

27 – Anonymous 8	
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	As the majority of European countries are dependent of energy imports, EU needs to be prepared any time for a disruption of energy 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	Keeping up different systems within EU and IEA would cause high workload for everybody involved. Plus IEA rules have proved to work best for its purpose.
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.	The timeframe mentioned is well chosen to deal with a serious oil supply disruption and IEA is also working with the same numbers. Lowering this number would risk to have adequate volumes stored.
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	The regulation for Naphtha needs to be amended. The difference between 4 and 7 per Cent should be deleted as it complicates the calculation.

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?	Yes, partly
Please explain your answer	Recently it was noticed that refining business is coming under economic pressure. Going forward one should consider to increase the amount of product stocks as there may be less refining capacity.
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	There is no mechanism in place how to deal with local, regional or intra EU crisis.
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, partly
Please explain your answer	The first step has been taken but (thankfully) there has been

	no testing phase yet. Additional aspects like specific stocks needs to be amended as there is no benefit for them.
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?	The administrative burden increased slightly
Please explain your answer	As most of the work is been handled by the national CSE the impact has not increased significantly.
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	There is still a difference in interpretation among the member states how to handle commercial via specific 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	The rules are too strict re the conditions of holding stocks for others which is hindering CSE to offer any surplus quantities.
3.8. Are you aware of any unexpected or unintended effects of the Directive?	Yes
Please explain your answer	In the ticket system the expression "any oil" should be excluded and replaced by a specific product.
3.9. Any additional views on the effectiveness of Directive 2009/119?	Fuel oil should be excluded from the list of potential oil products as its significance is decreasing.
4.1. In your view, the costs related to the implementation of the Directive were:	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):	3

CSE	
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
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	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): Tax payers	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): State finance	4
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?	No
Please explain your answer	Aspects like specific stocks, option for fuel oil, takeover of obligations, etc proved to be not working and should be corrected.
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	Actually the Directive results in higher stocks than the IEA due

	to the 10 per cent discount.
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, partly
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	No
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	No
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	No

<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
Please explain your answer	European energy market is not homogenous and competitive close to country borders. Individual interpretation of stock holding obligation keeps market fragmented. Biofuels are not handled.
<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, partly
Please explain your answer	As the EU is working on the energy transition gas and electricity is becoming more important. However, there is no stock holding obligation for these energies in place.
<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>	Yes, partly
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	
<p>5.6. Any additional views on the coherence of the Directive with other rules, policies and actions?</p>	
<p>6.1. Do you see an added value in having a coordinated mechanism for emergency oil stocks?</p>	Yes
<p>6.2. Do you think that the existence of a separate EU system for emergency oil stocks is justified?</p>	Yes
Please explain your answer	Yes due to different membership of EU and IEA but there should be no major difference to the IEA regulation.
<p>6.3. Do you consider that the EU system is a good complement of the IEA system?</p>	Yes
Please explain your answer	However, major differences should be corrected or avoided.

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	There would be individual rules from each MS in place which will differ greatly from each other. In case of a major disruption it may be not sufficient.
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	Some countries would be better prepared than others which will cause distortion.
6.6. Is there a need for EU additional policy on emergency oil stocks?	No
Please explain your answer	EU should only provide a frame within each MS can act.
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	The difference of 4 or 7 per cent should be deleted with a new rule providing one clear and single treatment of Naphtha. This would give a reliable and fixed basis right at the start of the year.
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	Products kept as emergency stocks should be harmonised across EU by name and type. The list of allowed products should consist only of strategic products which are useful in

	time of crisis. These are gasoline, diesel, heating oil and Jet A1. Therefore products like fuel oil, petrol cake, paraffin, bitumen and others should be excluded.
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	For specific stocks a 10 per cent discount is not justified.
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	Plus dependent on nature of stocks - Commercial or specific.
Do you have other specific views that could not be expressed in the context of your replies to the above questions?	27