> Recoded as: 5. Strongly increase participation

Figure 32 Q: One of the policy objectives of this initiative is to facilitate and increase the participation of mobile EU citizens in local elections. In your opinion, how likely are the following measures to increase the participation of mobile EU citizens in local elections? Please place yourself on this scale where '1' indicates that you believe it will “strongly decrease participation”, 5 indicates that you believe it will “strongly increase participation” and the remaining numbers indicate something in between these two positions. (n=60)



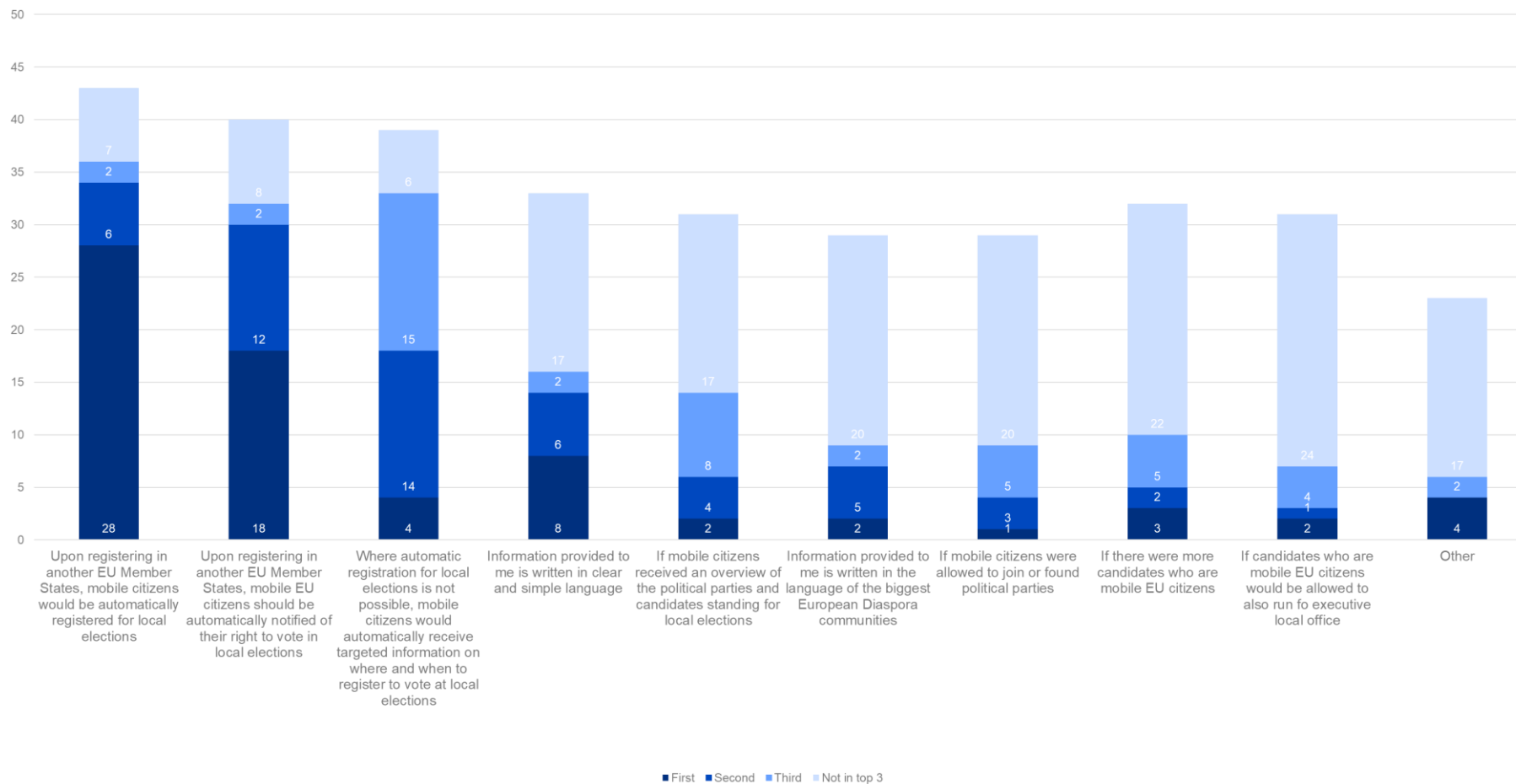


Source: OPC data manipulations

The figure above depicts respondent preferences regarding the different policy options aimed at facilitating and increasing the participation of mobile EU citizens in local elections in their host country. The most popular policy option was the automatic notification of voting rights in local elections upon registration in another EU MS. Indeed, 53 respondents said this policy option would either strongly or moderately increase participation. The option considered to increase participation, either moderately or strongly, by the largest number of respondents was automatic registration for local elections at the time of registration in the new state of residence. This option received 43 “strongly increase participation” answers, while the first received 35. The two options with the least support were the presence of more mobile EU citizen candidates, and being allowed to join or found a political party in the residing MS.

When invited to put forward other policy options, six respondents took the opportunity. Two of them mentioned voting rights in local elections and the barriers that both mental and physical disabilities can pose accessing these rights. There was also mention of the fact that such rights and barriers vary between Member States. One respondent added that local/regional/national authorities should consider introducing online and email registration in order to facilitate and speed up the process. One policy option deemed to moderately increase the participation of mobile EU voters was the ability for citizens to serve as members of polling station commissions in all EU MS, and the right of every voter to dispute the results of elections in court.

