

Beyond the Last Petrol Pump: India's Downstream Petroleum Architecture Gap and the Case for Structural Fuel Continuity Reform

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Abstract

India's March 2026 LPG and Natural Gas Control Orders — issued under the Essential Commodities Act 1955 in response to disruptions in the Strait of Hormuz — demonstrated both the institutional capacity and the structural limitations of India's downstream petroleum architecture. While the government's crisis response was effective, it was reactive. This paper identifies five structural deficiencies: the absence of an operational neutral wholesale petroleum market; the absence of a comparably clear standalone open-access framework for downstream terminal and rack capacity used for product lifting by independent operators; the absence of a formal industry-wide emergency petroleum stockholding framework specifying obligations, reporting and release conditions; the absence of a pre-established National Essential Petroleum User Registry (NEPUR); and the absence of a pre-crisis framework for triggering domestic supply-protection measures. The paper argues that the March 2026 disruption exposed institutional questions about how available petroleum supply is priced, moved, buffered and prioritised during stress. Five targeted policy steps are proposed, several of which can be pursued within existing statutory authority while others would require subordinate regulatory measures or amendments.

Keywords: Downstream petroleum; fuel security; PNGRB; essential commodities; strategic reserves; supply continuity

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1. When the Strait Went Silent: India's March 2026 Stress Test

On 8 March 2026, the Ministry of Petroleum and Natural Gas issued an LPG Control Order under the Essential Commodities Act 1955, directing refineries and petrochemical complexes to maximise LPG production and channel their C3 and C4 streams — comprising propane, butane, propylene and butenes — to Indian Oil Corporation Ltd, BPCL and HPCL for domestic cooking gas distribution (PIB 2026a). A separate Natural Gas Control Order followed on 9 March 2026, prioritising supply to domestic PNG, CNG and LPG production over lower-priority industrial uses (PIB 2026b). At the time, India imported about 60 per cent of the LPG it consumed, and about 90 per cent of those imports passed through the Strait of Hormuz. Commercial shipping through the Strait was severely disrupted in March 2026, concentrating the exposure of India's LPG supply (PIB 2026a; PIB 2026b).

India's institutional response was rapid and coordinated. By 12 March, the Ministry reported that domestic LPG production had increased by 28 per cent over the preceding five days following refinery directives (PIB 2026a). By late March, government updates reported domestic LPG output at approximately 50,000 metric tonnes per day after a further production ramp-up (Newsonair 2026d). The government also diversified procurement and used fiscal measures to support domestic availability. From 27 March 2026, export levies, including the Special Additional Excise Duty (SAED), were applied to exports of petrol, diesel and aviation turbine fuel (ATF) to disincentivise exports during the West Asia supply disruption (CBIC 2026; PIB 2026c). On 18 March 2026, the Petroleum Planning and Analysis Cell (PPAC) was designated as the nodal agency for collecting, compiling, maintaining and analysing information across the petroleum and natural gas supply chains (PPAC 2026). The designation created a central information point for monitoring sector-wide supply conditions during the disruption.

India managed a major external supply disruption without a system-wide petroleum shortage. The outcome was nevertheless uneven: commercial LPG use was restricted, including for eateries, while people without formal LPG connections - who relied on the secondary market - faced difficulties. The crisis demonstrated a structural reality that warrants honest institutional attention: what architecture would have made this response easier, faster, and more precisely targeted — and what architecture will make the next disruption manageable before it begins?

2. The Infrastructure Paradox: Physical Capacity and Downstream Continuity

India's petroleum infrastructure and supply capabilities are substantial. Installed refining capacity reached 258.1 MMTPA and is projected to rise to 309.5 MMTPA by 2030 (Rajya Sabha 2025a). By the end of November 2025, India had 1,00,266 retail fuel outlets; over 90 per cent were operated by

IOC (41,664 outlets), BPCL (24,605) and HPCL (24,418), with private-sector participation accounting for 9.3 per cent of the total (PPAC 2025a).

In FY2024-25, India imported 243.22 MMT of crude oil and exported approximately 65 MMT of refined petroleum products on a provisional basis (PPAC 2025b). Crude oil import dependence was approximately 89 per cent (PPAC 2025b).

