

## Recommendations for EU's architecture for Security of Energy Supply

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Over the last years, the EU has faced unprecedented situations that revealed the fragility of its current energy supplies systems. Recent crises have shown that there is an impending need to re-assess the EU framework for energy supplies to regain our capacity to prepare against, and respond to, potential future crises.

Against this background, we underline that strategic storage and distribution infrastructure of energy carriers are fundamental elements for industrial competitiveness, as they act as a buffer that evens out supply and demand whilst preventing price spikes.

FETSA, the Federation of European Tank Storage Associations, and UPEI, the Association of Europe's Independent Fuel Suppliers, welcome initiatives focused on Energy Security of Supply, recognising their importance in laying a solid foundation for future debates and legislative initiatives within this critical field.

Building on this momentum, UPEI and FETSA wish to highlight several key points deserving of attention:

1. European institutions **should urgently reform the EU framework for compulsory energy storage**, especially Directive 2009/119/EC (hereinafter the 'Oil Stocks Directive'), including:
  - a. **Assess the current and future needs for stockpiling** based on new risks such as the IEA scenarios that include conflicts, sabotage, cyber threats or extreme weather events (all potentially happening in parallel), as well as on experience and national specificities, while providing maximum flexibility to each Member State.
  - b. **Expand the list of products for which mandatory strategic storage** is required in relation to demand trends. This should cover energy carriers in use today that are not yet subject to such coverage; including natural gas, clean hydrogen, e-fuels, green methanol, green ammonia, electricity, batteries, and advanced biofuels and their feedstocks.
  - c. **Do not reduce today's stock volumes.** The current Directive obliges sufficient oil (and derived products) stocks equal to 90 days of net import or 61 days of inland demand. Other G7 jurisdictions e.g. US (Strategic Petroleum Reserve) and Japan (JOGMEC) have reserves aimed at fulfilling demand approaching one year (over 300 + days). Europe's strategic competitors such as China are building out vast stockpiling capacity to guard against sanctions and conflict. A stockpiling obligation adjusted to today's risks will make the EU less exposed to the influence of other countries and thus have greater scope for action in the event of supply disruptions or peaks in demand.
2. **Liquid energy carriers, and especially domestically produced low carbon alternatives** such as advanced biofuels, e-fuels (renewable fuels of non-biological origin), renewable hydrogen and green methanol and ammonia **should be explicitly mentioned as key contributors to Europe's security of supply**, while delivering on the energy transition.

3. **Storage and distribution infrastructure should be fully recognised** as an integral part of any future energy security strategies, and as such should benefit from easier and simplified permitting procedures.
4. In line with fast geopolitical changes and the need for the EU to update its defence and preparedness strategies, **measures for allowing and enhancing the dual civilian-military use of energy storage and distribution infrastructure should be proposed and discussed** with interested parties from both the public and private sectors, including the need to support an appropriate and secure level of liquid fuel availability alongside military transport corridors.

You can find more information on UPEI & FETSA's proposals on energy security of supply [here](#).

#### ABOUT FETSA

Members of [FETSA](#) are businesses engaged in bulk storage and energy infrastructure across Europe. Bulk liquid and liquefied gas terminals are present in ports, airports, logistics platforms and along rivers, canals and pipelines. In total FETSA represents 141 companies operating 743 terminals across Europe. These tank storage terminals provide an essential interface between sea, road, rail, inland waterways and pipeline logistics. They are critical links in the supply chain for energy carriers, chemicals, animal feeds and fats, oils and other substances, helping to balance out supply and demand and ensure companies and consumers have access to these products. Many tank storage terminals are designated as Critical National Infrastructure by the EU and national governments due to their importance in providing energy to society. The storage capacity represented by FETSA also includes strategic reserves held for emergencies (such as NATO stocks and IEA mandated reserves) and supply disruptions.

#### ABOUT UPEI

[UPEI](#) represents nearly 2,000 European importers and wholesale/retail distributors of energy for the transport and heating sectors, supplying Europe's customers independently of the major energy producers. They are the interface between producers and consumers, using their own infrastructure and flexibility to supply existing demand for conventional and renewable liquid fuels, as well as non-liquid alternatives as part of the energy transition. They cover more than a third of Europe's current demand. The organisation brings together national associations and suppliers across Europe. Independent fuel suppliers bring competition to Europe's energy market and are able to respond rapidly to changes affecting supply, contributing to security on a local, national and regional level. They have developed and maintain a comprehensive infrastructure for the sourcing, storage and distribution of transport and heating fuels, with a commitment to delivering a high-quality service to all consumers, including those in remote areas.

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