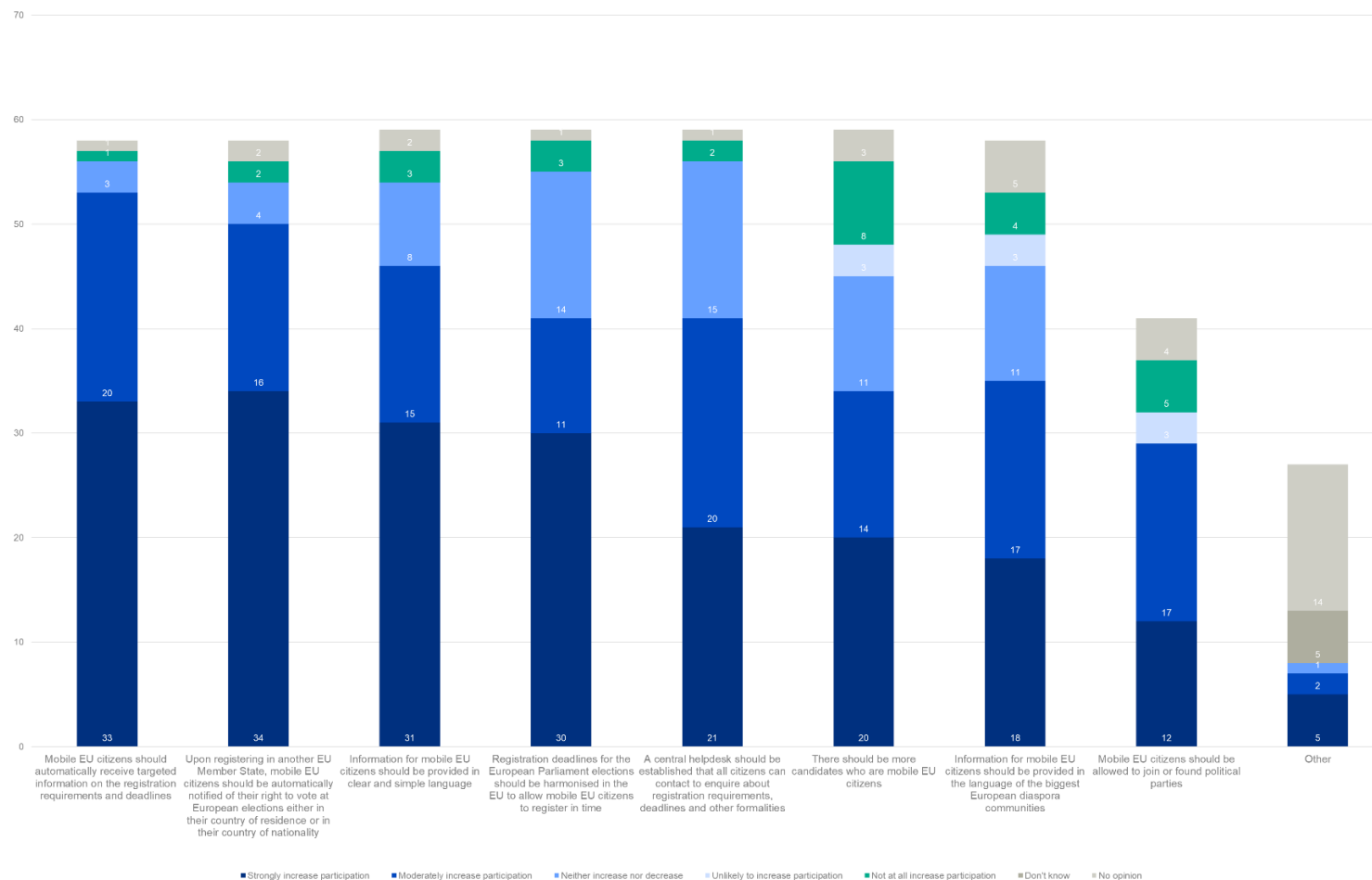
Figure 33 Which of the above measures, do you think, is most likely to increase the participation in local elections for mobile EU citizens? Please rank your top 3. (n=43)



Source: OPC data manipulations

When asked to rank the nine policy options most likely to increase participation in local elections for mobile EU citizens, citizens and NGOs arrived at similar conclusions as in the question above. Indeed, the first option in the ranking was automatic registration for local elections upon registering in another EU MS. Automatic notification came in second place in the aggregate ranking. However, there are significant differences in the policy options that came last in the ranking. The option least mentioned in the top three was the option whereby candidates who are mobile EU citizens would be allowed to run for executive local office. There were no big differences between civil society, authorities and citizen respondents.

Figure 34 Q: Another policy objective of this initiative is to facilitate and increase the participation of mobile EU citizens in elections to the European Parliament. In your opinion, how likely are the following measures to increase the participation of mobile EU citizens in European parliamentary elections? Please place yourself on this scale where '1' indicates that you believe it will "strongly decrease participation", '5' indicates that you believe it will "strongly increase participation" and the remaining numbers indicate something in between these two positions. (n=59)

