

5 – Anonymous 3	
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	Oil is a major energy source and its availability important for the economy of the MSs. Restricting the access to oil has become a political instrument, internationally and nationally (strikes)
2.2 Do you agree that the EU needs to have its own rules on emergency oil stocks?	Yes, partly
Please explain your answer	I understand and concur that the EU rules are stricter than the IEA ones; EU rules implies also EU sanctions, which do not exist on IEA level.
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	As long as this alignment does not create negative side-effects and increases the quality and availability of the 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.	90 days is 1/4 of the yearly oil consumption (or better: net imports). In case of a disruption with 10% this would result in a 100% supply during 2 1/2 years.
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	I liked the former calculation of the national obligation much better: the relation with the national consumption makes much more sense; the role of naphtha in the new method is hard to understand.

<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>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>Yes, partly</p>
<p>Please explain your answer</p>	<p>The calculation favours finished products to crude oil, which is understandable due to the immediate availability. The favouring of the 'main products' is also ok. 10% deduction is not justified.</p>
<p>2.8. Any additional views related to the relevance of the objectives of Directive 2009/119?</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>The obligation of at least 30 days in products is good; the admission of vaselines, pet coke, et cetera is not good, especially if these products are not consumed (to the same extent) in that MS.</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>
<p>Please explain your answer</p>	<p>The obligation that the stocks need to be fully available is a good thing. That bilateral agreements are no longer needed, implies that stocks can</p>

	be held everywhere, which is bad in national crisis
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	The EU still differs largely because only strategic stocks can count + product stocks for 30 days
3.4. If you are a public administration, how would you rate the impact of the Directive on the administrative burden?	
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?	No opinion
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	Before you knew the conduct of a MS toward bilateral stocks; now you no longer need an agreement but still some MSs ask for an agreement or MoU
3.8. Are you aware of any unexpected or unintended effects of the Directive?	Yes
Please explain your answer	The volatile level of stockholding obligation due to the naphtha trigger and substitution between LPG and naphtha; starting date
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:	high

Please explain your answer	Belgium started with an agency in 2007. Costs for building up stocks were high. Naturally this was a national policy option (we could have continued with the old obligation on industry)
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
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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	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): Consumers	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): 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	4
4.3. Did the Directive improve efficiency by simplifying reporting?	No opinion
Please explain your answer	
4.4. Did the Directive improve efficiency through better harmonisation with the IEA system?	Yes, partly
Please explain your answer	Member states no longer have two different obligations; however: very negative impact: naphtha trigger which makes our obligation fluctuate by some 38%
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?	

<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>No</p>
<p>Please explain your answer</p>	<p>The obligation may be the same (except for the 30 days in products); however the strategic stocks that you need to hold differs largely.</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 integratedEuropean energy market; (3) energy efficiency contributing to moderation of demand; (4) decarbinising 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>
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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? : Research, innovation and Competitiveness</p>	No opinion
Please explain your answer	
<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>	Yes, fully
Please explain your answer	
<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>	No opinion
Please explain your answer	
<p>5.5. In your view, is the Directive coherent with other EU policies? https://ec.europa.eu/info/index_en</p>	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	EU system is more stringent (which is good); possible sanctions
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	I believe that, given also the budgetary constraints that many MSs face, the governments would be tempted to lower the stock levels.
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?	Yes
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	Belgium is within the EU the most affected country. It is not understandable that an element that has nothing to do with national consumption influences the obligation in such a way.
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?	Yes

Please explain your answer	The more clarity the better
7.4. In your view, is a 10% deduction still justified?	No
Please explain your answer	
7.5. if not justified, how should Annex III be amended?	No deduction rate at all for unavailability
Please explain your answer	
Do you have other specific views that could not be expressed in the context of your replies to the above questions?	