

15 – Anonymous 6	
2.1 Do you agree that the emergency oil stocks are necessary to guarantee the security of supply in the EU?	Yes, fully
Please explain your answer	
2.2 Do you agree that the EU needs to have its own rules on emergency oil stocks?	Yes, fully
Please explain your answer	
2.3 Do you agree that the EU rules on emergency oil stocks need to be in line with the rules applied in the context of the IEA?	Yes, partly
Please explain your answer	EU and IEA rules should be in line as much as possible, but they cannot be in line completely (due to certain differences, e.g. IEA counts also commercial stocks into the overall "emergency stocks")
2.4. The Directive obliges to hold a level of oil stocks equivalent to 90 days of average daily net imports or 61 days of average daily inland consumption, whichever of the two quantities is greater. In your view, are these levels of emergency oil stocks requested by the Directive appropriate for the EU to cope with a serious oil supply disruption?	Yes, fully
Please explain your answer notably by clarifying if you think higher or lower level of stocks would be more adapted.	
2.5. The average daily net imports referred to in question 2.3. need to be calculated based on the crude oil equivalent of imports during the previous year. Annex I of Directive 2009/119/EC lays down the methodology based on which the imports of petroleum products are converted into crude oil equivalent. In your view, is this methodology well adapted for the calculation of the equivalent of crude oil import?	Yes, partly
Please explain your answer	But not fully. For example the "naphtha yield (or consumption) rule" makes the calculation sometimes diverse from the real circulation of the oil imports.

2.6. The average daily inland consumption referred to in question 2.3 need to be calculated based on the crude oil equivalent of inland consumption during the previous calendar year. Annex II of Directive 2009/119/EC lays down the methodology based on which the inland consumption is converted into crude oil equivalent of inland. In your view, is this methodology well adapted for the calculation of the inland consumption?	Yes, fully
Please explain your answer	
2.7. Annex III of Directive 2009/119/EC lays down the methodology for calculating the level of stocks held. In your view, is this methodology well adapted for calculating the actual level of stocks that would be actually accessible and available in case of oil supply disruption?	No
Please explain your answer	The 10 % deduction rule does not make any sense, yet it makes considerably big difference. In most cases more than 99 % of the held emergency stocks is physically accessible and available at any time.
2.8. Any additional views related to the relevance of the objectives of Directive 2009/119?	
3.1. In your view, has the Directive improved the availability of the stocks in case of oil disruption?	Yes, fully
Please explain your answer	
3.2. In your view, has the Directive improved the physical accessibility of the stocks in case of oil disruption?	Yes, fully
Please explain your answer	
3.3. In your view, has the Directive achieved a better harmonization with the International Energy Agency (IEA) system?	Yes, fully
Please explain your answer	

3.4. If you are a public administration, how would you rate the impact of the Directive on the administrative burden?	The administrative burden increased slightly
Please explain your answer	
3.5. If you are an economic operator, how would you rate the impact of the Directive on the administrative burden?	
Please explain your answer	
3.6. In your view, has the Directive improved the transparency as regards the level of emergency oil stocks held in the Member States and the European Union as a whole?	Yes, fully
Please explain your answer	
3.7. Emergency oil stocks may be held at any location across the EU. The previous rules allowed cross-border stockholding only if there was a bilateral agreement between the Member States concerned. The Directive removed this requirement, but Member States need to authorize in advance cross-border arrangements between operators. In your view, has the Directive improved transparency as regards the cross border stocks?	No
Please explain your answer	The cross-border stocks, especially ticket stocks, are still not transparent enough.
3.8. Are you aware of any unexpected or unintended effects of the Directive?	Yes
Please explain your answer	Above mentioned "naphtha rule" is able to cause unexpected and unwanted deviations in the year-on-year development of the stockholding obligation.
3.9. Any additional views on the effectiveness of Directive 2009/119?	
4.1. In your view, the costs related to the implementation of the Directive were:	Moderate
Please explain your answer	
4.2. How would you estimate the economic burden resulting from the Directive on the different stakeholders? (0 stands for no impact 1 for minimum impact and 5 for a maximum impact): CSE	2
4.2. How would you estimate the economic burden resulting from the Directive on the different stakeholders? (0 stands for no impact 1 for minimum impact and 5 for a maximum impact): SME	0

4.2. How would you estimate the economic burden resulting from the Directive on the different stakeholders? (0 stands for no impact 1 for minimum impact and 5 for a maximum impact): Industry	3
4.2. How would you estimate the economic burden resulting from the Directive on the different stakeholders? (0 stands for no impact 1 for minimum impact and 5 for a maximum impact): Consumers	4
4.2. How would you estimate the economic burden resulting from the Directive on the different stakeholders? (0 stands for no impact 1 for minimum impact and 5 for a maximum impact): Tax payers	0
4.2. How would you estimate the economic burden resulting from the Directive on the different stakeholders? (0 stands for no impact 1 for minimum impact and 5 for a maximum impact): State finance	1
4.3. Did the Directive improve efficiency by simplifying reporting?	No
Please explain your answer	
4.4. Did the Directive improve efficiency through better harmonisation with the IEA system?	Yes, partly
Please explain your answer	
4.5. Considering your answers to chapter 3 and to questions 4.3 and 4.4, do you think that the costs related to the implementation of the Directive are proportionate to the benefits achieved?	Yes, fully
Please explain your answer	
4.6. Any additional views on the effectiveness of Directive 2009/119?	
5.1. The IEA requires its members to hold oils stocks equivalent 90 days of net imports and imposes no obligation on net oil exporters. Contrary to the EU system, stocks held for commercial or operational use can be counted to this purpose. 20 EU Member States have to comply with both the EU and the IEA mechanism. In your view, is the system resulting from the Directive coherent with IEA obligations?	Yes, fully
Please explain your answer	If a country complies with EU requirements, it also complies with the IEA. But since there are the mentioned differences, the IEA rules cannot be applied to EU system completely and uncritically.