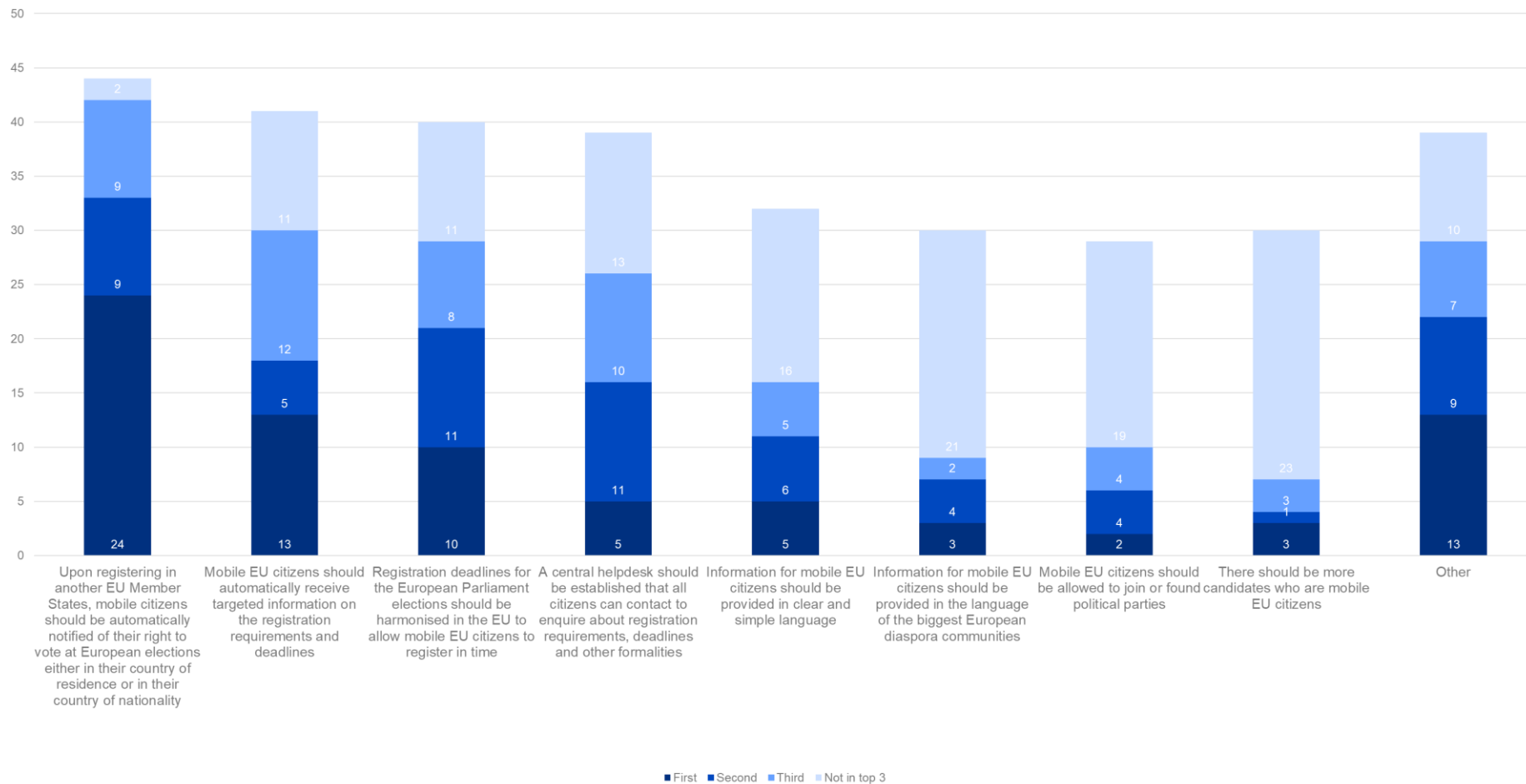


Source: OPC data manipulations

Turning to the policy measures aimed at facilitating and increasing participation of mobile EU citizens in European parliament elections, the option that gathered the most support involved the automatic dissemination of targeted information on registration requirements and deadlines to mobile EU citizens. 53 respondents agreed that this option would increase participation, either strongly or moderately. The second most popular option was automatic notification of the right to vote at European elections in either the host country or the home country. The option for mobile EU citizens to be allowed to join or found political parties received the least support. Three respondents said it would not increase participation, and five said it would not do so at all. The option regarding an increasing number of candidates who are mobile EU citizens received 11 negative opinions, including eight that said this option would not increase participation at all.

When invited to offer other alternatives, six respondents grabbed the opportunity. One mentioned a European list instead of national lists. The issue of disability and the form in which voting options are presented was raised again for this question at EP election level. One respondent called for automatic registration along the lines presented in the question above. Finally, another comment was made calling for citizens to be allowed to serve as members of polling station commissions in all EU MS, and for every voter to be able to dispute the results of elections in the courts.

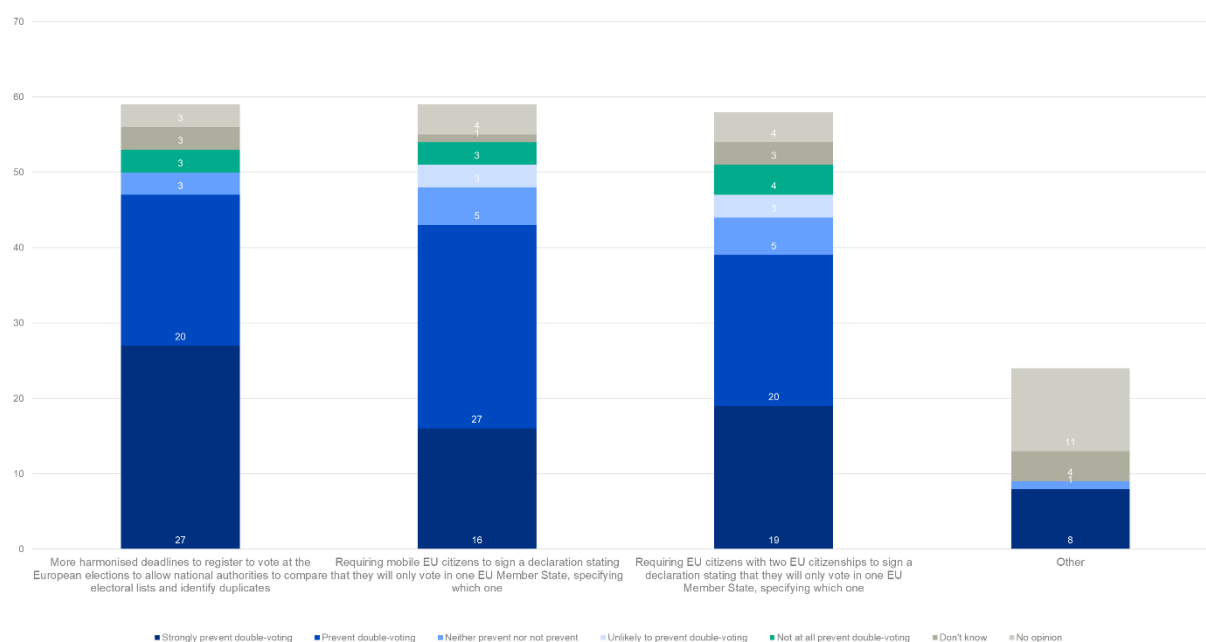
Figure 35 Q: Which of the above measures, do you think, is most likely to increase the participation in European elections for mobile EU citizens? Please rank your top 3 (n=44)



Source: OPC data manipulations

In the ranking of the measure most likely to increase the participation of mobile EU citizens in European elections, citizens and NGOs considered that the automatic notification of EU mobile citizens of their right to vote at European elections either in their country of residence or in their home country upon registration in the new country of residence, was the best. The provision of automatic targeted information on the registration requirements and deadlines to mobile EU citizens was in second place. The least preferred option involved having more candidates who are mobile citizens themselves.

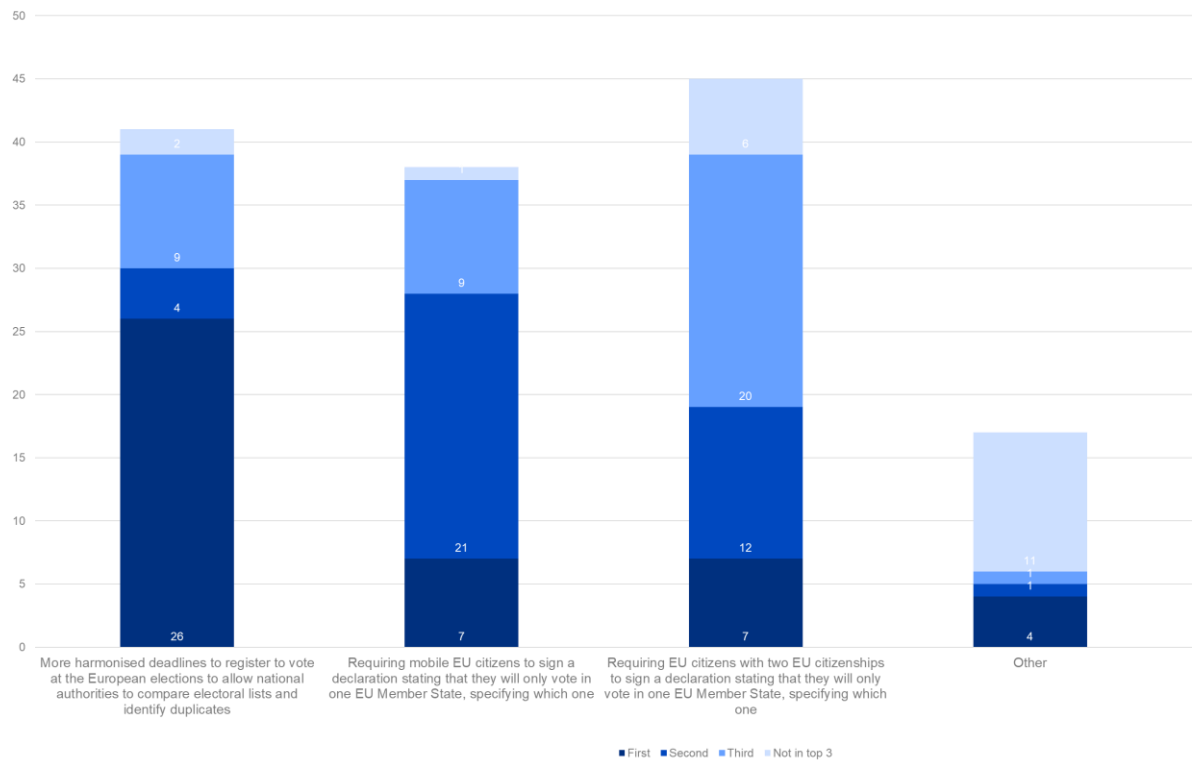
Figure 36 Q: Another objective of this initiative is to fight double voting (voting in more than one country in the same election). In your opinion, how likely are the following measures to prevent double voting? Please place yourself on this scale where '1' indicates that you believe it will "not at all prevent double voting", '5' indicates that you believe it will "strongly prevent double-voting" and the remaining numbers indicate something in between these two positions. (n=59)



