







# Annual Report

CZECH ENVIRONMENTAL INSPECTORATE

**2021**

\*

### Connection and contact:

Author name:	Czech Environmental Inspectorate
Headquarters address:	Na Břehu 267/1a, 190 00 Praha 9
Telephone:	222 860 111 (HQ exchange)
Web:	<a href="http://www.cizp.cz">www.cizp.cz</a>
E-mail:	<a href="mailto:podatelna@cizp.cz">podatelna@cizp.cz</a>
Green line:	800 011 011
Office hours:	Monday and Wednesday 8 AM to 5 PM, other workdays 8 AM to 2 PM by appointment
Name of establisher:	Ministry of the Environment



## Director's foreword



In 2021, the Czech Environmental Inspectorate celebrated 30 years of its existence. The Inspectorate has become a respected institution during that time and one can only acknowledge with joy the environmental protection, of which the CEI is a direct actor, is gaining importance for society as a whole. At the same time, however, the year 2021 was again like the previous year, largely in the spirit of Covid-19 – thus, in the spirit of government measures, which to a large extent limited and affected the overall activities of the Inspectorate.

However, before I proceed to my own evaluation, I present the basic scheme of the operation of the Inspectorate in the context of the state administration of the Czech Republic:

### The role of the Czech Environmental Inspectorate

in the state administration system of the Czech Republic fully corresponds to its legal definition. The main mission of the Inspectorate is therefore primarily the supervision of compliance with laws in the field of the environment, in all its components (water, air, waste, nature, forest). According to law, the CEI is a so-called “first-instance administrative body” (office), which means that its administrative decisions become final either after the expiry of the appeal period for the entities with which the proceedings are conducted or - in the case of an appeal - only after the decision of the appeal body, which are the so-called “departments of state administration” (divided territorially) that are included in the organizational structure of the Ministry of the Environment. The activity of the Inspectorate is determined annually by the Activity Plan of the Czech Environmental Inspectorate for the given year. The structured preparation of this plan reflects on the one hand, direct legal obligations (e.g. the inspection of entities subject to the so-called “integrated IPPC permit”), as well as direct tasks imposed by the Ministry of the Environment, tasks resulting from the fulfilment of relevant international conventions and strategic government documents, etc. The fulfilment of the control activity plan is monitored and controlled. Another significant part of control activities (over 40% of performance) are inspection activities based on so-called

“public suggestions”, the number of which has steadily increased even in the Covid year of 2021. According to law, every suggestion must be checked (usually by an unannounced on-site inspection), and based on the assessment of the detected situation, administrative proceedings are then initiated or not.

### In the long term, the following key topics are decisive for CEI:

- Within the legally defined areas of competence of the CEI, the orientation of all activities primarily as a service to the public (communication, prevention, education, direct resolution of complaints) and as an important factor in ensuring a fairly and non-discriminatory economic, social and environmental system.
- The need to develop all external, as well as internal, activities from ethical rules and full moral and ethical integrity, including all conducted selection procedures.
- Actions, or rather obligations according to the Civil Service Act, are undoubtedly a burden on the Inspectorate beyond the scope of normal activities and have impacts not only on control activities, but also, for example, on the ability to smoothly replace employees within the framework of standard turnover.
- The family silver of the CEI is highly educated and professionally acting inspectors and other employees. The retention of these professional employees, their education, training and their occupational safety is a long-term priority.
- The situation in the area of remuneration of Inspectorate staff (e.g. the lowest average income of all inspection bodies in the Czech Republic) remains one of the essential threats and limits to the quality performance of inspection activities.
- The need to continue to act as an open office, in the sense of “absolute transparency” of all performed activities while taking into account the given legal restrictions (e.g. non-publicity of administrative proceedings as a strict requirement of the applicable administrative regulations).

### **In 2021, we managed to fulfil the monitored and above-specified goals and parameters:**

- Obligations and activities resulting from the Covid-19 pandemic and all government measures (e.g. activities in the field of medical waste control).
- Resolution of all received suggestions.
- Reduction in the number of temporarily unoccupied systemized positions due to the acceleration of the pace of selection procedures.
- Requirements of the Civil Service Act and especially its continuously generated sub-statutory standards (decrees, measures and methodological instructions of the Ministry of the Interior of the Czech Republic).
- Continuous replenishment of qualified employees, especially stabilization of the team of senior civil servants.

### **The existing limitations of the Inspectorate include, in particular:**

- The ambiguity of enforced legal regulations, which generally arises in the process of legislative deliberation (various changes, additions, interventions within the framework of parliamentary deliberations, results of lobbying, etc.). This, together with the growth of the legal obligations of the subjects (meaning the growth of the objective control obligations of the Inspectorate), increases the pressure on the speed of inspection activities, which can in some cases also lead to the emergence of unintentional mistakes by inspectors.
- Lower societal pressure to comply with laws in general, including environmental legislation.
- Limitations in methodical communication and unification of procedures with appellate authorities, including different views of individual regional appellate authorities, e.g. on the correct and fair amount and type of sanctions for the same delicts in the area of environment.
- Permanent underestimation of the remuneration of inspection staff, especially executive inspectors. According to continuously published comparisons of remuneration of organizations in the state sector, CEI continues to be at the very end of this table. It is the lowest-paid inspectorate (compared to CTIA, veterinarians, herbalists, and other similar control bodies), and the second lowest-paid organization in the department of environment. For example, district archives and similar institutions report a higher average salary. This is clearly the reason for the relatively high turnover, so despite the very successful filling of jobs after departing employees, the total annual number of departures and arrivals is almost identical.
- The nature of the inspection activity itself, which is especially demanding on the psychological qualities and overall resilience of the inspectors and at the same time requires a high level of special expertise. The need for insufficient experts is manifested especially among lawyers, for whom adequate conditions can only very rarely be created in the described circumstances.

### **The state of emergency was declared for 133 days and a ban on movement between districts due to protection against the spread of aggressive mutations of the coronavirus was declared for three weeks.**

Naturally, this had to be reflected in the number of inspections by our inspectors and the fines. In addition, the restrictions on controls from the previous year, which were even more significant in this regard, were also evident in the final decisions. Compared to the "non-covid" year 2019, the number of controls in 2021 decreased by around five thousand. While in 2019, 16,896 inspections were carried out with the result of 8,607 fines in the total amount of CZK 112,329,717, in 2021, 11,231 inspections were carried out with the result of 1,690 fines in the total amount of CZK 79,387,735.

However, the "Covid" era is far from the main problem of the Inspectorate. The sad consequences, whether in the area of threats to health or even directly to people's lives, but also to the economy, which has been affected by this pandemic, can be sadly shrugged off with the statement that it is "force majeure". It can be dealt with sooner or later; it is not directly influenced by humans.

The problem, which persisted in 2021, is unfortunately influenced by some people (outside the Inspectorate) to a greater extent. Obviously, I am referring to the accident on the Bečva river, which occurred in September 2020. In the annual report, I have to pay attention to this case just out of respect for the employees of the Inspectorate, the inspectors, who did not fail in their work after the accident on the Bečva, nevertheless, they have been facing incomprehensible public dishonour and insults for two years. Certainly, every general can say after the battle that this and that could have been done differently, perhaps better. Clearly, (not only) the Inspectorate constantly learns and improves its procedures via accidents of such scale. However, as the longest-serving director of CEI, I must fully say that I will continue to defend and protect colleagues whose professional competence and years of professional activity are ruthlessly trampled on by political and media cries. Together with my colleagues from the Inspectorate management, we insist that our inspectors proceeded correctly from the first hours of the accident investigation, as required by law, according to the standard procedures and instructions of the managing entities (in accordance with the Water Act) during the investigation on the Bečva in the first days of accident. In accordance with the instructions of the Water Authority (VPÚ) and the Integrated Rescue System, they have gradually narrowed down the range of dozens of possible causes of fish death and on the second day after the accident, they clearly discovered the place (outlet) with - later laboratory confirmed - the entry of a deadly substance into the Bečva river. Then, they handed over all findings and documents to the Police of the Czech Republic on 25<sup>th</sup> September 2020, which initiated criminal proceedings. So, what should be endlessly answered to those who constantly shout that the Inspectorate did not

solve the accident on the Bečva, when at the same time the Inspectorate cannot interfere with the work of the police or the public prosecutor's office in any way? And in the legal framework, the criminal proceedings have priority over proceedings on an administrative offence.

As I write these lines, the prosecutor has already filed an indictment against one legal entity and one natural person. So who wants to doubt anything? Even the work of the public prosecutor will be subject to review – after all, they will testify in court. Who wants to doubt whom and to what extent? The Inspectorate, experts, police? Will they continue with the public prosecutor or even the judge? Or the Court of Appeal? We can, more or less, doubt when and how well justice is negotiated in our country. But we truly follow the rule of law.

Therefore, how should we explain the shouts of a politician who constantly attacks the Inspectorate with all kinds of fictional facts and stories, when his party received a financial gift from the waste company that was fined hundreds of thousands of crowns by the Inspectorate and is fighting for a monopoly license for a certain type of waste? How can we explain the approach of a television program, a public television program, which does not use the answers to the questions provided by the Inspectorate in order to defame it? The only excuse can be that if the editors used the answers, they wouldn't have anything to broadcast and it's probably not possible to broadcast images and sounds of playing kittens for half an hour. How can we respond to the constantly asked questions about why we didn't take samples from the fishermen, when they didn't even offer us any (they were handed over to the Water Authority), when the authorities didn't communicate well with each other (as everything was managed by the Water Authority from the beginning – which is according to the law)? And I could go on. The audit of the Ministry of the Environment did not reveal any errors of the Inspectorate, nor does the report of the ombudsman mention any mishandling of the Inspectorate. Doubts were expressed only by the parliamentary commission, composed of non-experts and people with political interests, of politicians who primarily want to satisfy various interests regardless of facts and reality.

At the same time, it is clear that for the inspectors this personal experience of a collision with politics can have a negative impact on the investigation of other cases, including accidents on the water, which must be considered a real threat.

### **The problem, which is gaining more intensity over the years, concerns waste management.**

It is no secret that this business is among the most lucrative economic illegal activities worldwide, after the trade with weapons, people and drugs. And naturally, all parties are looking for various ways to earn as much as possible. They are looking for ways, how to, for example, imitate some waste as a by-product (which, of course, involves completely different financial conditions), or as a structural element, how to transfer waste, even dangerous, through related companies

into the untraceable unknown, or to liquidate companies on purpose, etc. And the result? Waste that disappears, or landfills that fell into the responsibility of the state – even though large financial resources have been set aside for them – and the state must rehabilitate "suddenly discovered waste" without an owner at the taxpayer's expense. Alternatively, the entire landfill with no one to turn to for accountability.

And certainly, with such huge amounts related to waste management, there is no shortage of various forms of coercion. And not just at our office. Lobbying with the purpose to favour certain conditions for entrepreneurs in this field concerns not only local governments, but also top politics. How to get a tax advantage, how to limit levies on reclamation funds, how to obtain extremely lucrative licenses for a certain type of packaging, a monopoly on the collection of specific waste in regions, etc. And also - why not use a form of coercion or at least any influence on the media to advance your interests? With an enormous amount of financial resources, which are the reward for this activity, the widest and most expensive marketing and lobbying procedures can be used.

And it is very sad that only few people are interested in a number of publicly available clues that can be used to find out criminal or at least startling activities. Even journalists, who are so fond of speculating about everything, only cover this topic superficially. "A reader or viewer will only like" topics that are simple. Currently, the 90s are fashionable - Klondike in the Czech Republic. We look at those stories as monstrosities of the past, but does it really occur to no one that many of the activities of the "ugly 90s" got a slightly different, more sophisticated form? More refined, smarter...

In no case do I want to use these words to cast blame or even attribute collective guilt to all entrepreneurs in waste management. Most of them are of course honest and fulfil their obligations not only in terms of the law, but also ethics. Many of our inspections clearly demonstrate this. And I don't want to cry here about the current situation and a number of incorrect procedures of some entrepreneurs, against whom we have no power due to legal obstacles. I don't even want to spread alarmist news. I'm just trying to explain that the cliché - nothing is just black or just white - applies in this case as well, and that with a little effort, all kinds of pressures can be found behind everything, even completely natural, based on the very essence of man - to be better than others.

The Czech Environmental Inspectorate stood in the way of the described pressures and dishonest individuals in the past, and it is still standing in the way, and will continue to stand in the way in the future.

My sincere thanks go to all employees of the CEI, from the highly professional inspectors to my colleagues in the management, not only for the results of the Inspectorate, but also for bravery and integrity in the time of an unprecedented pandemic crisis and beyond.

**Erik Geuss**

Director of CEI







## Directors of CEI since its establishment in 1991



**Ing. Jan Hořejší**

16<sup>th</sup> Jul 1991 – 31<sup>st</sup> Jan 1992



**Ing. Jan Slanec**

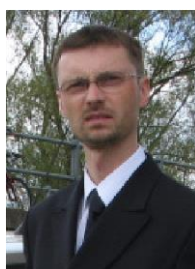
18<sup>th</sup> Jun 2003 – 14<sup>th</sup> Nov 2006

6<sup>th</sup> Dec 2011 – 10<sup>th</sup> Nov 2014



**Ing. Michael Barchánek**

1<sup>st</sup> Feb 1992 – 4<sup>th</sup> Mar 1993



**Ing. Hynek Beneš**

1<sup>st</sup> Dec 2006 – 19<sup>th</sup> Dec 2007



**Ing. Marie Šeborová**

4<sup>th</sup> Mar 1993 – 3<sup>rd</sup> May 1997



**Mgr. Milan Bukolský**

16<sup>th</sup> Aug 2010 – 7<sup>th</sup> Dec 2011



**Ing. Petr Soukup**

1<sup>st</sup> Jul 1997 – 30<sup>th</sup> Sep 2002



**Ing. Erik Geuss, Ph.D.**

1<sup>st</sup> Dec 2014 – now



**Ing. Eva Tylová**

1<sup>st</sup> Oct 2002 – 17<sup>th</sup> Jun 2003

17<sup>th</sup> Mar 2008 – 12<sup>th</sup> Aug 2010

## Summary information about activity in 2017—2021

	2017	2018	2019	2020	2021
Number of inspectors (as of 31 <sup>st</sup> December)	396	408	409	408	396
Number of inspections	15,864	16,572	16,896	11,784	11,231
<b>All decisions (fines and other decisions, including on charges) in force:</b>	<b>10,249</b>	<b>8,541</b>	<b>8,607</b>	<b>2,444</b>	<b>1,690</b>
All fines that entered into force	2,655	2,543	2,532	2,041	1,673
Other decisions in force (other decisions, incl. on charges)	7,594	5,998	6,075	403	17
<b>Total amount of fines in force in CZK</b>	<b>113,051,685</b>	<b>100,274,621</b>	<b>112,329,717</b>	<b>87,604,415</b>	<b>79,387,735</b>
<b>Other decisions in force:</b>	<b>417</b>	<b>424</b>	<b>412</b>	<b>309</b>	<b>244</b>
Instances of halting or restriction to 1 operations, a facility of part of it, in force	22	38	71	75	55
Number of confiscations in force	143	157	119	104	101
Number of remedial measures in force	252	229	222	130	88
EIA statements (Act no. 100/2001 Coll.)	1,019	610	657	667	742
Other expert statements issued	5,356	5,333	5,538	4,378	5,179
Number of suggestions and petitions received	2,781	3,044	3,493	2,972	2,853
Number of suggestions submitted to public authorities from own inspection work	233	322	309	293	250
Number of crime reports	8	14	18	11	14
Number of accidents and emergencies	*431	413	369	315	457



Number of requests for information received (Act no. 106/1999 Coll. and Act no. 123/1998 Coll.)	295	325	362	382	316
Number of complaints about CEI's work or inspectors received Section 175 of the Administrative Code)	54	43	57	54	50
Number of relevant notifications on unlawful work	0	0	0	0	0
Total number of employees as of 31 Dec	536	550	557	546	564
Education structure (% of employees with university education among all employees)	77.8	77.8	81.5	82	78.9
Occupational safety/injuries (frequency of injuries per 100 employees)	0.19	0	0	0.18	0.00
Rate of unscheduled employee absence (sickness. injury) (% of scheduled time)	3.39	3.07	3.84	3.45	3.53
% of voluntary fluctuation (excludes forced departures. including due to organisational changes and retirements)	7.2	4.8	6	5.7	4.4
<b>Total CEI budget funds in CZK</b>	<b>418,991,688.36</b>	<b>430,837,260.55</b>	<b>509,237,482.82</b>	<b>418,476,260.00</b>	<b>511,907,997.05</b>

\* In previous years, the Air Protection Department did not collect and report numbers of emergencies (accidents and breakdowns); the numbers only gained importance after the amendment of the Air Protection Act in late 2016 and the EC requirement to report leaks of coolants.

\*\*The decrease caused by the amendment of the Water Act No. 113/2018 Coll. after which the CEI no longer issued decisions on fee advances.

\*\*\* The EIA Act was amended in 2018, leading to a decrease in required statements among other things.

\*\*\*\* In the water protection component, the Inspectorate's competence to control natural non-entrepreneurs was withdrawn from 1<sup>st</sup> of January 2019 by amendment No. 113/2018 Coll. of Act No. 254/2001 Coll., on water and on the amendment of certain laws. From 1<sup>st</sup> January 2019, inspectors of the Water Protection Department of the CEI cannot inspect natural persons, even in the case of an investigation of submitted complaints.







	<b>Foreword</b>	<b>05</b>
	<b>Summary information about activity in 2017-2021</b>	<b>10</b>
	<b>Content</b>	<b>13</b>
<b>1</b>	<b>Description of activities</b>	<b>14</b>
	1.1 Role of the CEI	15
	1.2 Organizational structure	17
	1.3 Intensity of the inspection activity	18
<b>2</b>	<b>Overview of activity of territorial inspectorates in 2021</b>	<b>19</b>
<b>3</b>	<b>Dealing with stakeholders</b>	<b>21</b>
	3.1 Cooperation with the public	22
	3.2 Cooperation with state institutions, professional and interest organisations	28
	3.3 International cooperation	28
	3.4 Communication with the public and the media	30
<b>4</b>	<b>CEI activity in 2021 by department</b>	<b>31</b>
	4.1 Air protection, Earth's climate system and ozone layer protection	33
	4.2 Water protection and prevention of major industrial accidents	42
	4.3 Waste management, chemical substances and biocidal products	53
	4.4 Nature protection and CITES	68
	4.5 Forest protection	81
	4.6 CEI involvement in accident resolution	92
	4.7 Integrated agendas	94
<b>5</b>	<b>Ethics and integrity, anti-corruption activity, solutions and data protection</b>	<b>106</b>
	5.1 Ethics and integrity	107
	5.2 Anti-corruption programme	108
	5.3 Complaint handling	108
	5.4 Data protection and legislative compliance	109
<b>6</b>	<b>Tenders and supply chain in 2021</b>	<b>110</b>
<b>7</b>	<b>Employee environment and human resources</b>	<b>112</b>
	7.1 Human resources management	116
	7.2 Education	120
	7.3 Occupation safety and health protection	120
<b>8</b>	<b>Energy and material intensity of CEI activity</b>	<b>123</b>
<b>9</b>	<b>Economy</b>	<b>125</b>
	9.1 Overview of transfer of budget fund savings to unspent expense claim report	128
	9.2 Use of reserve fund and other non-budgetary resources	128
	9.3 Total income assessment	129
<b>10</b>	<b>Financial statement as of 31<sup>st</sup> December 2021</b>	<b>130</b>
	<b>Contacts</b>	<b>143</b>
	<b>List of abbreviations</b>	<b>145</b>



# 1 Description of activities

## 1.1 Role of the CEI

### CEI Organization

The Czech Environmental Inspectorate (CEI) was established in 1991 by Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and Its Scope of Activity in Forest Protection, as amended. The CEI is an organisational component of the State, directly subordinate to the Ministry of the Environment of the CR and is divided, pursuant to the CEI Act, into the Directorates (referred to as the Headquarters since 1993) and territorial inspectorates (TI), of which there have been ten since 1995. They are the Prague TI, České Budějovice TI, Plzeň TI, Ústí nad Labem TI, Hradec Králové TI, Havlíčkův Brod TI, Brno TI, Olomouc TI, Ostrava TI and Liberec TI.

The CEI organisation structure lends the Headquarters the position of a managing, organisational and methodological body. The CEI Headquarters methodological work is done by the expert departments, divided into two units. One is the Technical Environmental Protection and Integrated Prevention Unit, consisting of the Air Protection Department, the Water Protection Department, the Waste Management Department and the Integrated Agenda Department. The other unit is the Nature and Forest Protection and CITES Unit<sup>1</sup>, comprising the Nature Protection Department, the International Biodiversity Protection and CITES Department and the Forest Protection Department.

The inspection work is then carried out by CEI inspectors of the territorial inspectorates. Generally, 40-45% of the inspector's workload intended for supervisory / inspection work is planned ahead. The rest of the inspection work capacity is left for performing tasks that occur in the course of the year and the CEI is required to deal with (such as unscheduled inspections, including, e.g., inspections of authorised emission measurement, suggestions by the public pointing to environmental damage or hazards, operatively assigned MoE thematic sub-tasks, etc.). Investigation of accidents is often very demanding.

### Legal framework of CEI activity

The legal concept of environmental protection, of which the CEI is a part, is based on the principle of separate definitions for each environmental component under so-called component acts (see introductions to the components in the Work Plan for 2021 at <https://www.cizp.cz/cizp/plany-cinnosti>). In addition, general legal regulations that affect the work of the CEI as a whole have to be listed. Being a specialised authority carrying out prevention, inspection and penalty work in the area of environmental protection, the CEI is required to act in accordance with these general legal regulations.

The general legal regulations include Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended, defining the general framework for administrative proceedings and being the fundamental legal regulation in the area of administrative law. Another general legal regulation for the CEI's work is Act no. 255/2012 Coll. on Inspection (Inspection Rules), as amended, defining the process of inspection. Another, no less important source of law is Act no. 250/2016 Coll. on Liability for delicts and Proceedings Thereabout, as amended, defining both material and procedural aspects of handling delicts. The right to the favourable environment is also pursued by the public by means of so-called information acts, namely Act no. 123/1998 Coll. on the Right to Environmental Information, as amended, and Act no. 106/1999 Coll. on Free Access to Information, as amended. Given the CEI's work and position within environmental protection, the general legal regulations also include Act no. 224/2015 Coll. on Prevention of Major Accidents Caused by Selected Hazardous Chemical Substances or Mixtures and amending Act no. 634/5004 Coll. on Administrative Fees, as amended (Major Accident Prevention Act), as amended, Act no. 167/2008 Coll. on Prevention of Environmental Harm and its remedy and on amendment of certain acts, as amended.

<sup>1</sup> The CEI activities arising from the CITES Convention on International Trade in Endangered Species.

### Prevention activity of the CEI

The CEI's activity in the area of environmental protection consists of prevention, inspection and penalty work.

The prevention activity in its broader sense consists of the existence of the CEI itself. The ability to perform an inspection followed by a penalty to an entity for violation of legal regulations in the area of environmental protection means an assumed and intended pressure towards compliance with the regulations. Moreover, the CEI's prevention work is done by way of communication with the public, be it queries, provision of information or receipt of suggestions pointing to environmental damage or hazards.

Imposition of remedial measures is a boundary institute between the prevention and penalty work. Remedial measures are not a form of punishment from the point of view of administrative law, but they are always connected with unlawful conduct or status and with restriction of an entity's rights and obligations to do or not do something. Their application prevents more extensive environmental damage or remedy to a status where environmental damage has already occurred but can be solved.

Another aspect of the CEI's work is inspection and penalty work. This activity is carried out mostly by the CEI territorial inspectorates. The inspection work is done by CEI inspectors based on powers defined by the respective component acts and consists of scheduled work and work based on suggestions by the public, which are a very important category of cases. The inspection is carried out in accordance with the Inspection Rules. If a CEI inspector finds out during inspection that the inspected object has violated a legal regulation, the CEI is authorised to handle the unlawful conduct and start a delict proceeding.

If the CEI does not have right to handle the unlawful conduct, it shall notify the applicable authority about the unlawful conduct or transfers the matter to the appropriate authority. Depending on powers defined by component acts, such authorities are notably municipal authorities, authorities of municipalities with extended powers, regional authorities, State Navigation Authority, Ministry of the Environment of the CR, Regional Public Health Authorities, Nature Conservation Agency of the Czech Republic, National Park Administrations, and others. If multiple authorities are applicable for handling a case, typically the CEI and a municipality with extended powers or the CEI and another nature protection authority, the decisive factor is which of the authorities first starts the delict proceeding. The administrative proceedings are carried out in accordance with the Act on Liability for delicts and Proceedings Thereabout and the Rules of Administrative Procedure.

Decisions by the CEI, being a first-instance authority, can be appealed against; appeals are advanced along with their dossier to the appeal authority, which is the Ministry of the Environment. It decides as the second instance through its Department of State Administration (DSA), which are decentralised territorially with offices in Prague, České Budějovice, Plzeň, Chomutov, Liberec, Hradec Králové, Brno, Olomouc and Ostrava.

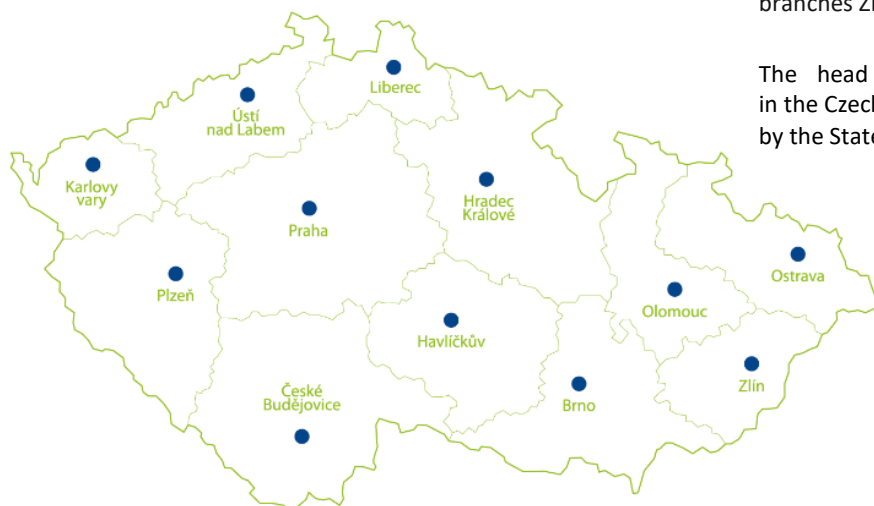
Following a review proceeding by the appeal authority, the first instance decision issued by the CEI can be confirmed or repealed and the matter returned for new handling, or repealed and the proceeding halted, or changed but never to the detriment of the defendant.

In case someone feels deprived of their rights by the decision of the authority (DSA), they can demand an administrative court to repeal the decision or to declare it nugatory. Administrative proceedings are conducted by the administrative court in accordance with Act No. 150/2002 Coll., the Administrative Code of Court, as amended.



## 1.2 Organizational structure

The CEI is divided into 10 territorial inspectorates, two branch offices and headquarters. As of 31 Dec 2020, it employed 564 persons, including 421 expert employees.



### Territorial inspectorates:

Prague, České Budějovice, Plzeň, Ústí nad Labem, Liberec, Hradec Králové, Havlíčkův Brod, Brno, Olomouc, Ostrava, branches Zlín and Karlovy Vary.

The head of the service office performing their duty in the Czech Environmental Inspectorate is appointed by the State Secretary.

### Overview of competences of professional environmental protection departments

CEI Competence		Professional departments of environmental protection					
		Air	Water	Waste	Integrated prevention	Nature	Forest
<b>Supervision</b>	Inspections, reviews, checks, investigations, etc.	•	•	•	•	•	•
<b>Penalties</b>	Fines to legal entities	•	•	•	•	•	•
	Fines to natural persons	•		•	•	•	
	Restriction or halt of activity, operation	•		•	•	•	•
<b>Measures</b>	Measures to remedy identified shortcomings as well as serious conditions according to the Waters Act	•	•	•	•	•	•
	Seizing and confiscation of illegal specimens of endangered animal or plants					•	
	Seizing of illegally held individuals, sampling	•			•	•	
<b>Accident records</b>	And cooperation in solving them	•	•				
<b>Statements</b>	Positions statements, statements, approvals for other organs	•	•	•	•	•	•
<b>Suggestions</b>	Handling of suggestions	•	•	•	•	•	•

## 1.3 Intensity of the inspection activity

In 2021, the CEI make 11,231 checks and issues 1,690 decisions in force, including 1,673 decisions on fines. Compared to 2020, the total number of inspections decreased (-553) as did the number of decisions on fines issues in force (-368). The reason for the decrease was the measures taken in connection with the Covid-19 epidemic and the lower number of inspectors compared to the previous year.

The total number of CEI inspectors in 2021 was 396. Therefore, one inspector accounted for approximately 28 inspections on average. In 2021, the CEI issued a total of 5,921 position statements and statements, including 742 on the EIA process.

### Number of inspections by territorial inspectorates – 5-year overview

	2017	2018	2019	2020	2021
Prague TI	2,200	2,221	1,970	1,353	1,532
České Budějovice TI	1,146	1,293	1,331	907	853
Plzeň TI	1,667	1,635	1,675	1,137	1,150
Ústí nad Labem TI	1,393	1,564	1,517	1,055	967
Hradec Králové TI	1,682	1,782	2,099	1,610	1,272
Havlíčkův Brod TI	1,408	1,405	1,474	1,012	1,089
Brno TI	1,962	2,064	2,224	1,454	1,248
Olomouc TI	1,244	1,227	1,327	977	810
Ostrava TI	1,705	1,705	1,698	1,226	1,212
Liberec TI	788	900	867	590	634
Headquarters	669	776	714	463	417

### Year-on-year comparison of fines imposed - 5-year overview

	No. of fines imposed	No. of fines in force	Total amount of fines in force (CZK)
2021	1,712	1,673	79,387,735
2020	2,109	2,041	87,604,415
2019	2,630	2,532	112,329,717
2018	2,641	2,547	100,274,621
2017	2,712	2,655	113,051,685



## 2 Overview of activity of territorial inspectorates in 2021

## 2 Overview of activity of territorial inspectorates in 2021

Territorial Inspectorate	Number of inspectors	Number of inspections	EIA statement (issue no. 100/2001 Coll.)	Other statements	Statements		Fines			Other decisions			The number of initiatives submitted to state administration	Number of criminal reports filed
					All fines issued in the monitored period	All fines that became legally binding in the monitored period	Total amount of fines in force (CZK)	Number of suspensions or restrictions of activity, operation or part thereof in legal force	Number of withdrawals / confiscations under legal authority / confiscation by legal authority / removal / confiscation by legal	Number of remedial measures in force	Number of emergencies (in terms of air laws) and accidents (according to the Water Act)	The number of resolved complaints		
Prague	57	1,532	151	1,076	130	126	7,086,000	6	2	8	80	630	30	1
České Budějovice	31	853	50	157	136	127	5,090,515	25	0	19	25	213	21	0
Plzeň	33	1,150	40	274	150	150	6,858,000	0	1	6	11	226	14	2
Ústí nad Labem	43	967	72	444	136	131	4,900,715	9	3	10	26	311	13	0
Hradec Králové	36	1,272	113	198	226	231	19,835,500	2	4	8	62	343	38	1
Havlíčkův Brod	30	1,113	53	296	194	197	4,896,700	3	1	1	16	336	39	1
Brno	43	1,248	113	845	222	211	15,935,092	2	0	17	39	431	31	2
Olomouc	23	810	24	234	154	153	4,464,393	6	0	6	66	187	19	0
Ostrava	41	1,212	68	448	181	175	6,652,720	0	1	3	92	284	20	0
Liberec	24	634	26	182	99	91	3,326,100	0	0	8	20	227	23	0
CEI TI Total	361	10,791	710	4,154	1,628	1,592	79,045,735	53	12	86	437	3,188	248	7





### 3 Dealing with stakeholders

## 3.1 Cooperation with the public

Handling of suggestions pointing to environmental damage or hazards, handling of requests for information and complaints are a fundamental part of the CEI's work. The suggestions, petitions and complaints agenda is an integral component of CEI's work at all CEI territorial inspectorate departments. This activity is embedded in the CEI Organisational Rules.