These are genuine strengths in physical capacity and supply infrastructure. The gaps addressed in this paper lie instead in the downstream institutional architecture. The official material reviewed for this article through May 2026 did not identify an operational neutral wholesale petroleum-products exchange. It regulates third-party access to common- and contract-carrier petroleum product pipelines, including certain facilities integral to those pipeline systems, but it does not have a comparably clear standalone open-access framework for downstream terminal and rack capacity used for product lifting by independent operators. Commercial and strategic storage exists, but the regulatory sources reviewed for this article do not identify an industry-wide emergency stockholding obligation, reporting regime and release framework across eligible entities. There is no pre-established National Essential Petroleum User Registry (NEPUR). Nor is there a pre-crisis framework specifying the conditions under which domestic supply-protection measures should be activated.

The March 2026 crisis was driven primarily by disruption to incoming supply, not by a shortage of refineries or petrol pumps. The downstream architecture gap addressed in this paper concerns a different question: how effectively available supply can be allocated and supply continuity maintained from refinery gate to end user during such a disruption.

3. Diesel: India's Economic Nervous System

No petroleum product better illustrates the downstream continuity challenge than High Speed Diesel (HSD). In PPAC's estimated consumption data for FY2025-26, HSD demand was projected at approximately 93 MMT, representing an estimated 41.1 per cent of total petroleum product consumption (PPAC 2025c). Road transport accounts for nearly 71 per cent of India's overall freight movement (NCAER-DPIIT 2025), making continuity of diesel supply particularly important to the movement of goods across the economy. HSD use also extends beyond road freight into agriculture, power generation, industry and other essential activities (PPAC 2013).

The significance of diesel continuity therefore extends well beyond the petroleum sector. A sustained disruption can affect freight movement and other diesel-dependent economic and essential activities. Downstream petroleum continuity should consequently be treated as an issue of wider economic and infrastructure resilience, rather than solely as a fuel-sector concern.

4. Five Structural Deficiencies in India's Downstream Architecture

4.1 Deficiency 1: No Operational Neutral Wholesale Petroleum Market

Unlike natural gas, which is traded on the Indian Gas Exchange (IGX), petroleum products did not have an operational national exchange in the official material reviewed for this article through May 2026. In its Action Plan for 2025-26, the Petroleum and Natural Gas Regulatory Board (PNGRB) described a Petroleum Products Exchange as a concept being designed to provide a transparent and regulated trading environment, improve price discovery, support supply-demand balancing and promote competition (PNGRB 2025). Its absence means that authorised market participants lack a common regulated platform through which petroleum products can be transparently offered, priced and matched between buyers and sellers. A functioning exchange would not create additional physical supply, but it could improve visibility of available product and facilitate more transparent reallocation of that supply when market conditions tighten.

4.2 Deficiency 2: No Standalone Open-Access Framework for Downstream Terminal and Rack Infrastructure

The PNGRB Act 2006 and the Petroleum and Petroleum Products Pipeline (PPPL) Access Code Regulations 2016 provide a framework for third-party access to common- and contract-carrier petroleum product pipelines. The Access Code also covers certain storage and terminal facilities that are integral to pipeline operation (PNGRB 2016). This is not the same as a general open-access regime for downstream terminal or rack capacity. For independent operators, the unresolved issue is therefore not pipeline access in principle, but access to the terminal and lifting infrastructure required to receive and redistribute product. The PPPL Tariff Regulations 2024 revised the tariff framework but did not themselves create third-party access (PNGRB 2024).

4.3 Deficiency 3: No Formal Emergency Petroleum Stockholding Framework

India's strategic petroleum reserves are managed by Indian Strategic Petroleum Reserves Limited (ISPRL) across three underground facilities: Visakhapatnam (1.33 MMT), Mangaluru (1.50 MMT) and Padur (2.50 MMT), with a combined capacity of 5.33 MMT (ISPRL 2026). As of 23 March 2026, ISPRL held approximately 3.372 MMT, or about 64 per cent of nameplate capacity (Rajya Sabha 2026a).

The Government also reported total national petroleum storage capacity equivalent to approximately 74 days of net imports when strategic and commercial capacity are considered together (Newsonair 2026d). This is a capacity measure, not an emergency-stockholding obligation or a statement that 74 days of stocks were continuously held. The regulatory sources reviewed for this article do not identify an industry-wide emergency stockholding obligation comparable to the IEA member-country model. A formal framework could define how much emergency stock is required,

which eligible entities may hold it, how holdings are reported and the conditions under which designated stocks may be released.