Source: OPC data manipulations

Three measures intended to prevent double voting were presented to respondents, who were asked to assess their effectiveness. The most effective measure was seen to be the option calling for more harmonised registration deadlines for the European elections to allow national authorities to compare electoral lists and identify duplicates. Fully 27 respondents considered that this would strongly prevent double voting, and 20 that it would prevent double voting. Requiring mobile EU citizens to sign a declaration stating that they will only vote in one EU MS and specifying which one was close behind. The measure with the least support was the suggestion that EU citizens with two EU citizenships should sign a declaration stating that they will only vote in one EU Member State, specifying which one. Finally, eight respondents thought that 'other' options might strongly prevent double voting. These vary widely across the 6 respondents that provided a response. Three respondents mention the idea of an EU-wide database of EU citizens' registrations to vote. The idea of an exchange of voter lists between EU MS was also raised. One respondent said that citizens should only be able to vote in their country of origin. Finally, one respondent suggested a digital electoral passport, which would show the authorities whether an individual had voted or registered to vote in another country.

Figure 37 Q: Which of the above measures, do you think, is most likely to help prevent double voting

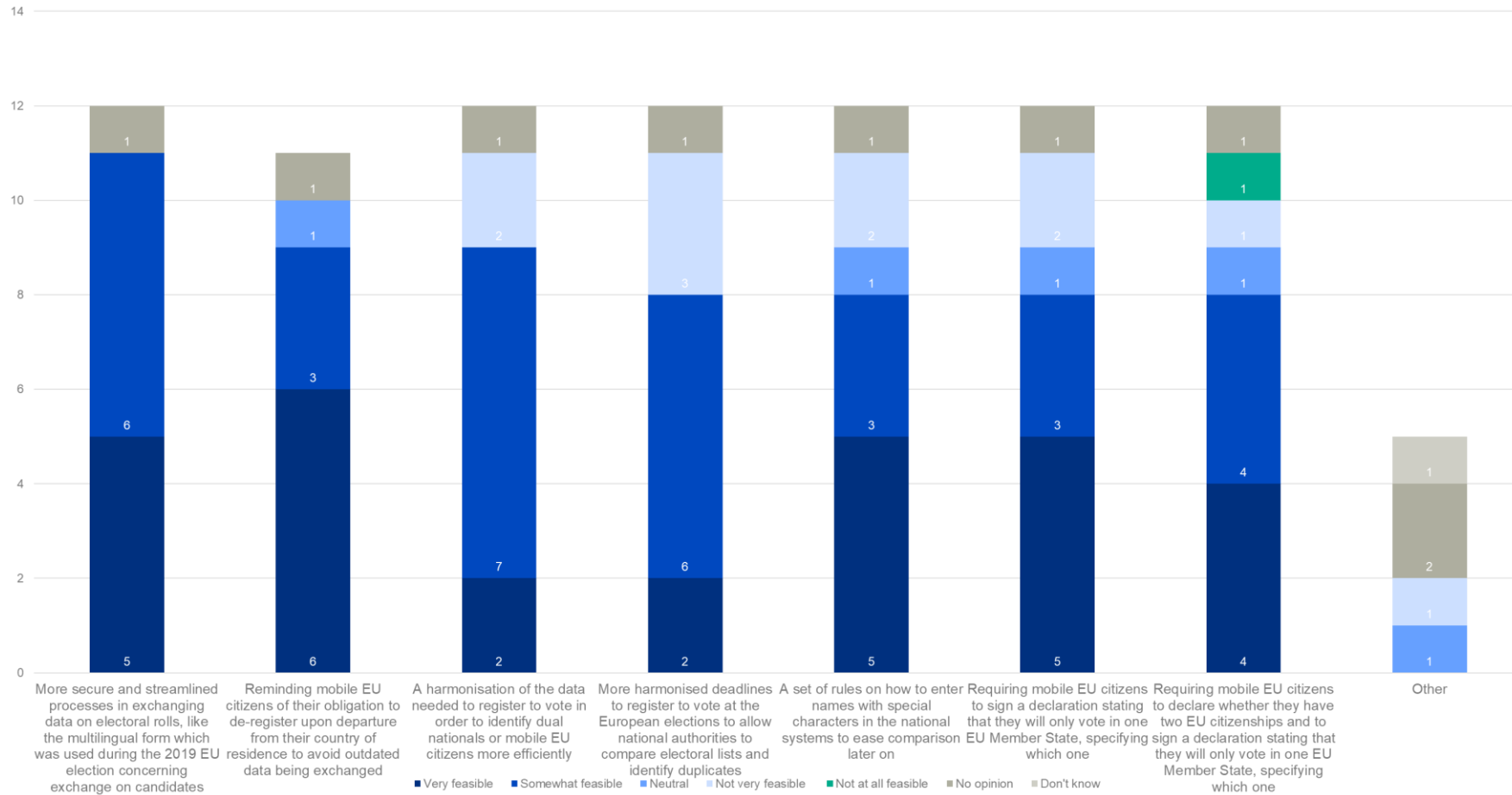


in European elections? Please rank your top 3 (n=45)

Source: OPC data manipulations

Respondents in the NGO and citizens survey were also asked to rank the measures above in the order of their likelihood to prevent double voting in European elections. This question resulted in the same order as the previous one, with more harmonised registration deadlines for European elections to allow national authorities to compare electoral lists and identify duplicates coming first place for 26 of the 41 respondents. Four respondents selected other potential measures as their first choice for preventing double voting.