### 3. 1. 1 Suggestions

The Czech Environmental Inspectorate handles suggestions pointing to environmental damage or hazards within the legal framework of:

- Act no. 255/2012 Coll. on Inspection (Inspection Rules), as amended,
- Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended,
- Act no. 85/1990 Coll. on the Petition Right,
- specialised acts on protection of environmental components.

Suggestions for investigation can be announced to the CEI by any citizen of the CR or any natural person, natural person doing business and legal entity. The CEI has published information on submitting suggestions on its website (<https://www.cizp.cz/prakticky-radce>).

#### CEI and the civil society

Suggestions, complaints and petitions are an important element in the CEI communication with the public. The civil society often points to violations of laws that would otherwise remain hidden. Suggestions and petitions are a starting point for the CEI's further steps (external inspection work). If the CEI investigation finds grounds to initiate an official proceeding, then it initiates a penalty proceeding or a proceeding on remedial measures. Another important part of handling of suggestions is increasing of public legal awareness in the area of the environment protections. Some suggestions are transferred to other applicable public administration bodies if they are not applicable for the CEI.

#### Numbers of suggestions received

In 2021, the CEI received a total of 2,853 suggestions. The number of suggestions received by the CEI territorial inspectorates and headquarters are shown in the top right table. As in previous years, CEI Prague territorial inspectorate handled the most suggestions in 2021. It is not an uncommon situation for the CEI to receive a complaint for which it does not have the legal competence to investigate. Such suggestions are forwarded for investigation to the relevant state administration body. This was the case with 424 suggestions in 2021. A single suggestion may draw attention to endangerment or damage to multiple environmental components. It is thus often the case that several departments act on the same suggestion. Information about how the different departments contributed to handling of suggestions in 2021 is shown in the table at the bottom right.



### Number of suggestions received by individual TIs and headquarters in 2021

Territorial inspectorate	Suggestions received	Suggestions handed over as irrelevant
Prague	563	49
České Budějovice	213	25
Plzeň	226	26
Ústí nad Labem	270	51
Hradec Králové	284	49
Havlíčkův Brod	256	48
Brno	359	61
Olomouc	150	22
Ostrava	284	19
Liberec	196	36
Headquarters	52	38
<b>Total</b>	<b>2,853</b>	<b>424</b>

The TI and HQ departments contributed to handling of suggestions received in 2021 as follows.

Territorial inspectorate	Department of					
	Air protection	Water protection	Waste management	Nature protection	Forest protection	Integrated agendas
Prague	71	110	120	286	41	2
České Budějovice	12	41	44	101	15	0
Plzeň	28	33	53	89	21	2
Ústí nad Labem	37	61	74	112	27	0
Hradec Králové	42	86	73	120	22	0
Havlíčkův Brod	56	105	52	108	14	1
Brno	85	92	96	132	26	0
Olomouc	31	29	49	65	11	2
Ostrava	36	43	67	121	17	0
Liberec	35	42	53	74	14	9
Headquarters	10	9	17	14	0	2
<b>Total</b>	<b>443</b>	<b>651</b>	<b>698</b>	<b>1,222</b>	<b>208</b>	<b>18</b>

### Main topics of suggestions in 2021

The CEI Air Protection Department most frequently handled suggestions concerning annoying smoke and emissions of odorous substances in the air and dust from industrial compounds. Besides, it dealt with suggestions relating to waste combustion and operations emissions.

The Water Protection Department most frequently investigated suggestions related to unpermitted wastewater discharge into surface water and groundwater, watercourse pollution, groundwater and surface water consumption without permission or in contravention of a permit, as well as suggestions to inspect wastewater treatment plants and observance of minimum residual flow rates by small hydropower plants.

The CEI Waste Management Department handled citizens' suggestions concerning waste handling, packaging, chemical substances and chemical compounds (including biocidal products). They included primarily illegal waste loads and waste dumps, unpermitted landscaping using waste, handling of car wrecks without permission and violation of obligations in the area of recollection of electrical appliances and tyres.

The Nature Protection Department handled mostly suggestions to investigate cutting of non-forest trees and damage to trees (trimming, root system interference, etc.). They also handled interference with natural evolution of specially protected animal and plant species. The Forest Protection Department dealt mostly with suggestions to investigate forest logging interventions, often in connection with damage to forest soil, as well as waste dumps and landscaping on forest land, forest owners' inactivity in the case of bark beetle infestations or more specifically, lacking or insufficient removal of bark beetle infested timber and, last but not least, unauthorized use of land intended for forest functions for other purposes.

### Green line

Effective as of 1 Sep 2008, the CEI has implemented "Green line" (800 011 011). It is a direct and free telephone contact between the CEI and citizens. The number is primarily used for receiving citizens' suggestions, handling citizens' queries regarding environmental issues, and citizens are also informed about the CEI's legal powers in this way. The line is in operation on weekdays between 8 am and 4 pm.

### Number of received suggestions in 2017–2021 by TI and headquarters

Territorial inspectorate	2017	2018	2019	2020	2021
Prague	597	704	943	656	563
České Budějovice	223	209	216	204	213
Plzeň	235	232	232	260	226
Ústí nad Labem	265	367	337	276	270
Hradec Králové	266	299	328	336	284
Havlíčkův Brod	233	236	279	224	256
Brno	322	331	381	374	359
Olomouc	136	153	167	144	150
Ostrava	300	274	325	281	284
Liberec	159	158	162	163	196
Headquarters	45	81	123	54	52
<b>Total</b>	<b>2,781</b>	<b>3,044</b>	<b>3,493</b>	<b>2,972</b>	<b>2,853</b>

### 3. 1. 2 Provision of information

In 2021, the CEI handled 329 requests for information, including 23 pursuant to Act no. 106/1999 Coll. on Free Access to Information, as amended, and 306 requests pursuant to Act no. 123/1998 Coll. on Right to Environmental Information, as amended. Besides information provided by the CEI pursuant to the Information Acts above, the CEI communicates with the public by means of press releases, annual reports, brochures,

leaflets, provision of toll-free “Green line”, etc. Information provision helps to establish stronger public feedback for the CEI. The primary objectives are to maintain contact with both professional and lay public and the media, answer questions regarding the CEI’s inspection and supervision powers as well as possible and provide objective information about CEI’s inspection results.

#### Provision of information pursuant to Act no. 106/1999 Coll. on Free Access to Information, as amended

Pursuant to Section 18 of the Act, the CEI publishes the Annual Report 2021 on its activity in provision of information according to Act no. 106/1999 Coll, as amended.

Requested information pursuant to Act no. 106/1999 Coll. in 2021	Number
Number of requests for information	23
Number of issued decisions on refusal	0
Number of appeals against the decision	0
Description of the essential parts of each judgment in the matter of reviewing the legality of the decision of the obliged entity to reject the request for the provision of information and an overview of all expenses incurred by the obliged entity in connection with legal proceedings on rights and obligations under this Act, including the costs of its own employees and costs for legal representation	\
List of exclusive licences granted, including justification of necessity of granting of exclusive licence	\
Number of complaints submitted under Section 16a, reasons for filing and brief description of their handling	1 Complaint filed due to non-compliance with the processing deadline. According to Section 16a, Para. 5 of the Act, the complaint was fully complied with and the information provided.
Other information relating to enforcement of this Act	1 request for information was postponed according to Section 17 Para. 5 of the Act due to non-payment of costs.



### Provision of information pursuant to Act no. 123/1998 Coll. on Right to Environmental Information, as amended

Pursuant to this Act, 298 applications were received in 2021. The CEI Headquarters and the CEI Territorial inspectorate Hradec Králové processed the most requests, the CEI Territorial Inspectorate České Budějovice handled the least. The decision to deny disclosure of information or part of information was issued most often since the requested information was related to unfinished proceedings and non-jurisdictional decisions on delicts and other administrative offences.

### Number of received requests for information in 2021 by TI and headquarters

TI	Total number of requests	Number of requests pursuant to Act no. 106/1999 Coll.	Number of requests pursuant to Act no. 123/1998 Coll.	2020	2021
Prague	30	0	30	656	563
České Budějovice	10	0	10	204	213
Plzeň	22	0	22	260	226
Ústí nad Labem	33	0	33	276	270
Hradec Králové	49	0	49	336	284
Havlíčkův Brod	16	0	16	224	256
Brno	31	0	31	374	359
Olomouc	23	0	23	144	150
Ostrava	18	0	18	281	284
Liberec	17	0	17	163	196
Headquarters	80	23	57	54	52
<b>Total</b>	<b>329</b>	<b>23</b>	<b>306</b>	<b>2,972</b>	<b>2,853</b>

### Number of requests for information in 2017-2021

Year	Total number of requests	Number of requests pursuant to Act no. 106/1999 Coll.	Number of requests pursuant to Act no. 123/1998 Coll.
2021	329	23	306
2020	382	15	367
2019	362	13	349
2018	325	15	310
2017	295	18	277

The total number of requests for information has decreased in 2021. Compared to 2019, the CEI received 53 fewer requests pursuant Act No. 123/1998 Coll. and 8 more requests pursuant to Act No. 106/1999 Coll. Although the number of requests has decreased, public interest in providing information is still relatively high. Questions from the public on the CEI Discussion Forum are not included in the records in the sense of the aforementioned laws.

### Discussion forum

The CEI ran a discussion forum on its website, where citizens can ask all types of questions about the environment. These questions are not included in the records pursuant to the above Acts. In 2021, the Inspectorate received 37 queries and comments, which was 22 less compared to the year before. Like in 2020, the questions aimed mostly at waste management, water protection and air protection. The most frequent discussion topics were waste management, wastewater management and annoyance with odorous air-polluting emissions. A part of the questions also concerned topics outside of the CEI's competence.

## 3.2 Cooperation with state institutions, professional and interest organisations

The CEI cooperates with numerous organisations on performing its tasks, consults expert institutions and cooperates on joint education projects with non-profit organisations.

[www.cizp.cz/Institute-verejne-spravy](http://www.cizp.cz/Institute-verejne-spravy)

[www.cizp.cz/Vedecke-a-vzdelavaci-institute](http://www.cizp.cz/Vedecke-a-vzdelavaci-institute)

[www.cizp.cz/Neziskove-organizace](http://www.cizp.cz/Neziskove-organizace)

## 3.3 International cooperation

In 2021, due to the global Covid-19 pandemic and related measures, only one foreign trip with personal participation took place, which was attended by two CEI employees. It was a trip to Slovakia for the "CITES International Conference" regarding the exchange of information with the relevant authorities of the Slovak Republic on enforcing compliance with the CITES convention. The main theme of the conference was the exchange of experience in the practical enforcement of the CITES convention, the presentation of problems faced by the competent authorities of both countries, and an outline of the future development of this issue, including a discussion of future forms of cooperation between the two countries.

Despite this difficult situation, international cooperation took place, just like in 2020, in the form of online communication. One of the most important activities of the CEI is collaboration under the IMPEL network. The IMPEL consists of representatives of organisations in EU member states, EU accession and candidate states and EEA and EFTA countries that actively advocate the environmental law. The IMPEL's mission is to contribute to effective implementation and enforcement of EU environmental law by building capacity, sharing good practice, provision of handbooks and tools, promoting cooperation and provision of feedback to legislators and regulators on practicality and enforceability of environmental legislation. The core of the network's work is projects.

Two meetings of the General Assembly were held within the framework of the IMPEL organization in the past year. In view of the current epidemiological situation, the meetings took place via video conference. The first took place in June during

the Spanish Presidency of the EU Council and the second in December during the Slovenian Presidency of the EU Council. The CEI submitted a nomination for a member of the IMPEL Board on behalf of the Czech Republic, which was accepted. Therefore, the Czech Republic now has a representative on the Board of IMPEL for the period of the French and Czech presidencies in the Council of the EU.

The CEI employees continued to participate in the work of the IMPEL expert groups in the areas of Air and Industry, Water and Soil, Waste and TSF, Nature Protection and Cross-cutting Tools and Approaches. In 2021, representatives of the CEI, also in cooperation with the employees of the Ministry of the Environment, participated in various activities within these groups. As part of the "Meeting of the IMPEL expert group for nature", they participated in the ongoing projects "IMPEL-ESIX" (illegal handling of birds and transboundary crimes) and "BIOVAL" (Ecosystems Recovery).

The IMPEL project to implement the directive on industrial emissions continued in 2021, but due to the Covid-19 pandemic only in the form of several virtual meetings, in which employees of CEI and MoE participated.

The final theses were created within the IMPEL Water and Soil expert group in 2021 for the project "Water and soil remediation for the period 2020-2021". They were focused on two remediation technologies - In Situ Chemical Oxidation (ISCO) and Soil Vapor Extraction (SVE). An employee of the CEI is a co-author of a report on ISCO technology.



The CEI, through its employees, also participates in most projects of another expert group, IMPEL Waste and TSF. It is actively represented, for example, in the "WEEE Article 17 Free-riders Project (EWEN)" project (implementation of Article 17 of the WEEE Directive (2012/19/EU), "Plastic Waste Shipments" or in the "Big-Little approach on TSF legislation" (control of legislation related to cross-border movement of waste). As part of the activities of this expert group, in addition to projects, so-called operational activities also take place. One of these activities, "NCP Best Practices Meetings", dealing with the exchange of information and experience, case studies, discussions on interpretations and inspection approaches between TSF national contact points, was also co-organized by a representative of the CEI. We also participated in the November IMPEL workshop "End-of-Waste and By-Products: Compliance with REACH Regulation".

The CEI is also involved in external IMPEL projects. Among them is, for example, the "SWEAP" project (project on the issue of waste transportation). At the November video conference "LIFE SWEAP Best Practice Meeting 2021", a case investigated by the CEI regarding the illegal cross-border transport of waste from Germany to the Czech Republic was also presented.

In addition to the IMPEL projects, the CEI employees from the International Biodiversity Protection and CITES Department participated in thematic webinars in the last year: „Wildlife Trafficking Cyber Crime Training Program“, „41st Meeting of the Wildlife Trade Enforcement Group“, „32nd INTERPOL Wildlife Crime Working Group Meeting“ or „Together to Defeat Wildlife Traffickers (On-line Multi-stakeholder Workshop)“. They also participated in two virtual meetings: „2020 EU CITES Seizure Data Analysis - Preliminary Discussion“ (discussion to data analysis on captures of CITES-listed wildlife in the European Union) in October and „6th Global Biodiversity Conservation Conference (GBCC) - The World After 2020: From Crisis to Biodiversity Conservation“ (concerning the conservation of biological diversity) in November 2021. The work on projects within the operational action EMPACT - Environmental crime "OP Lake 2020/2021" and "OP Lake 2021/2022", aimed at combating the illegal trade in eels, also continued via active participation in operational video meetings during the year and at the final video conference.

The head of the Waste Management Department (WMD) of the CEI Directorate presented the planning of inspections in the framework of cross-border transport of waste as part of the "Strike" project (enforcement of regulations in the area of waste and mercury) and presented experience of the Czech Republic with illegal waste transport in the "Waste-Force" project (detering illegal trade and waste management). WMD of the Liberec Territorial Inspectorate is a project partner of the cross-border group Germany-Czech Republic (North Bohemian region) and has been cooperating at this level

for a long time in the organization of seminars within the framework of individual projects in the field of waste management and at the same time as an expert advisor. In 2021, the WMD employees participated in the seventeenth two-day online video conference "Landfill Workshop Zittau-Liberec", organized this time on a commercial basis by the International Higher Education Institute Internationales Hochschulinstitut Zittau (IHI).

In the field of chemical safety, the CEI employees once again participated in regular online meetings, namely the "37th, 38th and 39th Forum for the Exchange of Information on Enforcement" (ECHA) and the "12th, 13th and 14th Meetings of the Biocides Subgroup ECHA forums" (BPRS), which aim to harmonize control activities in the field of chemical legislation.

In connection with the above, the chairmanship of the CEI in the "Working group for project prioritization" (the group that selects the topics of the ECHA forum projects for the next years), the chairmanship in the "Working group for the pilot project of the ECHA forum on recovered substances" (workshop with national coordinators took place in November 2021) and the participation of the CEI in the working group for the "ECHA REACH-EN-FORCE-8" forum project. The group is preparing and managing the eighth major ECHA Forum project focused on CLP, REACH and BPR and on substances, mixtures and articles sold online, for which virtual meetings took place in June and August 2021.

In the field of water protection, an online seminar "Cross-sectional regulations with an emphasis on air and IPKZ" was held in November, organized by the Slovak Environmental Agency (SEA) with a program dedicated to control activities and experiences in the prevention of serious industrial accidents. The CEI provided presentation on "Prevention of serious accidents - control activities in the Czech Republic during the Covid-19 pandemic". The head of the Water Protection Department of the CEI Directorate is a member of Working Group "H" under the International Commission for the Protection of the Elbe, and in 2021 they also participated in the online meeting of this group, which deals with the "International Warning and Alarm Plan for the Elbe" (IWAPE), an overview and evaluation of accidents in given year. The online meeting of the working group "Accidental pollution" (G3) under the International Commission for the Protection of the Odra from Pollution and the 29th meeting of the Czech-Polish working group for the protection of border waters from pollution were among other activities of the CEI. An online meeting of the "Accident Prevention and Control Group of the International Commission for the Protection of the Danube River" (ICPDR) was also held, where the issue of locations in the Danube basin contaminated with dangerous and particularly dangerous substances was discussed.

Despite the generally unfavourable epidemiological situation, in September 2021, as part of long-term cooperation and the transfer of experience in the field of integrated prevention, a training and consultation was held, with the participation of employees of the Ministry of the Environment of the Slovak Republic. An excursion was organized for the participants in the production line for aluminum beverage cans of the company CANPACK Czech, s. r. o. in Stříbro.

Foreign trips are usually carried out for the purpose of securing contractual obligations of the Czech Republic within the framework of international organizations, conventions and protocols on the one hand and activities directly related to EU membership on the other. In total, the CEI spent CZK 7,800.85 on foreign trips in 2021.

### 3.4 Communication with the public and the media

The CEI systematically communicates with the public and the media. In 2021, the situation was greatly affected by the Covid-19 epidemic. In connection with the state of emergency at the beginning of 2021, the CEI was restrained in publishing press releases.

In 2021, 36 press releases were issued and 310 media inquiries were answered. Due to the pandemic situation, the CEI did not hold any press conferences.

According to Newton media agency, the CEI was mentioned in 5,733 media items. Within that, 127 contributions were broadcast on radio, 207 on television, 1,192 articles were published in printed newspapers and regional papers, 4,207 in online magazines. However, not all programs, especially in electronic media, are monitored by Newton media.

In 2021, the media was most interested in the following topics: the accident on the Bečva waterway, waste dumps, illegal importation of waste, wetlands, artificial snow, fish deaths, destruction of nests, windstorms, illegal felling and forest destruction in connection with the construction of the Krtkův svět entertainment centre.





## **4 CEI activity in 2021 by department**



## CEI activity in 2021 by department

From among the decisions in force, Chapter 4 selects examples of the highest fines imposed by the CEI inspectorates to legal entities and natural persons doing business and decisions resulting in restriction of halting of operations. These decisions are listed for each of the environmental components (air, water, waste, forest, nature) for each CEI inspectorate. Examples of decisions on integrated agendas are listed for the CEI as a whole.

### Overview of CEI's work in 2021 by department

	Air protection	Water protection	Waste management	Nature protection and CITES	Forest protection	Integrated agendas	TOTAL 2021	
Number of inspectors (heads of departments + inspectors; final as of 31 Dec) *	79	84	93	77	46	17	396	
Number of inspections	2,813	2,235	2,651	2,113	913	506	11,231	
EIA statements (Act no. 100/2001 Coll.)	reported by IAD	reported by IAD	reported by IAD	reported by IAD	reported by IAD	742	742	
Other statements	3,351	722	125	77	97	807	5,179	
Fines	All fines imposed	252	372	529	453	69	37	1,712
	All fines that entered into force	264	349	515	448	64	33	1,673
	Total amount of fines in legal force (CZK)	13,532,000	16,635,035	34,905,000	8,082,200	4,579,500	1,654,000	79,387,735
Other decisions	Instances of halting or restriction to operations, a facility of part of it, in force	1	0	–	32	22	0	55
	No. of confiscations in force	0	–	–	101	–	–	101
	No. of remedial measures in force	6	19	4	20	37	2	88
No. of emergencies (under air acts) and accidents (under Waters Act)	141	297					438	

\*Note: The number of inspectors excludes joint public administration and self-government officers, directors of territorial inspectorates and directors of department.

— The department has no powers for this activity.

## 4.1 Air protection, Earth's climate system and ozone layer protection

### 4. 1. 1 Overview of inspection activity in 2021

Inspection activity in 2021 was carried out by the Air Protection inspectors in the areas of air protection, ozone layer protection and Earth's climate system protection to the full extent of powers defined in legal regulations in force and effect embracing the related environmental protection aspects. We inspected performance of obligations imposed by generally binding national legal regulations and EU regulations as well as performance of obligation specified in permits for operation of stationary sources of air pollution. In total we made 2,813 inspections, including 46.7% scheduled and 53.3% unscheduled.

The numbers and distribution of inspections carried out in 2021 among the areas of jurisdiction corresponded to the seriousness of the activities operated and their environmental impact. Most of the inspections concerned facilities with stationary sources of air pollution (2,153 checks) and the related activities of persons authorised for emission measurement and development of expert assessments (406 checks), and fewer inspections concerned compliance with requirements for protection of Earth's climate system (244 checks, within that 56 at facilities included in the greenhouse gas emissions permit trading system and 169 at entities handling fluorinated greenhouse gases) and ozone layer protection - stratospheric ozone (19 checks). In connection with inspections of adherence to requirements when handling controlled substances and fluorinated greenhouse gases, we inspected 10 entities doing activities requiring certification by the Ministry of the Environment.

The inspections carried out in 2021 and inspections carried out in the previous period with an overlap in proceedings until 2021 resulted in 264 final decisions on fines for breach of obligations in the protection of the air, ozone layer and the Earth's climate system.

Proceedings initiated in 2021 resulted in 225 fines (in the amount of CZK 6,345,000) and proceedings initiated in 2020 resulted in 39 fines (in the amount of CZK 7,187,000). The total amount of fines imposed in 2021 was CZK 13,532,000 (CZK 559,000 more than in 2020).

A total of 414 delicts (in 2020 – 437 delicts) were handled in the aforementioned final decisions on fines. Another 6 delicts were resolved with a reprimand (in 2020 – 6 delicts). Besides separate inspections on adherence to obligations of operators of stationary sources of air pollution, the department inspectors were involved in 374 inspections of facilities with integrated permits (integrated checks), inspecting adherence to all environmental protection requirements (compared to 256 integrated checks in 2020).

The total amount of fines imposed by Air Protection inspectors for violation of air protection requirements in proceedings run separately by the APD inspectors was CZK 13,275,000; it was CZK 209,000 for violation of requirements for handling of fluorinated greenhouse gases, CZK 10,000 for violation of requirements for handling of controlled substances. Two fines in the amount of CZK 28,000 were imposed in authorized and certified entities in 2021.

## 4. 1. 2 Overview of the performance of departmental tasks

### 4. 1. 2. 1 Air protection

In the area of air protection, departmental tasks were performed in 2021 as a part of the 5 categories of departmental tasks, namely (i) inspection of operation of facilities based on permits of air protection authorities and in accordance with the permits, (ii) compliance with set pollution levels (emission limits and emission ceilings) and technical requirements replacing or extending emission ceilings, (iii) detection of air pollution levels, (iv) record-keeping and reporting duty, and (v) other duties of entities operating stationary sources of air pollution and bans on selected activities.

#### I.

In 58 cases, the inspections found out that operators of stationary sources of air pollution listed in Annex 2 to the Air Protection Act, the operation of which requires a permit of an air protection authority, operated the facilities without a permit. Fines totalling CZK 7,038,000 were imposed for the proven delicts.

In 51 cases, the inspections found out that operators of stationary sources of air pollution listed in Annex 2 to the Air Protection Act, the operation of which requires a permit of an air protection authority, operated the facilities in contravention of permits. Fines totalling CZK 2,575,000 were imposed for the proven delicts.

In 25 cases, the inspections found that operators of stationary sources of air pollution with integrated permits operated their facilities in contravention of air protection requirements included in their integrated permits. Fines totalling CZK 1,108,000 were imposed for the proven delicts.

Since 2012, the operating permits have also included requirements for operation when exceeding air pollutant threshold values (the smog warning and regulation system), approved by the Czech Environmental Inspectorate before 2012 as regulation rules.

In 2021, only one smog situation was declared in the territory of the Czech Republic without the announcement of regulation (the main pollutant was airborne dust expressed as PM<sub>10</sub>). Since no regulation was announced, the Air Protection Department did not carry out any inspection of sources with operating conditions when exceeding the threshold value of pollutants in the air.

### Smog situations, regulation in 2021 for airborne dust expressed as PM<sub>10</sub>

Area	Smog situation	Regulation
	Duration in hrs	Duration in hrs
Ostravsko/Karvinsko/Frýdecko-Místeko excluding Třinecko	58 from 27 <sup>th</sup> December 2021 1:51 AM to 29 <sup>th</sup> December 2021 12:00 PM	0

In 2021, the Czech Environmental Inspectorate proceeded to halting of the operation of a stationary source of air pollution in one case. Details are in the section dedicated to significant cases.



## II.

Exceedance of emission limits for pollutants and technical requirements that replace or extend emission limits was identified in 27 cases. In proceedings with one delict and in proceedings with multiple delicts (cases where the delict was the most severely punishable), an amount of CZK 1,330,000 was imposed for these violations, of which CZK 945,000 for 21 delicts for non-compliance with a specific emission limit, CZK 85,000 for 5 delicts for non-compliance with the technical conditions of operation) and CZK 300,000 for 1 delict for non-compliance with the emission ceiling, and the delict was resolved through operation in violation of the integrated permit. The most numerous case types were exceedance of emission limits of nitrogen oxide (12 cases, solid fuel combustion in boilers), carbon monoxide (9 cases – combustion processes – combustion of gaseous and solid fuels, cogeneration units), solid pollutants (8 cases – combustion of solid fuels in boilers, foundry industry), volatile organic substances (5 cases – surface treatment by painting, degreasing, processing of petrochemical products), sulphur dioxide (3 cases – combustion of solid fuels), dimethylacetamide (1 case – processing of synthetic polymers).

Inspection of adherence to prescribed pollution levels (specific emission limits) and air impacts of sources was also done by means of measurements carried out by Air Protection Department employees of the CEI Headquarters. The concentrations of ten pollutants were determined by direct measurements, and a total of three samples of collected solid pollutants and odorous substances were analysed in the laboratory. In order to find out the influence of sources emitting substances with a nuisance odour on the air, the air protection inspectors of the HQ took two air samples and analysed them using dynamic olfactometry. In both cases, it was a source for which no specific emission limits for odorous substances have been established. The results of these measurements were used to objectify the level of pollution when dealing with suggestions.

## III.

A fine of CZK 335,000 was imposed for this violation in proceedings with one delict and in proceedings with multiple delicts (cases where the delict was the most severely punishable). In 54 cases, resource operators did not comply with the obligation to submit a protocol with measurement results to the Inspectorate. In proceedings with one delict and in proceedings with multiple delicts (cases where the delict was the most severely punishable), a fine of CZK 320,000 was imposed for this violation. Four cases of untimely submission of protocols were dealt with in the form of reprimands.

In 2021, the CEI inspected adherence to the duty of identification and evaluation of air pollution levels by direct measurements taken by authorised persons as single measurements or continuous measurements arranged by the operator. It was an obligation of facility operators to submit reports with measurement results to the Inspectorate within the set period. In 30 cases, the violation of the obligation to carry out single emission measurement was identified. A fine of CZK 335,000 was imposed for this violation in proceedings with one delict and in proceedings with multiple delicts (cases where the delict was the most severely punishable). In 54 cases, resource operators did not comply with the obligation to submit a protocol with measurement results to the inspection. In proceedings with one delict and in proceedings with multiple delicts (cases where the delict was the most severely punishable), a fine of CZK 320,000 was imposed for this violation. Four cases of untimely submission of protocols were dealt with in the form of reprimands.

In 2021, CEI inspectors checked 406 cases of adherence to duties of persons authorised by the Ministry of the Environment for development of expert reviews and performance of single emission measurements. The checks found no violation of authorised entities' obligations. The inspected expert reviews had been developed by their authors in accordance with the MoE Air Protection Department methodological instruction for development of expert reviews and showed no formal shortcomings.

## IV.

Failure to adhere to the obligation to keep operating records or submit summary operating records was proven to operators of stationary sources of air pollution in 108 cases (105 cases of non-reporting of summary operational record data, three cases of non-maintenance/non-keeping of operational records). In proceedings with a single delict and in proceedings with multiple delicts (cases where the delict was the most severely punishable), an amount of CZK 423,000 was imposed for this violation (CZK 363,000 for failure to report data in the summary operating records, CZK 60,000 for failure to maintain/keep operational records). One case of failure to report the data of the summary operational record by the deadline was resolved in the form of a warning.

## V.

During the performance of the inspection activity, violations of other obligations and prohibitions in air protection were also found. In nine cases, the combustion of unpermitted materials in an open fire was found, the fines for violating this ban amounted to CZK 131,000. During the inspections, it was found that in two cases that the operator of the stationary

source of air pollution did not submit a notification on the calculation of the fee, for which a fine of CZK 15,000 was imposed. In one case, there was a violation of the operator's obligation to provide the environmental inspection upon request with information about the operation of the pollution source. A fine of CZK 300,000 was imposed for this offence. In another case, the operator of the source did not submit a report to the inspection on the removal of deficiencies identified during the previous inspection of the source. A fine of CZK 10,000 was imposed according to the Inspection Regulations for non-cooperation during the inspection. In one case, a violation of the obligation of the pollution source operator to discharge waste air into

the outdoor air through a defined vent was found, the delict was handled in the proceedings together with the other detected delicts and the amount was absorbed into the most severely punishable delict, the total amount imposed by the decision was CZK 120,000.

In 2021, compared to 2020, there were no violations of waste combustion in stationary combustion sources or non-removal of a dangerous state due to a malfunction during the operation of the sources.

## 4. 1. 2. 2 Earth's climate system protection

The tools of Earth's climate system protection – prevention of greenhouse gas emissions that absorb radiation in the infrared area – are inspection of compliance with requirements on handling of fluorinated greenhouse gases and requirements set for facilities included in the greenhouse gas permit trading system.

The 169 checks of operators of facilities with fluorinated greenhouse gas contents and other entities handling fluorinated greenhouse gases resulted in 15 proven delicts, leading to the imposition of 11 fines totalling CZK 209,000. 13 cases dealt with the violation of the obligation to arrange equipment tightness inspection.

In one case, at the time of the inspection, the operator did not have records of devices with F-gas at the establishment, in the last case it was a matter of not keeping records of devices containing F-gases.

Persons carrying out activities for which certification by the Ministry of the Environment is required were also inspected, especially in the form of tightness checks, service and maintenance of equipment containing refrigerants based on regulated substances and fluorinated greenhouse gases, persons ensuring the processing of decommissioned refrigeration equipment as well as attestation and evaluation of entities. As a result of these checks, 31 delicts were proven, for which two fines totalling CZK 28,000 were imposed. These included delicts by attestation entities that did not inform the Ministry of the Environment and the CEI about the place and date of the relevant examination, and at the same time, delicts were handled in these proceedings, such as not sending a list of persons, who in the previous calendar year received a certificate, and attestation entity's fail to notify the Ministry of the Environment about the change of identification data.

In 2021, a total of 56 inspections of stationary facilities included in the greenhouse gas emission allowance trading system were carried out. No delict was found during these checks.

## 4. 1. 2. 3 Ozone layer protection

Ozone layer protection (stratospheric ozone) from effects of substances that deplete it ("controlled substances") represents prevention of release of controlled substances from facilities containing them, typically as coolants. Controlled substances are gradually replaced with substances with a lower ozone layer depletion potential (ODP) and numbers of facilities in operation containing them are decreasing. In spite of that, one type of controlled substances is still used for critical uses such as extinguishing agents (halons). With a view to the general reduction in their use, we made relatively fewer checks in this area than in the case of equipment containing fluorinated greenhouse gases.