4.4 Deficiency 4: No Pre-Established National Essential Petroleum User Registry

The March 2026 LPG and Natural Gas Control Orders prioritised specified domestic and essential uses after the disruption had begun (PIB 2026a; PIB 2026b). A pre-established, digitally maintained National Essential Petroleum User Registry (NEPUR) could identify essential users and priority categories in advance, reducing the administrative work required to determine who should receive available supply first when a supply-stress event is declared. The UK's National Emergency Plan for Fuel (NEP-F), which pre-identifies priority sectors and response responsibilities, illustrates this principle in practice (DESNZ 2024).

4.5 Deficiency 5: No Pre-Crisis Framework for Triggering Domestic Supply-Protection Measures

The government's March 2026 export levies demonstrated that fiscal measures can be used to discourage petroleum-product exports when domestic availability is under pressure. These measures were introduced after the disruption had begun and were subsequently recalibrated through fortnightly reviews (CBIC 2026; PIB 2026c). The resilience issue is therefore not an absence of government authority to intervene, but the absence of a pre-crisis framework specifying when domestic-availability measures should be activated. Pre-defined triggers linked to observable supply conditions could allow such measures to be considered earlier and more consistently when available domestic supply comes under stress.

5. Eight Proposed Market Roles for a Downstream Continuity Architecture

The proposed architecture comprises eight market roles. The table below identifies the function each role would perform and the existing statutory or regulatory framework through which the proposed role could be considered.

Table 1: Functions of the existing statutory and regulatory framework under the proposed framework

Proposed entity	What it would achieve	Proposed legal/regulatory route
National Fuel Marketer	Enable multi-source procurement and an intermediary supply layer between refinery and downstream markets.	MoPNG transport-fuel marketing authorisation framework; PNGRB market-development provisions where applicable.
Independent Licensed Retailer	Enable authorised retailers to source from more than one eligible supplier.	MoPNG Guidelines for Granting Authorisation to Market Transportation Fuels, 2019.
Authorised Wholesaler	Provide a formal route for bulk petroleum supply to eligible commercial and institutional buyers.	Would require a specific wholesale/marketing regulatory definition under existing petroleum-marketing and Essential Commodities frameworks.
Regional Distributor	Provide an authorised distribution layer for defined geographic areas, including service obligations where prescribed.	Would require a specific downstream distribution authorisation under applicable MoPNG/PNGRB frameworks.
Emergency Stockholder	Hold designated emergency petroleum stocks under prescribed stockholding, reporting and release conditions; the entity may be an integrated market participant or a dedicated storage provider.	Petroleum Act 1934 and Petroleum Rules 2002 govern storage safety and licensing through the Petroleum and Explosives Safety Organisation (PESO); a separate stockholding obligation or instrument would be required.
GPS-Tracked Fuel Transporter	Improve traceability of petroleum-product movements between authorised supply and delivery points.	Petroleum Rules 2002 and applicable transport/safety requirements; any mandatory GPS or reporting requirement would need an operational direction.
Rural Micro-Format Access Point	Provide a formalised small-format fuel-access mechanism in locations where conventional retail infrastructure may be limited.	Would require a specifically designed MoPNG/PESO framework; Legal Metrology requirements would apply to dispensing equipment.
Registered Essential User (NEPUR)	Pre-identify users or services eligible for priority allocation of available fuel during a declared supply-stress event.	Essential Commodities Act 1955, ss 3 and 5, through an implementing control/order framework.

Source: Author's compilation.

These are proposed roles rather than existing statutory categories. Several could be pursued through subordinate instruments within existing frameworks, but the exact legal route for each would require regulator or ministry determination and legal review.

6. Strategic Storage and Emergency Stockholding: Capacity, Stocks and the IEA Benchmark

India's ISPRL Phase-I system has a combined nameplate capacity of 5.33 MMT across Visakhapatnam, Mangaluru and Padur. As of 23 March 2026, ISPRL held approximately 3.372 MMT, or about 64 per cent of that capacity (Rajya Sabha 2026a).

The Government separately reported total national petroleum storage capacity equivalent to approximately 74 days of net imports when ISPRL and commercial petroleum storage capacity are considered together (Newsonair 2026d). This system-wide figure describes storage capacity; it should not be read as ISPRL coverage alone or as evidence that 74 days of emergency stocks were actually held at all times.

