

10 – Anonymous 4	
2.1 Do you agree that the emergency oil stocks are necessary to guarantee the security of supply in the EU?	Yes, partly
Please explain your answer	As most of the economies in the EU are highly dependent on (external) oil imports with less and less indigenous production it is essential to hold emergency oil stocks to ensure continuous oil supply
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, fully
Please explain your answer	For a better cooperation with non-EU IEA members it is more effective and reasonable to have rules which are in line with each other. Many of those non-EU IEA members have significant influence on glo
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.	Ninety days of average daily net import ensures adequate time to find substitute sources in case of supply disruption.
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?	No
Please explain your answer	As the Trinomics study has also revealed the adoption of the 7% naphtha rule can result in large jumps in the annual obligation to hold emergency stocks for Member States close to the 7% naphtha yield

<p>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?</p>	<p>No opinion</p>
<p>Please explain your answer</p>	<p>With no significant recent and expected indigenous production, XXX uses the calculation based on average daily net imports. Therefore we would not comment on the calculation method of the inland c</p>
<p>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?</p>	<p>No</p>
<p>Please explain your answer</p>	<p>Rules should be aligned with those of IEA and when reducing 4% of naphta yield it should be deducted not only from crude oil stocks but NGL and feedstocks also need to be taken into consideration.</p>
<p>2.8. Any additional views related to the relevance of the objectives of Directive 2009/119?</p>	<p>As many other member states have also pointed out: the beginning of the reference year should start some months later than now (1st of April) so that all statistical data can arrive and be processed in time.</p>
<p>3.1. In your view, has the Directive improved the availability of the stocks in case of oil disruption?</p>	<p>Yes, partly</p>
<p>Please explain your answer</p>	<p>Despite changes in the regulatory environment there was no significant change regarding the level of availability of oil stocks since the establishment of the (CSE).</p>
<p>3.2. In your view, has the Directive improved the physical accessibility of the stocks in case of oil disruption?</p>	<p>Yes, partly</p>

Please explain your answer	Despite changes in the regulatory environment there was no significant change regarding the level of physical accessibility of oil stocks since the establishment of the (CSE).
3.3. In your view, has the Directive achieved a better harmonization with the International Energy Agency (IEA) system?	Yes, partly
Please explain your answer	Further harmonization is needed e.g. concerning cooperation in naphtha rule changes; methodology for calculating the level of stocks (Annex III.) or the distinction of different types of naphtha.
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	Annual reporting obligations e.g. according to Article 9.5 imposed unnecessary administrative burden.
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, partly
Please explain your answer	See answer in 3.7.
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?	Yes, partly
Please explain your answer	There are still significant challenges in some cases when it comes to the establishment of cross-border stockholding cooperation (e.g. bureaucratic burdens, national limitations) which need to be addr

3.8. Are you aware of any unexpected or unintended effects of the Directive?	Yes
Please explain your answer	For unintended naphtha rule effect please see previous answer in 2.5..
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	Being close to 7% threshold of naphtha yield, costs arose at CSE because of significant jumps in stockholding obligation.
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	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): SME	1
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	1
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	1
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?	Yes, partly
Please explain your answer	By having adjusted reporting obligations to that of the IEA, the efficiency has been simplified in this respect. However with new reporting obligations like the one in Article 9.5. unnecessary adminis
4.4. Did the Directive improve efficiency through better harmonisation with the IEA system?	Yes, partly
Please explain your answer	Please see answer in 4.3..

<p>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?</p>	<p>Yes, partly</p>
<p>Please explain your answer</p>	
<p>4.6. Any additional views on the effectiveness of Directive 2009/119?</p>	
<p>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?</p>	<p>Yes, partly</p>
<p>Please explain your answer</p>	<p>There are many similarities between the two systems and they can be deemed rather coherent. Of course because of the differences mentioned in the question above not completely (e.g. the inclusion of c</p>
<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, fully</p>
<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? : Fully integrated European energy market</p>	<p>Yes, fully</p>

<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>Yes, partly</p>
<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? : Decarbonising the economy</p>	<p>No</p>
<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? : Research, innovation and Competitiveness</p>	<p>Yes, partly</p>
<p>Please explain your answer</p>	<p>The Directive aims to increase the security of oil supply in the first place.</p>
<p>5.3. In your view, is the Directive coherent with other EU rules in the energy sector ? https://ec.europa.eu/energy/en/topics</p>	<p>Yes, fully</p>
<p>Please explain your answer</p>	
<p>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</p>	<p>Yes, fully</p>
<p>Please explain your answer</p>	
<p>5.5. In your view, is the Directive coherent with other EU policies? https://ec.europa.eu/info/index_en</p>	<p>Yes, fully</p>
<p>Please explain your answer</p>	
<p>5.6. Any additional views on the coherence of the Directive with other rules, policies and actions?</p>	

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	For EU countries which are not members in the IEA it provides a mechanism for addressing supply disruption situations jointly. There is room for addressing challenges individually in case of issues th
6.3. Do you consider that the EU system is a good complement of the IEA system?	Yes
Please explain your answer	See answer in 6.2.
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?	No consequence
Please explain your answer	As XXX is also member in the IEA, therefore the stockholding obligation and level on national CSE would not really change. The system itself would be less transparent and EU institutions have less
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?	No consequence
Please explain your answer	The stockholding obligation deriving from the IEA would remain and thus the security of oil supply would not really be affected.
6.6. Is there a need for EU additional policy on emergency oil stocks?	No
Please explain your answer	No additional policy is needed, further simplification would be desired instead (e.g. in reporting).
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	Please see question 2.5.

<p>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?</p>	<p>Yes</p>
<p>Please explain your answer</p>	<p>Yes, because mentioning solely crude oil leads to misinterpretation and misunderstanding. Better would be to reflect the wording of IEA "crude oil, NGL, and feedstock" in the same sense.</p>
<p>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?</p>	<p>Yes</p>
<p>Please explain your answer</p>	<p>There should be made a difference and only naphtha for petrochemical uses should be deducted.</p>
<p>7.4. In your view, is a 10% deduction still justified?</p>	<p>No</p>
<p>Please explain your answer</p>	<p>The 10% tank bottom deduction seems not reasonable.</p>
<p>7.5. if not justified, how should Annex III be amended?</p>	<p>Other (specify)</p>
<p>Please explain your answer</p>	<p>"Both: no deduction rate at all for unavailability in the first place or a lower deduction rate.</p>
<p>Do you have other specific views that could not be expressed in the context of your replies to the above questions?</p>	<p>The amendment should be regulated together with IEA rules so that they remain aligned.</p>