The result of 19 checks of compliance with requirements on handling of controlled substances was two cases of violations. In one case, an entity committed a violation by not arranging equipment tightness, for which a fine of CZK 10,000 was imposed. Another violation was reviewed

in the proceedings conducted for the violation of the obligation to carry out check of tightness on equipment containing F-gases. The Czech Environmental Inspectorate, as the administrator of the fee for the import and production of regulated substances, checked compliance with the fee obligation of the persons by whom the regulated substances were placed on the market. In three cases, the obligation to pay fees in the total amount of CZK 23,937 for imported halons for critical uses was determined.

In addition, a total of CZK 30,674 was transferred to the account of the Czech Environmental Inspectorate, based on the obligation given by Act No. 73/2012 Coll., to calculate the fee for the import of regulated substances separately and pay the amount to the account of the fee administrator by 30<sup>th</sup> April of the year following the calendar year in which the fee obligation arose.

## 4. 1. 3 Overview of the performance of specific tasks

Due to the extent of the departmental tasks, covering all of the air protection inspector's inspection work in the areas of air protection, climate and ozone layer protection, no specific tasks were assigned for 2021.

## 4. 1. 4 Major cases by amount of fine imposed and decisions on halting operations

### Prague TI

The CEI imposed a fine of CZK 90,000 on LASSELSBERGER, s.r.o. for operating a facility for the production of porous ceramic tiles in Lubná u Rakovníka in violation of the binding condition set out in the integrated permit – exceeding the emission limit for nitrogen oxides.

### České Budějovice TI

The CEI imposed a fine of CZK 150,000 on the company ERB invest, s. r. o. for operating the Černětice quarry without the permission of the air protection authority and for not reporting the data of the summary operating records.

The CEI imposed a fine of CZK 150,000 on the company Wotan Forest, a. s. for operating a stationary source of air pollution for wood processing in the Slavonice and Protivín facilities in violation of the permit conditions (failure to prevent dust, installation of unauthorized equipment to reduce emissions) and for failure to measure emissions.



Sawdust leakage into the external environment at the Protivín sawmill



### Plzeň TI

The CEI imposed a fine of CZK 100,000 on the company Plzeňská teplotárenská, a. s. for operating a heating plant in violation of the integrated permit - the deadlines for eliminating malfunctioning conditions on the equipment resulting in exceeding the emission limits for carbon monoxide and sulphur dioxide were not met.

### Ústí nad Labem TI

The CEI imposed a fine of CZK 350,000 on Greif Czech Republic, s. r. o., Ústí nad Labem for operating technology for painting manufactured metal barrels in violation of the operating permit (non-compliance with emission limits for VOCs (volatile organic compounds), non-compliance with the prescribed VOC content in paint materials, non-functional filter equipment, failure to perform filter checks) and for failure to perform an authorized measurement of formaldehyde emissions.

### Liberec TI

The CEI imposed a fine of CZK 180,000 on GOLEM Velké Hamry, a. s. for non-compliance with emission limits for solid pollutants and carbon monoxide during the operation of a stationary combustion source.

### Hradec Králové TI

The CEI imposed a fine of CZK 180,000 on the company BRUKOV, spol.s.r.o. for operating paint application technology in Smiřice without valid permission from the air protection authority and for carrying out painting in unauthorized premises.



Space in the premises of the BRUKOV company, where unauthorized painting took place

### Havlíčkův Brod TI

The CEI imposed a fine of CZK 80,000 on the company COLAS CZ, a. s. for the operation of the aggregate processing line in the Vícenice quarry near Náměště nad Oslavou in violation of the permit of the air protection authority consisting in the non-implementation of the measures stipulated by the operating regulations to limit the impact of traffic on the atmosphere.



Failure to provide measures to limit the impact of traffic on the air in the Vícenice quarry near Náměště nad Oslavou

### Brno TI

The CEI imposed a fine of CZK 5,000,000 on ZUCCA, a. s. for operating stationary sources of air pollution – cogeneration units and biogas production – at the "Bioplynová stanice Velký Karlov" site, Hrádek u Znojma, without an operating permit and further decided to stop operation of these resources.



Velký Karlov biogas station

### Olomouc TI

The CEI imposed a fine of CZK 150,000 on the company H+V VMD Grygov, s.r.o. for the operation of the listed sources in the village of Grygov in violation of the permit of the air protection authority. During the operation of the powder coating plant, the maximum consumption of powdered plastic was exceeded and unapproved preparations containing volatile organic substances were used.

### Ostrava TI

The CEI imposed a fine of CZK 150,000 on Varroc Lighting Systems, s. r. o., the operator of paint application technology in Šenov near Nový Jičín, for non-compliance with the emission limit for the mass concentration of volatile organic substances expressed as total organic carbon.

### Department of Air Protection at HQ

The CEI imposed a fine of CZK 20,000 on Swiss Automotive Group CZ, s. r. o., Hostivice, as an attestation entity, for not notifying about conducting exams to obtain a certificate for the recovery of fluorinated greenhouse gases from air conditioning systems of motor vehicles, not sending a list of persons with a certificate and not notifying changes to data.

## 4. 1. 5 Conclusions from the inspection work

With the inspections carried out, the Czech Environmental Inspectorate covered the entire scope of its competence in the areas of air protection, the ozone layer and the Earth's climate system, as set out both in directly effective national generally binding legal regulations and in EU regulations. The activity of the Inspectorate was affected by the epidemic of the Covid-19, just like the previous calendar year.

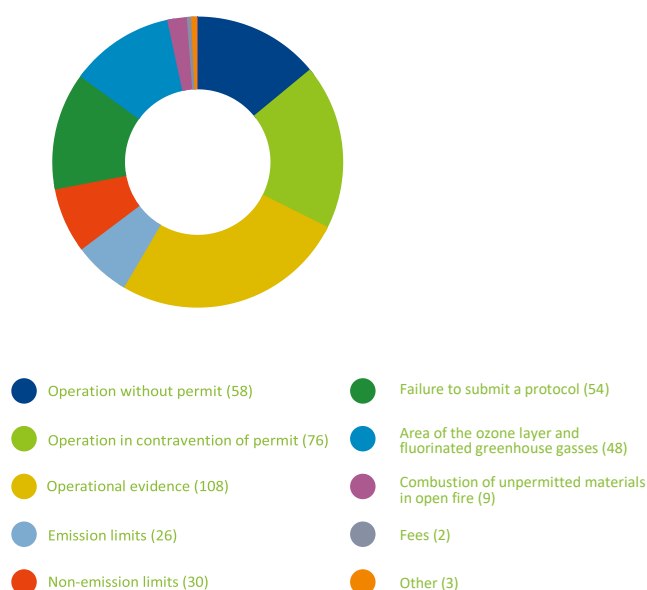
Compared to 2020, the activity was not significantly different in terms of numbers (in 2020 a total of 3,063 inspections were carried out, in 2021 2,813 inspections, in 2020 a total of 437 delicts were handled, in 2021, it was 414 delicts in the form of jurisdictional fines). The slight decrease in the number of performed inspections compared to 2020, which is recorded and reported by the Department of Air Protection, was caused by the transfer of the inspection capacity of the Department of Air Protection to inspections according to the Act on Integrated Prevention, which must be carried out at a certain mandatory legal frequency (in 2021, inspectors of the air protection unit participated in 374 integrated inspections, in 2020 they participated in 256 integrated inspections).

In 2021, a downward trend in the number of cases of operation of air pollution sources, listed in Annex no. 2 to the Air Protection Act, without a permit to operate was recorded. In 2021, 58 delicts for operating resources without a permit were handled, in 2020, it was 110 delicts.

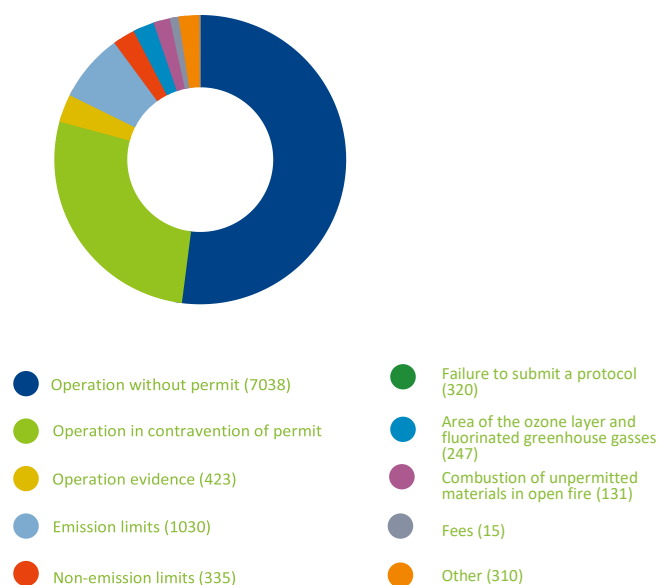
The CEI paid attention to Earth's climate system protection, both prevention of leakage of fluorinated greenhouse gases and compliance with requirements on operators of facilities included in the greenhouse gas emission permit trading system.

Even though the use of ozone layer depleting (controlled) substances is in a phase-out, we handled two delicts of violation of requirements for handling them. One case with violation of the obligation to carry out leak checks, for which a fine of CZK 10,000 was imposed. Another violation of the same obligation was handled in the proceedings for violation of the obligation to carry out leak checks on equipment containing F-gases.

### Numbers of delicts in air protection, ozone layer and Earth's climate system protection in 2021



### Fines imposed for violations of the conditions of air protection, the ozone layer and the Earth's climate system according to delicts in 2021 (in thousands of CZK)



## 4.2 Water protection and prevention of major industrial accidents

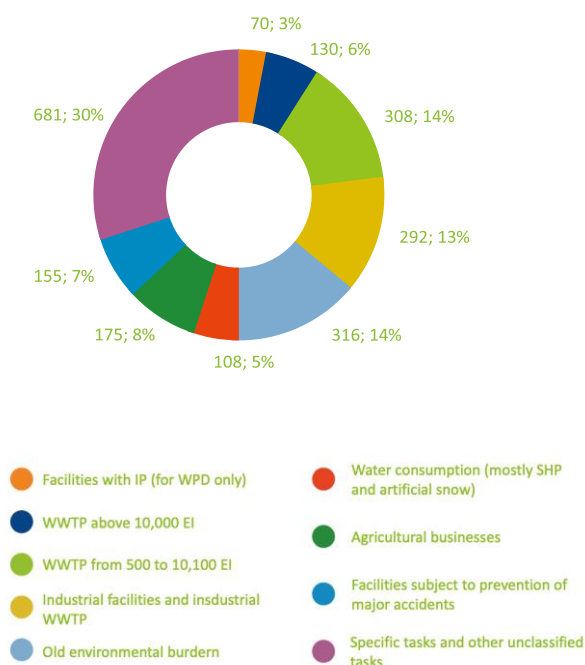
### 4.2.1 Overview of inspection work in 2021

Inspection work in 2021 was done by the Water Protection Department (WPD) inspectors to the full extent of powers defined by the Waters Act, Major Accident Prevention Act and Integrated Prevention Act in force and effect.

In 2021, Water Protection Department inspectors carried out 2,235 separate checks. Within that, 49% of the checks were scheduled (1,107) and 51% were unscheduled (1,128), the latter including checks made based on suggestions. Moreover, the WPD inspectors made 376 checks under the Integrated Prevention Act in cooperation with the other Departments.

The numbers and distribution of inspections corresponded to the importance of facilities and their environmental impacts. Most of the checks concerned wastewater treatment plants, industrial facilities including those falling under the Major Accident Prevention Act, and there were inspections of water collection, agriculture and sites with historic environmental burdens (HEB).

#### Breakdown of performed checks in 2021

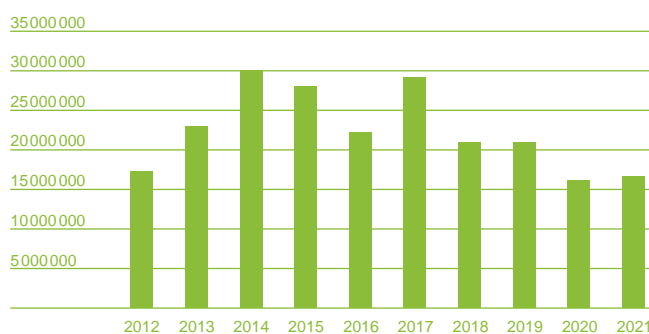


Based on the inspection work, we initiated 376 delict proceedings and issued 349 conclusive decisions on fines totalling CZK 16,635,035. Moreover, WPD inspectors cooperated on the issuance of 7 decisions as part of inspections in businesses with integrated permits (IP) that are registered in Chapter 4.7. The greater part of the fines was imposed based on results of unscheduled checks. To eliminate identified shortcomings and defects, we issued 20 decisions imposing a fixed-term corrective measure, of which 19 decisions became legal in 2021. Furthermore, 1 enforcement order was issued for non-fulfilment of the imposed remedial measure, which was already imposed by the CEI in 2020.

Act no. 113/2018 Coll. cancelled, as of 1<sup>st</sup> January 2019, collection of advance charges. At the same time, the Waters Act amendment transferred the complete charge agendas to the State Environmental Fund. In spite of that, the CEI still issued decisions in the charge agenda in 2021, because, pursuant to the transitional provisions, charge obligations arising prior to the effective date of the amended Act no. 113/2018 Coll. are governed by Act no. 254/2001 Coll., as effective before the amendment. We issued 10 decisions in the charge agenda, including two decisions on charges for discharge of wastewater into surface water amounting to CZK 4,155,348 and eight decisions on groundwater collection totalling CZK 296,460.

WPD inspectors developed 1,971 statements, both separately for the WPD (722) and as part of aggregate statements (1,249).

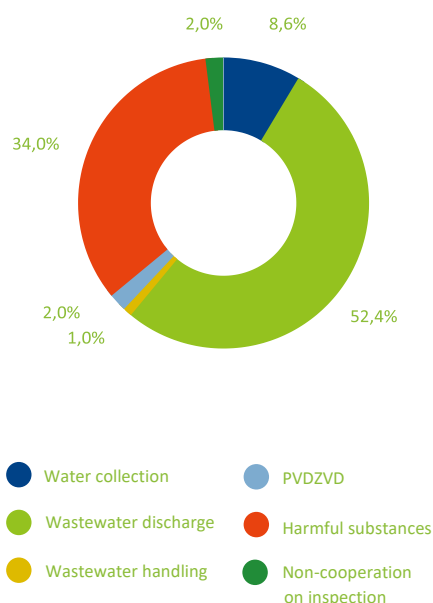
#### Amounts of fines in force (CZK)





In terms of delicts committed, the decisions on fines can be divided into six categories, including penalties for water collection (surface and/or groundwater collection in contravention of and/or without a permit), for wastewater discharge (from WWTP, septic tanks and/or fine sewer outlets in contravention of and/or without a permit), for wastewater handling (disposal of wastewater from dead-end cesspools without documenting the disposal method, disposal of wastewater in contravention of the Waters Act, such as on farmland), for handling with water (watercourse modifications without a permit, operating a hydraulic structure in contravention of a permit, operating or handling rules), for harmful substances (handling of harmful substances in the form of failure to carry out leak tests of storage facilities, failure to prepare an emergency plan, failure to take adequate measures to prevent harmful substances from entering surface or underground water) and for non-cooperation during inspection (violation of the provisions of Section 10, Para. 2 of Act No. 255/2012 Coll.).

#### Breakdown of fines in force into six basic categories of delicts committed



## 4. 2. 2 Overview of the performance of main and departmental tasks

### Inspections at environmental component pollution sources with valid integrated permits

The most important sources of pollution from the point of view of water protection fall under the Integrated Prevention Act. The focus of the inspections was chosen based on specific facility conditions. Inspections made by the WPD inspectors focused on adherence to requirements of the water management section of the integrated permit (IP), primarily adherence to permits for groundwater and surface water collection, wastewater discharge, handling of potential pollutants, verification of IP validity, inspection of operating rules, currency of accident plans and their elaboration pursuant to Decree no. 450/2005 Coll.

We made 446 checks as part of the task. WPD inspectors in cooperation with other departments made 376 integrated inspections and made 70 inspections on their own. A total of 22 penalty decisions imposed by the WPD entered into force, for fines totalling CZK 1,193,615. Furthermore, one reprimand was imposed. The most commonly identified delict was exceedance of emission limits in wastewater discharged. Detailed information relating to inspections made under the Integrated Prevention Act is provided in Chapter 4.7 Integrated Agendas.

As part of the task, 14 operations of neutralization stations and two operations of ammonia management were inspected. Based on the results of the investigations, in 2021, in the case of neutralization station operations, one decision on a final fine was issued and seven infringement proceedings were or will be initiated. In the case of ammonia operations, no final decision was issued, but 2 infringement proceedings will be initiated.

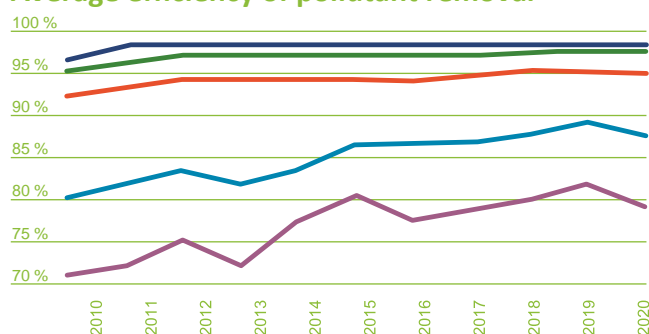
### Inspections at most important municipal wastewater treatment plants sized above 10,000 EI

The purpose of inspections at most important municipal wastewater treatment plants (WWTP) was to check functionality and technical condition of the WWTP, compliance with Council Directive 91/271/EEC on municipal wastewater treatment and GR no. 401/2015 Coll., on indicators and values of permissible pollution of surface water and wastewater, requirements for a permit to discharge wastewater into surface water and into sewers, and sensitive areas, with an emphasis on identification of the actual produced and discharged pollution from different sources and all other facts that may affect WWTP functionality, thus quantity of pollution discharged.

In 2021, 130 municipal WWTPs over 10,000 equivalent inhabitants (EI) were inspected. Due to the unfavourable epidemiological situation caused by the Covid-19 pandemic, six planned inspections were not carried out. On the basis of the inspections carried out, the inspectors found that there are no frequent and significant violations of the Water Act at sources in this category. According to the results of inspections carried out in 2021 and inspections from previous periods, five final fines totalling CZK 255,000 and one reprimand were imposed. From the statistics for the period 2015–2021, it follows that an average of three percent of inspections were terminated annually with sanctions. Legal fines were imposed for exceeding the allowed pollution emission limits set in water rights permits and for failure to comply with the conditions and obligations under which a specific WWTP was authorized and put into operation.

WWTP sized above 10,000 EI are checked periodically; the results indicate clearly that renovations of WWTP structural and process components and use of best available techniques leads to gradually improving quality of wastewater discharged from the WWTP, thus significant reduction of pollution discharged into surface waters. This statement is based on the observable trend of increasing efficiency of wastewater treatment, particularly as concerns the frequently debated indicator  $N_{tot}$  (see schematic chart of average efficiency of pollutant removal). The need for higher removal efficiency of dissolved phosphorus and nitrogen remains an important topic in the field of wastewater treatment.

### Average efficiency of pollutant removal



For all municipal WWTP in this category, we inspected the balance data for 2020, showing that 5.8 million cubic metres of wastewater had been treated. The treatment efficiency of municipal wastewater at these WWTP was 98.2% for BOD<sub>5</sub>, 95.3% for COD<sub>cr</sub>, 97.7% for NL, 79.9% for N<sub>tot</sub> and 87.6% for P<sub>tot</sub>. Quality required by Legislative Decree No. 401/2015 Coll. and Council Directive No. 91/271/EEC was achieved for the controlled WWTPs.

### Inspection of municipal wastewater treatment plants from 500 to 10,000 EI

The physical inspection of the water status of wastewater treatment plants in the category from 500 to 10,000 EI was of these water works, compliance with the conditions of the permit for the discharge of wastewater from them in relation to the way they are operated and the monitoring of their operation by polluters and compliance with the provisions of the Water Act regarding fees for the discharge of wastewater into surface waters. The inspections were carried out in view of the fact that at the beginning of 2021, the amendment to the Water Act No. 544/2020 Coll., which amends Act No. 254/2001 Coll., on waters (Water Act) entered into force with effect from 1<sup>st</sup> February 2021, which, among other things, amended the provisions of Section 8 Para. 3 letter g) of the Water Act, regarding the discharge of wastewater from relief chambers into surface waters without the permission of the relevant water authority.

In 2021, a total of 308 inspections were carried out as part of this task, which is 74 inspections more than in 2020. Due to the unfavourable epidemiological situation caused by the Covid-19 pandemic, 21 planned inspections were not carried out. Revisions and records of treatment plants that have not yet been inspected, that were inspected a long time ago, or treatment plants where a problem was detected in the past, were primarily carried out. In 2021, 45 final decisions on fines in the total amount of CZK 2,153,000 and one reprimand were imposed, another 14 administrative proceedings on fines have not yet been completed. Statistics for the period 2015–2021 show that an average of 13% of inspections were terminated annually with sanctions. In the long term, the most frequent delicts are exceeding the permitted pollution emission limits and the discharged volume of wastewater, failure to observe the frequency of taking control samples or discharging wastewater without the permission of the water authority.

It follows from the list of fines that major operational deficiencies occur permanently and regularly at WWTPs that are operated by municipalities, townships or voluntary associations of municipalities. On the basis of long-term experience, the expertise of workers, the range and availability of technical means, water companies usually operate treatment plants without major shortcomings and without technological fluctuations affecting the quality of discharged wastewater.

Insufficient removal of biogenic elements ( $P_{\text{tot}}$ ,  $N_{\text{tot}}$  and  $N\text{-NH}_4^+$ ) is a constant problem in the field of wastewater treatment. For smaller WWTPs, there are no provisions in Government Regulation No. 401/2015 Coll. maximum or permissible values of phosphorus concentration are set, and some WWTPs do not have phosphorus removal technology at all. The residual concentration of ammonia nitrogen in wastewater is the indicator most often exceeded at WWTPs in this category.

With the increase in public interest in water (including the intensification or construction of WWTPs) in the last few years, the number of unplanned inspection checks based on citizen's initiatives has increased significantly.



A view of the inner part of the Střílky wastewater

### Inspection of industrial entities handling potential pollutants

The inspections focused primarily on major industrial compounds where potential pollutants are stored or handled on a larger scale. The task included inspection of industrial WWTP (neutralization or demulsification station). The inspections focused primarily on compliance with requirements of permits for discharge wastewater into surface water and sewerage. Inspections of industrial entities operating ammonia management (winter stadiums or cold storage operations) were an integral part. In 2021, as part of the task, 12 neutralization station operations and 16 ammonia management operations were inspected in accordance with the Water Act. Furthermore, 14 operations of neutralization stations and two operations of ammonia management were inspected as part of integrated inspections. Based on the results of the inspections carried out, in 2021, in the case of neutralization station operations, there decisions were issued to impose a final penalty of CZK 120,000. In two cases, some pollution indicators were exceeded, but this did not affect the environment in terms of the death of aquatic animals. In one case, the required range of analyses was not observed.

In ten cases, proceedings on the offense will be initiated in the foreseeable future.

In the case of ammonia operations, four decisions on fines in the amount of CZK 60,000 entered into force in 2021. In all four cases, the penalty was imposed for handling a harmful substance without an approved emergency plan or without an emergency plan at all. In addition, another seven proceedings will be initiated. It can be stated that the operation of neutralization stations and ammonia management is at a generally good level from a technical point of view. The most common violation is the operation of equipment without an emergency plan.

A total of 292 checks were carried out as part of this task. The most common shortcoming was the absence of an emergency plan in case of an accident, exceeding emission limits at industrial WWTPs and non-fulfilment of obligations when dealing with harmful substances (water management security of tanks against leakage of stored substances, tank tightness tests, etc.). In 2021, 68 decisions in the total amount of CZK 4,610,702 and two decisions on measures to correct a defective condition became legal.



Storage of harmful substances on an area not secured by water management.

### Inspection of implementation of remediation of historic environmental burdens and long-term groundwater accidents

The inspection supervision of long-term accidents on the waters and, as a priority, the implementation of remediation in the removal of ecological damage that occurred before 1989 has been ongoing continuously for many years as part of the planned activity. Similar to the previous year, this year too, TI's activities were negatively affected by the next wave of the Covid-19 pandemic, which was reflected in a slight reduction in the number of planned inspection days at the sites of old ecological burdens (OEB). A total of 158 inspections were planned in 2021. For the above-mentioned reason, 129 of them were carried out. Control activities took place at OEB locations even



outside control days. A further 187 unplanned inspections were carried out, including locations of long-term accidents, which cannot be solved on the basis of the environmental contract with the Ministry of Finance of the Czech Republic, but their removal can be solved by drawing national and European subsidies.

CEI's supervision over the implementation of remedial works consists in monitoring their progress with regard to compliance with the deadlines set by corrective measures in CEI's decision. The situation has long been complicated by problems, e.g. insufficient funding given the amount of the allocated guarantees and the discovery of new facts of a technical nature that change the methodology of the remediation process. These problems ultimately prolong the entire process of removing OEBs, they can threaten the recontamination of already rehabilitated areas, they force changes in decision deadlines and the obligation to carry out executions by 1 February 2021. With effect from this date in connection with amendment No. 544/2020 Coll. of the Water Act, provision Section 42, Para. 2, was supplemented with the wording: "The execution of a decision issued pursuant to this provision cannot be initiated, ordered or carried out." The CEI terminated all executions initiated by the CEI as of this date.

In 2021, six remedial measures on the OEB (mostly these were shifts in the dates of implementation of remedial measures) and two decisions on long-term accidents came into force. Remediation work was completed in 2021 at the site of Mopas, a.s. Holešov, then at a sub-site in the area between the intra-company road and the banks of the Elbe on the premises of SPOLANA, s.r.o. On the sub-site "Contamination Cloud No. 2c" on the premises of ORLEN Unipetrol, a.s., in the premises of ŠROUBY Krupka, s. r. o., owned by Sokolovská uhelná, legal successor, a. s., the remediation of the heavy tar sludge dump was completed, and the remediation of the Mydlovary substation, company EG, was also completed. The environmental contracts with the acquirers of ČEZ, a. s. and MARS Svatka, a. s. were terminated according to protocol.



Demolition of tar pits underground

### Inspection of (mostly surface) water collection

This task focused on water collection with an emphasis on compliance with requirements of water management authority permits (observance of minimum residual flow rates) and observance of permitted quantity of water collected, both surface and groundwater. In the summer, the inspections focused primarily on water collection for operation of small hydropower plants (SHP). In the winter, we inspected water collection by skiing resorts, which use water for artificial snowing of ski slopes. Under this departmental task, we made 108 inspections. 32 decisions on fines totalling CZK 787,573 and one reprimand entered into force.

As part of this task, 59 SHP operations were inspected. As a result of non-compliance with the conditions set for the operation of the equipment, the minimum residual flow rate in the streams occurred in the SHP operations. In the monitored period, 16 decisions on the imposition of sanctions for the operation of SHP became legally binding in the total amount of CZK 357,000. The most frequent occurrences were excessive abstraction of water beyond the scope of the permit, operation of the waterworks without handling regulations, or operation of the SHP without a water permit.

26 ski resorts were checked. In the monitored period, only two violations were detected, for which final decisions in the total amount of CZK 65,000 were imposed. In both cases, there was excessive withdrawal of surface water from the stream and non-compliance with the minimum residual flow.

The remaining 14 decisions on the imposition of a sanction were imposed for the detected excess of the amount of water taken for the supply of drinking or utility water. The CEI will continue inspections focused on water withdrawals in the following year as well.



Placement of the hydrometer to monitor the minimum residual flow



### Inspections at agricultural businesses in terms of compliance with Waters Act requirements

The task is focused on fulfilling the requirements of the Water Act, and in particular on the management of harmful substances that are handled during agricultural activities. As part of the task, the water rights agenda was also inspected, especially permits for the management of underground and surface water and for the discharge of wastewater. Specifically, during the inspection activity, the handling of manure, slurry, fermentation sludge, digestate, fugate, silage juices, agrochemicals and, last but not least, substances of petroleum origin were monitored. Furthermore, the details of emergency plans were checked - water management security of operations.

A total of 175 inspections were carried out. On the basis of these inspections and inspections from previous years, 70 legal fines totalling CZK 4,194,145 and one reprimand were imposed. Furthermore, six authoritative measures were issued to correct the defective condition.

In view of the wide range of hazardous substances that are handled in agriculture, deficiencies in the handling of hazardous substances and deficiencies in the management of water were found during the inspection.

This year, the control activity was also affected by the situation arising during the Covid-19 pandemic, yet the control activity has a positive effect on the management of agricultural entrepreneurs in relation to water protection.



Unsecured manure pit

### Inspection of adherence to Act no. 224/2015 Coll. on Major Accident Prevention

An annual plan was approved by the Ministry of the Environment of the Czech Republic, according to which a total of 151 inspections were to be carried out in 2021 in accordance with the Act on the Prevention of Major Accidents. Their aim was to check all subjects according to the period of repeated inspections. In 2021, inspections were greatly hampered by government measures in connection with the spread of the Covid-19 pandemic. Only one inspection of an entity classified in group B was not carried out for these reasons. Based on the "criteria" developed and subsequently approved by the integrated inspection authorities, when a two-year interval was agreed, one entity from group B was reassigned to the plan for 2022. Beyond the approved plan four controls of unclassified subjects were still performed.

Inspections were carried out in cooperation with integrated inspection bodies (State Office of Labour Inspection, administrative authorities in the field of fire protection, population protection, integrated rescue system, Czech Mining Office, Regional Hygiene Station) and regional authorities in accordance with Act No. 224/2015 Coll., which incorporates current European regulations, in particular the Directive of the European Parliament and the Council No. 2012/18/EU, on the control of the risk of serious accidents involving the presence of dangerous substances.

Inspections in 2021 were focused mainly on local investigations in operation (if the pandemic situation allowed), technical condition of the equipment (leakiness tests, defectoscopy, detection tests, sprinkler tests and other elements of emergency preparedness), compliance with the Safety Management System in the facility (training of PZH and work safety, setting goals in the field of occupational health and safety for the upcoming period, audit and control of occupational health and safety objectives of the past period), record of extraordinary events, description of measures in connection with the pandemic, completion of the "aging questionnaire" (if it was not completed in 2020) and measures taken in connection with the Covid-19 pandemic.

During 2021, there were four major accidents. During these accidents, there were leaks of dangerous substances. In the first case, the reason was spot corrosion, in the second case a defect in the transport pipeline. In another case it was crash during preparations for a scheduled shutdown, a fire and explosion which resulted in injuries. In the case of the last accident, blast furnace gas leaked into the air. Three subjects in which a serious accident occurred were classified in group B, one subject was classified in group A. Currently, one of these accidents has not yet been evaluated by the regional authority as to whether it was a serious accident within the meaning of the Act on the Prevention of Serious Accidents or extraordinary event. The CEI did not impose a final fine

on any controlled entity in 2021 for an offense under the Act on the Prevention of Serious Accidents. The Inspectorate issued one corrective measure, which is valid. However, one violation of the obligations stipulated by the Act on the Prevention of Serious Accidents was detected the CEI, and administrative proceedings will be initiated.

The cooperation of the Inspectorate with other bodies of the integrated inspection was very good in 2021. As a result of this cooperation, practically the same number of inspections as planned was carried out. The inspection activity within this task has a positive impact in preventing the occurrence of emergency situations, which can be evaluated positively from the point of view of the impact on the environment.

### 4. 2. 3 Overview of the performance of specific tasks – summary

The planning of specific tasks reflects issues specific to a given region of territorial inspectorates (TI). Plans are established annually and inspections are targeted, based on long-term experience, on smaller operators who are assumed to be less informed about compliance with the provisions of the Water Act during their activities.