Figure 38 Q: And how politically and practically feasible do you find these measures to fight double-voting in European parliamentary elections? Please place yourself on this scale where '1' indicates not at all feasible, '5' indicates very feasible and the remaining numbers indicate something in between these two positions.: 5. Requiring mobile EU citizens to sign a declaration stating that they will only vote in one EU Member State, specifying which one. (n=12)



Source: OPC data manipulations

Finally, public authorities were also asked about the political feasibility of the options. Public authorities identified the most politically and practically feasible measure as more secure and streamlined processes for exchanging data on electoral rolls. The second most politically and practically feasible measure involves reminding mobile EU citizens of their obligation to de-register upon departure from their country of residence to avoid outdated data being exchanged. The least feasible of these measures was requiring mobile EU citizens to declare whether they have two EU citizenships and to sign a declaration stating that they will only vote in one EU Member State, specifying which one. No national authority mentioned having a measure that is both politically and practically feasible.

Additional feedback provided

Several respondents provided additional feedback to the OPC:

- One noted that they would also like to be able to vote in other elections in their country of residence and another said that voting in other elections was a major motivation for them to acquire host country nationality. On the other hand, one respondent stated that people should only be allowed to vote in their country of citizenship, and that they should apply for citizenship if they wished to vote where they reside;
- One noted that the ambition of allowing people to choose where to vote (home or host country) is a commendable one;
- One respondent also encouraged the idea of common party lists at EU level rather than having to choose to vote for a national list;
- One respondent stated that in their country of residence (Belgium) the way the information provision to mobile Europeans is handled is excellent. Another said that information provision is essential for participation;
- One respondent spoke about the specific case of Latvia where long-time residents who are not Latvian nationals, who represent an important minority in the country, are not allowed to vote in any Latvian elections. As a result, mobile European citizens have stronger voting rights than this minority, many of whom were born and raised on Latvian territory.
- One person stated that they did not see how double voting is a problem. But it seems they understood double voting as voting in two national elections in two different countries, rather than voting multiple times in EP elections;
- There was also a comment made that countries should allow their citizens to vote at distance and other countries should allow people to have double nationality.
- Another contribution highlighted the need for campaigning and outreach to increase participation.
- Finally, as for previous questions, the voting rights of persons with disabilities were underlined as needing further action.

Summary of position papers

| Country | Organisation | Stage at which the organisation contributed |
|----------------|---|---|
| Netherlands | International Working Group Delft | Inception impact assessment |
| Belgium | European Disability Forum | Inception impact assessment |
| Germany | Global Institute for Structure relevance, Anonymity and Decentralization (GISAD) i.G. | Inception impact assessment |
| Belgium | Mental Health Europe (MHE) | Both stages |
| United Kingdom | the3million | Inception impact assessment |
| Belgium | Voters Without Borders | Inception impact assessment |
| Spain | Ministry of interior | Open Public Consultation |
| Belgium | FEANTSA | Open Public Consultation |
| Germany | Anonymous organisation | Open Public Consultation |
| Denmark | National Association of Local Communities | Open Public Consultation |
| Hungary | Harghita County Council | Open Public Consultation |
| Portugal | | Open Public Consultation |
| Belgium | ECAS | Open Public Consultation |
| France | Brexpats you matter | Open Public Consultation |

This section summarises the feedback received at both stages: inception impact assessment and open public consultation.

Feedback on the inception impact assessment

Voting and candidacy rights for mobile EU citizens

There are many EU citizens living in different EU Member States. These ‘mobile EU citizens’ pay taxes in their host countries and some are politically engaged, or as a Dutch organisation put it, “some are even members of a local political party and raise their voice”. Despite these developments, mobile citizens lack the right to elect regional and national representatives or stand as candidates. The Dutch stakeholder suggested that voting rights should be extended to EU citizens so that they are allowed to vote in all elections in their country of residence. The right to vote could be provided in two ways:

Directly, by enfranchising EU citizens

Indirectly, by granting citizenship

In the view of this stakeholder, the indirect solution might pose some problems, as some countries require those requesting citizenship to give up their existing citizenship. As people are usually reluctant to give up their citizenship in exchange for that of the host country, he

believed that enfranchising EU citizens was a more suitable option. He regarded requiring citizens to acquire the citizenship of the host country in order to exercise their right to vote as in contradiction to EU citizenship.

GISAD (a German Institute)²⁰ welcomed the European Commission's initiative which aims to simplify the voting process for mobile citizens. The stakeholder emphasised the need to allow mobile citizens to vote digitally, but the technical standards for elections should be the same in all EU countries (ensuring, at the same time, the safe transmission and storage of voting data). The European Disability Forum (EDF) recommended the increased accessibility of digital solutions (as well as tools, information communication, identification methods). In particular, the EDF advocates for the same accessibility requirements as those laid down in the 2016 Web Accessibility Directive and 2019 European Accessibility Act for the methods used for European Parliament (EP) or municipal elections. Should a shared source be created, this should also fulfil the accessibility requirements for persons with disabilities.

Comparably, Voters Without Borders (an NGO) stated that having automatic and online registration in all MS would "greatly encourage the participation of mobile citizens and reduce the difficulties associated with administrative processes." Mobile EU citizens should be given the choice to register either in their country of residence or the country of origin (for each election type). For reform to be fully effective, the NGO considered that both hard and soft options are needed (see below on the Policy Options), with a preference for mandatory options which could ensure the right to vote for mobile citizens.

The NGO considered that more effort should be put into the information and involvement of citizens, not withholding cooperation between MS. The need for clear communication – especially for people with intellectual and learning disabilities - was also raised by the EDF. Some people might face language barriers when it comes to the voting process or simply knowing their voting rights. Therefore, information should be understandable, presented in plain language, etc. (e.g., see requirements of the European Accessibility Act²¹).

A rather concerning situation regarding the voting rights of EU mobile citizens was brought up by the3million²², a UK-based organisation representing EU citizens in the UK. The UK Government has guaranteed EU citizens' voting rights for the 2021 local elections. In Scotland and Wales, different rules apply, whereby EU citizens can also vote in national Scottish and Welsh elections. the3million considers that EU citizens are under-represented voters, as only half of them are registered to vote. Moreover, the recent EU Settlement Scheme estimates that there are over 4 million EU citizens living in the UK (with either pre-settled or settled status). The organisation emphasised the need to mobilise these mobile citizens and get them involved in local politics. Bilateral voting rights agreements have only been secured between the UK and Portugal, Spain, Poland and Luxembourg. Therefore, some EU citizens may lose their rights if the UK does not enter bilateral agreements before the next local elections.

The Inception Impact Assessment points to the issue of the identification of potential candidates who have previously been deprived from their right to stand for election in their country of origin. The EDF points out that in certain Member States there are laws which prevent certain persons with disabilities from standing as candidates in the European elections (e.g., Finland). The EDF calls for the Commission to ensure that mobile voters with disabilities enjoy the same political rights as non-disabled mobile voters.

