

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

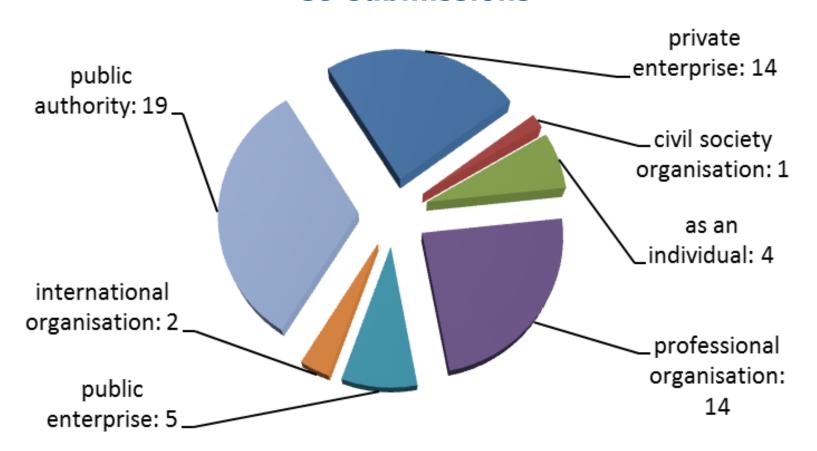
Aim: Feed in the mid-term evaluation of the Directive

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