

14 – Anonymous 5	
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 emergency stocks are essential for the services of the public.
2.2 Do you agree that the EU needs to have its own rules on emergency oil stocks?	Yes, partly
Please explain your answer	It is essential also to have a minimum of product stocks whereas in the IEA-system crude oil would be sufficient.
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	But Naphtha-rule and 10%-deduction should be changed as well as the list of products allowed (no any-oil!). Heavy Fuel Oil should not be part of the preferred products with factor 1,2.
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 are an appropriate level to cope with a shortage of supply.
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	Naphtha-deduction rule should be changed.

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?	No opinion
Please explain your answer	Not relevant in our country.
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?	Yes, partly
Please explain your answer	10%-deduction is obsolete. Factor 1,2 for Heavy Fuel Oil should be abolished.
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, partly
Please explain your answer	Rules have become clearer and better harmonized.
3.2. In your view, has the Directive improved the physical accessibility of the stocks in case of oil disruption?	Yes, partly
Please explain your answer	The requirements for emergency stocks have become a little bit strikter.
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	Adaption to the rules of the IEA (calculation methods, COE)
3.4. If you are a public administration, how would you rate the impact of the Directive on the administrative burden?	No impact
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, partly
Please explain your answer	Reporting system, esp. for bilateral stocks.
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	... but some countries still require bilat. agreements or MOUs.
3.8. Are you aware of any unexpected or unintended effects of the Directive?	No
Please explain your answer	
3.9. Any additional views on the effectiveness of Directive 2009/119?	Checks and controls for bilateral stocks should be improved. For the time being, there is only reporting and the controls seem to be rarely done.
4.1. In your view, the costs related to the implementation of the Directive were:	Low
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	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): SME	
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	0
4.3. Did the Directive improve efficiency by simplifying reporting?	No
Please explain your answer	No changes so far from our side.
4.4. Did the Directive improve efficiency through better harmonisation with the IEA system?	Yes, partly
Please explain your answer	The figures are more comparable.
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, partly
Please explain your answer	
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	Yes, fully

<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>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? : 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>
<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>No</p>
<p>Please explain your answer</p>	<p>The items 2-5 are no objectives of emergency oil-stockholding.</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>No opinion</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>	
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>	Yes, partly
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	"Not all EU-members are also members of the IEA.
6.3. Do you consider that the EU system is a good complement of the IEA system?	Holding a minimum of product-stocks is essential."
Please explain your answer	Yes
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?	
Please explain your answer	Decrease the level of oil stocks held
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?	
Please explain your answer	Increase the vulnerability in case of oil disruption
6.6. Is there a need for EU additional policy on emergency oil stocks?	
Please explain your answer	Yes
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?	
Please explain your answer	Yes

<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>No avoid spikes from year to year in the stockholding obligation.</p>
<p>Please explain your answer</p>	<p>Yes</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>Clarification is needed that every country calculates by the same rules.</p>
<p>Please explain your answer</p>	<p>No</p>
<p>7.4. In your view, is a 10% deduction still justified?</p>	<p>It is hard to distinguish where the Naphtha will end up - in the chemical industry or as a gasoline-component. It is not enough just to have a certain "intention". However, these figures are hard to check.</p>
<p>Please explain your answer</p>	<p>No</p>
<p>7.5. if not justified, how should Annex III be amended?</p>	<p>In case of the agencies, 100 % of the stocks are available any time.</p>
<p>Please explain your answer</p>	<p>Several deduction rates based on the nature of the stock holders (whether CSE, private, cross border,...)</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>No deduction for agencies, 10 days deduction for industry-stocks.</p>