²⁰ More information at: <http://gisad.eu/>

²¹ More information at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019L0882&rid=4>

²² More information at: <https://www.the3million.org.uk/>

Preferred Policy Options

Stakeholders were unanimously in favour of Policy Option 3, but some additional suggestions for improvement were provided.

GISAD supported the implementation of Option 3 which includes a mix between the classic portal voting system and voting via the EU-D-S. Mental Health Europe (MHE) is also in favour of Option 3 although none of the options proposed fully address barriers for mobile EU citizens with psychosocial disabilities (i.e. legal and administrative barriers, lack of awareness of rights, inaccessible voting procedures, facilities, fewer opportunities for participation in political life). To fully address the barriers, Option 3 should include “the revision of measures that prevent mobile EU citizens with psychosocial disabilities from the enjoyment of their legal capacity and the exercise of their right to vote and stand for election.”

the3million considered Option 3 to be the “the most comprehensive approach to ensure the rights of EU citizens to continue voting in UK elections will be protected”. The organisation believed that the UK would seek confirmation that individual EU MS would allow British residents to have voting rights at local level. In return, EU mobile citizens from the respective countries would benefit from the same voting rights in the UK.

Voters Without Borders preferred Option 3 but with some suggestions. The NGO considered that, if Options 2 and 3 were introduced, soft law measures must be introduced along with them in order to be fully effective. Furthermore, mobile citizens should be allowed to stand for executive office in their municipal/regional place of residence. Where the use of digital identification for registration (and other electoral services) are foreseen by MS, these should be obliged to make such tools available to all citizens, regardless of their legal status (nationals vs. mobile citizens).

Voters Without Borders also emphasised that since the conditions to vote and stand in elections differ between MS, these should be harmonised across the countries. Lastly, legislative reform should include the possibility to stand for mayor for all residents, thus leaving it up to the voters to decide who is the most suitable candidate.

Feedback on the Open Public Consultation

Status quo and problem analysis

The ECAS contribution highlighted the fact that there is little awareness of the fact that mobile European citizens have the right to vote and stand as candidates in local and EP elections in their host countries, citing Eurobarometer data as well as the results of their own survey. Another contribution highlighted low participation rates not only among mobile Europeans but also among Europeans in general.

The association of Danish municipalities sent a contribution that described the process of automatic registration that is currently in place in Denmark as fast (7 days after residence registration) and efficient, stating that it makes the act of voting easy for mobile European citizens. The contribution also noted that some municipalities engage in active outreach to mobile Europeans with a view to increasing turnout. They also pointed out that very few candidates from among mobile Europeans decide to stand as candidates although this is made easy for them. The contributors believed that language and information barriers are the main obstacle.

The following types of obstacles and barriers to voting were described in the contributions received:

Insufficient information provision and outreach and the fact that when information is provided it is only in the language of the host country;

Some Member States impose additional residency requirements (examples cited were Czechia, Luxembourg);

The fact that automatic registration is not yet a common practice in most Member States and a few Member States require repeated registration;

Registration deadlines are too distant from the actual election;

Disenfranchisement as a result of exchange of information. The Portuguese authorities in particular noted that they are frequently faced with complaints from Portuguese nationals who used to reside and vote abroad and are unable to vote when they return to their home country, as they are marked on the electoral roll as voting in another country (previous country of residence).

The following obstacles were noted regarding candidacy:

Eligibility restrictions if people want to stand as candidates (inability to stand for executive offices);

Difficulties for mobile European citizens to join political parties in their host country

The Spanish authorities' contribution also gave a detailed account of the rules and procedures for participation in local and EP elections for mobile Europeans. It did not discuss any specific challenges with this procedure beyond describing how it works in practice.

FEANTSA pointed out that a significant proportion of homeless persons across the EU are mobile European citizens. They also note that many have been deprived of their citizenship rights due to destitution procedures. FEANTSA pointed out that homeless mobile European citizens face even more challenges in exercising their rights than homeless persons who are residents in their home country. The note also emphasised the need for elections to be inclusive and hence ensure participation of these severely disadvantaged groups.

Mental Health Europe submitted a report prepared together with the European Network of National Human Rights Institutions about citizenship rights of people with disabilities and under guardianship. This report was not tailored to the purposes of this public consultation but it does point out the difficulties this target group have in exercising their electoral rights.

Finally, a contribution was received from an organisation that aims to organise UK expatriates who reside in EU Member States with the aim of campaigning for their right to vote in their countries of residence. The content of the contribution called for guaranteeing voting rights to UK expatriates in their host countries.

Policy options

In general, the contributions received supported the initiative to further facilitate electoral participation of mobile Europeans. The following areas of action were discussed.

Increase access to information and active information outreach

Contributions emphasised that increasing efforts to inform mobile European citizens about their right to vote and how to exercise it, was the way forward.

This was seen as a shared responsibility between:

- Local authorities;
- EU institutions;
- But also civil society and political parties.

Facilitating registration

Contributions called for automatic registration to become the default option. Where automatic registration is not possible the procedure should not require physical attendance at the municipal office and could be done digitally and remotely.

They also suggested that registration deadlines should be closer to the actual election date.

FEANTSA more specifically stated that the proof of address should not be required for registration as, *de facto*, it discriminates against homeless persons. Homeless persons should be able to give the address of a shelter in order to be eligible to vote.

Improving opportunities for distance voting

One contribution called strongly for increased opportunities for all Europeans to vote using distance voting options – in particular electronic voting.

Removing eligibility restrictions

One contribution also called for Member States to remove eligibility restrictions both for candidacy and for voting.

Shared EU resource

One contribution was sceptical about the benefits of a shared EU resource for the exchange of information about mobile Europeans. It mentioned what the contributors saw as the high cost as a possible obstacle.

Another contribution, however, suggested that this is indeed necessary.

Addressing disenfranchisement as a result of exchange of information

To address the problem, noted above, whereby persons who return to live in their home country are deprived of their right to vote because they are still marked as voting in the previous country of residence, Portugal suggested the following process:

- The host country has to notify the home country that the person is no longer a resident of that host country;
- The indication in the electoral roll that they vote abroad would subsequently be removed.

Monitoring of the status quo

A call was also made to better monitor political participation of mobile European citizens and the ways in which they exercise these rights.

Other points highlighted

The contributions also highlighted other actions not covered by this impact assessment, namely:

- Extending the right to vote of mobile Europeans to all elections;
- Lowering barriers to participation for specific groups of persons with disabilities or homeless persons independently of their country of residence.

Annex 8 – Third-country case studies

Information on voting systems in third-countries

Australia

Australia is a federal country divided into six states, three internal territories, and three external territories²³. Elections are regulated through the Commonwealth Electoral Act of 1918²⁴.

