



State of play in the transposition/implementation of the oil stocks directive in the Energy Community

17th Oil Forum of the Energy Community

30 September 2025

OVERVIEW



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- **Progress in the Contracting Parties**
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Oil Overview in the Contracting Parties



- Oil accounts for around 31,77% of the total energy supply, 41,56% of total final consumption and is expected to remain a key source in the near future
- The region holds around 600 million tons of remaining oil in place, but most existing oilfields are largely depleted
- Crude oil production stands at roughly 4 million tons, while petroleum product consumption is much higher, around 19–20 million tonnes
- As a result, domestic production and export potential will likely decline, leading to growing import dependence
- The oil market in the CPs is generally open, allowing crude and refined products to move smoothly and freely
- However, pipeline connections remain limited, creating challenges for infrastructure integration and supply security

Year 2023	Share of oil in energy supply	Share of oil products in energy consumption
	%	%
AL	44,90	48,00
BiH	24,30	38,00
GE	26,00	29,00
KS*	33,00	50,00
MD	34,10	39,00
MNE	36,80	50,00
NMK	43,70	56,00
RS	26,10	37,00
UA	17,00	27,00
EnC	31,77	41,56

Source: IEA

ALBANIA



Albania's legal framework for emergency oil stockholding remains non-compliant with Directive 2009/119/EC

The system is still governed by outdated legislation from 1999, amended in 2004, alongside government decrees issued in 2004 and 2007, all of which place the entire stockholding responsibility on the oil industry

Although a new draft law on the Establishment, Maintenance, and Management of Minimum-Security Stocks of Crude Oil and Petroleum Products was prepared in 2018, it was not adopted

In 2022, three draft regulations and a government decision were developed to align the national framework with the Directive's requirements while preserving the industry-based model

Nevertheless, Albania's emergency procedures remain insufficient to meet the Directive's standards

As a result, no tangible progress was achieved during the reporting period, leaving the country's emergency stockholding system and legal basis unchanged and still falling short of the Directive's requirements

BOSNIA AND HERZEGOVINA



Bosnia and Herzegovina does not have state-level legislation on compulsory oil and petroleum product stocks or a national policy to comply with Directive 2009/119/EC

Both entities have adopted laws, but they remain non-compliant with the Directive

Establishing a state-level emergency stockholding model that aligns with Directive 2009/119/EC and is tailored to the country's specific circumstances is still needed

Despite substantial efforts to develop a workable emergency oil stockholding system for both entities and the Brčko District, the legal framework remains inconsistent with the oil acquis

In 2024, the Secretariat issued a Reasoned Request to the Ministerial Council concerning Bosnia and Herzegovina's failure to transpose the Oil Stocks Directive

The Secretariat has reviewed a new draft Law on the Obligation to Maintain Minimum Stocks of Crude Oil and/or Petroleum Products and provided comments and recommendations

The draft introduces a system whereby economic operators are responsible for maintaining emergency stocks, while a designated agency oversees compliance

The draft law reflects significant revisions compared to the earlier version, most notably an extension of the implementation timeline

The Government is now authorised to determine the required level of emergency stocks by 2030—well beyond the deadline of 1 January 2023 set by the Ministerial Council Decision

The draft law is currently part of the Ministry of Economy and Sustainable Development's short-term legislative agenda

In 2024, the Secretariat sent the Ministerial Council a Reasoned Request for non-transposition of the Oil Stocks Directive

No additional progress was made during the reporting period

KOSOVO*



In Kosovo*, the draft Law on Compulsory Oil Stockholding—still pending—was initially expected to be adopted in 2024 or before the general elections in February 2025

In 2024, the Secretariat issued a Reasoned Request to the Ministerial Council concerning the CP's failure to transpose the Oil Stocks Directive

No progress was made during this reporting period, leaving Kosovo* non-compliant with the oil acquis

* This designation is without prejudice to positions on status and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

Moldova does not maintain emergency oil stocks at the level required by the Oil Stocks Directive

In 2024, the Ministry of Energy drafted a law on the security of supply of petroleum products based on a hybrid emergency oil stockholding model (50:50 obligation between the CSE and importers). The draft is to be submitted for public consultation by the end of Q4 2025

Apart from this initiative, no further progress was achieved during the reporting period, leaving Moldova's legal framework non-compliant with the oil acquis

In 2024, the Secretariat issued a Reasoned Request to the Ministerial Council regarding the country's failure to transpose the Oil Stocks Directive

No progress was recorded during the reporting period

MONTENEGRO



Parliament adopted the Law on the Supply of Petroleum Products in the Event of Supply Disruption in December 2024.