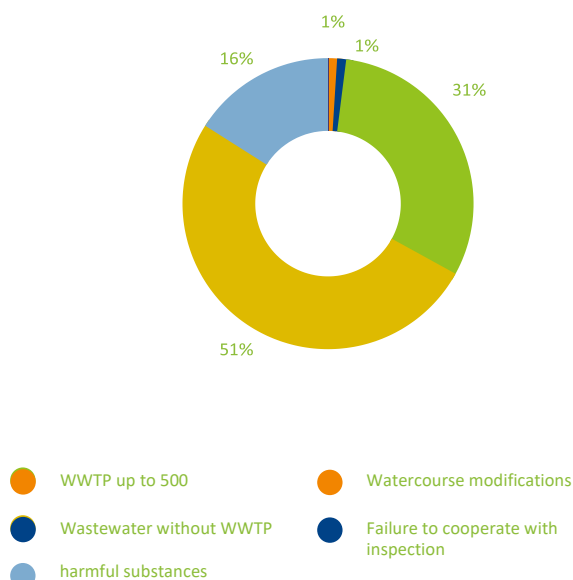
In 2021, 235 inspections were planned across territorial inspectorates. Similar to the previous year, the state's anti-epidemic measures had a negative impact on their implementation, and only 158 planned inspections were carried out compared to the plan. On the other hand, 523 additional unplanned inspections were carried out. In total, the inspectors carried out 681 inspections, on the basis of which they initiated 107 delict proceedings. All issued decisions became legally binding in the monitored period. Fines were imposed in the amount of CZK 3,441,000. Furthermore, in 2021, one reprimand was issued and two decisions on measures to correct the defective condition became legally binding. In order to enforce the obligations to eliminate the existing objectionable condition consisting in the discharge of strongly smelling sewage wastewater from a non-functional and non-operating wastewater treatment plant into surface waters, the CEI issued one enforcement order.

The inspections were focused on delicts related to the discharge of wastewater from WWTPs up to 500 EI in violation of a permit or without a permit, discharge of wastewater from free sewage outlets without a permit, disposal of wastewater from septic tanks and pits without drains without proof of their disposal, treatment of water flow without permit, failure to take adequate measures against the ingress of harmful substances into underground or surface waters.

From the point of view of delicts committed under our specific tasks, the amount of fines in force can be divided by percentage into five basic categories that include WWTP

to 500 EI (wastewater discharge in contravention of or without a permit), wastewater discharge without WWTP (discharge of wastewater from septic tanks and/or free sewage outlets in violation of a permit and/or without a permit, or disposal of wastewater from drainless pits without documenting the method of their removal), modifications of streams (modification of water flow without permission), harmful substances (handling of harmful substances in the form of failure to carry out leak tests of storage facilities, failure to prepare an emergency plan, failure to take adequate measures to prevent harmful substances from entering surface or underground water) and non-cooperation during inspection (violation of regulations of Section 10 Para. 2 of Act No. 255/2012 Coll.).

### Breakdown of fines in force into five basic categories of delicts committed



As examples of actions in the area of compliance with the applicable provisions of the Water Act we can mention inspections at public and non-public fuel filling stations (Plzeň TI), inspections of municipal waste water treatment plants up to 500 EI (Ústí nad Labem TI, Havlíčkův Brod TI, Prague TI, Hradec Králové TI, Brno TI, Ostrava TI), inspections of management of entities in protective zones of water resources (Ústí nad Labem TI - workplace Karlovy Vary, Havlíčkův Brod TI), inspections of recreational facilities and hotels (Ústí nad Labem TI, Olomouc TI), inspections of wood-processing industry establishments (Havlíčkův Brod TI), inspections of concrete plants and packaging plants with an emphasis on the handling of harmful substances (Havlíčkův Brod TI), inspections of ponds with a focus on water protection and control of handling regulations (Plzeň TI), inspections of wastewater discharge from open sewers outlets (Plzeň TI), inspections of car scrap yards and operators of metal waste warehouses (Plzeň TI).

## 4. 2. 4 Major cases

### Highest conclusive fines in the Water Protection Department by TI

Territorial Inspectorate Name	Entity	Imposed fine in force	Entry into force
Prague TI	FOBOS INVEST, a. s.	CZK 1,000,000.00	9 <sup>th</sup> February 2021
Brno TI	ZUCCA, a. s.	CZK 600,000.00	7 <sup>th</sup> May 2021
Ostrava TI	PROJEKT MORAVSKÁ, s. r. o.	CZK 450,000.00	22 <sup>nd</sup> September 2021
Ústí nad Labem TI	Agrokomplex, spol. s r. o.	CZK 332,775.00	24 <sup>th</sup> March 2021
České Budějovice TI	FONTÁNA HOTEL, s. r. o.	CZK 280,000.00	8 <sup>th</sup> December 2021
Plzeň TI	OKULA Nýrsko, a. s.	CZK 270,000.00	14 <sup>th</sup> January 2021
Havlíčkův Brod TI	ENVIROPOL, s. r. o.	CZK 250,000.00	16 <sup>th</sup> February 2021
	PKS okna, a. s.	CZK 250,000.00	29 <sup>th</sup> November 2021
Olomouc TI	ZOD Němčice nad Hanou, družstvo	CZK 200,000.00	13 <sup>th</sup> May 2021
Liberec TI	ROVS, s. r. o.	CZK 150,000.00	3 <sup>rd</sup> February 2021
Hradec Králové TI	Vodárenská společnost Chrudim, a. s.	CZK 120,000.00	14 <sup>th</sup> December 2021
	Kozák Svitavy, s. r. o.	CZK 120,000.00	17 <sup>th</sup> February 2021

### Highest sanctions imposed by each TI (in descending order of fine amount):

#### Prague TI: FOBOS INVEST, a. s.

(the highest legal fine imposed by WPD in 2021)

The CEI imposed a fine of CZK 1,000,000 on the company FOBOS INVEST, a. s. for handling harmful substances in a larger scale without an approved emergency plan and for a storage tank that was not secured against the mixing of harmful substances stored in it with rainwater. The company did not appeal against the decision, and the inspection decision entered into force on 9<sup>th</sup> February 2021. Analyses of soil samples taken in the vicinity of the above-ground tank proved that hazardous substances (petroleum substances and PAHs) are leaking from the tank into the soil around the tank.

#### Brno TI: ZUCCA, a. s.

According to the decision of the CEI, a fine of CZK 900,000 was imposed on the company Zucca, a. s., which operates a biogas station in Velký Karlov, including storage facilities.

The company appealed against the CEI's decision. The appeal body reduced the fine to CZK 600,000. The decision of the MoE entered into force on 5<sup>th</sup> July 2021. The CEI found a violation of legal obligations under the Water Act during the operation of the biogas station in the failure to comply with the imposed corrective measure, which consisted in securing stored materials containing harmful substances against being washed away by rainwater, in the storage and handling of harmful substances without an approved emergency plan, or in the way of handling harmful substances that are also suitable from the point of view of water protection, and for the leakage of fermentation sludge and failure to report the accident.

#### Ostrava TI: PROJEKT MORAVSKÁ, s. r. o.

The company's delicts consisted in not reporting the accident that occurred on 21<sup>st</sup> January 2021 at the terminal equipment of the Bílov biogas station in the form of a leak of digestate onto the paved and unpaved areas around the reservoir and further into the nameless tributary of Pustějovský potok, in the leakage of silage juices onto the adjacent terrain



and further into melioration ditch opening into an unnamed watercourse on 18<sup>th</sup> February 2021 and in the leakage of a harmful substance from the fermenters of the Bílov biogas station onto the unpaved adjacent terrain and subsequently into the melioration ditch on 2<sup>nd</sup> March 2021. For the aforementioned violations, the inspection imposed a fine of CZK 450,000 on the company by decision. The company did not appeal against the decision and the decision of the CEI entered into force on 22<sup>nd</sup> September 2021.



Leakage of a harmful substance in the terminal equipment of the Bílov biogas station

### Ústí nad Labem TI: Agrokomplex, spol. s r. o.

In the area of OMD Čáslav (stables and social facilities) and in an apartment building with tenants operated by Agrokomplex, spol. s r. o., the Inspectorate found the illegal withdrawal of 11,092.5 m<sup>3</sup> of groundwater, during the years 2018 and 2019. A fine of CZK 332,775 was imposed on the company for the illegally withdrawn quantity of groundwater in violation of the valid water management permit of the water authority. The company did not appeal against the CEI's decision, and the decision became final on 24<sup>th</sup> March 2021.

### České Budějovice TI: FONTÁNA HOTEL, s. r. o.

The company FONTÁNA HOTEL, s. r. o., as the operator of the recreational facility "Hotel Fontána Hrdoňov", took 15,633 m<sup>3</sup> of groundwater from drilled wells without a water management permit. Furthermore, during the same period, the company discharged pre-treated wastewater from the wastewater treatment plant into surface waters without the permission of the water authority and operated the WWTP in violation of the WWTP operating regulations. For the mentioned delicts, the CEI decided to impose a fine of CZK 280,000 on the company in accordance with the provisions relating to the most severe criminal delict, i.e. for discharging wastewater without a permit. The company did not appeal against the decision and the fine became final on 8<sup>th</sup> December 2021.

### Plzeň TI: OKULA Nýrsko, a. s.

For taking 23,781 m<sup>3</sup> of surface water from the Úhlava river in violation of the decision of the water authority, for discharging waste water from flow-through cooling in the production area of the Okula plant in Nýrsko into surface water without the necessary permit from the water authority, for exceeding the monthly limit set by the permit by 7,904 m<sup>3</sup> for the discharge of wastewater from flow-through cooling in the production area of the Okula plant in Nýrsko into surface water and for handling harmful substances on a larger scale without an approved emergency plan, the CEI imposed a fine of CZK 270,000 on the company. The company did not use its right to appeal and the fine became legally binding on 14<sup>th</sup> January 2021.

### Havlíčkův Brod TI: ENVIROPOL, s. r. o.

The company ENVIROPOL, s. r. o. violated the Act on Integrated Prevention (No. 76/2002 Coll.) by discharging wastewater containing a particularly dangerous harmful substance (cadmium) into the public sewage system of the city of Jihlava from its Jihlava - Hruškové plant without the permission of the Water Authority. The CEI imposed a fine of CZK 250,000 on the company for the delict committed. The company appealed against the decision; the appellate body confirmed the decision of CEI. The decision entered into force on 16<sup>th</sup> February 2021.

### Havlíčkův Brod TI: PKS okna, a. s.

During the inspection of the company PKS okna, a. s., it was found that from the window production located in Žďár nad Sázavou, wastewater containing a particularly dangerous harmful substance (propiconazole) is being discharged into the sewage system for public use in the city of Žďár nad Sázavou without the permission of the water authority. The CEI imposed a fine of CZK 250,000 on the company for violating the provisions of the Act on Integrated Prevention. The company appealed against the decision; the appellate body confirmed the decision of CEI. The decision of the Inspectorate took legal effect on 29<sup>th</sup> November 2021.



Storage of harmful substances on the premises of PKS Okna



### **Olomouc TI: ZOD Němčice nad Hanou, cooperative**

On the basis of the reported accident with the leakage of a harmful substance into the Žlebůvka stream, an inspection at the ZOD was carried out and found that the ZOD was discharging a harmful substance (rainwater with residues of silage water) in the amount of 36 m<sup>3</sup> behind the fence of the cooperative's area using a tank fecal truck. The impact on the Žlebůvka stream was demonstrated up to a distance of approx. 2.5 km from the point of inflow. The CEI imposed a fine of CZK 200,000 for the aforementioned delict. The cooperative did not appeal against the decision of the CEI, and the fine became final on 13<sup>th</sup> May 2021.

### **Liberec TI: ROVS, s. r. o.**

In February 2020, the CEI announced the start of an inspection of the company in order to verify the fulfilment of the imposed remedial measure, which the Inspectorate imposed on the basis of an earlier investigation in the period 2016 to 2019, which found violations of the provisions of the Water Act during the operation of agricultural activities, consisting in the failure to secure harmful substances against leaks into underground water and for which the CEI imposed a legal fine and remedial measures on the company. At the same time as the inspection was announced, the company called for the submission of documents related to the conditions of the stabled cattle, the amount of water taken, leak tests of pits for storing harmful substances and emergency plans approved by the water authority. In March 2020, the company asked the Inspectorate for an alternative date for the delivery of the required documents, first due to the workload of the responsible employee, and then due to the declaration of a state of emergency and the related restriction of activity. The CEI granted the request, but the company did not provide the documents even in the alternative deadline. The Inspectorate imposed a fine of CZK 150,000 on the company ROVS, s.r.o. for not allowing an inspection in accordance with the Act on Inspection and not providing the necessary cooperation. The company filed an appeal against the decision of the CEI, which was rejected by the appeal body as late. The decision entered into force on 3<sup>rd</sup> February 2021.

### **Hradec Králové TI: Vodárenská společnost Chrudim, a. s.**

The company Vodárenská společnost Chrudim, a. s., the operator of the WWTP Hlinsko, violated the conditions of the valid water management permit consisting in exceeding the emission limits in the discharged wastewater in June 2021 for the pollution indicators BOD<sub>5</sub>, CHSK<sub>Cr</sub>, and N<sub>tot</sub>. For the aforementioned violation, the CEI fined the company Vodárenská společnost Chrudim, a. s. with an order in the amount of CZK 120,000, against which the company did not appeal, and the order became legally binding on 14<sup>th</sup> December 2021.

### **Hradec Králové TI: Kozák Svitavy, s. r. o.**

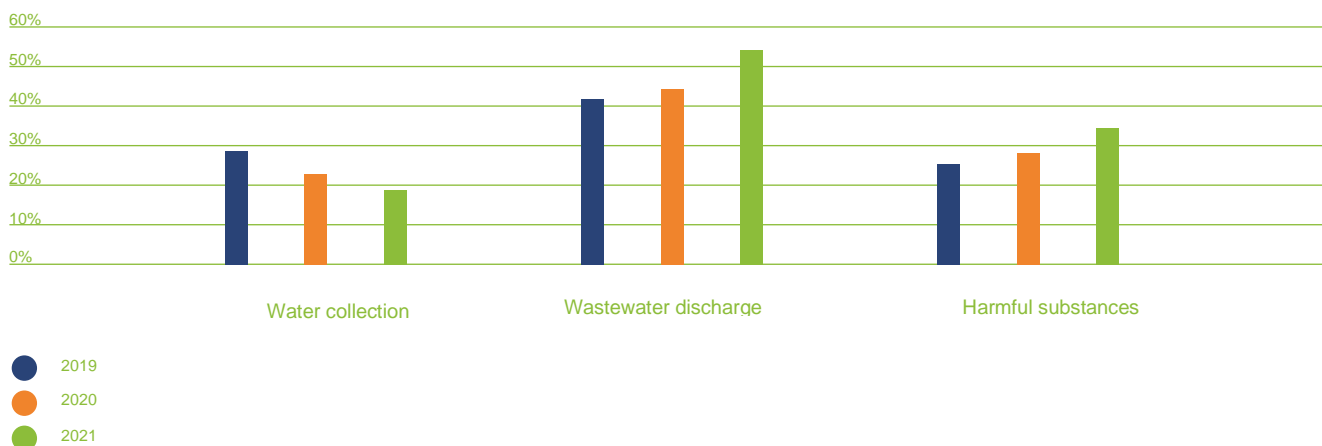
The CEI found the company Kozák Svitavy, s. r. o. guilty by order because it did not take adequate measures in the establishment "Povrchové úpravy Lanškroun" to prevent galvanic baths containing cyanides from entering the technological wastewater into the public sewage system of the city of Lanškroun, which terminates in the municipal sewage treatment plant. Furthermore, the company Kozák Svitavy, s.r.o. handled harmful substances to a greater extent, which were not listed in the valid emergency plan approved by the local water authority. For the aforementioned violations, the company's inspection imposed a fine of CZK 120,000 for the most severe criminal delict, i.e. for the leakage of a galvanic bath containing cyanide into the technological waters and then into the sewage system. The company did not object to the order and the order entered into force on 17<sup>th</sup> February 2021.

## **4. 2. 5 Conclusions from inspection work**

The CEI ensured a wide range of controls resulting from the relevant legal standards in water protection during the monitored period. When comparing the results with the previous period, the development can be characterized as stable. Even in 2021, the government measures of the Czech Republic in connection with the declared state of emergency caused by the Covid-19 pandemic had a negative impact on the implementation of planned activities within all tasks. Following the extraordinary measures announced by the resolutions of the Government of the Czech Republic on the adoption of crisis measures, which mainly consisted in limiting personal contacts, the control activity in 2021 was mainly focused on solving incidents and accidents, on new findings during terrain reconnaissance and checking the conditions of the decision based on the documents received in electronic or paper form from controlled entities. Anti-epidemic measures were followed in the case of the need to carry out an inspection with the participation of the inspected person.

The evaluation of the results of all inspection activities of the WWTP during 2021 showed that most delicts were dealt with for the illegal discharge of wastewater into surface waters from the operations of smaller WWTPs, often operated by municipalities, and from the operations of small entrepreneurs in the field of business for the provision of catering and accommodation services. The next most frequent breach of obligations under the Water Act was found by the CEI in the storage and handling of harmful substances. On the contrary, violations related to water withdrawals are decreasing.

## Breakdown of fine amounts by delict in comparison between 2019 to 2021



As in previous years, it is confirmed once again that the introduction of the best available technologies during the operation of WWTPs above 10,000 EI resulted in a significant reduction of pollution discharged into surface waters. The inspection findings showed that these important sources do not have major problems with compliance with legislative obligations. Violations of the Water Act, consisting in exceeding the emission limits set in the permits of the water authorities, were found only in rare cases at large WWTPs. The Inspectorate perceives this fact as a positive finding and evidence of the constantly improving state of the quality of discharged wastewater. However, due to the importance of large WWTPs and above all the amount of wastewater discharged, supervision of these WWTPs is still necessary.

The identified serious deficiencies in industrial and agricultural enterprises related mainly to the handling of hazardous substances in the form of failure to conduct leak tests in general or failure to conduct leak tests by a professionally qualified person, absence of emergency plans and failure to take adequate measures when handling and storing hazardous substances. In 2021, in the case of industrial enterprises (whether with or without an integrated permit), the inspection activity was additionally focused on checking the operations of neutralization stations and ammonia management. The CEI found violations of the Water Act in the form of storage of harmful substances without an approved emergency plan and exceeding permitted emission limits in wastewater discharged into surface waters in more than 50% of inspected entities operating neutralization stations or ammonia farms.

In the case of small establishments, which can be classified as municipalities operating WWTPs up to 500 EI or free sewer outlets, establishments of accommodation and catering facilities, car workshops, services, warehouses, carriers, ČS PHM operators, etc., violations of the Water Act were found in almost every seventh inspected entity. In the area of supervision and the detection of violations of the law with the subsequent imposition of a fine, the trend of cases from

unplanned controls compared to findings from planned controls is confirmed, which means greater time and administrative demands in securing evidence, obtaining documents and obtaining the results of the investigation.

It follows from the inspection activity that the completion of remedial works related to the removal of the OEB will be at a number of locations where the funds guaranteed by the environmental contract with the Ministry of Finance of the Czech Republic have already been used up, the problematic and imposed corrective measures of the inspection will not be fulfilled within the imposed deadlines. For this reason, enforcement of the imposed measures by the CEI will be very problematic. With effect from 1<sup>st</sup> February 2021 in connection with amendment No. 544/2020 Coll. of the Water Act, the provision of Section 42, Para. 2, was supplemented so that the execution of decisions issued pursuant to this provision cannot be initiated, ordered or carried out. All started executions, which relate to OEB sites with an environmental contract, were terminated by inspection as of the indicated date.

Although four accidents were recorded in 2021 for entities covered by the Major Accident Prevention Act, the contribution of inspection supervision carried out under the Major Accident Prevention Act can be assessed as effective in preventing accidents and emergency situations.

In 2021, the inspectors of the Water protection department continued to cooperate with other state administration bodies, both in the area of preparing new, but also in the area of revisions of current legal regulations with the central state administration body (MoE), as well as in the area of cooperation in the performance of control activities (e.g. regional authorities, police of the Czech Republic, the fire brigade, regional hygiene station, Czech Trade Inspection, watercourse managers, etc.). Controls in the area of water protection are still a significant preventive tool leading to the social protection of underground and surface water supplies.

## 4.3 Waste management, chemical substances and biocidal products

### 4.3.1 Overview of inspection activity in 2021

The CEI Waste Management Department (WMD) inspectors performed a total of 2,651 checks. They managed to carry out most of the planned inspections. These were inspections of compliance with legislation in the area of waste management, end-of-life products, packaging and chemicals. The inspections carried out include both planned inspections of the WMD CEI (1,264 inspections) and unplanned inspections (1,387 inspections), which also include inspections carried out on the basis of received suggestions. In 362 cases, the inspectors of the Waste Management Department participated in inspections pursuant to Act No. 76/2002 Coll., on Integrated Prevention (IPPC).

In 2021, 492 proceedings were initiated and 529 decisions on the imposition of sanctions were issued. A total of 515 decisions on fines became final in 2021, and corrective measures were imposed in four cases. In the monitored period, the legal authorities received fines in the total amount of CZK 34,905,000. An integral part of the work of WMD inspectors was the issuing of statements, especially on EIA and IPPC issues and other relevant agendas in the field of waste management.

### 4.3.2 Overview of the performance of departmental tasks

#### Waste disposal facilities

In 2021, a total of 386 inspections were carried out to control the operations of waste disposal facilities, both legal and illegal (e.g. illegal waste burning, illegal waste concentration, etc.). Compliance with the Integrated Prevention Law or the Waste Law was monitored for different types of facilities. These were mainly landfills during all phases of operation (landfilling, reclamation and aftercare). In addition, waste incineration plants were inspected, especially in connection with the epidemiological situation in 2021 accompanied by an increase in the amount of medical waste. Other controlled activities included the operation of facilities for the processing or decontamination of waste (solidification and neutralization units), biodegradation and waste storage facilities.

The most frequent violations of IP (Ingress Protection) conditions or breaches of the operating rules were detected.

The field inspections also examined whether operators had adequately responded to the change in legislation and to the situation in practice without implementing regulations to the law. The changes and the impact on their activities have been discussed with them. This often required consultations with the relevant department at the Ministry of the Environment.

Within the framework of the departmental task, 102 delict proceedings for the imposition of fines were conducted. Seventy-four decisions have entered into legal force in the amount of CZK 4,463,000.

#### Landfill sites

Most landfills for disposal of municipal waste or category "O" waste (S-003) were inspected but not all hazardous waste landfills were inspected for the reasons mentioned above. During the inspections of landfills, the inspection focused on checking the conditions of operations, such as compliance with the size of the active area, proper acceptance of waste, sufficient overlapping and compaction so that the operation of landfills is safe in relation to environmental protection, the use of waste in the technological equipment of buildings. In cases of suspected non-compliance with the specified dimensions of the active area or for accurate measurement of the landfill body, to determine the amount of waste deposited in the landfill (volume calculation) and also for determining the achieved elevation of the landfill body, inspections with a drone system were actively used. Among other things, the audits also focus on the creation of a financial reserve in the reclamation escrow accounts. During inspections, the Czech Environmental Inspectorate also focuses on compliance with measures to prevent fires, in many cases in regional cooperation with the fire brigade – even in 2021, there were fires at several landfills. The operation of a landfill site always involves serious situations that have a negative impact on the environment. As part of the operation controls at some landfills, compliance with Act No. 25/2008 Coll. on the Integrated Pollution Register was also checked but no violations of the Act were found.

The inspections of the landfills mainly found violations concerning the operating regulations and violations of the Ingress Protection conditions. In particular, the following was found at the landfill:

- non-compliance with the size of the active area,
- insufficient waste overlap (usually associated with spills of light fractions of waste),

- non-permitted waste types to the technological equipment of the buildings,
- also, incorrect (wrong registration codes) or inadequately kept waste records,
- failure to document the quality of waste received, shortcomings in the basic description of the waste or failure to carry out a visual inspection of the waste on receipt and whether it corresponds to the basic waste description provided (e.g., when waste was deposited, the undercut mixture of plastics was detected which, according to the basic waste description on the receipt was declared as mixed municipal waste),
- seepage water from the landfill was not managed in accordance with the conditions of the Ingress Protection (IP),
- the landfill site was used for the accumulation of waste types that were not approved by the operating rules, violated the fencing of the site, etc.

### Old landfills

Inspections and monitoring were carried out at several locations of the so-called “old landfills”, which were operated based on the decisions of the District National Committee issued in the 1980s or based on the decisions of the relevant MEP (municipality with extended powers) in the 1990s. These were small municipal landfills for solid waste. The landfills should be closed and reclaimed but the reclamation has not been carried out to a sufficient quality; exceptionally, the location has continued to be used for illegal disposal. Most of the time, the old landfills which have been closed lack land registry records to show the burden on the land because of waste disposal.

### More serious cases

In the case of the hazardous waste (HW) landfill near Litvínov, the Czech Environmental Inspectorate issued a decision to restrict the operation of the landfill when barrels of liquid waste containing styrene resins were found in the hazardous waste landfill during an inspection, which originated from the implementation of the OEB state contract (Nelahozeves – Kaučuk landfill). Subsequently, repeated inspection and monitoring activities were carried out at the landfill to verify compliance with operating restrictions and the implementation of measures. At the same time, there was close cooperation with law enforcement authorities and the prosecutor's office, several consultations with the Ministry of Finance and the Ministry of the Environment of the Czech Republic, the Fire Rescue Service, the Regional Authorities, etc.

### Illegal waste disposal and illegally concentrated waste – so-called “fly-tipping”

The received complaints drew attention to illegal waste handling, in particular the burning of waste and the dumping or occurrence of waste in unauthorized places, also called “fly-tipping”. The change in legislation has brought a new solution to the investigation of illegal waste dumps, which should be newly dealt with at the level of MEP (municipality with extended powers). The handling of illegally concentrated waste in relation to landowners is set out in Section 14 of the new Waste Law. Some cases of illegal waste were therefore referred to the local authority (MEP – municipality with extended powers) for resolution.

### Waste Incinerators

#### Extraordinary inspections aimed at ascertaining the state of medical waste management

Following the increased production of infectious waste as a result of the Covid-19 pandemic, a number of emergency inspections were carried out in the first quarter of the year, focusing on the management of medical waste, both at medical waste disposal facilities and at facilities for the collection, decontamination and production of medical waste. In the case of some incinerators of hazardous waste (or facilities for energy recovery of waste), the Czech Environmental Inspectorate carried out the longer-term monitoring of the intake of medical waste, where data was monitored in the system of the registration of hazardous waste shipments.

The nationwide action confirmed the enormous increase in the volume of medical waste and especially the high capacity of hazardous waste incinerators, which the operators had to deal with. As a result of the need to incinerate already decontaminated waste in 2021, it has become clear that thermal capacities in the Czech Republic are still insufficient. When storing infectious waste prior to disposal, timescales have been exceeded, although only occasionally for objective reasons (incinerator capacity combined with an increase in the volume of waste from stable healthcare suppliers). In addition, the operation of hazardous waste incinerators has been found to exceed the permitted capacity and fails to secure and label the hazardous waste containers. There was also an occasional attempt to send infectious waste to an incinerator, which was only allowed to receive a selected type of medical waste. The authorization for one incinerator expired at the end of 2021 and the waste had to be diverted to other already limited thermal capacities. The inspection of the medical waste decontamination facility revealed, in addition to errors in record-keeping, a number of fundamental mistakes in the operation of the facility – failure to carry out regular checks on the effectiveness of the decontamination process, failure to label waste



and exceeding the capacity, which was exceeded repeatedly (during the temporary storage of medical waste of the hazardous category, during the accumulation of medical waste and waste resulting from the treatment of hazardous waste - HW). Due to the repeated findings, a significant sanction has been proposed, which is not yet in force.

No other deficiencies or breaches of legal obligations were detected during unannounced emergency inspections at hazardous waste incinerators; the technological procedure, the proper regime and the specified permitted capacities of the facilities were followed, often by strictly regulated orders from suppliers. It can be concluded that most waste management companies have been highly helpful in dealing with the increased amount of medical waste.

### Other waste disposal or treatment facilities

Waste treatment facilities prior to disposal that remove or reduce the hazardous properties of waste by means of physico-chemical processes, were also inspected, in particular solidification and decontamination lines, demulsification stations and chemical treatment plants for wastewater and liquid waste as well as electroplating plants.

In an exceptional case of solidification, a leakage of hazardous waste – immature stabilizer from the stabilization technology was detected and it was also found that the operator does not possess a valid certificate for the exclusion of hazardous properties for the treated waste (stabilizer).

The inspection of the hazardous waste Biodegradation Facility found that the operator did not mark the concentrated hazardous waste, did not mark the water levels in the sumps for the levels, did not keep records of the water levels in the sumps and did not report an emergency situation regarding the loss of data in the electronically maintained operating log during a PC failure, which resulted in the loss of data for a year and a half period, concentrated part of the waste outside the facility in an area not secured by water, did not separate the different waste streams (categories Dangerous and Other) concentrated at the facility so that they were not mixed, did not maintain the consistency of the basis matrix in the biodegradation of waste carried out (i.e. a significantly heterogeneous mixture of wastes within the same batch), operated part of the biodegradation area in contravention of the Integrated Permit (IP). Sampling of the waste after biodegradation was carried out and the relevant batch of waste did not comply with the requirements, as all limit values were exceeded.

### Waste resulting from the tornado

After the devastating tornado in South Moravia, monitoring was carried out during the liquidation of the consequences of the natural disaster in the villages of Moravská Nová Ves, Hrušky, Mikulčice, Lužice and the settlement of Pánov. Continuous monitoring of the effects of the tornado was carried out to monitor the condition of the intermediate waste deposits, including their sorting, recycling and recovery to the maximum extent possible, removal of unusable waste and restoration of the areas after the intermediate waste deposits to their original state.

The inspections were initially carried out about twice a week in order to identify specific sites of “natural” waste concentration, then after the establishment of three “official” waste concentration sites (part of the field between the villages of Hrušky and Moravská Nová Ves, the area of the former lignite mine in Mikulčice and the area of the former South Moravian wood processing plant PLOMA in Hodonín) monitoring was carried out about once a week. After the removal of waste from the concentration sites began, the frequency of monitoring was gradually reduced and the waste recovery facilities where some treated demolition waste was transported for recovery were also inspected. There was continuous communication with the authorised waste disposers about the quantity of waste disposed of and the specific end facilities to which the waste was transferred.

A financial subsidy from the National Environment Programme was allocated for the implementation of the repair of damage and processing of waste resulting from the tornado and the subsequent activities of the Integrated Rescue System in the municipalities of the South Moravian Region. The aim was to improve the current state of the environment in the affected areas and to significantly reduce the negative effects of the deposited waste on the individual environmental components.

### Waste recovery equipment

A total of 165 inspections were carried out within the framework of inspections focused on waste recovery. Facilities for the treatment of biodegradable waste (composting plants, biogas plants, sludge application to soil), the use of construction waste and excavation waste in land reclamation, landscaping or backfilling, facilities for the treatment and recycling of construction waste (recycling equipment), recycling of plastics, waste sorting and the production of alternative fuels were inspected. 85 offence proceedings were initiated for the identified deficiencies. A total of 62 fines came into force last year, amounting to CZK 5,830,000.

### Landscaping and backfilling with construction waste

The submissions mainly alert the inspectorate to the loading of construction and demolition waste, illegal loading on land and unauthorized landscaping. They are also related to large-scale backfilling, when massive loads up to thousands of tons of construction waste are loaded, which is usually related to the construction of linear transport structures (motorways, expressways, etc.). The highest penalties are imposed for the illegal handling of construction and excavation debris. The illegal use of waste in the form of landscaping or reclamation was the subject of 38 delict proceedings and 27 penalties amounting to CZK 3,105,000 all of which became final last year.

Significant shortcomings have been found especially in the area of construction and demolition waste management, with illegal deliveries of large volumes of waste materials to the field. The reasons for illegal dumping are mainly of a financial nature (reduction of disposal and transport costs) but often just an unwillingness to go through the administrative procedure of permitting landscaping at the relevant building authority or approval of backfilling equipment under the Waste Act. The most frequent violation was the disposal of waste in places not designed for that purpose. It was also found that the facility was operated in violation of the operating rules, that the quality of the disposed waste in terms of environmental parameters was not documented and that a risk assessment for the site was not prepared. The management of cross-border transported waste steel slag, which was subsequently used in the Czech Republic as an artificial aggregate for non-cemented applications, was also addressed. Similarly, the large-scale loading of shredded tires for landscaping purposes was identified and addressed. The cases are still under investigation.

In many cases, inspections often encounter insufficient activity by the relevant building authorities (lack of building permits for landscaping, problematic demolition areas). Often the Czech Environmental Inspectorate has to deal with problems that should primarily be dealt with at the local level by the building authority (or municipal office or municipality with extended powers). These authorities have time and local availability, including control powers and in many cases, problems with illegal behaviour could be avoided.