IEA Member countries are required to maintain oil stocks equivalent to at least 90 days of net imports. India is an IEA Association country rather than a Member country, so this obligation is not presently binding on India (IEA 2026a; IEA 2026b). The 74-day Indian capacity figure and the IEA 90-day stockholding obligation are also not directly equivalent measures. The IEA benchmark remains relevant here as an international reference for the scale and governance of emergency stocks, but it should not be used to infer a directly measured Indian stock shortfall or non-compliance.

The policy implication is therefore to define an emergency petroleum stockholding framework rather than prescribe a single type of storage operator. Such a framework could specify required emergency stocks, eligible stockholders, reporting arrangements and release conditions. Stocks could be held through a combination of strategic government reserves, obligations on existing refiners, marketers or other eligible industry participants, and dedicated storage providers where useful.

7. Global Precedents: Japan, Australia, the UK, and the EU

Japan responded to the March 2026 disruption under the Oil Stockpiling Act. On 24 March 2026, the Ministry of Economy, Trade and Industry (METI) announced the release of approximately 8.5 million kilolitres of crude oil from 11 national petroleum stockpiling bases, equivalent to about one month of national supply (METI 2026). The relevant institutional feature is that the stockpiling authority and release mechanism pre-dated the crisis.

Australia activated its Fuel Security Act 2021 framework. On 13 March 2026, the Australian Government temporarily reduced the baseline Minimum Stockholding Obligation (MSO) for petrol and diesel by up to 20 per cent, enabling up to 762 million litres to be released to address localised regional supply pressures (DCCEE 2026a). In May 2026, the Government announced an A\$3.2 billion Australian Fuel Security Reserve and a plan to increase mandatory stockholding so that diesel and jet-fuel reserves reach 50 days (DCCEE 2026c).

The United Kingdom's National Emergency Plan for Fuel (NEP-F), updated on 16 April 2024, pre-establishes a tiered toolkit of escalating response measures under the Energy Act 1976 (DESNZ

2024). It identifies priority sectors and allocates response responsibilities in advance, reducing the need to design these arrangements after a disruption has begun.

The European Union applies a mandatory oil-stock framework. Council Directive 2009/119/EC requires Member States to maintain stocks equivalent to at least 90 days of average daily net imports or 61 days of average daily inland consumption, whichever is greater, together with reporting and accessibility requirements (European Commission 2009).

Taken together, the four jurisdictions point to three complementary dimensions of petroleum resilience: maintaining emergency stocks; establishing mechanisms that can move and allocate available fuel when normal supply channels are under stress; and identifying priority users and response responsibilities before a disruption occurs. These dimensions are linked because stored fuel contributes to continuity only when institutions can direct and deliver available supply to priority uses during a disruption.

8. The Open-Access Transition: India's Regulatory Reform in Progress

India's regulatory framework is already evolving in several of the areas discussed here. PNGRB's Action Plan 2025-26 proposes a regulated petroleum products exchange and identifies high-volume corridors for petroleum-product movement on a common-carrier basis (PNGRB 2025). The PPPL Tariff Regulations 2024 also revised the framework for determining pipeline transportation charges. Schedule A retains railway-linked benchmarking for specified pipelines, while Schedule B provides a cost- and financial-data-based methodology incorporating a regulated return for relevant pipelines (PNGRB 2024). This distinction matters because the Schedule B approach can relate tariff determination more directly to pipeline economics, but tariff reform does not itself create third-party access; access remains governed separately through the common-/contract-carrier and Access Code framework.

The government's March 2026 responses — including the LPG and Natural Gas Control Orders, refinery directives, the PPAC information-gathering framework and export measures — show that multiple legal and administrative instruments can be mobilised once a disruption is underway (PIB 2026a; PIB 2026b; PPAC 2026; PIB 2026c). The gap addressed in this paper is the degree to which market-access arrangements, priority-user identification, emergency stockholding and activation triggers are defined before the next disruption.

9. The Policy Pathway: Five Actionable Steps

The five steps below can largely be pursued through existing statutory and regulatory frameworks, although specific subordinate regulations, amendments and legal review would be required for implementation.