<p>5.2. The Energy Union means making energy more secure, affordable and sustainable. The Energy Union strategy is made up of 5 dimensions: (1) energy security, solidarity and trust; (2) a fully integrated European energy market; (3) energy efficiency contributing to moderation of demand; (4) decarbonising the economy and (5) research innovation and competitiveness. http://ec.europa.eu/priorities/energy-union-and-climate_en In your view, is the Directive coherent with the Energy Union objectives? : Energy security, solidarity and trust</p>	<p>Yes, partly</p>
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<p>5.2. The Energy Union means making energy more secure, affordable and sustainable. The Energy Union strategy is made up of 5 dimensions: (1) energy security, solidarity and trust; (2) a fully integrated European energy market; (3) energy efficiency contributing to moderation of demand; (4) decarbonising the economy and (5) research innovation and competitiveness. http://ec.europa.eu/priorities/energy-union-and-climate_en In your view, is the Directive coherent with the Energy Union objectives? : Energy efficiency contributing to moderation of demand</p>	<p>No opinion</p>
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Please explain your answer	While the Directive contributes to the energy security, it has no impact on the other 4 dimensions.
5.3. In your view, is the Directive coherent with other EU rules in the energy sector ? https://ec.europa.eu/energy/en/topics	No opinion
Please explain your answer	
5.4. In your view, is the Directive coherent with other EU rules relating to the oil sector? https://ec.europa.eu/energy/en/topics/oil-gas-and-coal http://ec.europa.eu/growth/tools-databases/newsroom/cf/itemdetail.cfm?item_id=8630&lang=en	No opinion
Please explain your answer	
5.5. In your view, is the Directive coherent with other EU policies? https://ec.europa.eu/info/index_en	No opinion
Please explain your answer	
5.6. Any additional views on the coherence of the Directive with other rules, policies and actions?	
6.1. Do you see an added value in having a coordinated mechanism for emergency oil stocks?	Yes
6.2. Do you think that the existence of a separate EU system for emergency oil stocks is justified?	Yes
Please explain your answer	
6.3. Do you consider that the EU system is a good complement of the IEA system?	Yes
Please explain your answer	
6.4. What would be the consequences on the levels of oil stocks available in case of disruption if the EU no longer required Member States to hold emergency stocks?	Decrease the level of oil stocks held
Please explain your answer	
6.5. What would be the consequences on the security of oil supply if the EU no longer required Member States to hold emergency stocks?	Increase the vulnerability in case of oil disruption
Please explain your answer	
6.6. Is there a need for EU additional policy on emergency oil stocks?	No
Please explain your answer	

6.7. Any additional views on Directive 2009/119 added value?	
7.1. The 7% naphtha threshold might have an impact on the stockholding obligation for some Member States with naphtha yield fluctuating around 7%. Do you consider annex I should be amended to limit the trigger effect of the 7% naphtha yield?	Yes
Please explain your answer	I strongly agree with the Trinomics report. It is necessary to make the change of the 7% naphtha threshold according to the recommendations from the Trinomics study.
7.2. Under the IEA methodology, for calculating the stock levels, the 4% naphtha yield is deducted from "crude oil, NGL, and feedstock" which is the abbreviation for the full name of Crude, NGL, Feedstocks, Additives/oxygenates and Other Hydrocarbons; compared to 4% reduction of "crude oil" in Annex III of the Directive. "Crude oil" in the sense used in Annex III of the Directive comprises also Crude, NGL, Feedstocks, Additives/oxygenates and Other Hydrocarbons. Do you consider Annex III of the Directive should be amended to explicitly indicate the full name of Crude, NGL, Feedstocks, Additives/oxygenates and Other Hydrocarbons?	Yes
Please explain your answer	
7.3. Under the IEA methodology, naphtha for gasoline production is included in the calculation for stock levels if it is reported as gasoline blending component while naphtha for petrochemical uses is excluded. According to Annex III of the Directive, stocks of naphtha are not included in the emergency stocks. Do you consider Annex III of the Directive should be amended to further detail the possible reporting of naphtha as gasoline blending component?	No
Please explain your answer	
7.4. In your view, is a 10% deduction still justified?	No
Please explain your answer	The 10 % deduction is not at all justified. The rule should not apply - at least for the CSE stocks.
7.5. if not justified, how should Annex III be amended?	Several deduction rates based on the nature of the stock holders (whether CSE, private, cross border,...)
Please explain your answer	e.g. cross-border ticket stocks are still not transparent enough, so some deduction rate could still be applied to this kind of stocks. No deduction should apply to stocks that are fully

	available.
Do you have other specific views that could not be expressed in the context of your replies to the above questions?	"Besides the urgent need to amend the naphtha rule and cancel the 10 % deduction, there is (at least) one more rule that needs to change - the 1st of April compliance date. It should be set for later date to allow proper acquirement of additional stocks in case the obligation increases.