### Waste recycling

Facilities treating waste, especially construction waste, were inspected. In the context of the recovery of construction waste, recycling centres are being developed that process construction waste into recyclates, whereby the waste regime is terminated (waste-to-product transition). In addition, facilities for the processing of plastic waste were inspected, as were facilities for the processing of wood waste,

for the processing of edible oils and fats as well as for the use of metal waste in metallurgy (waste rhodium, residual silver). Problems and errors were found in the waste records or failure to keep them, in the annual reports on waste production and management, errors in the reporting sheets for the transport of hazardous waste and the unsorted collection of generated waste. There were 26 proceedings, in 18 cases the sanctions became final and the total amounted to CZK 2,073,000.

### Use of biodegradable waste

Inspections of facilities for the biological treatment of waste in composting plants, in BPS (Basis point), in sludge treatment for land application focus in particular on the compliance of the operation of the facility with the consent granted and with the approved operating rules. 21 composting plants, 8 BP (Biogas Plants) and five cases of the use of sludge on the Agricultural Soil Fund were inspected. From the results of a total of 34 inspected facilities for the recovery of biodegradable waste, 21 delict proceedings for fines were conducted and 17 sanctions in the total amount of CZK 652,000 came into force.

Inspections of composting facilities carried out in 2021 show that there is still a problem with record-keeping in the use of waste management codes for composting as a long-term process. Facilities will often use the treatment code BN13 (composting) automatically on arrival at the facility, even though the composting process has not yet been started, completed and verified by analysis. Often the operator waits to establish landfills, so bio-waste is just stored instead of completing the required technological processing. Another persistent problem is that no recipes are set out in the operating rules and landfills are created simply by piling up waste according to the season, resulting in poor-quality compost that does not meet the quality mark. Common violations include exceeding the capacity of the composting facility, placing accepted waste outside a water-secure area, failing to comply with permit conditions, failing to report truthfully and completely on waste management production or even failing to analyse the output of the facility.

### Waste collection and redemption facilities

Even though the inspection activity of the Inspectorate was significantly reduced in 2021, 173 inspections were carried out in 2021 (10 less than in 2020) on waste collection, redemption facilities and warehouses for other and hazardous waste. 15 inspections were carried out on the basis of a complaint received. 51 sanction procedures were initiated. 50 decisions came into force, imposing fines amounting to CZK 4,407,000 (CZK 749,000 more than in 2020). Of this total amount, five were administrative fines (failure to submit documents by the deadline or failure to attend a reported inspection without a proper excuse) totalling CZK 720,000.

Also, in this case the Inspectorate focused its activities on view of the pandemic caused by the Covid-19 disease on waste collection, redemption facilities and warehouses handling other and hazardous waste, especially on the reception of infectious waste from healthcare facilities. The inspections focused on the management of medical infectious waste that was transferred to the cited facilities from various healthcare facilities (hospitals, clinics, etc.), testing facilities, laboratories and Covid-19 testing companies. The most frequent misconduct on the part of the operators of waste collection, redemption facilities and waste warehouses was the violation of the operating rules of the facilities in connection with the non-cooling of the premises in which the received infectious waste was subsequently stored, as well as the exceeding of the specified capacities of these facilities. This (exceeding the set capacity of the facilities) was due to the limited options for the physical management of healthcare waste in 2021 (the low capacity of waste incineration plants and a ban on the landfilling of medical waste).

Across the territorial inspectorates, inspections of waste collection, redemption facilities and warehouses for the other and hazardous waste most frequently recorded cases of facilities operating in violation of their approved operating rules. These included, for example, the receipt of unauthorized waste into the facility, cases where the person delivering the waste to the facility was not properly identified when buying the waste, the collection of waste in places not designed by the operating rules or failure to mark collection containers for hazardous waste. Inspectors also noted late, false or incomplete Waste Production and Management Reports that should have been prepared by the operator for the facility's activities. In 2021, the Inspectorate imposed the highest final sanction of CZK 950,000 on ESET, spol. s r.o. for failing to submit a Waste Production and Management Report for the operation of a mobile waste collection and redemption facility. The ESET Company was proven to have handled over 23,000 tonnes of other and hazardous waste while they have yet failed to comply with its obligation under the Waste Act.

### Hazardous waste warehouses

The inspections of the hazardous waste warehouses found mostly that these facilities had exceeded the maximum permitted capacity. Occasionally, during the inspection of the hazardous waste warehouse, serious deficiencies were found in the accumulation and storage of hazardous waste in outdoor areas, i.e. in places not specified in the operating rules of the facility. During an inspection of a mobile waste collection and redemption facility, the illegal storage of hazardous waste on the premises without a valid permit was detected. The Czech Environmental Inspectorate (CEI) also carried out specific inspections focused

on the management of metallic mercury to ensure the monitoring of mercury vapour and unauthorized transfer of waste to facilities without a valid permit. In one case, a final sanction of CZK 400,000 was imposed when the waste was stored separately from other stored liquid and flammable hazardous waste while other specific conditions for the storage of metallic mercury set out in the decree were violated. The BOMETANK® type containers with metallic mercury were folded directly on the floor, without any placement in protective collection tanks. Although there was no direct damage to the environment in this case, the facts of the offence were of a threatening nature. The company appealed the fine. The sanction was upheld by the appellate authority and became final in October 2021.



Storage of metallic mercury waste in contravention of the requirements of valid legislation

### Equipment for the collection and processing of car wrecks

In the area of end-of-life vehicle management (formerly car wrecks), a total of 82 entities were inspected in 2021. In half of the cases (i.e. 41 inspections), the inspection was carried out on the basis of complaints received, which is a slight increase compared to previous years (the CEI dealt with a total of 28 complaints in 2020 and a total of 35 complaints in 2019). The complaints are often directed at the illegal dismantling of end-of-life vehicles. In the course of 2021, inspectors initiated 28 offence proceedings and 25 decisions came into force, imposing fines totalling CZK 1,029,000. In all cases, fines were imposed on businesspersons or legal entities, as the CEI no longer has the competence to impose fines on natural persons as of the 1<sup>st</sup> of January 2021. Four cases were prosecuted for failure to cooperate with the inspection.

As a part of inspections focused on the management of end-of-life vehicles, the CEI detects both the illegal takeover and dismantling of end-of-life vehicles as well as misconduct by operators of permitted facilities. Almost half of the proceedings on this issue concern illegal disposal. Similarly, as in previous years, the CEI has encountered cases

where vehicles have been bought into the Czech Republic from abroad after a crash or in poor technical condition in order to be dismantled for spare parts. In one such case, inspectors of the CEI imposed a final fine of CZK 100,000. Specifically, it involved the illegal dismantling of at least 11 end-of-life vehicles that were purchased for the purpose of obtaining spare parts, mostly from Germany. In addition, inspectors encounter cases where dismantled vehicles are stored in a so-called “deposit” (i.e. temporarily taken out of service) without the relevant permit or vehicles that have officially ceased to exist (in connection with the acceptance of Act No. 239/2013 Coll.). In the past year, inspectors of the CEI also encountered a case where a vehicle registered as “stolen” in the Vehicle Register was illegally dismantled. The CEI subsequently informed the police of the Czech Republic about this finding.

In some cases, even subjects with valid permits are involved in illegal dismantling (dismantling outside designed areas). For example, the CEI dealt with a case where a metal waste collection facility was collecting and dismantling end-of-life vehicles even though it was not allowed to dispose of them. These end-of-life vehicles were registered and taken to another authorised end-of-life facility of the same operator. A final fine of CZK 80,000 was imposed for this behaviour.

During inspections of permitted facilities, as in previous years, violations of the operating regulations were most frequently detected, especially exceeding the specified capacity, storage and dismantling of end-of-life vehicles outside approved locations, failure to disclose the Vehicle identification number (VIN), errors in the storage of end-of-life vehicles or simply registration errors. In addition, the CEI frequently encounters cases where misconduct is found in the photographic documentation of an end-of-life vehicle. In particular, it is not clear from the photographic documentation that the end-of-life vehicle was in the facility at the time it was taken, as required by legislation. These findings may be related to the fact that these vehicles are admitted to the authorised facility on a ‘registration’ basis only, when they have not been physically admitted to the facility. For example, the CEI inspectors dealt with a case where end-of-life vehicles taken into a permitted facility were dismantled by someone outside the facility. During the inspection, it was found that the VIN code of the end-of-life vehicles had not been degraded and some vehicles were found to have been incorrectly photo-documented. 25 end-of-life vehicles (waste category ‘other’ and ‘hazardous’) were found outside the permitted facility. A final fine of CZK 80,000 was imposed on the permitted facility for these violations. In five other cases in 2021, the CEI also addressed the fact that end-of-life vehicles accepted for registration at permitted facilities were located at places other than these facilities, where they were mostly used as a source of spare components. In one investigated case,

an end-of-life vehicle was even caught by the police of the Czech Republic in a traffic accident.



Unauthorised storage and dismantling of car wrecks in a scrap metal yard

### Product take-back, end-of-life vehicle processors

The CEI inspectors checked a total of 121 entities in the field of take-back of selected products (electrical equipment, batteries and accumulators and tyres) in 2021. Of this number, 39 inspections were carried out on the basis of complaints received (some of them were directed at several producers and sometimes at several products at the same time). The most frequent suggestions pointed to the possible free riding of selected products, especially electrical equipment. The second most frequent subject of the received complaints was a non-functionality of tyre take-back points.

The table below shows the number of inspections and the number of complaints received by type of product subject to take-back, while some inspections and complaints may concern more than one product.

Product take-back	Number of inspections	Number of complaints
Electrical equipment	62	23
Tyres	46	14
Batteries and accumulators	22	5
<b>Total</b>	<b>121</b>	<b>39</b>

Concerning the issue of take-back, the CEI mainly controls producers (those who place individual products on the market in the Czech Republic), distributors, last sellers, operators of take-back points and also processors of these products. For take-back points, the CEI inspectors check whether these points are publicly accessible, functional and whether the take-back of selected products is carried out free



of charge. In 2021, the CEI inspectors initiated a total of 19 infringement proceedings in the field of selected products and 19 decisions came into force, imposing fines totalling CZK 730,000. The highest final fine of CZK 200,000 was imposed by the CEI on the last seller of electrical equipment who did not cooperate with the inspection (order fine). This last seller did not submit the required documents even after repeated requests from the CEI so that it could properly complete the inspection. In this case, this was the second fine for non-cooperation imposed on this particular seller.

## Tyres

In the area of tyre take-back, the CEI inspected 14 manufactures, 23 last sellers, 17 take-back points and one waste tyre processor. The CEI investigated a total of 14 complaints on this issue, seven of which related to non-functioning tyre take-back points. As in the previous year, these complaints mainly pointed to the refusal to take back tyres at take-back points or to conditioning the implementation of take-back only on the purchase of new tyres. These were mostly take-back points set up by manufactures, who fulfil their obligations individually, e.g. in garages, tyre shops or car dealers.

In addition, in 2021 the CEI inspected importers and cross-border transporters of tyres suspected of not fulfilling their obligations at all (so-called “free riding”) or fulfilling their obligations individually (these inspections focused mainly on meeting the minimum level of take-back, ensuring the treatment of waste tyres and fulfilling the reporting duty). In the case of the latter sellers, the CEI mainly checked compliance with the obligation to inform the end user in writing about the method of ensuring take-back, both in the case of sales via e-shops and in brick-and-mortar shops.

In the area of tyre take-back, a total of eight final fines in the amount of CZK 214,000 were imposed, of which six fines were imposed for ‘free riding’, i.e. importers and cross-border transporters of tyres who did not ensure the take-back of tyres and fulfilment of other related obligations (e.g. submission of an application for registration in the List of Producers, meeting the minimum level of take-back, ensuring a minimum collection network, registration and reporting obligations). In one such case, where a company placed numerous tyres on the market in the Czech Republic without complying with its obligations, the CEI inspectors imposed a final fine of CZK 100,000. The CEI also fined the operator of a take-back point in 2021 for charging for the take-back of tyres.

## Electrical equipment and batteries and accumulators

The CEI carried out a total of 62 inspections in the context of the take-back of electrical equipment, of which 23 were carried out on the basis of complaints received. These complaints most often pointed to internet sellers of mainly small electrical equipment intended for households and possible free riding of these products. In total, the inspectors checked 30 manufactures, 21 last sellers, 3 distributors and 7 processors of electrical equipment. In the area of batteries and accumulators, the CEI inspectors carried out a total of 22 inspections, most of them on manufacturers and last sellers.

Within the field of the take-back of electrical equipment, batteries and accumulators, the CEI initiated a total of 13 infringement proceedings and 13 decisions came into force, imposing fines totalling CZ 516,000. The most frequent violation of the law in this area concerned the so-called ‘free riding’ of importers of electrical equipment, batteries and accumulators, as in 2020 (a total of eight final decisions imposing fines of CZK 171,000). For example, the CEI imposed a fine of CZK 40,000 on an internet retailer of electrical equipment that failed to ensure that the end user could take back a used washing machine free of charge at the point of delivery of a new washing machine in the so-called ‘piece-for-piece’ scheme, for which the retailer additionally charged CZK 600 and the retailer also failed to inform the end user of the method of ensuring take-back. In 2021, the CEI also imposed a fine of CZK 75,000 on an electrical waste outside the areas defined by the relevant permit.

## Inspections of industrial enterprises and other waste producers

In 2021, inspectors carried out a total of 649 inspections of waste producers. A total of 95 penalty proceedings were initiated and 96 decisions came into force in 2021, imposing fines totalling CZK 4,651,500 and one corrective measure.

In 2021, the largest part of inspections of waste generators consisted mainly of large industrial enterprises or agricultural cooperatives with integrated permits. The focus mainly on emitters with an integrated permit is, similarly to last year, a consequence of the Covid-19 situation, where some inspections in 2020 were postponed until 2021. In most cases, these inspections take place in enclosed indoor areas, which has not always been possible in the context of efforts to limit personal contact, which is why a decrease in the number of inspections carried out in 2021 can be noted. Furthermore, the inspectors of the Waste Management Department (WMD) of CEI prioritized the investigation of received complaints of illegal waste management. Due to the entry into force of the new Waste Act on the 1<sup>st</sup> of January 2021, which

imposed some new obligations on waste generators, the inspections were also aimed at verifying whether the generators had accepted the new obligations as their own and were able to apply them in practice. As the transition to the new legislation took place very quickly, within a matter of days and no transition periods were set for some new obligations, the Inspectorate found occasional breaches during its investigations, such as the new obligation to conclude a written contract before generating municipal and construction waste that is not treated by the generator or the failure to ensure that all five components of municipal waste (paper, plastic, glass, biodegradable waste and metals) are sorted for visitors to the premises. Traditionally, large waste generators have not been found to have serious infringements, as they usually have an integrated permit, which is already known and acted upon by the generators. Large waste generators are also usually assisted by specialised ecologist, who are quicker to navigate new and old legislation and help bring operations into compliance. As in previous years, from the usual obligations of waste generators, rather minor offences such as failure to sort waste due to employee indiscipline or fulfilling registration and reporting obligations were detected. Furthermore, inspectors encountered, for example, misclassification of waste, failure to equip hazardous waste disposal sites with hazardous waste identification sheets or the transfer of waste to an unauthorized person. A persistent scourge among the generators of construction and demolition waste is the disposal of this waste in places not designed for this purpose and thanks to its apparent harmlessness, the subsequent transfer to persons who are not authorised to receive it.

The Inspectorate issued a fine of CZK 450,000 to the waste generator for unprofessional handling during the disposal of waste containing asbestos. The Inspectorate carried out the inspection on the basis of two complaints received in 2021 concerning alleged awful conduct by the contractor of the construction of a residential complex. During demolition work on the site of the former bakery, the company destroyed asbestos-containing boiler panels without taking any measures to prevent the release of asbestos fibres into the air. Nor did it ensure that asbestos fibres or asbestos dust was not released into the air during further handling of this waste. It treated the asbestos-containing waste produced in a mixture with construction waste as other category waste.

### Municipalities

In 2021, the CEI WMD carried out a total of 80 inspections of municipalities. 12 proceedings on the imposition of sanctions were initiated, and seven decisions, which imposed fines in the total amount of CZK 134,000, became final.

In 2021, municipal inspections focused again primarily on securing places for the separate concentration of municipal waste components, i.e. hazardous waste, paper, plastic, glass, metals, biodegradable waste (BDW) and edible oils and fats. Most municipalities have municipal waste collection points set up in a generally binding decree (hereafter referred to as GBD). Although the new Waste Act came into force on 1<sup>st</sup> January 2021, the Ministry of the Environment was benevolent towards the municipalities and stated in the methodological instructions to the municipalities that the existing GBD of the municipalities will also be valid in 2021, if they were in accordance with the old legislation. In 2021, the municipalities thus had space to prepare GBD in accordance with the requirements of the new legislation. Most of the inspected municipalities in the Czech Republic have a municipal waste management system that has been functionally and appropriately set up and operated for a long time, so even in 2021, violations in the field of setting up the municipal system were detected in a minority. If the problem has already been identified, it was most often law violation in the area of biodegradable waste, e.g. tree branches removed by burning. The most frequent violation, for which municipalities are sanctioned, is therefore not related to the setting of the municipality's system, but again to the issue of construction and demolition waste, which municipalities generate from carrying out construction work on their territory. These wastes are often, out of ignorance, deposited on undesignated municipal land, without quality analysis, or used to strengthen roads or fill various depressions in the territory of municipalities.

In 2021, for example, the case of the village of Poděvousy was interesting, which as part of the traditional "burning of witches" event also burned waste - in the burned pile there was waste such as mixed construction debris, the remains of bulky waste (charred metal bed frames or mattress reinforcements or charred door handles) and fresh BDW. The municipality received a final fine of CZK 40,000 for violating the Waste Act.

### Chemical act and biocides

CEI inspectors check regulations regarding chemical safety. These are the Chemicals Act No. 350/2011 Coll., the Biocides Act No. 324/2016 and related directly applicable European regulations - Regulation No. 1907/2006 on the Registration, Evaluation, Authorization and Restriction of Substances (REACH Regulation), Regulation No. 1272/2008 on classification, labelling and packaging of substances (CLP Regulation), Regulation No. 648/2004 on detergents, Regulation No. 528/2012 on biocides and others. The CEI carried out 551 inspections of the above-mentioned regulations. Most of the controls related to the REACH Regulation (substance registration, safety data sheets,

restricted and permitted substances; a total of 210 controls) or obligations arising from the CLP Regulation (classification, packaging and labelling of substances; a total of 167 controls). Biocidal preparations were inspected in 61 cases (122 biocidal preparations and treated objects were inspected, of which 55 showed defects).

In 2021, 110 fines and reprimands issued by Inspectorate for violations of the Chemicals Act, the Biocides Act and the Control Regulations (Act No. 255/2012 Coll.) in the total amount of CZK 2,398,500 came into force. 116 delict proceedings were initiated this year. Most of the violations related to internet advertising, incorrect labelling of substances and mixtures, biocidal products, notification of chemical mixtures and the quality of safety data sheets. The Inspectorate has been involved in the work of the European Chemicals Agency (ECHA), in particular its Enforcement Information Exchange Forum and Biocides Subgroup. Inspectorate staff actively participated in several working groups of the forum (for prioritizing control projects and for preparing a pilot project for recovered substances).

## Thematic controls

### European control projects

In 2021, the obligation to supply and use substances listed in Annex XIV of the REACH Regulation was controlled. These substances can only be placed on the market and used if it is permitted or if one of the exceptions applies to such a case. The inspections focused mainly on the use of hexavalent chromium compounds and took place within the framework of the pan-European inspection project REACH-EN-FORCE 9. 10 inspections were carried out, and in one case a violation of the REACH Regulation was found.

The pilot project of the ECHA forum was devoted to recovered substances - i.e. substances arising from waste. In general, the recovery of substances is considered as production according to the REACH Regulation and it is necessary to treat the obligation to register these substances. In some cases, it is possible to use the exemption from registration according to Article 2 Para. 7 letter d) of the REACH Regulation, and it was the use of this exception that the pilot project was primarily focused on. In order to use the aforementioned exemption from registration, it is particularly necessary to document the similarity of the composition of the recovered substance and the registered substance. A total of 12 inspections were carried out within the project.

### Newly restricted substances and 3D filaments

The inspectors were also involved in the Newly Restricted Substances project. These were restricted substances according to the European REACH Regulation, specifically substances newly listed in Annex XVII, namely inorganic

ammonium salts, bisphenol A, methanol, D4 and D5 cyclosiloxanes, NMP, organic and inorganic additives in textile products specified in Appendix 12 of REACH and silanetriol, including its derivatives (TDFA).

The control of PFOA was subsequently removed from the project, as this substance was moved to another European regulation (POPs) at the beginning of 2021. A total of 12 checks were carried out and two products were discovered that did not meet the criteria set out in REACH.

A pilot project of 3D filaments was added to the given thematic review due to the current development of technologies and anticipated social needs. 3D printing from polymer filaments is very widespread today, it uses recycled plastics or polymers with many additives (metals, dyes, flame retardant fillers, etc.), raw materials are often imported from non-European countries. Objects created by 3D printing are not subject to any further control or supervision, they can be used in any industry, including household and dining items, children's toys or respiratory protection items. At the same time, 3D printing itself is a very popular pastime not only for adults, but also for children.

This project showed many difficulties of market surveillance and proved the validity of these controls, because - even though it was a project with a small number of controls and samples - filaments with an unusual content of heavy metals or with chlorine and bromine content were also found. A total of 35 samples were checked, of which two showed suspicious values (Cr, Cl) and one more was sent for further analysis due to high bromine content.

Both parts of this thematic inspection were significantly facilitated by the possibility of using screening methods in the CEI laboratory.

## Market surveillance

The CEI, like one of many other bodies, supervises the safety of products placed on the European market (see also the 3D filament project). Its powers in this regard derive mainly from Act No. 102/2001 Coll., on general product safety in connection with the Safety Gate warning system (RAPEX) and from European Regulation 1020/2019 on market surveillance and compliance of products with regulations.

Based on the above, CEI inspectors monitor compliance with the ban on the sale of dangerous products listed in the Safety Gate (RAPEX) system, or they themselves search for potentially dangerous products on the Czech market. In 2021, 98 inspections were carried out and 150 declared dangerous products were examined. No products declared in the SG/RAPEX system were found in the given year. On the other hand, a novelty on the market - nicotine pouches - appeared as a problem.

At the same time, the performance of market surveillance is also related to the new obligation to use the European database system ICSMS. The transition to this system will be mandatory in the near future, and this will significantly increase the data network load of supervisory authorities and the administrative burden of individual inspectors. Related to this new duty of the office is the need to adapt internal database systems.

### A significant case – the chemical safety agenda

As part of the inspection, the inspectors focused on the NANO+ Silver disinfectant spray, the PURE 100% mask and respirator regeneration product, and BAMBOO Gold, a gentle washing gel for scarves and masks. Information on the hazardous properties of controlled mixtures was missing from the website. In addition, the controlled biocidal products contained an active substance from a supplier that is not included in the list kept according to the regulation on biocides. The company was fined CZK 40,000 for the delicts committed.

### Packages

In 2021, CEI inspectors carried out 101 inspections focused on the fulfilment of obligations arising from the Packaging Act, of which 10 inspections were carried out on the basis of received suggestions. These initiatives mostly drew attention to the free riding of packaging as well as products subject to take-back (mainly electrical equipment and batteries and accumulators). During the year 2021, the CEI initiated 47 delict proceedings and a total of 47 decisions, which imposed fines in the aggregate amount of CZK 854,000, became final.

More than half of the inspections was focused on entities that were suspected of not fulfilling their obligations under the Packaging Act at all, i.e. they did not have a contract with an authorized packaging company, nor did they submit a proposal for entry into the List of individually fulfilling persons. CEI inspectors select these entities on the basis of documents from the General Directorate of Customs (GDC), on the basis of suggestions, own findings, etc. In most of these cases, delict proceedings are subsequently conducted for violation of the Packaging Act, or for violation of the control line, when the entity in question does not provide the CEI with the necessary cooperation during the inspection (e.g. does not submit the required documents). During the inspection, the inspected person can prove to the CEI that they are subject to an exception according to Section 15a of the Packaging Act, in the event that they have placed on the market or into circulation in the Czech Republic less than 300 kg of packaging per calendar year and at the same time its annual turnover, or annual net turnover did not exceed CZK 25 million. A total of 11 entities used this exception during inspections in 2021.

In 2021, inspectors checked, for example, importers and sellers of packaged goods (cosmetics, electrical equipment, wines, nuts, sweetened beverages, coffee, confectionery, feed and pet supplies), sellers and distributors of packaging materials, manufacturers of cleaning products, and operators of fast food, restaurants or seller of delicacies. As part of its activities, the CEI also checks persons registered in the List of Persons pursuant to Section 14, Para. 1 of the Packaging Act, who, based on the submitted Annual Reports on packaging and packaging waste, are suspected of not comply with the obligation to use the packaging they place on the market in the Czech Republic. During these inspections, as in previous years, non-compliance with this obligation (i.e. failure to meet the specified percentages of recycling and use of packaging waste) or incorrect filling in of annual reports was most often detected.

In the area of handling packaging, the highest sanction in the amount of CZK 100,000 was imposed on the importer of packaged goods from China (primarily canned fruit, wines and sweetened beverages), which was selected by the CEI on the basis of documents from GDC. The importer did not present the required documents to the inspectors and thus did not allow the inspection to be carried out properly. Furthermore, in 2021, the CEI imposed a fine of CZK 85,000 on a seller of delicacies, food and miscellaneous goods for failure to ensure the fulfilment of obligations regarding packaging (primarily made of materials such as paper, plastic and aluminum) that it placed on the market in the Czech Republic. This seller arranged for a remedy after inspection.

### Cross-border transportation of waste

The CEI WMD carries out inspections focused on the fulfilment of obligations related to the cross-border transport of waste, mainly for senders and recipients of waste according to the EU Regulation on the transport of waste No. 1013/2006 (hereinafter the "regulation"). These are mandatorily planned inspections as required by the regulation carried out at waste generators or facilities that trade in waste (import and export). The CEI WMD also carries out inspections based on information about intercepted illegal shipments within the territory of the Czech Republic and the territories of other countries. In such cases, the CEI cooperates with the MoE (international cooperation) and the Customs office.

In 2021, 69 senders and receivers of waste were inspected, mainly entities transporting waste under the so-called green list regime. Regional cooperation with the customs administration continued. A total of 23 delict proceedings were initiated within this departmental task. 26 sanctions in the total amount of CZK 11,224,000 became legal in 2021.

Also in 2021, the CEI cooperated with the customs administration, the police and the Ministry



of the Environment to solve cases of intercepted and detected illegal shipments of waste, for example electrical waste, sludge from wastewater treatment plants or mixed non-recyclable plastics. The most frequent violations detected included the transport of waste without consent or correctly filled out transport documents, failure to keep these documents for the prescribed period, failure to conclude a contract between the sender and the recipient on the use of waste, importation to a recipient who is not authorized to accept imported waste, or an attempt to export incorrectly classified waste to countries where import bans are known for the given type of waste. The so-called "green list" of waste continues to be abused to facilitate the process. An example can be the import of sludge from wastewater treatment plants or non-recyclable mixed plastics, the import of which is, in the territory of the Czech Republic, subject to a process of prior notification and approval by the Ministry of the Environment, as they are included in the "yellow list of waste". In the case of the import of sludge from the WWTP, it was found that the ministry did not issue this consent for the company, so the company decided to classify the waste under a different waste catalogue number and import it to its facility under the green list regime, which indicates an organized and conscious violation of regulations in the field of waste management.

During 2021, some other countries in the world have restricted certain plastic waste commodities that can be legally imported to their territory for use. Support for the use of plastic waste thus remains for clean and easily usable waste but finding a legal outlet for e.g. waste from municipal waste is increasingly problematic, as there are still not enough recycling capacities available in the Czech Republic or in the world. In the area of imports, pretended recycling continues to occur, when the real purpose may be, for example, landfilling of waste. Exports of electrical equipment to non-OECD countries (especially Asian countries) are also related to the restriction of exports of certain waste commodities, when there was an attempt to pass off electrical equipment as, for example, aluminum waste, and thus circumvent the ban. Starting this year, the new Waste Act No. 541/2020 Coll., which is effective from 1<sup>st</sup> January 2021, helped to solve the waste management situation, as it for example prohibited mobile waste collection and purchase equipment from being a recipient or sender of waste in the framework of cross-border transport wastes. However, the issue of repatriation of waste from illegal transport remains a problem, when the waste is unloaded in the Czech Republic and subsequently there is no consensus between the relevant authorities regarding the return of waste to the country of dispatch and the determination of clear deadlines for this implementation. This disproportionately increases the risk associated with illegally stored waste. In view of the findings, it is still necessary to pay

attention to inspections and punishments, especially for entities that repeatedly participate in the illegal transport of waste. In this regard, it is still necessary to maintain intensive cooperation with the Customs Administration of the Czech Republic and law enforcement authorities.

### 4. 3. 3 Overview of the performance of specific tasks

In addition to the nationally resolved departmental tasks, the CEI TIs set specific tasks for themselves. These tasks correspond to local needs based on the knowledge of the specific region. Alternatively, it could have been an inspection of a specific entity with follow-up inspections monitoring individual waste streams. However, with regard to the epidemiological situation, the inspections could not always be fully carried out and they are expected to continue in the following period. As part of specific tasks, we inspected e.g. record irregularities based on data analysis, old ecological burden, cross-border transport of waste within selected entities or joint inspections with the Customs office, inspections of plastic processing equipment, inspections of construction waste, sites with abandoned waste, etc. In addition to the standard inspection activity, which leads directly to the initiation of delict proceedings, these actions also have the character of field monitoring. They can be a source of knowledge for further inspection investigations, or for cooperation with other state administration bodies or law enforcement authorities.

## 4. 3. 4 Major cases

### Highest conclusive fines in the department by TI

#### Prague TI: Natural person authorized to do business Roman Maroš

In the period of 2018 and part of 2019, he illegally stored waste received in a mobile device for collection and redemption in an unauthorized place on a plot of land in the municipality of Komořany. In 2019, there were at least 270 tons of hazardous waste (e.g. dirt trap sludge, packaging containing residues of hazardous substances) and 81 tons of other waste (e.g. bulky waste). For the year 2018, there was hazardous waste in a minimum amount of 521 tons and waste in the other category in a total amount of 68 tons. The Inspectorate imposed a penalty of CZK 490,000 on Mr. Maroš for violating the Waste Act, the accused appealed against the Inspectorate's decision. The appeal body confirmed the Inspectorate's fine in its entirety.

#### České Budějovice TI: EKOPUR, s. r. o.

A fine of CZK 200,000 was imposed for breaching the obligations set out in the operating regulations of the facility for the operation of the decontamination facility for the treatment of medical waste - in particular, it was found that the capacity of the facility was exceeded, failure to carry out regular checks on the effectiveness of the facility, failure to mark hazardous waste and errors in record keeping.

#### Plzeň TI: ROBSTAV stavby, k. s.

A fine of CZK 800,000 for unauthorized disposal of waste from various buildings (roads) in at least three locations around Pilsen. This is a very complex case, where the accused tried to blame the illegal actions on another insignificant entity, practically without employees, technology and with a repeatedly changed statutory representative. Evidence was very complicated due to the non-cooperation of interested parties and the absence of any records regarding waste management. The MoE rejected the accused's appeal. A further inspection of the company is currently being carried out.

#### OMGD, s. r. o.

A fine of CZK 1,100,000 was imposed for the storage of 15,000 tons of contaminated demolition waste (demolished operations and boiler room) in the area of the former chemical factory in Kaznějov. This is a case that started back in 2014, but it was finally ended last year, when after court proceedings the initial decision was annulled, the matter was returned to the CEI for a new examination of the delict.

