



# Public consultation on the Directive imposing an obligation on Member States to maintain minimum stocks of crude oil and/or petroleum products (2009/119/EC)

*Summary of results*

# Scope

**Aim:** Feed in the mid-term evaluation of the Directive

**Main issues addressed:**

- Assess the Directive and its objectives in light of the 5 following criteria
  - Effectiveness
  - Efficiency
  - Coherence
  - Added-value of the EU intervention
  - Relevance
- Consultation on the recommendations from the independent study

# Overview of contributions

## 59 submissions



# Key message:

## General support of stakeholders for the directive

- **Effectiveness**
  - Overall a majority agree the Directive met at least partly its 4 objectives
- **Efficiency**
  - Costs incurred are proportionate to the fostered benefits
- **Coherence**
  - Coherence is satisfactory but could be improved
- **EU added value**
  - 90 % support such coordinated approach to oil SoS;  
83 % agree oil SoS would be more vulnerable without it
- **Relevance**
  - Objectives are relevant but need to be adapted slightly

# Assessment of the results

## Main comments

- Support for specific EU rules, that should nevertheless be close to IEA rules
- Concerns over the calculation of emergency stock levels
- Costs increased but are proportionate to the benefits achieved
- Transparency of cross-border stocks needs further improvement

## □ EU rules but close to IEA rules

Respondents agree with **specific EU rules,**

- Important for non IEA EU Member States
- Good complement to the IEA system
- Takes into account the specificities of EU context

but favour rules that are **similar to the IEA's.**

- Increased transparency
- Reporting obligations should be fully aligned to reduce administrative burden
- Address discrepancies between the types of eligible stocks under the two systems

## ❑ Calculation methodologies

Current 90 / 61 day emergency stock obligation is regarded as **appropriate**, but:

- Methodologies to calculate the reference volumes are seen as not best-adapted
  - 7 % naphtha rule may result in large variations in emergency volume
  - 10% deduction accounting for stock unavailability is not justified
- List of products that can be taken into account is too broad

## ❑ Cost increase

**Costs** and **administrative burden** are perceived to have **increased** at least slightly

- Depending on the stockholding system (obligation on CSE, industry, or both)
- Oil refiners sometimes under higher obligation than importers
- Annual reporting obligation under Art. 9(5) clearly pointed out; reporting under Art. 6(2) mentioned



## □ Transparency of cross-border stocks

Submissions highlight the **increased transparency** of cross-border ES, but share **concern:**

- Procedures for cross-border stockpiling differ from a MS to another
- Hinders full completion of the internal energy market

Several suggest to

- Prohibit bilateral agreements
- Set an EU-wide registry system