

1 – Anonymous 1	
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	To be effective we must keep the same fuels that are actually used (e.g. It is not possible to hold HFO for diesel). Pet-coke can be replaced with coal and is not a substitute of other liquid fuels.
2.2 Do you agree that the EU needs to have its own rules on emergency oil stocks?	No opinion
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?	No opinion
Please explain your answer	
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, partly
Please explain your answer notably by clarifying if you think higher or lower level of stocks would be more adapted.	This is appropriate for liquid fuels but not for solid fuels. For example petroleum coke in cement industry can be replaced with coal which does not have the same limitations in availability
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	The individual petroleum products are not direct substitutes between each other, therefore holding 'equivalent products' creates an illusion of availability, not a real replacement

<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</p>
<p>Please explain your answer</p>	<p>The individual petroleum products are not direct substitutes between each other, therefore holding 'equivalent products' creates an illusion of availability, not a real replacement</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>The individual petroleum products are not direct substitutes between each other, therefore holding 'equivalent products' creates an illusion of availability, not a real replacement</p>
<p>2.8. Any additional views related to the relevance of the objectives of Directive 2009/119?</p>	<p>Pet-coke used for the cement industry should be excluded because</p> <ol style="list-style-type: none"> 1. it is not possible to be replaced by other petroleum products for technical reasons 2. Pet-coke can be replaced at the kilns by coal without any modifications. Its availability world-wide is much higher (annual world production of pet-coke is 105million tons, while coal production is 8 billion tons of which 1,2 billion is traded by sea)
<p>3.1. In your view, has the Directive improved the availability of the stocks in case of oil disruption?</p>	<p>No</p>
<p>Please explain your answer</p>	<p>The ability to maintain other fuels not direct substitutes will create a problem in case of a disruption as the actual fuel</p>

	needed will not be there.
3.2. In your view, has the Directive improved the physical accessibility of the stocks in case of oil disruption?	No
Please explain your answer	The risk still remains if the reasons relate to war / terrorism. Also the accumulation of big quantities of fuels in remote or inhabited areas increase the risk of loss or wider damage
3.3. In your view, has the Directive achieved a better harmonization with the International Energy Agency (IEA) system?	No opinion
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?	No opinion
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?	The administrative burden increased slightly
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?	No
Please explain your answer	There are cases where there is abuse of the freedom to reduce the cost of holding stocks. For example some countries have chosen to hold pet-coke as emergency stock for diesel or petrol!
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 opinion
Please explain your answer	
3.8. Are you aware of any unexpected or unintended effects of the Directive?	
Please explain your answer	
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:	Very high
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	5
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	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): Industry	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): 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	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): State finance	3
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?	No opinion
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?	No
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?	No opinion
Please explain your answer	

<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>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? : Fully integrated European energy market</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? : Energy efficiency contributing to moderation of demand</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? : Decarbonising the economy</p>	<p>No</p>

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Please explain your answer	
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?	No
6.2. Do you think that the existence of a separate EU system for emergency oil stocks is justified?	No
Please explain your answer	
6.3. Do you consider that the EU system is a good complement of the IEA system?	No opinion
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?	No consequence
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?	No consequence
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?	

<p>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?</p>	
<p>Please explain your answer</p>	
<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>Please explain your answer</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>Please explain your answer</p>	
<p>7.4. In your view, is a 10% deduction still justified?</p>	
<p>Please explain your answer</p>	
<p>7.5. if not justified, how should Annex III be amended?</p>	
<p>Please explain your answer</p>	
<p>Do you have other specific views that could not be expressed in the context of your replies to the above questions?</p>	