To fully implement the Directive, two bylaws were adopted in 2025:

- Rulebook on the method of calculation and payment of the fee for emergency stocks of petroleum products
- Rulebook on the form and methodology for calculating emergency stocks of petroleum products
- An amendment to the Regulation on how the elements used to determine maximum petroleum product prices are set.

Action Plan for Establishing Emergency Oil Stocks - adopted in Dec 2024. It serves as a baseline for establishing emergency stocks within the proposed deadlines. Montenegro aims to secure its mandatory oil stock reserves by 2029.

During 2025, Montenegro plans to adopt the Crisis Plan to address disruptions in the supply of oil derivatives

The Montenegro Hydrocarbons Administration (MHA) will establish at least 50% of the mandatory reserves, while the remainder will be supplied by the importer. MHA plans to purchase petroleum products by Q4 2025, utilizing rented tanks

Storage capacities are the main concern:

Once the facilities in Bar are overhauled, the reserve-building process is expected to commence. However, this process might be delayed due to the cancellation of the tender for reconstructing the facilities in Bar. In addition to Bar, Montenegro has oil storage facilities in Bijelo Polje and Lipci, which also require upgrades

The government plans to store reserves abroad under lease agreements for at least three years

The Fee (introduced in Feb 2025) - 0.03 euros per litre to fund the reserves. This fee will remain until 2029, when it is expected to decrease to 0.02 euros per litre to cover maintenance costs

NORTH MACEDONIA



Primary and secondary legislation has been fully transposed and complies with Directive 2009/119/EC

As of Dec 2024, the average occupancy of compulsory oil reserves, calculated according to the methodology set out in Commission Implementing Directive (EU) 2018/1581, corresponds to 51,39 days of average daily net imports

The country has yet to fully meet the emergency oil stock obligation of maintaining reserves for 90 days of average net imports, as outlined in the 2023–2025 action plan for establishing mandatory reserves

No progress was recorded during the reporting period

Primary and secondary legislation on oil stocks – fully adopted.

The country's crude oil equivalent as of July 2025 corresponds to **43.76** days of average daily net imports - showing a slight increase of 2 days during the reporting period

The Directorate for Energy Reserves **completed** the construction of four storage tanks, with a total capacity of **80,000 m³**. Technical inspection and obtaining the usage permit are currently being done

Another key priority that has yet to be finalised is the public-private partnership (PPP) model to secure the required storage capacity

In November 2023, the Law “On Minimum Reserves of Oil and Petroleum Products” (Law No. 3484) was adopted

The industry-based emergency oil stocks model involves oil companies, refineries, storage operators, and relevant government agencies

Aims to ensure the availability of strategic oil reserves, safeguard energy security, and reduce the impact of crises on the oil industry and the wider economy

Several implementing regulations were approved in December 2024 by the Cabinet of Ministers of Ukraine:

- Procedure for Monitoring the Quality and Safety of Petroleum Products in Ukraine
- Procedure for Monitoring Volumes in the Oil and Petroleum Products Market
- Procedure for the Operation and Maintenance of the Electronic Reporting System
- Procedure for the Establishment, Management, and Operation of the System of Minimum Reserves of Oil and Petroleum Products

In May 2025, the government adopted the Action Plan to Address the Crisis Situation in Ukraine's Oil and Petroleum Products Market

The Ministry of Energy also issued Orders:

- On Determination of the Administrator of the Electronic Reporting System” – Jan 2025
- On Approval of the Standard Form of the Ticket Agreement for the Reservation of Oil and Petroleum Products Included in the Minimum Reserves. – March 2025

Pending adoption:

The Order of the Ministry of Energy “On Approval of the Methodology for Calculating the Level of Emergency Stocks,” which, according to the Ministry's regulatory plan, is scheduled for the fourth quarter of 2025