Step 1 — Operationalise a Petroleum Products Exchange: PNGRB's 2025-26 Action Plan proposes a regulated exchange to support transparent pricing, supply-demand balance and market competition (PNGRB 2025). Operationalising the exchange would give authorised buyers and sellers a common platform through which available petroleum products can be identified, priced and traded. During periods of supply stress, this could improve visibility of product available across market participants and facilitate transactions beyond an entity's usual bilateral supply arrangements. It would not create additional physical supply or remove pipeline and terminal constraints; its contribution to resilience would lie in improving the transparency and matching of available supply.

Step 2 — Make Third-Party Pipeline Access Operational on Priority Corridors: India's existing PPPL Access Code already provides for publication of available pipeline capacity and allows third-party shippers to request capacity on common- and contract-carrier pipelines (PNGRB 2016). The next step is therefore not to create an access regime from scratch, but to make it practically usable on priority petroleum-product corridors. PNGRB could identify high-volume corridors, require transparent publication of usable capacity and entry/exit options, monitor response timelines for access requests, and address the terminal or lifting connections needed for independent shippers to receive product. Where spare capacity and technical conditions permit, this would allow an authorised supplier to move available petroleum products through pipeline infrastructure it does not own.

Step 3 — Establish a Formal Emergency Petroleum Stockholding Framework: India should establish an explicit framework specifying the emergency petroleum stocks to be maintained, the entities responsible for holding them, reporting requirements and the conditions under which designated stocks may be released. The framework need not depend on a storage-only operator category. Additional stocks could be held through a combination of strategic government reserves, obligations placed on existing refiners, marketers or other eligible industry participants, and dedicated storage providers. Stockholding, reporting and emergency-release obligations should attach to designated emergency stocks rather than depend on whether the entity holding those stocks also participates in refining, marketing, distribution or other petroleum activities.

Step 4 — Establish NEPUR: A pre-registered, digitally maintained list of essential-service entities and priority categories could be prepared before a supply-stress event, with activation and routing rules specified in advance. The Essential Commodities Act 1955 provides an existing statutory basis for supply-control measures, while the March 2026 designation of PPAC as nodal agency provides an institutional information platform that could support implementation (PPAC 2026). The exact design would require an implementing order and inter-agency protocol.

Step 5 — Formalise an Export-Domestic Continuity Protocol under Applicable Trade and Fiscal Authorities: Section 3 of the Foreign Trade (Development and Regulation) Act 1992 allows the Central Government to prohibit, restrict or otherwise regulate exports by order. The March 2026 export levies separately demonstrated that fiscal tools can be introduced and recalibrated during supply stress (CBIC 2026; PIB 2026c). A continuity protocol could pre-define the supply indicators and decision process that would trigger consideration of temporary export restrictions, levies or other

domestic-availability measures under the applicable legal authority, rather than designing the decision framework after a crisis has begun.

10. Conclusion: India Has the Refineries. It Needs the Architecture

India's petroleum infrastructure is a genuine national asset. Its 258.1 MMTPA refining capacity, 1,00,266 retail fuel outlets as of November 2025, large crude-import and petroleum-product supply network, and demonstrated crisis-management capacity collectively represent substantial institutional depth (Rajya Sabha 2025a; PPAC 2025a; PPAC 2025b).

The March 2026 experience demonstrated both India's capacity to respond to a major external supply disruption and the limits of relying primarily on measures designed after a crisis has begun. The reforms proposed in this paper are intended to move part of that response architecture into the pre-crisis period through a petroleum-products exchange, more usable third-party pipeline access, a formal emergency stockholding framework, a pre-established essential-user registry and pre-defined domestic-supply protection triggers.

In a future disruption, such an architecture would provide mechanisms to identify and transact available petroleum products more transparently, make third-party transport capacity more usable where technically available, maintain and release designated emergency stocks, identify priority users in advance, and activate pre-defined domestic-supply measures when specified stress conditions are reached.

These mechanisms would not eliminate a physical shortage of incoming crude oil, LPG or refined products. Their purpose is narrower but consequential: to improve how the fuel that remains available is identified, routed, buffered and prioritised while external supply is constrained.

India already possesses substantial refining capacity, a nationwide retail network and statutory authority to intervene during supply stress. The policy task is therefore not simply to add infrastructure, but to strengthen the institutional arrangements that connect available supply to downstream continuity before the next disruption occurs.

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