Proposals for Amendments to the report on the security of energy supply in the EU

February 2025

Original text	Proposed amendment
E. Whereas domestic energy production and energy efficiency measures decrease reliance on external energy sources and enhance the security of energy supply;	E. Whereas domestic energy production, ***distribution, storage*** and energy efficiency measures decrease reliance on external energy sources and enhance the security of energy supply;
Justification The Storage and Distribution sectors are key to reinforce Europe's readiness and security of supply. 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.	

Original text	Proposed amendment
	G (new). Whereas Directive 2009/119/EC (Oil Stocks Directive) was revised in 2015, and should be subject to periodic reviews by the Commission and the co-legislators;
Justification Russia's invasion of Ukraine and other geopolitical shifts have led to an impending need to re-assess the EU framework for compulsory energy storage to upgrade the capacity to address potential future crises. For the Oil Stocks Directive to fully deliver, future energy carriers and technologies, as well as the new geopolitical realities, need to be considered. Requirements in terms of the size and composition of stockpiles in the light of recent experiences need to be discussed.	

Original text	Proposed amendment
	H (new) Whereas Communication COM(2020) 0299 confirms that liquid energy carriers, such as biofuels, synthetic fuels, hydrogen and generally renewable and low-carbon fuels will be crucial in bolstering the EU economy by enabling energy system

	flexibility and resilience, as well as decarbonisation.
Justification 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. EU legislation should not exclude any technology or fuel that can facilitate the clean transition whilst securing supply in a cost-efficient way for Member States and consumers.	

Paragraph 6

Original text	Proposed amendment
6. Notes the need for a broader approach to flexibility and storage that incorporates molecules and heat; highlights the potential of district heating systems that can use thermal storage to reduce the temperature of the loop and incorporate waste heat, solar and other alternatives;	6. Notes the need for a broader approach to flexibility and storage that incorporates molecules ***- including not only fossil fuels, but also liquid low-carbon alternatives*** - and heat; highlights the potential of district heating systems that can use thermal storage to reduce the temperature of the loop and incorporate waste heat, solar and other alternatives;
Justification The consideration of liquid low-carbon alternatives is essential, 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, as they are key contributors to Europe's security of supply	

Paragraph 12

Original text	Proposed amendment
12. Notes that infrastructure bottlenecks impede the benefits of sector integration and aggravate the threats to energy security; underlines the importance of investing in new energy networks and optimizing existing infrastructure;	12. Notes that infrastructure bottlenecks impede the benefits of sector integration and aggravate the threats to energy security; underlines the importance of investing in new energy ***storage and distribution*** networks and optimising existing infrastructures;

Justification *Investment in infrastructure for storage and distribution networks is essential to ensure efficient delivery and accessibility. 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.*

Paragraph 13a (new)

Original text	Proposed amendment
	13a (new) Calls on the Commission to, in line with fast geopolitical changes and the need for the EU to update its defence and preparedness strategies, discuss with relevant stakeholders, and propose measures for allowing and enhancing the dual civilian-military use of energy storage and distribution infrastructure, including an appropriate and secure level of liquid fuel availability alongside military transport corridors.
Justification *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 miliary transport corridors.*	

Paragraph 26a (new)

Original text	Proposed amendment
	26a. Stresses the need to review Directive 2009/119/EC (Oil Stocks Directive) to expand the list of products for which mandatory strategic storage and to adjust today's stockpiling obligation to today's risks.
Justification	

Current and future needs for stockpiling need to be assessed based on new risks such as the IEA scenarios that include conflicts, sabotage, cyber threats or extreme weather events, as well as on experience and national specificities, while providing maximum flexibility to each Member State. 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.

The list of products for which mandatory strategic storage is required needs to be expanded 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.

ABOUT FETSA

Members of FETSA are businesses engaged in bulk storage and energy infrastructure across Europe. Bulk liquid and liquified 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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