REPORTING



EnC Contracting Parties: Reporting Status Notes - September 2025

SEPTEMBER	No consistent issue	Minor consistent issue	Major consistent issue	
CPs	MOSOIL_M	COIR	Annual Report	Register
Albania	Late submissions	Does not report COIR, but has some production - correspondence on this started August 2025	No data submitted	No data submitted
Bosnia & Herzegovina	No data submitted		No data submitted	No data submitted
Georgia		No data submitted	No data submitted	No data submitted
Kosovo*	No data submitted	No data submitted	No data submitted	No data submitted
Moldova			No data submitted	No data submitted
Montenegro			No data submitted	No data submitted
North Macedonia	late submissions		No data submitted	No data submitted
Serbia				
Ukraine (1)	No data submitted	No data submitted	No data submitted	No data submitted

(1) (Agreed understanding: No data submissions required and no reminders sent from Feb 2022 and until lift of martial law)

Article 6(2):

By 15 March each year, each CP shall send the Secretariat a summary copy of the stock **register** showing at least the quantities and nature of the emergency stocks included in the register on the last day of the preceding calendar year.”

Article 9(5):

Each CP that holds less than 30 days of specific stocks is deemed to draw up an **annual report** analysing the measures taken to ensure and verify the availability and physical accessibility of its emergency stocks and to document the arrangements made to control the use of these stocks in case of oil supply disruptions. That report shall be sent to the Secretariat by the end of the first month of the calendar year to which it relates.

THE ROAD AHEAD (1)

ALBANIA

- Adopt the draft emergency oil stockholding law or the 2022 draft regulations
- Establish complete reporting (MOS Oil tables + COIR)

BOSNIA AND HERZEGOVINA

- Establish the state-level stockholding model covering both entities + Brčko
- Ensure national-level monthly oil data collection

GEORGIA

- Adopt the revised draft law and designate the central agency
- Improve MOS Oil & COIR reporting (include tables 5b/5c)
- Shorten the implementation timeline.



THE ROAD AHEAD (2)

KOSOVO*

- Adopt the draft Law on Compulsory Oil Stockholding
- Establish emergency release procedures.
- Begin MOS Oil & COIR reporting

MOLDOVA

- Adopt draft law (currently in public consultation)
- Develop and implement secondary legislation
- Ensure full MOS Oil reporting

MONTENEGRO

- Implement Action Plan (start procurement Q4 2025)
- Reconstruct Bar facilities, upgrade other storage sites
- Lease storage abroad until domestic capacity is ready
- Ensure importers meet obligations (40% by 1 Oct 2025)
- Improve MOS Oil reporting

* This designation is without prejudice to positions on status and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.



THE ROAD AHEAD (3)

NORTH MACEDONIA

- Increase reserves to reach 90 days of net imports (per 2023–2025 plan).
- Submit annual report & stock register by legal deadlines.
- Maintain MOS Oil & COIR reporting

SERBIA

- Complete inspection and permit process for new storage tanks.
- Procure 42,000 t Euro diesel + 4,300 t jet fuel (increase days).
- Finalise PPP model for storage capacity

UKRAINE

- Adopt methodology for stock calculation (Q4 2025).
- Fully implement the electronic reporting system & ticketing model.
- Resume reporting to the Secretariat when possible.
- Begin physical stock build-up



OIL AS A STRATEGIC RESOURCE

Energy Security First:

Oil remains critical for economic stability; reliable stocks protect citizens

Alignment with EU Standards:

Compliance with Directive 2009/119/EC is key to EU integration

Economic and Strategic Value:

Secure supply chains reduce volatility and boost investor confidence

Crisis Preparedness and Solidarity:

Coordinated release procedures ensure swift responses

Roadmap for the Future:

Invest in infrastructure and financing to meet 90-day obligations

Green Transition Synergy:

Strategic stocks enable a smooth, secure transition to cleaner energy



FINAL TAKEAWAY

Strategic oil stocks are not just an obligation:

- **They are the backbone of energy security**
- **Economic stability**
- **A safe transition to a greener future for all Contracting Parties**





THANK YOU!



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