#### Ústí nad Labem TI: PD Power, s. r. o.

The CEI carried out an inspection at the company's facilities located on land in the Svatava municipality. As part of the inspections, the Inspectorate found that PD Power, s.r.o. carried out illegal shipments of waste from Germany to the Czech Republic from 2017 to 2020. It involved the transport of a plastic mixture, probably originating from the collection of municipal waste and unsorted waste collected from households. The transport was carried out as a transport of "green list" waste, while it became clear that it was in fact waste that can only be imported with the consent of the Ministry of the Environment and was incorrectly classified. The smell of waste also bothered citizens living near the collection point. The waste in the collection centre was not collected separately according to types, which led to its mixing - for example, a mixture of plastics and paper with an admixture of polystyrene and municipal waste, waste textiles, which partly included unsorted municipal waste stored in the collection centre and transported from Germany. Thus, the company imported waste to the collection centre across the border, which was only stored there and then transferred to the facility, the company hid the true foreign origin of this waste, which ended up at the landfill, while it is prohibited to transport waste from abroad for disposal in the Czech Republic. The company also carried out repeated illegal shipments of waste slag, tires, concrete, bricks, plastics and plasterboard. The waste was admitted to the collection facility for records, although the company does not have any authorization to use the transported waste, but only the authorization to collect and buy it. In addition, the inspections revealed that the stored waste was not protected from the weather in the collection facility, so waste was escaping from the broken packages of the plastic mixture. The company also failed to ensure that all hazardous waste was labelled in accordance with applicable legislation. In conclusion, the company did not keep true records of some waste received, including waste from cross-border transport. The CEI imposed a fine of CZK 300,000 on the company, against which the company appealed. By decision of 11<sup>th</sup> February 2021, the MoE changed the CEI's fine by reducing it to CZK 280,000.



Waste from the illegal transport in the collection point of PD Power, s. r. o.

### **Hradec Králové TI:**

#### **GLODOBERA GROUP, s. r. o. (in liquidation)**

A fine of CZK 10,000,000 was imposed for the illegal transport of waste to the Czech Republic and unauthorized disposal of waste (illegal waste storage). The basis for the initiation of the proceedings were the facts established by the inspection of GLOBODERA launched by the CEI in 2019 in cooperation with other administrative bodies, when it was discovered that waste (mixed plastic waste) was transported by truck with domestic and foreign registration plates to the premises in the Skoránov district. Through an inspection, the CEI found that during the period of June to September 2019, various mixtures of waste were imported from abroad, with which two construction buildings rented by GLOBODERA were filled. The object was loaded with a diverse mixture of waste with a predominance of plastics, including other additives (paper, aluminum foil, organic matter), i.e. it was a so-called discharge of unusable waste from the sorting lines of separately collected components of municipal waste, where part was processed by crushing. It was a mixture of waste corresponding to classification under cat. no. 19 12 12 – other waste (including admixtures) from mechanical waste treatment. Approximately 3,440 m<sup>3</sup> of this waste was stored in the facility, which was transported across the border from Germany. Another object was loaded with a diverse mixture of untreated, polluted plastics sorted from municipal waste with varying amounts of other types of waste – mainly paper, textiles, wood, and it also included waste consisting of mixed municipal waste. According to a physical inspection, approximately 1,700 m<sup>3</sup> of this waste was stored in the building, which was transported across the border mainly from Italy. The accused appealed against the decision and the appellate body upheld the decision. The GLOBODERA company filed a lawsuit against the decision of the Ministry of the Environment to the Municipal Court in Prague. In the case in question, the court confirmed the decision of the MoE. At the same time, the CEI called on the insolvency administrator to arrange a remedy, i.e. the removal of illegally imported waste from these buildings.

#### **Havlíčkův Brod TI: ESKO-T, s. r. o.**

A valid fine of CZK 60,000 was imposed on the company for various violations of obligations related to the cross-border transport of waste during exports to Slovakia, Germany, Austria, Poland or Bulgaria in 2019 and 2020. In some cases, the company did not have contracts with foreign partners on the use of waste in accordance with Article 18, Para. 2 of Regulation (EC) No. 1013/2006, on the transport of waste, in other cases, the company did not keep the required documents for a period of three years from the start of the transport. In the event that waste is sent from a facility in the Czech Republic, it is also required that the person who arranges the transport is in the jurisdiction of the country of dispatch, i.e. from the Czech Republic, which the company

also did not fulfil, as in some cases the transport was arranged by the company, e.g. from the Netherlands. Furthermore, in the document according to Annex VII of Regulation (EC) No. 1013/2006, on the transport of waste, there were other errors such as missing signatures, missing data on the amount of waste transported, errors in the identification of waste, etc.

#### **Brno TI: ESET, spol. s r. o.**

The legal entity ESET, spol. s r.o. was fined CZK 950,000 for failing to send a report on waste production and waste management as an authorized person, the operator of a mobile device for collecting and purchasing waste, and it was also fined CZK 470,000 for a violation control order. The company, as an operator of mobile equipment for the collection and purchase of waste, did not send a report on the production and management of waste, the Inspectorate's own investigation showed that the entity took over 20,000 tons of waste (of which more than 15,000 tons were hazardous waste) from various entities in 2019.

#### **Olomouc TI: Natural person authorized to do business Rudolf Soldán**

He unauthorizedly took over waste soil in the amount of 12,500 t for the purpose of subsequent use for landscaping of land in the Niva district, beyond the scope of permits issued by other state administration bodies. For the purposes of landscaping with waste excavation soil, he did not prepare a risk assessment for the application of waste. The Inspectorate imposed a sanction of CZK 300,000. The accused appealed against the decision. The appeal body proceeded to moderate the amount of the fine to CZK 200,000, while the confirmed the Inspectorate's sanction.

#### **Ostrava TI: ECOPAK, s. r. o.**

The CEI, on the basis of a submission by the Regional Authority, carried out an inspection of the equipment of the sorting line in cooperation with the construction prevention department of the Fire Rescue Service of the Moravian-Silesian Region and authorized former employees of the company on the premises of the ECOPAK company – in the waste utilization facility under the name "RECYCLING CENTER OSTRAVA" - Line for treatment of usable waste by sorting, crushing and pressing. As part of the investigation, it was found that by the decision of the Regional Court in Ostrava, the bankruptcy of the debtor was established, bankruptcy was declared for its assets and an insolvency administrator was appointed. As part of the inspection, it was found that three thousand tons of unsorted waste and mostly residual mixed plastic waste after sorting (plastic waste) had accumulated in the facility, both in the hall and on the outdoor areas around the hall. The company concentrated waste in compacted packages on the outdoor area (around





Surplus mixture of plastic waste from plastic sorting – storage outside the permitted areas of the facility

the operating hall), which was in violation of the approved operating rules of the facility. The Inspectorate issued a decision to impose a fine of CZK 400,000. During the monitored period, the premises of ECOPAK were sold as part of insolvency proceedings, while the new owner ensured the removal of illegally stored plastic waste, as requested by the inspection when communicating with the insolvency administrator.

#### **Liberec TI: Purum, s. r. o.**

As the operator of the stabilization and neutralization station (Waste treatment plant – Hamr na Jezeře, Stará Lužice), the company did not ensure the waste received into the facility (e.g. various types of sludge, rinsing water, oily water, emulsion, acid, alkali, etc.) against the leakage of dangerous substances into the surrounding environment. Environmental contamination from the spill was confirmed by taking samples of soil, sediment and water from the lagoon, which were extremely contaminated. Purum, s. r. o. was fined CZK 300,000.

### **4. 3. 5 Conclusions from the inspection activity**

Understandably, the entire waste management sector in the Czech Republic was significantly affected, especially in the first half of 2021, by the complex epidemiological situation. The decrease in inspection activity was by 4% compared to the "Covid" year of 2020 and by 24% compared to the "pre-Covid" year of 2019. Another factor that significantly contributed and continues to contribute to the formation of the industry is, after about 20 years, a completely new law on waste, which became effective on 1<sup>st</sup> January 2021. Both of these factors had a significant impact on the inspection activity in the field, which was significantly limited. At the same time, it was necessary to come to terms with the new legal regulation within the framework of inspection activities, both substantively, methodologically, and procedurally. The situation in practice was not eased by the absence of implementing decrees. On the part of waste management inspectors, as well as on the part of facility operators, in 2021 it was a matter of ascertaining the real impacts of the new



legislation, especially on the operation of permitted facilities. In a number of cases, the Inspectorate had to proceed to the correspondence form of inspections and to the elimination of physical contact with inspected persons, which, however, from a practical point of view, is not a completely effective method of inspection work. In view of the situation, it was also decided to cancel or move part of the inspections focused on waste management, which can withstand the delay. If there was a significant reduction in inspection activity, and even that was often focused only on monitoring (e.g. old landfills, etc.), without the participation of inspected persons, there was also an adequate reduction in follow-up proceedings. The number of issued decisions fell by 30 percent compared to the previous year. A total of 141 initiatives were filed with other state administration bodies in connection with the findings, in one case a criminal complaint was filed with suspicion of damage and endangerment of the environment in connection with unauthorized waste management.

Regarding the individual departmental tasks, it can be stated that in the area of waste management and chemical substances, similar deficiencies are detected as in previous years. No significant negative trend was observed in any of the areas - the most frequent problem still remains the handling of construction and demolition waste in violation of the legislation. Insufficient capacity for the thermal removal of hazardous waste appears to be a long-term problem, while this waste tends to increase (especially in the healthcare sector) and legislative restrictions on their landfilling are expected.

The same applies to the energy use of waste (e.g. mixed waste, discards after waste sorting), while the legislation envisages a gradual restriction of their landfilling (current practice). Furthermore, in practice, it turns out to be problematic that the amount of liquid waste is taken out of the regulated area of the waste regime and transferred to the wastewater regime within the framework of the Water Act, which often happens based on the "pressure" of some waste companies on the waste generator. This makes it significantly more difficult to have an overview of the quality and the end devices in which these liquids are disposed of.

Another threat appears to be the purposeful removal of waste in the form of products for the purpose, in particular, of unauthorized backfilling, while this illegal practice can already be encountered when importing waste from abroad – e.g. some slag, waste from tire crushing or various waste mixtures, which, however, does not meet "end of waste" criteria and their use in these ways is prohibited. However, the financial motivation for some entities in the "reclamation" industry is potentially highly interesting. In general, there is still a need to pay increased attention to the area of hazardous waste management, especially for selected authorized persons, e.g. also within the framework of supervision of OEB.

These entities are looking for the cheapest and therefore potentially illegal methods of disposal, consisting of either re-categorizing waste with the aim of hiding the true properties of the waste and then storing it, for example, in a landfill, in circumventing the fee obligation during landfilling or by creating temporary illegal warehouses, or disposal in unsuitable final facilities. In this regard, we also continuously appeal and cooperate with the law enforcement authorities, which brings interesting findings for Inspectorate's activities as well.

In this context, it is also possible to mention the ongoing fulfilment of the tasks and measures of the Interdepartmental Working Team for the prevention and combating of criminal activity related to waste, which is implemented on the basis of the "Strategy for the prevention and combating of criminal activity related to waste for the period 2021 - 2023" (approved as the Government Resolution No. 984 from 5<sup>th</sup> October 2020). Currently, it is already possible to state a certain increase in the interest of the law enforcement authorities and the judiciary in the issue of "waste", even in the form of decisions by criminal courts, although the path to these decisions is sometimes thorny and long. After many years of cooperation, it is finally possible to see the first real outputs in the form of prosecution and punishment, which is envisaged by the EU directive on the criminal protection of the environment (crimes against the environment within the criminal code), i.e. especially in cases where administrative punishment is not sufficiently deterrent for offenders. In this regard, the long-standing and repeated educational activities of representatives of the judiciary and investigators in cooperation with the High Prosecutor's Office, CEI and Police of the Czech Republic have had a positive impact.

In the area of chemical safety, inspectors began to focus more on newly restricted substances (REACH and POPs regulations). These inspections will continue in the next period as well. Compliance with regulations when selling chemical substances and mixtures over the Internet also seems problematic.

In 2021, the CEI acquired another unmanned system together with the necessary software equipment, which is mainly used when dealing with landscaping and the loading of construction waste, illegal facilities or landfill monitoring. Continuously, applied screening analytical measurements of samples (e.g. asbestos, analysis of heavy metals in objects, etc.) before random delivery of samples to accredited laboratories have become part of common practice.

## 4.4 Nature protection and CITES

### 4. 4. 1 Overview of inspection work in 2021

The Nature Protection Department inspectors focused their work in 2021 on checking situations, activities and subjects, which could represent a serious threat to the interests protected by departmental law, in particular the Act on Nature and Landscape protection, Act on Agricultural Land Fund Protection, Act on Wild Animal and Plant Protection and Regulation of Trade in Them, Act on Genetically Modified Organism Management, Act on Zoological Gardens and the Act on Use of Genetic Resources Under the Nagoya Protocol. The inspection work can be divided into planned checks, subsequent to previous findings, reflecting current conditions and representing about 40% of the inspection capacities, carried out at the initiative of the public (again at about 40%) and operatively performed based on our own findings (approx. 20%). Also, during this year the inspection and administrative work continued to be partly affected by the unfavourable epidemic situation, as a direct consequence of repeated failures in the inspection capacities of individual departments.

Nature protection inspectors carried out a total of 2113 checks and investigations in 2021 (slightly fewer than in the previous year) that corresponds to an average of more than 27 investigations per inspector per year with 77 inspectors. A total of 622 decisions came into force in 2021 (91% compared to the previous year), namely 488 decisions imposing fines (221 for offences committed by legal and natural persons doing business and 227 for offences committed by natural persons), 21 reprimands, 32 decisions to restrict or halt activities, 101 decisions to confiscate or revoke, 20 decisions on corrective measures and 31 preliminary measures.

The total amount of fines imposed in 2021 amounted to CZK 8,082,200, which represents a decrease of approximately 17% compared to the previous year. This is obviously a belated consequence of the partial decline in the inspection and in particular, administrative activities of the Inspectorate. Fines in total of CZK 7,032,500 were imposed on legal and natural persons doing business and fines in the amount of CZK 1,049,700 were imposed on natural persons not doing business.

Inspectors carried out a total of 1,832 investigations and checks in the department of Nature and Landscape protection. A significant number of checks were implemented also in the area of CITES (130) and checks aimed at compliance

with the provisions of the Act on Agricultural Land Fund Protection (105) are increasingly being applied. Other checks aimed at issues of GMO (29) and zoological gardens (17), in both cases in areas with a limited number (in the order of tens) of subjects concerned. In 2021, the Inspectorate also submitted a total of 13 notices to law enforcement authorities in the area of nature protection and CITES as well as 54 initiatives directed at other government authorities at various levels.

Traditionally, the public sees the Inspectorate in the field of nature protection as the public authority that greatly surpasses the stereotypical idea of bureaucratic alibism with its expertise, professional skills and empathy while at the same time very resistant to extra-legal manipulative pressures. Therefore, an important part of its monitoring work involves the investigation of initiatives received from citizens and associations, which represent a valuable source of information, especially with regard to the protection of trees growing outside the forest and the protection of the agricultural land fund. The number of initiatives submitted by the public has shown a gradual increase in the long-term, oscillating in recent years around 1,200 initiatives per year; in 2021, inspectors dealt specifically with 1,222 complaints within the scope of nature protection. On average, there were almost 16 investigated complaints per inspector per year. Even in this segment of activity, it became clear that the Inspectorate was able to fulfil its mission of public service regardless of national social and economic constraints.

The total of 729 statements issued by the inspectorate in 2021, representing an almost 20 percent year-on-year increase, illustrates the activity of inspectors even in a situation where the pandemic has paralysed important segments of society.

The most important part of the work of the Nature Protection Department is the inspection and administrative work related to compliance with the Act No. 114/1992 Coll., on Nature and Landscape Protection. The area of nature protection traditionally accounted for the largest share of inspection activities (1832 out of a total of 2113 investigations and inspections) and administrative activities (fines imposed for CZK 7,411,900). All preliminary measures, the majority of which remedial measures issued, were decisions to restrict or stop activities and a significant number of complaints to other public authorities were related to nature protection. The spectrum of inspection, administrative and offence activities in the field of nature protection is very wide. This area is presented in more detail in the sections on specific tasks carried out and serious cases dealt with by the Inspectorate this year.

The inspection of observance of the provisions of Act No. 334/1992 Coll., on the protection of the agricultural land

fund is now an inherent part of the standard work of the nature protection department. In 2021, a total of 105 inspections or investigations were carried out in compliance with this act, of which 6 were carried out in cooperation with other professional departments of the Inspectorate, in particular the Waste Management Department and the Water Protection Department. During the monitored period, the Inspectorate also investigated 55 initiatives that drew attention to possible violations of legal regulations in this area. A total of eight complaints were passed on to other public authorities, as the Inspectorate concluded that there were violations of the provisions of the Act on the Agricultural Land Fund for which it had no competence. Traditionally, most of the complaints received have pointed to soil loading, waste or other materials on land registered as the Agricultural Land Fund. In 2021, three subjects were fined for violating the provisions of Act No. 334/1992 Coll., the total amount of these fines came to CZK 19,000.

In 2021, the Inspectorate continued to carry out inspections focusing on lead pollution of agricultural soil for the third year (exceeding the indicative and preventive values for lead set out in Regulation No. 153/2016 Coll. in relation to the operation of shooting ranges. Inspections of this type are the subject of the specific task described below.

In the area of CITES, 130 inspections were carried out in 2021 in accordance with Act No. 255/2012 Coll., on Inspection and a further 779 inspection investigations, mainly during inspection work at borders (airports, customs post). The Inspectorate solved a total of 39 initiatives in the field of CITES and handled four requests for information in compliance with Act No. 123/1998 Coll. It also imposed a total of 134 fines (of which 118 were imposed on natural persons and 16 on legal and natural persons doing business), in the amount of CZK 423,800 (of which CZK 322,800 on natural persons and CZK 101,000 on legal persons and natural persons doing business), six reprimands and one corrective measure. A total of 92 seizure decisions came into force. Compared to 2020, the amount of fines was decreased (in 2020, a total of CZK 737,800), which was caused both by the year-on-year prolongation of epidemiological measures, which resulted in a significant reduction in activity at the airport and by the fact that the CEI is increasingly focusing on important cases, which are subsequently dealt with in the criminal regime, as part of the intensification and efficiency of inspection work in the CITES area.

The Czech Republic is growing and collecting power while in the field of wildlife crime it plays an important role as a destination, transit and origin country. As part of the focus on trade in specimens directly threatened with extinction, the Inspectorate continued to uncover illegal activities in the trade in large feline carnivores. In relation to the amendment to Act No. 246/1992 Coll.,

on the protection of animals against cruelty, which, among other things, restricts the use of large felines for dressage purposes or prohibits their breeding, the Inspectorate has recorded several suspicious acts in connection with the disposal of carcasses, especially tigers and lions. Another important and still neglected commodity is the treatment and trade in predators, especially falcons, which form an important part of the culture of the Czech Republic and Arab countries. In 2021, the Inspectorate carried out investigations of almost thirty shipments of exports of live predators from Czech breeding. During the process, it inspected more than 700 falcon specimens. In both departments, the Inspectorate cooperated intensively with the authorities involved in criminal procedures, to whom it forwarded a total of eight criminal reports. This represents an increase compared to 2020 (by six) and suggests that illegal activities in the predator and big cat trade could pose a risk of spreading negation of the law in the specific communities to which they are tied. In 2021, the Inspectorate actively participated in a European project to prevent illegal international trade in common eel. As part of the mapping of subjects involved in the trade of young eel the Inspectorate checked a total of eight facilities and the following information obtained from foreign authorities, retrospectively checked 39 shipments of eels received by Czech subjects since 2019.

In 2021, the viral pandemic continued to result in a decline in the cross-border movement of people and goods by air. However, border control remains an important component of CITES inspection work. In total, the Inspectorate received 894 import and export notices in 2021, which were individually examined by the Inspectorate. In most of these notifications (779 in total), the Inspectorate was asked by the Customs Office to provide additional statements related to the inspection investigation or check. At Václav Havel Airport, CEI registers a total of 506 activities, which is about 100 fewer compared to 2020 and represents less than half of the number in 2019. Most of the illegal trade was represented by about two tens of individual imports of traditional Chinese medicine products by members of Asian communities, while the minority (few cases) were so-called "tourist imports" (corals, trophies, animal body parts). In the case of declared postal items, the Inspectorate carried out a total of 272 investigations and inspections in 2021, which is significantly higher than in 2020 (166 investigations). The most serious violations of CITES regulations were detected by the CEI when inspecting shipments of larger units of live plant exports (mainly cactus and other succulent plants). Other illegal shipments (imports of food, insects and trophies) represented only three cases.

Outside of the administrative and preventive area, the Inspectorate continued to fulfil the objectives of the Action plan for fighting illegal trade in threatened species of animals and plants until 2023, which is a strategic

document designed to help while its task should be to help develop instruments and linkages for a more effective suppression of illegal trade in endangered species. The Inspectorate participated in the work of the advisory group of the IMPAKT project VJ01010026 of the Institute for the environment of the Faculty of Science UK, which was focused on the effective use of forensic methods of evidence in the fight against wildlife crime. Cooperation on the project VH20182021028 continued "Aplikovaný výzkum genetiky vybraných druhů živočichů chráněných podle mezinárodní úmluvy CITES – vývoj forenzní metody, využitelné jako nástroje boje proti organizované trestné činnosti a závažné environmentální kriminalitě na národní i mezinárodní úrovni" ("Applied research on genetics of selected species of animals protected under the international convention CITES - development of forensic methods, usable as a tool to fight organized crime and serious environmental crime at national and international level"), as part of its professional competence and in providing specimens to fill the database with relevant DNA profiles. In cooperation with the Ministry of the Environment, the Inspectorate provided the necessary information support to EU institutions and other European as well as global organisations.

Also in 2021, the Inspectorate was engaged in expert and consultative activities. An important part of the expertise work represented expert statements (nine in total) and assistance during house searches carried out based on the requests of the authorities in criminal procedures. Inspectors also provided several dozen consultations to citizens, especially in areas related to intended tourist as well as commercial imports and exports.

Inspections of compliance with the provisions of Act No. 78/2004 Coll., on the handling of genetically modified organisms as well as genetic products and Act No. 162/2003 Coll., on the conditions for the operation of zoological gardens are the subject of thematic division tasks. Their evaluation is included in the following section.

Inspections focused on the conditions of the use of genetic resources under the Nagoya protocol implemented by national legislation with Act No. 93/2018 Coll., are a rather marginal part of the work of the department. The subject of the inspections is to verify whether or not the inspected subject is a user of genetic resources in the scope of the legal regulations related to this Act. In such cases, there is an obligation to proceed with appropriate care in the use of genetic resources.

In 2021 (in the light of the limitations related to the Covid-19 pandemic), no inspections of users of genetic resources under the Nagoya Protocol were carried out. Accordingly, inspections of selected subjects will be carried out in the following year. In 2021, an annual user inspection plan for 2022 has been prepared in cooperation with the Ministry of the Environment, using a risk assessment approach.

## 4. 4. 2 Overview of the performance of departmental tasks

The all-inspection, so-called "departmental tasks" included mainly obligatory inspections resulting from interdepartmental links (Cross Compliance), the work of some comprehensive agencies, resulting from existing knowledge, experience or requirements of the Ministry of the Environment (the handling of genetically modified organisms, zoological gardens, control of compliance with imposed measures).

### Inspections of agricultural subjects as a part of Cross Compliance (CC)

Although some restrictions related to the current epidemic situation remained in force in 2021, inspections of agricultural entities were carried out by the inspectorate in connection with the allocation of agricultural subsidies to the originally planned extent. In the past year, the CEI specifically carried out conditionality inspections on a total of 321 applicants for agricultural subsidies. Compliance with obligatory management requirements (hereinafter referred to as "OMR") following from Council Directive 79/409/EHS on the protection of wild birds (OMR 2) was assessed by the inspection in 204 cases, 117 subjects were inspected for compliance with the requirement following from Council Directive 92/43/EHS on the protection of natural habitats (OMR 3).

Inspections focused on compliance with OMR, arising from the above-mentioned European directives and compliance with the relevant provisions of Act No. 114/1992 Coll., are aimed at areas where there is a bigger risk of conflict between agricultural management and protected interests. In the case of OMR 2, it concerns estates where there is a high probability of unauthorized interference with trees growing outside of the forest, important landscape features such as watercourses, water meadows, bird nesting areas or they are located in the area of specially selected protected species associated with grasslands (bluebirds, corncrake). A requirement of OMR 3 is monitored in relation to the existence of a Site of Community Importance within the managed area or its immediate surroundings.

The majority of cross-compliance inspections were carried out on the basis of a centrally designed inspection plan involving at least one percent of the total number of applicants for agricultural subsidies. During the period monitored, there were only two extraordinary inspections carried out based on the received initiative, focused on compliance with the requirements arising from the Directive for the protection of wild birds.



In the past year, the cross-compliance inspections revealed deficiencies in two cases within the scope of Plzeň TI, both cases based on an initiative received. In connection with agricultural farming, terrain modifications in the protection zone of the natural monument Pod starým hradem, carried out without the consent of the nature protection authority, were detected. A fine will be imposed on the agricultural entity for the detected offence. However, the detection will not affect the granting of the agricultural subsidy as the specific control requirement of cross-compliance inspection is not linked to the offence in concern.

Another detected deficiency concerned the insensitive renewal of permanent grassland on properties that are part of the Site of Community Importance (SCI) Šumava. On the affected land there are some of the objects of protection of the Site of Community Importance (arrhenatherion elatioris meadows, submontane and montane violion caninae), which have been negatively affected by the renewal, including fertilization and sowing of cultural grass mixtures. Given that it was not possible to document in detail the condition of the land before the intervention itself, in this case it was not possible to submit a proposal for a reduction of the agricultural subsidy to the responsible subject. However, the violation detected is a reason to impose a corrective measure, the implementation of which should enable a gradual return to a desirable state.

The inspected subjects usually cooperate with the Inspectorate and respect the Inspectorate's instructions to take preventive measures to avoid possible conflicts of management with the public interest in the form of nature and landscape protection. During inspections, the Inspectorate continuously warns about selected protected interests and possible risk aspects of agricultural activity, including the possible consequences in terms of the reduction of agricultural subsidies.

### Inspections of handling genetically modified organisms

Inspections while handling genetically modified organisms proceed according to a pre-prepared plan, which (due to the limited number of subjects handling genetically modified organisms) makes it possible to inspect each GMO user at regular intervals. Due to the governmental measures connected with the COVID-19 pandemic which resulted in restrictions on inspections work, not all the inspections scheduled in 2021 were performed. Due to the experience gained in the process of inspection work in 2020, when it was necessary to adapt the implementation of inspections to changes related to the current epidemic situation, the difference in the number of planned and actual inspections was no longer too significant.

In response to the aforementioned limitations, the Inspectorate proceeded in the case of some long-term inspected subjects to carry out the inspection by correspondence, when the condition of premises used for GMO handling was not inspected but only the documentation on the handling genetically modified organisms. The Inspectorate proceeded to do these types of inspections primarily for subjects that since the last inspection at their location did not use other premises for the handling of GMO other than those that have already been assessed in terms of legal requirements, protective measures and security. At the same time, the inspection plan itself has been slightly modified, for example, inspections of most healthcare facilities have been mostly moved to the 2022 plan.

In 2021, a total of 29 inspections were carried out in this area. In 27 cases it concerned inspections of closed GMO handling in the risk categories 1-2. No violation of Act No. 78/2004 Coll., on the Management of Genetically Modified Organisms, was detected during the inspections and no proceedings for offences or corrective measures were initiated.

In 2021, two inspections were carried out focusing on the introduction of GMO into the environment. In both cases, the inspections were field trials. As mentioned in previous reports, there has been a significant reduction in the establishment of field trials by the authorised subjects, with only the long-term trial with GM plum trees continuing in 2021 and the trial with GM barley starting in 2019. Another type of introduction of GMO into the environment are clinical assessments of medicinal products using genetically modified cells. In 2021 (as well as in 2020), for both precautionary health and ethical reasons, no inspections of subjects authorised for this type of release of GMO into the environment were carried out. This is primarily because these are health care facilities, which are still very busy with the epidemiological situation.

### Zoological garden inspections

During 2021, a total of 18 inspections of zoological gardens licensed by the Ministry of the Environment were carried out. An essential part of the inspections of such facilities is not only the verification of compliance with the obligations arising from Act No. 162/2003 Coll., on zoological gardens, but also the handling of CITES exemplars within the diction of Act No. 100/2004 Coll. and of specially protected species of animals and wild birds under Act No. 114/1992 Coll. Since these inspections are mostly of facilities (keeping a large number of exemplars) and require the processing of a large amount of documentation, including the verification of facts with other public authorities, not all inspections have been finalized yet. Two of the inspections initiated in 2021 have not been finalized. On the other hand, inspections of two facilities initiated in 2019 and 2020 were completed in 2021.

In the case of two zoological gardens operated under licence, violations of Act No. 100/2004 Coll. were found. In one case, the mistake was only of an administrative nature and involved the failure to notify the registration office of changes concerning several exemplars within the time limit set by the law. In the second case, the zoological garden keeper offered to trade exemplars of a species directly threatened with extinction without a certificate of exception from the prohibition of commercial activities issued for those exemplars. In both cases, the Inspectorate imposed fines on the operators of the zoological gardens for offences under the Act on Trade in Endangered Species. The Inspectorate also cooperated with the Ministry of the Environment, to which it provided information and documents necessary for the implementation of its inspection activities, primarily in the form of statements on regular inspections of the Ministry of the Environment or statements on licence applications. In 2021, the Inspectorate prepared a total of 12 statements on regular inspections of the Ministry of the Environment and four statements on requests for a licence to operate a zoo. In two cases, the statements were made on applications from subjects that already had a licence to operate a zoo. However, in the case of one zoological garden, the licence issued for a fixed period of time expired in 2021, while in the second case, the operator of the zoological garden, which had a licence issued for an indefinite period of time had changed and the Ministry of the Environment was asked to issue a licence for a new operator.

An essential part of the inspection work, focused on compliance with Act No. 162/2003 Coll., was the inspection of breeding facilities that could fulfil the characteristics of a zoological garden. In addition to inspections of licensed zoological gardens, inspections of facilities of this type were included in the work plan as a departmental task but some were also carried out on the basis of an initiative. A total of four such facilities were inspected in 2021, three of which have not yet been completed. The inspections of these facilities showed that in two cases the facilities meet the definition of a zoological garden within the meaning of Section 2(1)(a) of Act No 162/2003 Coll. The Inspectorate initiated administrative proceedings to close these facilities to the public because they were operated without a licence from the Ministry of the Environment. One of these facilities has already been closed by a final decision of the Inspectorate. The operator of the second facility requested the Ministry of the Environment to grant a licence to operate a zoological garden and therefore, in accordance with the provisions of Section 15(3) of Act No. 162/2003 Coll., the Inspectorate suspended the administrative proceedings for the closure of the zoological garden until the final decision of the Ministry of the Environment in the licensing proceedings.

A facility fitting the definition of a zoological garden but operating without a licence was also closed to the public

by final decision in 2021, following inspection findings made at the end of 2020. A fine was imposed by the Inspectorate in 2021 for the offence of operating a zoological garden without a licence.

### Inspections of the implementation of measures ordered by the CEI under Sec. 66 and 86 of Act no. 114/1992 Coll

Checks on the implementation of the measures imposed have been included again in the 2021 inspection plan on the basis of previous findings that not every subject to which an obligation is imposed fulfils it. Their aim was to check whether the obliged subjects were complying with the measures (or conditions of activity) imposed on them by the Inspectorate. The subjects for inspection were selected on the basis of a central analysis and in cooperation with individual inspectorates with local expertise. This inspection work included all the decisions issued under Sections 66 and 86 of Act No 114/1992 Coll. which should have been implemented during the year and their inspection was not in conflict with the government regulations in connection with the Covid-19 pandemic.

A total of 61 inspections were carried out by the Inspectorate, with the majority of the corrective measures imposed being the implementation of replacement planting of trees. Inspections of compliance with the conditions established for the performance of work in relation to the protection of biotopes of especially protected species of plants and animals and small protected areas, usually in connection with landscape management or construction activities, were significantly represented. The restrictions or prohibitions imposed on the obliged subjects were mainly aimed at ensuring the protection of the biotopes of specially protected species of plants and animals.