Voting rights

Voting is compulsory in Australia, meaning that registration on the electoral roll also is compulsory. Eligible to vote are those who:

- Are Australian citizens or an eligible British subject (i.e. holding British citizenship and having been enrolled to vote for federal elections in Australia at least since 26 January 1984);

- Are 18 years or older on election day; and

- Have lived at their current address for at least one month.

Electoral roll

Electoral rolls are maintained by all states and territories. States and territories prepare, alter and revise electoral rolls in collaboration with the national authorities. As voting and registration is compulsory, the AEC may proactively reach out by text message to voters who are not yet enrolled, whose information has been received from other agencies or institutions.

Content of electoral roll(s)

The electoral roll contains biographic information such as name, date of birth, address, etc.

Updates of electoral roll(s)

While voters must be 18 or older, it is possible for eligible voters to register from the age of 16, after which they remain on the register. Registration on the electoral roll must be supported by any of:

- A driver's licence issued by a State or territory;

- An Australian passport;

- An attestation to the person's identity in an approved form, signed by an enrolled voter; and

- Any other evidence of the person's identity prescribed by regulations.

After residence in a specific subdivision for at least a month, the voter has the right to have their name placed on the electoral roll of that subdivision. In the Australian context, being *entitled* to registration should also be understood as being *obliged* to register due to the

²³ States: New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia. Internal territories: Australian Capital Territory, the Jervis Bay Territory, and the Northern Territory. External territories: Ashmore and Cartier Islands, the Australian Antarctic Territory, Christmas Island, the Cocos (Keeling) Islands, the Coral Sea Islands, Heard Island and McDonald Islands, and Norfolk Island. External territories are sovereign territories offshore; all others are located on the Australian mainland.

²⁴ [Commonwealth Electoral Act of 1918](#).

compulsory nature of the electoral system. It is only possible to be on the electoral roll for one subdivision at the time. This must be done within 21 days of becoming eligible to vote in a particular location²⁵.

While data is shared between the central and provincial electoral rolls, and the Australian Electoral Commission (AEC) complements this with data from federal and state departments and agencies²⁶, it is the responsibility of individuals to ensure that their data is up-to-date.

Use of registers in provincial elections

The electoral roll is centrally managed by the AEC – this means that an up-to-date list is always centrally available, and is shared with state and local governments for their elections. Table 3 summarises the modes of registration in states and internal territories of Australia. Note that this is the result of a cursory search, and the list may not be exhaustive (e.g. provinces or territories may have additional modes of registration to those listed). This search can be expanded upon if found useful for the purposes of the Final Report.

As noted above, registration must be done where one is eligible to vote at the latest 21 days after becoming eligible (i.e. when one has lived in the new electoral unit for a month). This goes for all states and territories listed in Table 3.

Table 3: Summary of registration practices of Australian states and internal territories²⁷

| State/territory | Registration | Relevant agency |
|--------------------|---|----------------------|
| Capital Territory | One month residence required. Registration is done online. | Link |
| New South Wales | One month residence required. Registration is done online or by mail. | Link |
| Northern Territory | One month residence required. Registration is done online or by mail. | Link |
| Queensland | One month residence is required. Registration is done online via the AEC. | Link |
| South Australia | One month residence is required. Registration is done online via the AEC or by completing a paper form, to be returned by scanning or faxing. | Link |
| Tasmania | One month residence required. Registration is done online via the AEC. | Link |
| Victoria | One month residence required. Registration is done online or by mail. | Link |
| Western Australia | Registration is done online via the AEC or through a form. | Link |

Canada

Canada is a federal country divided into 13 provinces and territories²⁸. Elections are regulated through the Canada Elections Act²⁹.

²⁵ Commonwealth Electoral Act 1918, Section 101.

²⁶ As per the [AEC](#), information is received from e.g. the state and territory Driver's Licence Authorities; the Department of Human Services – Centrelink; the Australian Tax Office; the Department of Home Affairs; Births, Deaths and Marriages Authorities; etc.

²⁷ As external territories are sovereign, they are not included in this summary table. The Jervis Bay Territory is also excluded, as administration of it is divided between the Capital Territory, New South Wales, and commercial contractors – only 391 individuals are resident in Jervis Bay.

Voting rights

People are qualified to vote in provincial elections if they are:

- A Canadian citizen;

- At least 18 years of age on polling day;

- Ordinarily resident in the province for 40 days immediately preceding the date of the election; and

- Ordinarily resident in the electoral district at the date of the election.

Electoral roll

Two main electoral rolls are maintained in Canada: A Register of Electors, and a Register of Future Electors (for those who do not, at the time of registration, qualify for voting). Registration in either register is optional. The two registers are national, but information from them is shared with provincial and territorial electoral agencies. However, voters may opt out of their information being shared by Elections Canada to provincial, territorial or municipal electoral agencies in writing. As the register is optional, they may also request to be removed from the register.

Content of electoral roll(s)

The Register of Electors and Register of Future Electors shall contain³⁰:

- Name, surname and given names

- Gender

- Date of birth

- Civic and mailing address

- Any other information which has been submitted to support applications for registration.

Updates of electoral roll(s)

Two main information sources are used for updating the Register of Electors and Register of Future Electors: information provided proactively by electors directly to the Chief Election Officer, or which they have expressly authorised other federal departments or bodies to share; and information held by other sources such as provincial Acts, listed and defined in the Elections Act³¹.

The Register of Electors is also updated with information from the Register of Future Electors as electors included thereon qualify for voting rights.

As the Register(s) draw on multiple data sources – including the Canada Revenue Agency, Immigration, Refugees and Citizenship Canada, the Department of National Defence, and provincial agencies for driver's licenses, vital statistics, or electoral bodies – it has a high accuracy. A 2018 study indicated that 90.5% of electors had the correct address registered on the Register of Electors, vs. 85% in the databases of driver's licence agencies³².

²⁸ Alberta, British Columbia, Manitoba, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Nunavut, Ontario, Prince Edward Island, Quebec, Saskatchewan and Yukon.

²⁹ Canada Elections Act ([S.C. 2000, c.9](#))

³⁰ Canada Elections Act, Art. 44(2).

³¹ Canada Elections Act, [Schedule 2 \(Section 46\)](#). This list includes Acts relating to e.g. drivers licence registrations, provincial or local elections, and other statistics collected by subnational bodies.

³² <https://www.elections.ca/content.aspx?section=vot&dir=reg/des&document=index&lang=e>

Registration of new electors on the Register of Electors

Before a new elector is included in either Register, they will be contacted by the Chief Electoral Officer with the information their office holds on the elector. To be included, the elector or future elector must then confirm, correct or complete the information, and submit it to the Chief Electoral Officer together with signed certification to the effect that they are qualified to be registered as an elector or future elector. Exceptions are when inclusion is done (i) at the voter's request, (ii) using information from lists of electors or future electors established under provincial law which the Chief Electoral Officer consider sufficient, or (iii) using information gathered from other federal or provincial registers.