The measures and conditions imposed were mostly respected by the obliged subjects. In eight cases, the Inspectorate found that the conditions established by the decisions of the CEI according to Section 86 of Act No. 114/1992 Coll. had not been complied with. Namely in the matter of replacement planting of trees. In one case, it was found that the obliged subject ceased to exist, while another subject continued the illegal activity that was the reason for the restriction of the activity. This subject was also restricted. The relevant offence proceedings have been initiated against the subjects concerned. In three cases, the responsible subjects were repeatedly found not to comply with the conditions set out in the decision, Section 86.

### Inspectorate-wide check

Due to the persistent unfavourable epidemic situation in the Czech Republic, the planned inspectorate-wide check was not carried out in 2021. The inspection should

traditionally have focused on compliance with legal obligations in the territory of the identified PLA. This inspection action will be carried out in one of the following seasons, depending on the further development of the infection situation.

### 4. 4. 3 Overview of the performance of specific tasks

Specific tasks reflect activities and subjects that represent current and potential serious threats to the interests of nature protection in the territorial scope of individual territorial inspectorates. Targeted inspection work is therefore based on local knowledge of individual regions and focused on activities and subjects that can be assumed to pose a potential serious threat to nature conservation interests protected by laws within the inspection's material competence. Although the scope of specific tasks is much wider, we only include those tasks to which we attach the greatest importance or those that demonstrate the wide range of Nature Protection Department activities.

#### Inspection of the legal protection of selected memorial trees

Memorial trees (MT) represent landmarks that have landscape and cultural-historical significance. Very often, due to their age, they are also of invaluable ecological importance. Therefore, their increased protection and security in the landscape is necessary to prevent their possible damage by human activities. The protection of MTs is secured by a decision that prohibits interference with them and their protection zone. Possible interventions can only be carried out with the consent and establishment of conditions by the competent nature protection authority. Identification of memorial trees in the landscape is provided by a sign with the inscription "Memorial Tree" and a small state emblem. These identifiers are a legal obligation, which is provided by the competent administrative authority.

In 2021, MT inspections were carried out to different extents by all territorial inspectorates. The condition and protection of a total of 139 memorial trees, groups of trees or tree colonies were gradually inspected. The majority of the inspections carried out found no violations of the law or major failures. Most of the inspected MTs are properly cared for. The method of their announcement and marking in the field also complies with the requirements of the law. In rare cases, however, material or formal failures were identified, typically insufficient signage, inadequate care or the undated status (non-existence) of a memorial tree, which were dealt with through consultation with the relevant nature protection authorities.

Several MT inspections revealed more serious findings. In the scope of the Territorial inspectorate České Budějovice, an emergency cutting of a memorial tree was detected, which was not reported within the legally established deadline. The inspection has not yet been finalized; however, it is expected that proceedings for violation of the relevant provisions of the law will be initiated. In the scope of the Havlíčkův Brod Territorial inspectorate, a possible violation of the law was detected in three cases, namely in connection with activities in the protection zone of the MT carried out without the previous consent of the competent nature protection authority. In two cases, the inspection acts are still taking place and the third case has already been closed with a final fine of CZK 20,000. The initiator of the illegal intervention was Collective Farm Velká Chyška, which farms in the area. The initiation of the offence procedure can be expected in the case of one of the MTs under the jurisdiction of the Territorial inspectorate Prague.

#### Inspection of compliance with the basic and more detailed protection conditions of small- and large-scale special protected areas and locations of European importance

The Inspectorate has long been considering the inspection of compliance with the protective conditions of specially protected areas (SPA) as one of the priorities in the field of nature and landscape protection. Specially protected areas contribute to the habitat diversity of the landscape and provide refugium for disappearing, rare and specially protected species of animals and plants. In 2021, all territorial inspectorates of the CEI inspected a total of 92 small-scale SPA, two large-scale SPA and a total of 10 locations of European importance (LEI). The inspection focused on boundary marking, compliance with the basic and more detailed protection conditions of the SPA during management and from the side of visitors or preliminary or basic protection of the LEI.

Of the inspections carried out in several Territorial Inspectorates (Ostrava 8, Plzeň 5), violations of protection conditions were found in two cases in the Ostrava Territorial Inspectorate. Serious damage to nature in the game reserve Poodří Kunín is described in more detail in the section on significant cases. Significant damage to the extant condition was detected during the inspection of Rákosina natural monument in Střítež nad Bečvou, when extensive unauthorized terrain modifications were carried out as part of the declared "restoration of pools", including the removal of several thousand cubic metres of soil and damage to trees growing outside the forest. A final fine of CZK 40,000 was imposed on the landscape contractor and a fine of CZK 100,000 was imposed on the contracting authority but the amount of the fine was reduced to CZK 40,000 on appeal.

Another violation of the protection conditions of the SPA was detected within the scope of the Territorial Inspectorate Plzeň and concerned unauthorized terrain modifications in the protection zone of the natural monument Pod starým hradem, as described in the section on the departmental task for cross-compliance inspections. Similar in kind is the proven violation of the protection conditions of the nature monument Nad kostelíčkem under the jurisdiction of the Territorial Inspectorate Olomouc, where an on-the-spot fine of CZK 5,000 was imposed for unauthorized terrain modifications in the protection zone. The offence proceedings will also be initiated in connection with the violation of regulations during the repair of the cable car in the protection zone of Šerák - Keprník National Nature Reserve. In several other cases (cutting down and removal of wood from Praděd National Nature Reserve, compliance with the protective conditions during crustacean beetle interventions in Rejvíz National Nature Reserve, compliance with the prohibition of entrances to Králický Sněžník National Nature Reserve, construction of an unauthorized small water reservoir in Velké Vrbno, etc.) the inspection has not yet been completed.

The other inspections usually did not reveal any violations of regulations or failures in the protection of individual localities. Any formal failures, such as inadequate field marking, were regularly discussed with the relevant nature protection authorities.

### Inspection of significant landscape features of watercourse and water meadow and registered significant landscape features

A significant landscape feature (SLF) is an ecologically, geomorphologically or aesthetically valuable part of the landscape that forms its typical appearance or contributes to maintaining its stability. Among these SLF belong watercourses and water meadows. The competent nature protection authority may also register other parts of the landscape for the values cited, which then receive the protection of a significant landscape element. Landscape features have long represented one of the currently endangered components of the landscape, especially in view of human activities, often affecting riparian vegetation and stream beds, which can disrupt their ecological stabilizing function, an activity that can only be carried out with the consent of the competent nature protection authority and under specific conditions.

In 2021, the Inspectorate carried out 61 inspections of registered SLF. Most of the inspections were planned but, in a few cases, they were in response to a public initiative. Most of the inspections did not find any illegal interference or law violations, only individual cases are subject to further investigations and administrative or offence proceedings. The Territorial Inspectorate České Budějovice will initiate proceedings for the imposition of a penalty for damage

to a spring with the occurrence of spring snowflake in connection with cattle grazing. The Territorial Inspectorate Ostrava continues to investigate two other cases of possible violations of the protection conditions of the SLF. In connection with a previous inspection carried out within the scope of the Territorial Inspectorate Plzeň, a fine of CZK 50,000 for serious damage to the registered SLA Mokřad u Ovčína in the area of the municipality of Ovčín became legally valid. Křimice is where the widespread destruction of woody and herbaceous vegetation was detected on about half of the area of the SLF.

Part of the planned SLF inspections focused specifically on compliance with the protection of the watercourse in connection with the construction, reconstruction and operation of small hydropower plants or compliance with minimum residual flows in the stream bed of watercourses and ensuring a favourable state of the environment for aquatic biota. Violations of the regulations were recorded in 2021 for three operators of small hydropower plants under the jurisdiction of the Territorial Inspectorate Olomouc, namely two small hydropower plants on the Bělá watercourse and one hydropower plant on the Kamenitý stream. The proceedings for the imposition of a fine for the offence have not yet been completed but the fact that both operators of the hydropower plants on the watercourse have already been fined in the past for non-compliance with the minimum residual flow can be considered as an aggravating circumstance.

Based on the findings of the previous year, two fines of CZK 30,000 imposed for non-compliance with the minimum residual flow rate on the operators of the hydroelectric power plants Aloisov and Rejhotice became legally valid. Two other offence proceedings of a similar nature have not yet been concluded. In one case the responsible subject appealed against the decision to impose a fine of CZK 35,000, in the other case the responsible subject submitted an appeal against the order in the amount of CZK 40,000. Non-compliance with the conditions established for the operation of small hydropower plants has been a long-term problem, at least in some areas.



MVE Bělá - Mikulovice



### **Inspection of compliance with the conditions set out in the issued exceptions to the prohibitions for SPL and SPS or decisions on the establishment of a different procedure for wild birds**

The Inspectorate has long been considering the control of conditions specified in exceptions to the prohibitions for especially protected areas as one of the priorities in the field of nature and landscape protection. It is necessary to comply with the conditions established by the relevant nature protection authorities during activities carried out in them. For the same reasons, a significant amount of attention is paid to species of plants and animals that are endangered or rare, scientifically or culturally very important in the territory of the Czech Republic and which are classified as specially protected species for these reasons. One of the tools is the legally established regulation of interference with their populations and habitats. The aim of the established protection conditions is that the relevant public interests (implementation of the intention and protection of the SPS) are assessed during the intended interference with the natural development and populations of specially protected species and conditions for the implementation of the intention are established in order to minimize the harmful impact. It is therefore necessary that subjects who intend to intervene that could affect the SPA or the population of the SPA (SPS) comply with the conditions set out in the decision on the exception from the prohibitions issued in relation to the intended activity.

In 2021, the Inspectorate carried out dozens of inspections of compliance with the conditions set out in decisions on exceptions to prohibitions or decisions on the establishment of a derogation procedure, which did not identify any significant misconduct that would justify the initiation of offence or administrative proceedings. Exceptions to this are inspections of the breeding of species specially protected or protected by CITES, which are listed in another section.

### **Inspection of the breeding and handling of CITES exemplars, individuals of SPS or wild birds**

Inspections focused on compliance with legal regulations in the possession, breeding and other handling of CITES exemplars, individuals of specially protected species of animals and wild birds are regularly carried out by the Inspectorate. The selection of inspected subjects is based on various criteria, e.g., identified discrepancies in the CITES Register, a higher number of recorded cases of illegal handling of specific species, etc. The breeding of birds of prey and owls, parrots or songbirds and breeders of turtles or other groups of reptiles from species protected by the CITES Convention are systematically controlled by several regular Inspectorates.

Collectively, this set includes inspection work focused on compliance with a wide range of legal requirements in the area of CITES, species and general nature protection, i.e. in particular proof of origin, compliance with the registration obligation, the obligation of unmistakable marking, reporting of acquisitions or changes, or compliance with the conditions set out in the regulations, the decision on the exception from the protection conditions of specially protected species or by deciding to establish a deviating procedure for wild birds.

The inspections carried out in 2021 recorded mostly individual cases of non-compliance with the legislative regulations, most often the non-reporting or late reporting of acquisitions or changes, or the absence of an unmistakable marking. The standard procedure is to impose corrective measures in terms of compliance with the legal requirements and to impose a sanction at the lower end of the statutory range, typically in the form of an on-the spot fine. More serious individual cases with a combination of multiple offences in the area of proof of origin, fulfilment of the registration obligation or unmistakable marking and fines of tens of thousands of CZK are subject to assessment in the CITES area.

### **Inspection of compliance with the protection of biotopes and populations of specially protected species of plants and animals**

The basic method of protecting populations of specially protected species is their in-situ protection, which is ensured through the protection and restoration of a suitable environment and the removal of risk factors that affect the area of current or potential occurrence of the species. As in previous years, the Inspectorate carried out several planned and unplanned inspections focused on the protections of species during the period, often in combination with other protection and restoration of a suitable protected interests. The Inspectorate repeatedly encounters unauthorized interference with the natural development of amphibians (fish, crayfish) in connection with technical interventions when it comes to watercourses, non-compliance with residual flows or manipulation of the water level in reservoirs. Among the specific cases handled, we can mention the case of cutting down 13 mature willows with the occurrence of the osmoderma barnabita in the scope of the Hradec Králové Territorial Inspectorate. The responsible subject, which is the administrator of the communication with the trees in concern, was forbidden by a decision in accordance with Section 66 of Act No. 114/1992 Coll. to continue further cutting and a fine was imposed for cutting down trees without permission and for unauthorized interference with the habitat and natural development of a specially protected species. The same Territorial Inspectorate also imposed a fine for damage to the habitat of the Dusky large blue in connection with the construction of a cycle route in the village of Helvíkovice.

A significant part of the inspections is focused on compliance with the protection conditions of specially protected species using human buildings, especially bats, common swifts, storks and other birds. The use of human buildings by specially protected species thriving in urbanized environments is a chronic problem. These are mainly cases of collision of a building as a biotope of a specially protected species with its external reconstruction, usually the building shell and roof. Specially protected species of animals are endangered or rare, scientifically or culturally very important on the territory of the Czech Republic, therefore legal regulation is needed to ensure the protection of their biotopes in the form of human buildings, which are mainly used by them only seasonally. The main reason for the use of human settlements is the lack of natural habitats for these species in the cultural landscape, such as old trees with hollows.

In 2021, the Inspectorate carried out several dozen planned and unplanned inspections of this focus in the scope of most of the territorial inspectorates. Violations of the law were found in individual cases. In the scope of the TI Hradec Králové, a fine was imposed for the removal of a repeatedly used white stork nest from a chimney in the village of Býšť. The same territorial inspectorate dealt with the death of an individual White Stork due to electric current. In the present case, the fault of the responsible subject has not been proven as the pole concerned was provided with the recommended elements for the protection of birds. The deficiencies in the security of the high voltage lines identified in the wider area will be the subject of corrective measures.

A specific case are the inspections of caves, mine workings and other sites with the occurrence of flying birds, which belong to specially protected species and which use these areas as wintering sites or as summer colonies. The availability and favourable conditions prevailing in these areas are therefore crucial for the survival of populations of this group of mammals. The inspections carried out in 2021 focused mainly on caves and mining sites in the České Středohoří Protected Landscape Area. In the cases inspected, no unauthorized entries into these areas, disturbance or killing of wintered flying birds, damage or other interference with the security of these areas were registered.

### **Inspection of shooting ranges aimed at compliance with the provisions of Act No. 334/1992 Coll., on the protection of the agricultural land fund**

Since 2019, within the scope of the TI Plzeň, targeted control of operating shooting ranges has been taking place, with a focus on controlling compliance with the prohibition of importing substances and preparations other than those permitted by specific regulations into the agricultural land

fund. Specifically, the subject of the inspection is to verify that the soil in the impact areas meets the limits for lead content, for which a precautionary value of 60 mg per kilogram of sample dry weight and an indicative value of 300 mg per kilogram of sample dry weight are set. Out of the six shooting ranges inspected, the energy dispersive X-ray fluorescence spectrometer detected at least one sample exceeding both the precautionary and indicative values in two cases. On the basis of these findings, an inspection by the CISTA (Central Institute for Supervising and Testing in Agriculture) staff will be carried out and if necessary, the responsibility of the shooting range operator will be taken. In the other two shooting ranges, no above-limit values were recorded and in the last two cases the results of the analysis of the samples taken are not yet available.

### **Inspection of compliance with Act No. 114/1992 Coll. during the implementation of investment actions**

In 2021, inspections focused on compliance with nature protection regulations during the implementation of investment actions took place primarily within the scope of Brno TI and Plzeň TI. During the inspection of construction activities in the Čebín district, damage to the root system of trees was noted as a result of compaction of the surface, weighting of soil and placement of construction material. Proceedings are currently underway to impose a fine for a delict on the responsible entity.

### **The Inspectorate was marginally devoted to other specific tasks, such as:**

- control of compliance with the ban on the commercial use of inaccessible caves,
- control of compliance with the specified conditions of deviant humilation on the ponds (blasting and scaring),
- control of water retention in the landscape (illegal drying of wetlands, loading of depressions, harmful activities in valley floodplains),
- control of the protection of tree species with a focus on the placement of replacing plants and control of their execution,
- inspection of small hydroelectric power stations aimed at compliance with minimum residual flows,
- checking compliance with the protection of trees in parking areas,
- control of municipal authorities when permitting the felling of trees growing outside the forest.

## 4. 4. 4 Major cases

In 2021, the Inspectorate encountered a wide range of illegal behaviour in the monitored area. Traditionally, the most common offence was the unauthorized felling of trees growing outside the forest, or their damage through unprofessional pruning. The Inspectorate dealt with the most serious forms of illegal behaviour in connection with encroachments on specially protected areas and important landscape elements caused by landscaping and construction activities or the inadequate use of intensive technologies, which often has subsequent devastating consequences on large areas, including biotopes and communities of specially protected species. The Inspectorate also noted a persistent problem in the area of non-compliance with the established conditions of activity, i.e. the decisions of the natural environmental protection authorities.

### Prague TI

For the illegal felling of a group of 10 mature trees growing outside the forest in the municipality of Babice u Řehenice, which before their removal represented a locally significant landscape-forming object within the peripheral part of the municipal urban area, the Inspectorate imposed a fine of CZK 95,000 on a natural person running a business.

### České Budějovice TI

The Inspectorate imposed a fine of CZK 150,000 for illegal intervention in the important landscape area of the Otava River and its valley floodplain, which is also a habitat for specially protected species of animals, by removing sediments and improving the banks in connection with the operation of the National natural monument Zátaví. The accused filed an appeal against this decision, which was rejected by the Ministry of the Environment on appeal and the Inspectorate's decision was confirmed. The court is currently dealing with this case.

### Plzeň TI

In 2019, the company ZUD, a. s. dredged an area (3,200 m<sup>2</sup>) to a depth of two to four metres during construction activities in connection with the rehabilitation and reclamation of the Terezia quarry in Vranovice. This activity violated the conditions of the exemption issued by the Regional Authority of the Pilsen Region regarding prohibitions in relation to specially protected species of animals, specifically ants of the genus *Formica*, common lizards and bumblebees of the genus *Bombus*. After an extensive investigation, the Inspectorate imposed a fine of CZK 100,000 in 2021.

### Ústí nad Labem TI

In violation of the terms of the decision of the Regional Authority of the Karlovy Vary Region on the granting of an exemption from the protection of specially protected

species from the order, the company Služby Boží Dar, s. r. o. allowed an aircraft to enter the large sightseeing circuit of the Johannes tunnel (i.e. it did not prevent the movement of people in the shaft and the object with the horse engine) and did not ensure the exit of the aggregate exhaust above the Johannes tunnel entrance area. A fine of CZK 80,000 was imposed on the named company for this action.

### Hradec Králové TI

At the end of 2021, the Municipal Court in Prague confirmed the decision of the Ministry of the Environment to appeal against the decision of the Inspectorate, by which a fine of CZK 50,000 was imposed on a natural person for the possession and transport of an inanimate specimen of a common wolf without proving its legal origin.

In 2021, the activities of SNĚŽNÍK, a. s. were solved as part of the expansion of the ski and recreation area in the village of Dolní Morava. In the winter and spring period at the beginning of 2021, forest cover with an area of approximately four hectares was removed, followed by the removal and temporary deposition of the rake, followed by the removal of stumps and roots using heavy equipment and the re-layering of the rake, in the bird area Králícký Sněžník and the habitat of several specially protected species of wood cranes, mountain blackbirds, common vipers and fragile blind, without exception to the prohibitions for specially protected species and consent to activities in the said bird area, issued by the relevant nature protection authority. Given that the case also involved a violation of legal regulations in the area of forest protection, the matter was resolved in cooperation with the forest protection department and in joint proceedings a fine of CZK 500,000 was imposed on SNĚŽNÍK, a. s. The company appealed against the decision of the Czech Environment Inspectorate (CEI) to the Ministry of the Environment.

### Havlíčkův Brod TI

The company Lesní družstvo in Polná carried out extensive felling of trees growing outside the forest in Brzkov district and damaged other trees. The implementation of the felling of the treated trees was preceded by a request from the municipality of Brzkov for the issuance of a permit to cut them down. The number of felled trees and their characteristics stated in the issued decision did not correspond to the actual felled trees, therefore the felling was assessed as unauthorized and the Inspectorate imposed a fine of CZK 50,000 for this act.

### Brno TI

At the beginning of 2021, the damage to the trees growing in the locally important linden alley in Zámecká Street in Kunštát was dealt with, by inexperienced pruning carried out in fundamental violation of valid arboricultural standards, which caused permanent and irreversible damage to at least

6 trees, therefore it was the subject that carried out the interventions, a fine of CZK 40,000 was imposed.



Wood damaged by unprofessional pruning in Kunštát

### Olomouc TI

For activities related to the construction of a ski area on land located in the third zone of the Jeseníky Protected Area and the Jeseníky Bird Area in the municipality of Karlov pod Pradědem consisting of extensive landscaping, the construction of ski slopes and bull tracks, unauthorized afforestation with non-native species of trees and encroachment on specially protected biotopes types, which took place from the end of April 2020 to the beginning of August 2020, the Inspectorate in 2021 imposed a fine of CZK 400,000 on the company SKI Karlov, s. r. o., which implemented the mentioned activities. The appointed person appealed against this decision, but subsequently withdrew this appeal, so the decision of the Inspectorate became final.

### Ostrava TI

The case, which had already been dealt with since 2018, was concluded in 2021 with a final decision imposing a fine of CZK 1,500,000 on the Veterinary University of Brno (formerly the Veterinary and Pharmaceutical University of Brno) for damaging nature in the specially protected area of the Poodří Protected Area and carrying out prohibited activities (intensive technology) in I. and II. of the protected landscape area Poodří protected area zone in connection with the breeding of an enormous number of game, which damaged the forest and meadow biotopes in the Poodří Kunín nature reserve. The original amount of the fine, i.e. CZK 2,000,000 was reduced by the MoE to CZK 1,500,000 in the appeal proceedings. The decision of the MoE was challenged by a lawsuit and the matter is currently in court.

### Liberec TI

In 2020, the inspectorate imposed a fine of CZK 50,000 on the contractor of this felling for the felling of 22 linden trees in the village of Vesec near Liberec, which were planted in a row of trees as replacement plantings forming perspective greenery in the inner city of the city without the permission of the nature protection authority, and subsequently in the final year, in 2008, the case was completed and the Inspectorate imposed a fine of CZK 80,000 on the contracting authority, the Ministry of Defence.



## 4. 4. 5 Conclusions of inspection activity

The agenda of the nature protection and CITES component, which the Inspectorate carries out, is extremely multifaceted and includes six component laws: No. 114/1992 Coll., on nature and landscape protection; No. 100/2004 Coll., on the protection of species of wild animals and wild plants by regulating trade with them; No. 78/2004 Coll., on handling genetically modified organisms and genetic products; No. 162/2003 Coll., on conditions for operating zoos; No. 334/1992 Coll., on the protection of the agricultural soil fund and No. 93/2018 Coll., on the conditions for the use of genetic resources according to the Nagoya Protocol.

The centre of activity of the nature and landscape protection component of the Czech Environmental Inspectorate traditionally lies in the control of compliance with the provisions of Act No. 114/1992 Coll. In this section, the Inspectorate in 2021 encountered a whole range of illegal acts. Individuals, as well as legal and natural business persons, most often committed illegal felling or damage to trees growing outside the forest. Unauthorized interventions in important landscape features, biotope or natural development of specially protected species were also significantly represented, typically in connection with construction activities, landscaping or modification of watercourses.

Serious illegal activity was also found in connection with damage to the preserved state of specially protected areas, including in connection with the already mentioned landscaping and construction activities (ski areas). A specific case is serious damage to natural biotopes in I. and II. zone of the PLA as a result of maintaining a significant surplus of game in field breeding, for which the Inspectorate, as part of the issued first-instance decision, proposed the maximum possible fine within the range of the fine established by law.

A specific part of the activity involved in the nature protection component are administrative proceedings on the prohibition of harmful activities or the determination of conditions for the performance of activities according to Section 66 of Act No. 114/1992 Coll. The issued decisions aim to eliminate any ongoing harmful activity and its effects on environmental interests protected by law. In 2021, a total of 32 decisions

of this type were enforced, with legal entities significantly predominating among the obliged entities.

In the previous year, the most frequently represented were "prohibition" proceedings related to the protection of trees growing outside the forest, specifically, a ban on the felling or damaging of non-forest trees was imposed on nine legal entities and two natural persons. Of these, in three cases it was a combination of banning the felling of the involved stands of trees and the opening of the watercourse bed, in one case a ban on the felling of riparian vegetation due to the absence of a consent opinion on intervention in the SLF watercourse. One of the issued decisions was intended to prevent illegal felling or damage to trees during landscaping and construction of fencing, while others set conditions for the reconstruction of the castle and castle park so that the root zone of trees is not damaged during excavations. A specific case is the suspension of the felling of trees along the road in a section with a proven occurrence of the specially protected brown stink bug, which is bound to the hollows of deciduous trees.

The second large group of decisions was related to the protection of specially protected species of plants, animals or wild European birds according to the provisions of Section 66 Nature Protection Act No. 114/1992 Coll. In four cases, the decision set the conditions for the performance of activities in connection with the implementation of construction works on projects connected with the occurrence of robins, golden sparrows or sparrows. In connection with the protection of the natural development of amphibians, one ban on the release of game-farmed wild ducks was also issued, three cases related to the ban on the release of water or manipulation of the water level at water reservoirs. One of the issued decisions established the conditions for the implementation of the mowing of grassland in connection with the proven occurrence of the field rattlesnake and another case related to the establishment of conditions for the management of grassland with the occurrence of the spotted bluebird, marsh bluebird and other species of butterflies. In connection with the protection of specially protected species, a ban on the application of the rodenticide product Stutox on land with the presence of field hamsters was imposed on one agricultural entity. Due to the protection of a larger number of specially protected species, the conditions for the mining of gravel and sand, respectively for possible interventions in the peripheral part of the mining area of the sand pit, were determined by means of two other decisions. In connection with the proven occurrence of several species of birds and aeroplanes, another decision restricted the operation of a wind power plant in the municipality of Bradáčov, until the time of the issuance of an exemption from

the prohibitions for the specially protected species in question.

Among the most serious cases dealt with is the issuance of a decision prohibiting the implementation of landscaping in connection with the construction of a sports complex in Karlov pod Pradědem. Extensive landscaping (on an area of more than 3.5 ha), carried out without the relevant permits of the nature protection authorities, did not respect the protection conditions of the PLA and the Jeseníky Bird Area, and furthermore of several specially protected species of plants and animals occurring in the location. In addition to imposing a fine (details given in the significant cases section), the Inspectorate proceeded to limit landscaping related to the construction and operation of ski and bicycle tracks.

The protection of plant species was the reason for the issuance of two decisions on the restriction of activities in the area of Králický Sněžník. In both cases, it was the same physical person who was supposed to refrain from field work and other disruptive interventions on the middle section of the dam of the Úžas pond with the occurrence of sedge, or field and construction work on plots of land with the occurrence of May foxglove and elder foxglove, specifically in connection with construction modifications within the Kraličák ski area. The last decision to restrict activity was issued to a natural person who is to refrain from weighing excavated soil and construction waste on several plots of land in the municipality of Svojšice u Kouřimi, which is banned. The activities carried out were contrary to the protective conditions of important landscape elements, the forest, water course and valley floodplain.

The following findings emerged from the inspection activity in the CITES section in 2021. The persistent absence of a rescue centre with sufficient capacity, especially for big cats and predators, threatens the application of the law and the public's perception of the authority of wildlife crime authorities. In order to make control and administrative activities more efficient and to deepen the coordination of cooperation with the Police of the Czech Republic, Customs Administration authorities, the State Veterinary Administration, the Central Agricultural Inspection and Testing Institute, forensic workplaces and EU authorities, need to cooperate in the conditions of increasingly complex legislation and the increase in the volume of special information, it is a categorical imperative to increase the personnel subsidy capacities of the Czech Environment Inspectorate (CEI) in the area of combating wildlife crime. The inspectorate considers it desirable to increase the penalty rates for violations of the law in the area of trade in endangered species.

## 4. 5 Forest protection

### 4. 5. 1 Overview of inspection activity in 2021

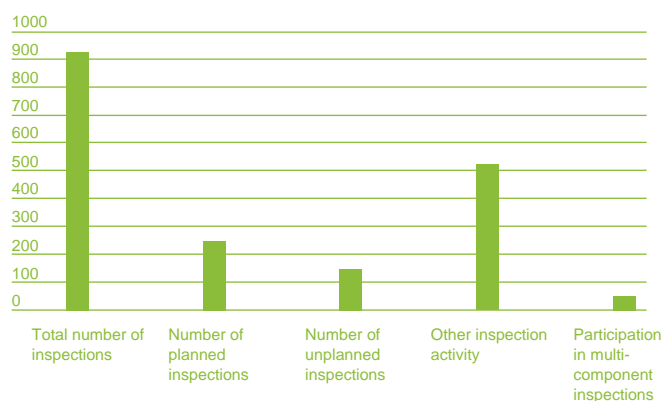
According to the records of the CEI personnel department, a total of 42 inspectors were registered in the forest protection department by the end of 2021, which is 4 inspectors less than the previous year. Each inspector thus accounted for approximately 62,253 ha of supervised forests according to the size of the vegetation area stated in the Report on the State of Forests and Forest Management of the Czech Republic in 2020.

Inspection activities in the forests took place on the basis of a similar legal framework as in previous years. It was primarily Act No. 282/1991 Coll., on the Czech Environmental Inspectorate and its powers in forest protection, Act No. 289/1995 Coll., on forests and on amendments and additions to certain laws (Forest Act), Act No. 149 /2003 Coll., on the circulation of reproductive material of forest trees of forestry-important species and artificial hybrids intended for forest regeneration and afforestation, and on the amendment of some related laws (Act on trade in reproductive material of forest trees), Act No. 114/1992 Coll. , on nature and landscape protection, Act No. 255/2012 Coll., on control (control order), Act No. 500/2004 Coll., administrative code, Act No. 250/2016 Coll., on liability for offenses and proceedings about them and internal management acts within the CEI.

Inspectors of the Forest Protection Department conducted a total of 913 inspections in the monitored period. Among these, 240 planned inspections, 152 unplanned inspections and 521 other inspections were carried out. As in previous years, field activities were carried out in the form of actions preceding the inspection, where the inspection did not have to take place subsequently, various investigations were carried out within the framework of the received initiatives and information, including cooperation with other state administration bodies, possibly police of the Czech Republic, etc. In addition, FPD inspectors took part in 54 multi-component inspections organized by other components of CEI.

Compared to the previous year, the number of inspections was lower due to the ongoing measures issued in connection with the Covid-19 epidemic, which was exacerbated by the declared states of emergency. Limitation of control activities (always according to the current state of the infectious situation) required a reduction in contacts with controlled subjects or persons present during the control or investigation.

### Numbers of inspections in 2021



Inspections were carried out on forest properties of all types of ownership, with topics mainly related to the current state of bark beetle development, wood sanitation, its transport and the situation in the preparation of forest restoration. In the year under review, the institute of fines and imposition of remedial measures was used only in cases of repeated and gross violations of laws.

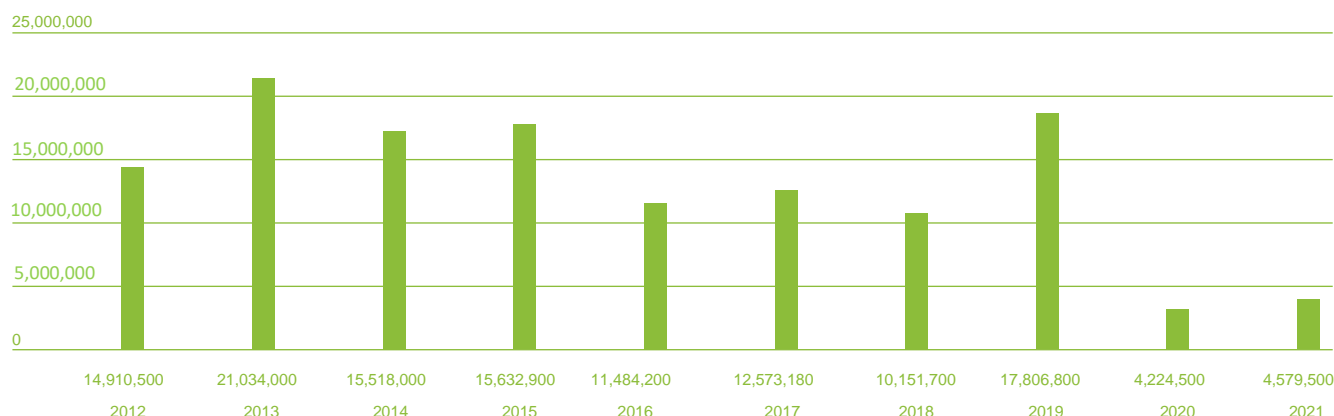
As part of other inspection activities, 382 comments on EIA assessments and 97 other opinions and comments were prepared both for natural and legal persons, as well as for state administration bodies and the Police of the Czech Republic.