To proactively be included, any person may provide the Chief Electoral Officer with an application containing the following:

- A signed certification that they are qualified as an elector or a future elector;

- Their name, surname, given names, gender, date of birth, and civic and mailing addresses; and

- Satisfactory proof of identity.

The Chief Electoral officer may request that the elector confirm, correct or complete the information within 60 days of receiving the request. Voters who are not registered may also register at an advance or election day poll, providing satisfactory proof of identity and address.

Use of register for elections

When elections are called, a preliminary List of Electors is produced based on the Register of Electors. Those electors who are included on the List shall be contacted and provided information on the address of their polling station; voting hours; contact details for more information; dates of advance polls, voting hours and locations; and the ID required for electors to identify themselves at the polling station.

If changes are required to the list (adding names of omitted electors, correcting information on electors on the list, or deleting names that were incorrectly included), these must be done at the latest at 6pm on the sixth day before polling day.

Use of registers in provincial elections

While Elections Canada shares the information in the Register of Electors with subnational levels of government, they caution that it may take weeks or even months before changes are reflected in the list of voters of provinces, territories or municipalities. If an election is underway or about to be held, voters are therefore encouraged to directly contact their provincial or territorial election offices. Another issue may be faced when the information held in the Register of Electors cannot be matched with information held by provinces or territories. Ultimately, subnational lists of voters are established by the relevant subnational elections agency.

Different registration practices for the provinces and territories are summarised in Table 4. Note that this is the result of a cursory search, and the list may not be exhaustive (e.g. provinces or territories may have additional modes of registration than those listed). This search can be expanded upon if found useful for the purposes of the Final Report.

In all provinces or territories, the federal requirements for voting (Canadian citizenship and being 18 years of age or older on election day) apply. They also all require sufficient ID, and

a signed certification by newly-registered voters to the effect that they fulfil the requirements for voting. While voters who have recently moved are encouraged to at the very least check their registration status, the voter lists also draw from other registers such as driver's license and social service offices. In other words, while voters may want to actively register to be sure that they are included, many will already be registered through their registration in the province or territory.

While some details differ between the provinces or territories, the most common practice is that six months of consecutive residence is required, and registrations is be done online, in person or by mail.

Table 4: Summary of registration practices of Canadian provinces and territories

| Province/territory | Registration | Relevant agency |
|---------------------------|--|----------------------|
| Alberta | Online registration portal. Voters can register and check their registration status. | Link |
| British Columbia | Six months residence required. Registration can be done online or in person. | Link |
| Manitoba | Six months residence required. Registration can be done online or in person. | Link |
| New Brunswick | 40 days of residence required. If information is shared with the register on voters who are not included, they are proactively contacted and invited to register. Registration is done by mail or fax. | Link |
| Newfoundland and Labrador | Registration is done by email or mail. | Link |
| Northwest Territories | Six months residence required. Registration can be done online or with Returning Officers of the district. | Link |
| Nova Scotia | Six months residence required. Registration can be done online or in person. | Link |
| Nunavut | One year residence required. Registration is done by mail. | Link |
| Ontario | Registration is done online or by mail. | Link |
| Prince Edward Island | Six months residence required. Registration is done online or in person. | Link |
| Quebec | Six months residence required. Registration is done online. | Link |
| Saskatchewan | Six months residence required. Registration is done by email or mail. | Link |
| Yukon | One year residence required. Registration is done online. | Link |

Summary of findings

Possible good practices or points of discussion

This list highlights practices that may be worthy of discussion as good practices from third countries in the Final Report – this is not so much a final list as a start of discussion, but it does highlight what Canada and Australia in some sense do differently, and which may be worth referring to.

Centrally managed electoral roll (Australia)

The compulsory nature of Australia's electoral system means that it is possible to maintain a central electoral roll which other subnational units refer to. There is still space (and need) for subnational bodies and voters themselves to ensure that details are up-to-date, but the role of the AEC means that the electoral authority has an overview of all other registers, and can ensure that they are linked.

Interaction of different registers and systems (both)

In order to use as up-to-date information as possible, the provincial and national voters lists draw on information from e.g. driver's licence, tax and social insurance agencies. This allows for information to be cross-checked, and for many voters to be registered without additional effort on their part. In EU Member States that do not have central population registers that allow for automatic registration, there might be space for a similar linking of information held in different registers (while acknowledging that this might still lead to some potential voters falling through the cracks).

National (federal) registers sharing information with subnational bodies (both)

The maintenance of the national Register of Electors provides a useful reference point for subnational bodies when they draw up their list of voters for elections: it means that new residents in a province who seek to register can be matched with their entry in the national database, and their details updated. This should also avoid double-voting, as the Register of Electors cannot indicate residence in two countries at the same time (even if their address in the register may be out-of-date). In EU terms this would entail a rather ambitious project of combining all electoral registers on a joint platform, which may be both politically and practically unfeasible – but it does provide a proof of concept.

Registration of electors who do not yet qualify

The possibility to register as an elector before you have fulfilled the conditions to vote may be an interesting option for EU Member States – e.g. a person who has not yet fulfilled residency requirements, or who has not yet moved to a new Member State but knows that they will do so (and can support it with documentary evidence), could register on a preliminary voting register, and be included on the actual register when conditions have been fulfilled. However, for this to be useful, the registration would need to be permanent (otherwise it is difficult to see how it would decrease administrative work for either voters or electoral agencies). Furthermore, this would not be required in Member States that already have automatic registration.

GETTING IN TOUCH WITH THE EU

In person

All over the European Union there are hundreds of Europe Direct information centres. You can find the address of the centre nearest you at: https://europa.eu/european-union/contact_en

On the phone or by email

Europe Direct is a service that answers your questions about the European Union. You can contact this service:

- by freephone: 00 800 6 7 8 9 10 11 (certain operators may charge for these calls),
- at the following standard number: +32 22999696, or
- by email via: https://europa.eu/european-union/contact_en

FINDING INFORMATION ABOUT THE EU

Online

Information about the European Union in all the official languages of the EU is available on the Europa website at: https://europa.eu/european-union/index_en

EU publications

You can download or order free and priced EU publications from: <https://op.europa.eu/en/publications>. Multiple copies of free publications may be obtained by contacting Europe Direct or your local information centre (see https://europa.eu/european-union/contact_en).

EU law and related documents

For access to legal information from the EU, including all EU law since 1952 in all the official language versions, go to EUR-Lex at: <http://eur-lex.europa.eu>

Open data from the EU

The EU Open Data Portal (<http://data.europa.eu/euodp/en>) provides access to datasets from the EU. Data can be downloaded and reused for free, for both commercial and non-commercial purposes.