In 2021, 69 decisions on fines were issued as part of administrative and delict proceedings. In the monitored period, 64 fine decisions came into force, of which 57 fines were issued in the monitored period and seven fine decisions were issued in the previous period. The total amount of legal fines was CZK 4,579,500.

The individual Forest Protection Departments contributed as follows: Prague CZK 1,284,000, České Budějovice CZK 724,000, Pilsen CZK 259,000, Hradec Králové CZK 607,000, Havlíčkův Brod CZK 833,000, Brno CZK 437,500, Olomouc CZK 47,000, Ostrava CZK 108,000 and Liberec CZK 280,000.

The total of fines for the file is CZK 355,000 higher than in 2020, but significantly lower than in the years 2012 to 2019. The reason for the reduction of the total amount in 2020 and 2021 can be seen on the one hand in the reduction of the number of inspections as a result of the measures issued in connection with the Covid-19 disease and also in connection with the issued public decrees, Measures of a general nature, by the Ministry of Agriculture as the central body of the state forest administration, which adjusted the management conditions in the forests as a response to the ongoing bark beetle calamity.

## Development of legal fines in CZK in the years 2012-2021



The delicts for which the aforementioned fines were imposed are similar to those in previous years. These are in particular delicts for neglecting forest protection and measures preventing the development of biotic agents, violating regulations during forest restoration, damaging land intended for the performance of forest functions by forest traffic, unauthorized occupation of land intended for the performance of forest functions, waste and garbage in forests, failure to comply with imposed measures to correction of the illegal state of forest property, etc.

For the entire FPD, in 2021 the highest final fines were imposed by FPD Prague on the company MatPres, s. r. o. in the amount of CZK 960,000 for failure to take corrective measures, and by FPD České Budějovice on REKULTIVA AG, s. r. o. in the amount of CZK 400,000 for unauthorized use of land for other purposes than to fulfil the functions of the forest and by FPD Hradec Králové in the amount of CZK 450,000 for damage to forest land by the company DrLes, s. r. o. These fines are described in more detail in Chapter 4. 7. 4 dedicated to major cases.

In the monitored period, administrative proceedings on the imposition of remedial measures (RM) were also conducted, when 37 administrative decisions were issued. 37 decisions on the imposition of remedial measures became legal, of which three decisions on remedial measures were issued in the previous period and became legal in the year under review. Most of the remedial measures concerned common forest management offences.

The largest number of RMs, a total of 12, were imposed by the FPD of České Budějovice TI, where illegal mining of the protected moldavite mineral occurs repeatedly. The Police of the Czech Republic follows up on the control and administrative activities of the FPD České Budějovice TI in this issue. Here, an activity ban is repeatedly issued from the inspection level with a subsequent solution by the Police

of the Czech Republic as part of the criminal delict of obstructing

the execution of an official decision and report. In 2021, 15 cases of this violation were dealt with by the Police of the Czech Republic under this activity ban regime, issued by the CEI.

In the criminal proceedings, the persons caught were sentenced to community service, imposed suspended prison sentences and, in the case of multiple sentences, also prison sentences. In the year under review, three reprimands were issued in legal force, of which one was issued at České Budějovice TI and two at Brno TI. At České Budějovice TI, activities were stopped or restricted in 22 cases, all in legal force.

10 initiatives were submitted to state administration bodies, eight of which were submitted by České Budějovice TI, one by Plzeň TI and one by Ostrava TI.

As in previous years, in 2021 the institution of calls for remedial measures was used, in cases where it was obvious that there would be a violation of legal regulations or a less serious violation had already occurred. From the perspective of the impact on the environment in forests, the mentioned procedure in relation to the forest owner is proven and more effective compared to often lengthy management of administrative proceedings with an uncertain or delayed result to the detriment of the state of the forest. This tool partly replaces the administrative procedure for remedial measures and is mainly used by small forest owners, who in this way are alerted to the shortcomings and obligations arising from a specific legal regulation. Only in case of non-fulfilment of the call or in case of repeated violation of the law, fine/remedial measures are initiated.

No criminal complaint was filed in the year under review.



## Inspection activity according to territorial inspectorates:

### Prague TI

In 2021, a total of 97 checks and inspections were carried out, of which 27 were planned and 70 were unplanned. The Office of Oceanography and Limnology (OOL) also participated in the solution of 10 multi-component inspections. Planned inspections were carried out in municipal and private forests. The controls were focused on compliance with legal regulations in the field of environmental protection in forests. In terms of substance, they chiefly concerned the protection of the forest against harmful biotic agents, the protection of land intended for the fulfilment of forest functions (unauthorized logging, landfills, landscaping), afforestation of clearings, mining activities, implementation of remedial measures from administrative proceedings, implementation of imposed challenges, etc.

Out of 70 unplanned inspections, 31 inspections were carried out based on suggestions. Unplanned inspections were carried out in state, municipal and private forests and related mainly to mining activities, protection of land intended for the fulfilment of forest functions (unauthorized logging, landfills, landscaping), afforestation of clearings, etc.

### České Budějovice TI

Even though the controlled activity was significantly affected by the unfavourable epidemiological situation in the evaluated period, 145 control actions were carried out, of which 84 were planned controls and 61 were unplanned control actions. The planned control activity resulted in a number of proceedings in the matter of corrective measures and fines, which mainly related to both unforested clearings and forest protection against bark beetles, the use of land intended for the fulfilment of forest functions and waste on forest land.

As part of the unplanned inspections, the issues of forest protection against bark beetles, damage to the soil cover by digging culverts, use of land designated for the fulfilment of forest functions for purposes other than those stipulated by the Forestry Act, as well as the fulfilment of calls to eliminate minor deficiencies in forest management, including the imposition of activity bans, were mainly addressed, concerning the illegal digging of moldavite on forest land.

### Plzeň TI

In the evaluated period, 28 planned and 43 unplanned inspections were carried out, and three inspections were carried out in cooperation with the NPD. The content of the inspections mainly included the development of biotic factors, damage to forests by logging and protection of the forest soil fund and the implementation of remedial measures. To a lesser extent, inspections related to animal

damage, reproductive material of forest trees and restoration of forest stands. The retirement of one inspector contributed to the failure to fulfil the number of planned inspections in the second half of the year.

Unplanned inspections were carried out chiefly on the basis of submitted initiatives and mainly related to mining activities (barkwood and illegal mining) and protection of the forest soil fund (forest land acquisition, waste in forests).

### Ústí nad Labem TI

In the year under review, 21 actions were carried out, compared to the planned 74 inspections. In addition to the COVID-19 epidemic, the non-fulfilment of planned inspections was also partially affected by the resolution of extensive initiatives submitted by the Duha Olomouc association and Greenpeace.

There were 53 unplanned inspections carried out, of which 25 initiatives were investigated under the competence of the FPD. Last year, the content of the control actions was almost identical to the previous year, i.e. in addition to the development of biotic factors, damage to the forest soil fund and restoration of forest stands were also investigated.

### Hradec Králové TI

The FPD carried out 44 planned inspections in forests having all types of ownership. These inspections were focused on the development of biotic factors, restoration of forest stands, protection of land for the fulfilment of forest functions, recreational activities, management of reproductive material of forest trees and the fulfilment of measures imposed by the decision of the CEI. Of the planned inspections, 12 were not carried out, as a result of measures taken in the framework of the COVID-19 disease.

There were 42 unplanned inspections conducted, of which 23 inspections were carried out on the basis of received suggestions. Threats to the forest in connection with the felling of trees and illegal use of forest land prevailed as a topic of unplanned inspections.

### Havlíčkův Brod TI

There were 56 actions carried out of the total planned 63 controls implemented. The scope of inspections underwent significant changes during the year. The most fundamental reason was the pandemic measures, as well as the rapidly changing calamity situation in the Vysočina Region with the consequence of the transfer of inspection capacities to the area of unplanned inspections, primarily to deal with complaints. Similar to the unplanned inspections, the topics were the disastrous situation in the development of bark beetles, protection of the forest soil fund, forest restoration and illegal dumping of waste.

Out of the total number of 33 unplanned inspections, there were 14 initiatives. Of the 14 initiatives, four were evaluated as reasonable. Information from Expert Forest Manager (EFM) and the State administration also participated in unplanned inspections.

### Brno TI

During 2021, the FPD carried out a total of 45 planned supervisory actions, of which 33 were inspections and 12 were other inspection activities - investigations. Compared to 2020, there was a slight decrease in inspections, due to both the epidemiological situation and the long-term absence of an inspector at the Zlín branch. Comprehensive checks and investigations prevailed, during which attention is paid to all relevant topics in a given place and where the mutual interdependence of individual social functions of the forest and the inseparable bond of forest stands and forest soil are based on each other. Unimplemented planned inspections were transferred to the FPD inspection activity plan for 2022.

There were 47 unplanned supervisory actions carried out, of which 32 were inspections and 15 were other inspection activities - investigations. 35 citizens' initiatives were dealt with unplanned. The topics were mainly the protection of the forest soil fund - waste, illegal occupation of forest land and forest protection - bark beetles, damage to trees by mining activities, etc.

### Olomouc TI

In 2021, there were 14 comprehensive inspections planned, eight inspections of the introduction of reproductive material of forest trees into circulation, seven inspections of the implementation of remedial measures and three inspections of mining areas, a total of 32 inspections. A total of 70 surveillance actions were carried out. The inspections that were not carried out were moved to the maximum extent into the inspection activity plan for 2022.

There were 28 unplanned inspections carried out, where in nine cases it was an investigation or inspections based on suggestions. The topics were dominated by the theme protection of land intended to fulfil the functions of the forest and especially bark extraction in the Jeseníky Protected Area.

### Ostrava TI

A total of 85 surveillance actions were carried out. The department dealt with 23 planned inspection actions, where inspections of the protection of the forest soil fund prevailed, including the use of the surroundings of mining areas, inspection of the restoration of forest stands and inspection of the implementation of corrective measures from administrative decisions. As a result of the pandemic situation and the solution of unplanned inspections, when the increase in the number of initiatives compared to the previous year was 53%, some planned inspections were not fulfilled.

The total of 44 unplanned control actions meant an increase when compared to 2020. In 37 cases, these were actions taken by initiative. Most often, inspections related to the protection of the forest soil fund, including the use of the surroundings of mining areas and damage to forests by logging, encroachment and the related disturbance of the stability of forest stands.

### Liberec TI

In the evaluated period, a total of 65 control actions were carried out, of which 15 planned controls, 10 unplanned controls and 40 other actions. The control actions of the planned controls in the monitored period were focused on the one hand as comprehensive controls, or, on the other hand on the control of the development of bark beetles, the protection of the forest soil fund, the restoration of forest stands, the introduction of reproductive material of forest trees into circulation, animal damage and the implementation of remedial measures from administrative decisions.

Unplanned inspections to the number of 10 actions were carried out mostly on the basis of initiatives and were mainly focused on the processing of random bark extraction, protection of the forest soil fund after forest transportation, illegal use of forest land including recreational activities and pollution of the forest by waste and animal damage.

## 4. 5. 2 Overview of the performance of departmental tasks

The departmental tasks for the year 2021 were the control of the state of development of bark beetles with a priority focus on the processing and rehabilitation of active bark beetle trees and the protection of the forest soil fund, its damage by mechanized means with an emphasis on the occurrence of subsequent soil erosion and disruption of the water regime. Attention was paid to the tasks in question within the framework of all types of control actions (complex controls, specific controls, investigation of initiatives, controls on the implementation of remedial measures, actions preceding the control, etc.), within the framework of the Control Act and the intentions of the internal regulations of the CEI, especially the Methodological FPD instruction No. 3/2014. Forest properties of all ownership types were inspected.

### The following findings can be summarised from the performed inspections:

In the supervised territory of the FPD **Prague TI** in the Central Bohemian Region, a significant gradation of bark beetles continued, mainly the spruce bark beetle (Nordic bark beetle). A large part of the region is in a state of calamity. In the future, the development and continuation of the bark beetle calamity is uncertain, it depends on the further development of climatic conditions. Active processing of wood attacked by bark beetles was found on all inspected forest properties and there was no reason to initiate administrative proceedings. In general, access to forest protection against biotic pests is better for large owners and state forests compared to small forest owners. No serious problems were detected in forest transport.

Within the South Bohemian Region, the FPD **České Budějovice TI** paid attention to departmental task controls within 65 supervisory actions. They revealed the fact that the occurrence of bark beetles, especially the spruce weevil and the glossy weevil, is still in an elevated or catastrophic state in the majority of the area in question. The most affected areas are the forests under the jurisdiction of MEP Tábor, Jindřichův Hradec, Písek and Milevsko. The calamity is slowly fading away in the District of the municipality with extended powers (MEP) České Budějovice, Prachatice, Strakonice and Vodňany. It completely died out at MEP Dačice due to a significant reduction in the representation of spruce in all age classes. Due attention was paid to the issue of forest protection on the properties of the large owners, Forests of the Czech Republic (FCR), state enterprise (s.p.) and Military Forests and Estates of the Czech Republic (MFE CR), s.p. The situation in the Šumava National Park can be considered stabilised. The largest, often repeated neglect of obligations in forest protection, regarding the processing and sanitation of active bark trees, was solved by inspections of small forest owners, sometimes also due to the difficulty of obtaining processing capacities and sales of firewood. A persistent problem with some owners can be seen in the method of remediation carried out, namely through removal. In the evaluated year, forest transport was carried out on most forest properties without major negative impacts, only in one case the damage to the soil cover will be solved by imposing a sanction and remedial measures.

Separately, the departmental task at the FPD **Plzeň TI** was solved during 16 inspections, when one final decision was issued to impose a fine of CZK 10,000. In the Pilsen Region, the MEP following the South Bohemian Region is the most affected by bark beetles, especially in the Domažlice, Horažďovice, Klatov, Nepomuk and Sušice areas, and in the remaining parts of the region mainly forest stands up to 600 m above sea level. A downward trend in the volume of wood attacked by bark beetles can be observed

in the National Park Šumava. Further development will depend on the weather, especially on the amount of precipitation.

In the forests of Karlovy Vary and Ústí Region, the FPD **Ústí nad Labem TI** carried out 50 unplanned inspections on the topics of departmental tasks.

In the Hradec Králové and Pardubice regions, the FPD **Hradec Králové TI** monitored the departmental tasks within the framework of comprehensive inspections and during 33 separate inspections focused on the condition and development of harmful insects, mainly the spruce weevil, the northern weevil and the glossy weevil. A greater spread of bark beetles and the subsequent threat to the surrounding forest stands was noted mainly among small forest owners. The population of bark beetles in both regions showed a mostly stagnant state during the observed period. The most affected areas can be considered the forests in the belt around Jičín, Nová Páky, Hořice, Dvůr Králové nad Labem and Jaroměř, and then around Nasavrky, Moravská Třebová, Jevíček, Přelouč and Svitav. The death of pine trees is also significant in the region, especially in the vicinity of Hradec Králové, Pardubice and Přelouč. The checks resulted in four fines ranging from CZK 3,000 to CZK 50,000. Significant damage to the forest floor by forest traffic was found in the vicinity of Vrchlabí, where heavy mechanisation was used in unsuitable climatic conditions with subsequent erosion of the forest floor. For the detected violations, a final fine of CZK 450,000 was imposed on the company carrying out this activity, and a fine of CZK 65,000 was imposed on the forest tenant who ordered the work.

In the Vysočina Region, the FPD **Havlíčkův Brod TI** carried out seven inspections of municipal and private properties as a result of the pandemic situation. The dominant biotic pests are the spruce beetle, the northern beetle and the glossy beetle. In particular, climatic developments in the winter and spring significantly influenced the course of the calamity situation in the year under review. Compared to the same period of the previous year, a noticeable improvement in the health of the stands can be noted. Despite the high population density of bark beetles in the forest stands, due to the positive effect of the weather, the vitality of the stands improved and there was no further massive spread of bark beetles. Currently, there is still significant damage to locations in Žďárské vrchy, in the vicinity of Nové Město na Morava, in the Protected landscape area (PLA) Železné hory, and then in the vicinity of Pelhřimov and Pacov. A dismal situation also remains along the Sázava and Želivka watercourses. No serious cases of damage to forests by forest transport were detected.

In the South Moravian and Zlín Regions, the FPD **Brno TI** paid attention to departmental tasks, especially within the framework of complex controls and also during the investigation of complaints. The course of the weather in the observed period gave reason for mild optimism in some places, yet the situation in the forests continues to call for considerable caution, due to the increased load of pests in the stands. In a number of localities, the representation of conifers, especially spruce, in forest stands was significantly reduced. More pronounced problems persist, for example, in the area of Rožnov pod Radhoštěm, the bark beetle calamity is gradually moving in a western direction, towards the Bohemian-Moravian Highlands. The volume of attack on spruce stands in 2021 was estimated to be one-third lower than in 2020 when compared to 2020. The checks carried out showed that the forest road network has not yet suffered major damage, and other forest transport routes (forest weighbridges, technological lines) have in most cases returned to their original state as part of post-production modifications.

The FPD **Olomouc TI** monitored the development of biotic factors in the Olomouc region, especially in the areas of MEP Zábřeh, Mohelnice, Šumperk, Litovel, Konice, Jeseník, within the framework of 20 surveillance actions. Decay of spruce stands due to bark beetle damage is at the very end in lower locations, and clearings are gradually being reforested. These are the territories of MEP Hranice, Lipník nad Bečvou, Olomouc, Štamberk and Uničov. As a result of favourable climatic conditions, there has been a certain reduction in accidental logging, but it is still true that in areas with a larger number of forest owners, where there has already been a large-scale breakdown of spruce stands, it is difficult or impossible to find out the person responsible for the creation of an illegal situation and it is not possible to clearly determine the responsibility for sanctions. In the monitored period, the treatment of bark beetle-infested stands took place mainly in higher locations, in the areas of MEP Jeseník (Zlaté Hory, Rejvíz), Zábřeh, Mohelnice, Šumperk, Litovel, Konice, Hranice and Prostějov, where significant damage still occurred in spruce stands. In the past year, the FPD dealt with the damage to forests by mining activities during comprehensive controls, inspection investigations and when dealing with complaints, in a total of seven cases. There have been cases of the use of heavy machinery under unsuitable climatic conditions resulting in the devastation of the soil surface and damage to trees without subsequent protective coating.

As part of the activities of the FPD **Ostrava TI**, the departmental task "development of biotic factors" was the subject of eight control actions in the Moravian-Silesian Region. Two fines in the amount of CZK 2,000 were imposed in delict proceedings. The third case, where a violation

of the law was found, is still being resolved. Damage to forest land by forest transport was the subject of seven control actions, where in one action the detected condition was evaluated as a violation of the law (the control has not been completed).

The departmental tasks of FPD **Liberec TI** were examined within 30 controls in the territory of the Liberec region. About 80 percent of the damage to spruce stands was caused by the European spruce bark beetle and about 20 percent by the Sixtoothed spruce bark beetle. The greatest damage by insect pests was found in locations up to 500 m above sea level and in the northwest of the in the northwest of the Liberec region in the PLA Lužické hory. Damage in the forests, caused by mining activities or the removal of wood, was not detected. Sanctions did not result from the inspections, forest owners were warned about minor deficiencies in several cases, which were subsequently removed. The controls thus had a preventive and educational effect.



### 4. 5. 3 Overview of the performance of specific tasks

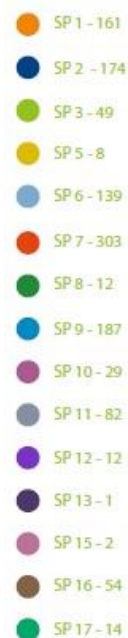
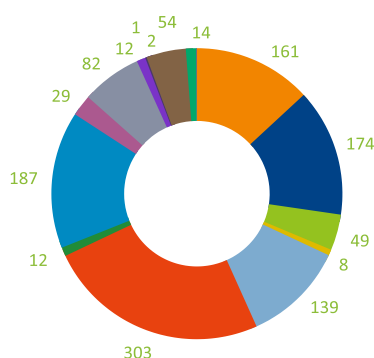
FPD TIs checked 15 topics in both scheduled and unscheduled inspections, namely:

#### Inspection topics

Inspection topics abbreviations	Inspection topics	Number of inspections
Sp 1	Comprehensive inspection	161
Sp 2	Development of biotic agents	174
Sp 3	Damage by game	49
Sp 5	Use of biodegradable oils and hydraulic fluids	8
Sp 6	Damage to forest by logging, skidding and upset stand stability	139
Sp 7	Protection of forest land fund, including use of surroundings of mining areas	303
Sp 8	Circulation of reproductive material of forest trees	12
Sp 9	Forest stand restoration, including stands after illicit logging	187
Sp 10	Adherence to binding provisions of FMP and FMG	29
Sp 11	Implementation of remedial measures from administrative decisions	82
Sp 12	Forest land fund protection – recreational activities	12
Sp 13	Ecological damage in forests	1
Sp 15	Afforestation of agricultural land fund	2
Sp 16	Pruning in stand age groups up to 40 years	54
Sp 17	Inspections in cooperation with NPD under Act no. 114/1992 Coll.	14

The above frequencies of specific task inspections do not match the total numbers of inspections since many inspections encompass several specific topics simultaneously. This is especially the case with comprehensive inspections, which are focused on all topics that are current on the inspected property. In 2021, specific tasks were checked during 913 inspections, of which 161 were comprehensive inspections.

### Overview of the number of inspections by thematic focus



## 4.5.4 Major cases

### Prague TI: Krtkův svět

The case concerns a natural person in the matter of the liquidation of the forest in the municipality of Horní Měcholupy and Dolní Měcholupy. Administrative proceedings

to stop the harmful activity have been initiated and are being conducted with the controlled person, and further criminal proceedings will be initiated in the given matter. We consider the obvious damage and threat to the environment to be so serious that it is important to state the essence of the whole case in this report.

The natural person owns forest land with a total area of 43,641 m<sup>2</sup> in the municipality of Horní and Dolní Měcholupy, on which he built the amusement park Krtkův svět, and all the forest land in question is affected to varying degrees by this extensive takeover. As part of the inspection activity, it was found that the forest land is not used to fulfil the functions of the forest. The forest land is completely fenced for the purposes of the amusement park Krtkův svět, which is subject to a charge for the public. It includes a large number of built-in play attractions for children (e.g. slides, climbing frames, swings, trampolines, houses, etc.), a theatre with seating, artificially created water areas, countless paved areas and paths, benches, refreshments, a large number of ornamental trees, perennials and also animals are kept here (e.g. Indian runner ducks, geese, goats, pygmy hogs). Various services are offered to visitors on the forest land in the form of celebrations, barbecues, concerts, theatre performances and other events for children. During the construction of the fenced-in amusement park Krtkův svět, trees were cut down in places and shrub floors were removed to make room for game attractions and other buildings. There was a large-scale disposal of the upper layer of soil (absence of forest rake) which was purposely replaced by reinforced surfaces (concrete, various types of gravel) and artificial or sown turf. Mechanical interventions were made in the deeper soil layers during the construction of high fences, dozens of concreted stakes and some attractions. From the investigation so far, it follows that the amusement park Krtkův svět is still in the construction phase, especially on the forest plots No. 532 and 533/1, both in the municipality of Horní Měcholupy. The CEI's inspection took place from June 2020 to September 2021. The construction of the amusement park caused the devastation of the natural environment and the original forest community. In the opinion of the Inspectorate, in the given case the conditions for proceeding according to the provisions of Section 3, Para. 4 of Act No. 282/1991 Coll., on the Czech Environmental Inspectorate and its powers in forest protection have been met, and administrative proceedings to stop harmful activity have been initiated and are being conducted with the inspected person. Furthermore, criminal proceedings will be initiated in the matter. During the monitored period, the CEI submitted "Notification regarding the suspected criminal act of obstructing the execution of an official decision pursuant to Section 337, Para 1 of Act No. 40/2009 Coll., or other criminal activities" to the Police of the Czech Republic.

### České Budějovice TI: REKULTIVA AG, s. r. o.

Unauthorized use of forest land for purposes other than the fulfilment of forest functions in the cadastral territory of Nesměň near Ločnice (MEP Trhové Sviny) by REKULTIVA AG, s. r. o., for which a final fine of CZK 400,000 was imposed in September 2021.

Through an inspection carried out in 2019 and in the subsequent delict proceedings, which took place in 2020-2021, the CEI discovered the implementation of illegal landscaping on a forest plot in the cadastral territory of Nesměň near Ločnice on an area of 960 m<sup>2</sup>, which reached the depth of four metres. Landscaping consisted in the removal of forest soil, apparently for the purpose of obtaining the protected mineral moldavite or sand, and the subsequent filling of the area with other soil. The imported soil had the same or worse character and the work carried out therefore did not have signs of recultivation or revitalization of the given area. The given plot of land has already been affected by the illegal digging of moldavite by unknown persons in the past. REKULTIVA AG, s.r.o., which carried out the work in the field, was fined CZK 400,000 for the illegal landscaping described above. The owner of the land, who requested the described work, has absolved himself of guilt as he had a contract for the work, which did not deal with the removal and loading of the soil.



Unauthorized use of forest land for purposes other than the fulfilment of forest functions by the company REKULTIVA AG, s. r. o.

### Plzeň TI: JT Company, s. r. o.

JT Company, s. r. o. (in liquidation) has not yet reforested a total of 2.39 ha of clearings in the cadastral territory of Chanovice and Dobrotica u Chanovice, which were created after timber harvesting. The legal deadline for afforestation of forest land ended in 2016. The company was not forced to reforest even by repeatedly imposed legal fines, the last one in the amount of CZK 239,000. The company was deleted from the commercial register on 1<sup>st</sup> February 2021 due to the dissolution of the business corporation through liquidation.

### Hradec Králové TI: DrLes, s. r. o.

A fine of CZK 450,000 was imposed on DrLes, s. r. o. for having significantly disturbed the forest land on an area of 7,940 m<sup>2</sup> in the vicinity of Vrchlabí during timber harvesting in the forest. As a result of the disturbance of the soil, it was eroded and thereby created conditions for the excessive action of biotic and abiotic harmful agents.

### Havlíčkův Brod TI: EUROFIN – IMC, s. r. o.

EUROFIN – IMC, s. r. o. was fined a legal fine of CZK 50,000 for endangering the environment in the cadastral territory of Březská (Žďár nad Sázavou district) by illegally using forest land for purposes other than the fulfilment of forest functions. It involved loading forest land with a total area of 0.57 ha with waste soil from various construction projects. The loading height reached up to 15 meters in some places.



Unauthorized use of forest land for purposes other than the fulfilment of forest functions by the company EUROFIN - IMC, s. r. o.

### Brno TI: HOLDING VINOHRADY, s. r. o.

The company HOLDING VINOHRADY, s. r. o. (in liquidation) was imposed a final fine of CZK 250,000 for the delict committed by the owner of forest land in the cadastral territory of Všechnovice u Tišnova. The owner had not ensured the timely and proper restoration of the forest on the said forest property since 2009, namely on the total reduced arable land with an area of approximately 1.35 ha.

### Olomouc TI

We consider it expedient to mention the legally imposed fine of CZK 27,000 on a natural person, not because of the amount of the fine, but because of the problems that the inspection body ran into during the proceedings. The actual fine was imposed for non-implemented remediation and processing of 270 m<sup>3</sup> of spruce. For non-cooperation, the natural person was given a warning according to the control order. In the course of the delict proceedings, the delinquent made rude, insulting and vulgar comments about both the activities

of the CEI and the inspection staff in written statements and in appeals against the decisions of the CEI. It is reasonable to assume that in the future these derogatory procedures towards the CEI will generally increase.

### Ostrava TI

Even though the case is not yet closed, we consider its essence to be serious from the perspective of forest protection. It concerns the non-afforestation of clearings older than two years and the associated failure to bring the location to the state of "achieving sufficient protection of the soil cover against water erosion", in the cadastral territory of Dolní Lomná (Moravian-Silesian Beskydy, the Jablunkovska region). The delict is related to the relatively recent advertising of this area as a so-called the "blue ski slope" in the area of SKI ARMÁDA Dolní Lomná, while the "blue ski slopes" are currently not permitted by any of the concerned administrative bodies and are in conflict with the municipality's zoning plan. The audited companies in this case are Capital group SERVICE, s. r. o. and KORAS Reality, s. r. o. In the monitored period, Capital group SERVICE, s. r. o. was fined CZK 30,000 for failure to cooperate.

### Liberec TI

The FPD imposed a fine of CZK 280,000 on a natural person for deficiencies in forest restoration in the cadastral territory of Bratříkov and for failure to comply with authorized corrective measures in the cadastral territory of Bzí u Železného Brodu, also for deficiencies in forest restoration. The inaction of the accused led to the spread of weeds and animal damage to forest trees, which significantly worsened the conditions for the proper restoration of the forest.

## 4. 5. 5 Conclusions of the inspection activity

The entire evaluated period was significantly affected by the coronavirus pandemic and declared a state of emergency. The measures issued in connection with the Covid-19 epidemic meant the restriction of contact with controlled entities and the subsequent cancellation of controls, which could not be fully implemented during the year 2021. In many cases, unfulfilled inspections had to be carried over to the following year.

At the level of the forest protection component, the personnel shortage has worsened, when the tasks involved in the supervision of the condition of the forests are not manageable in terms of capacity, and in particular, when pending cases and initiatives are dealt with. Approximately 62,000 per each inspector of supervised forests.

The limitation of field surveillance activity was necessarily reflected in the reduction in the number of fine and remedial action proceedings. This was partially contributed to by the complex and complicated agenda of some resolved initiatives, the investigation of which was time-consuming and last year 2020, there was an increase in the capacity utilisation of inspectors at the expense of planned and core activities in forest surveillance. The total amount of legal fines amounted to the second lowest in the last decade.

In addition to problems in the protection of forests, mainly from insect pests, other problems are administrative offences in the form of the unauthorized use of forest land for purposes other than the fulfilment of forest functions, waste disposal, landscaping, construction or other unauthorized encroachments that are a practically permanent trend.

Despite the problems connected with the development of bark beetles, often of a calamitous nature, it can be stated that the situation of the current forest management is at a good level for most forest owners. The regular monitoring of the state of the forest in risk areas and, above all, the rigorous control of the implementation of the imposed remedial measures have proven to be very effective. Educational activities in the form of frequently informing forest owners about their obligations also play a positive role.

A favourable trend continued in terms of the assessment of the prestige of the representatives of the forest protection department, which is particularly evident in the proven sending of calls to eliminate any deficiencies in the forests. The calls in question mostly led to the operative elimination of the undesirable condition. This practice substantially reduces the number of administratively demanding delict proceedings.

In 2021, there was no increase in activities in the area of unauthorized logging, apparently due to the overall supply of wood on the market as a result of massive random logging.

From the point of view of the predicted development, in 2022 we can expect a continued catastrophic spread of bark beetles on spruce, especially the spruce bark beetle, the northern bark beetle and the glossy bark beetle, but also bark beetles on pine and larch, and the associated high proportion of accidental extractions. Remaining significant problems in the increased development of crustaceans are expected mainly in the areas of the Moravian-Silesian, Olomouc, Zlín, Pilsen, Karlovy Vary, Ústí, Central Bohemia and Vysočina regions.

Despite the undoubtedly high utilisation of mining capacities throughout the Czech Republic, we cannot give up on the processing of active bark trees. Failure to carry out or delayed remediation of bark beetle-infested trees leads to the further, often uncontrolled, spread of pests.



We see it as important to maintain or deepen cooperation with the locally competent authorities of the State Forest Administration Department (SFAD). On the one hand, for the sake of mutual information and the exclusion of dualities within the control and administrative activities carried out, and also so that facts found within the framework of the inspection activities of the Czech Environmental Protection Agency or within the framework of the administrative activities of the SFAD authorities, which can be evaluated as a threat or damage to the environment in the area of forest protection, were preferentially dealt with by inspection, and on the other hand, cases that are a violation of the forest law, not threatening the environment, were handed over to the locally competent SFAD authorities.

Significant progress in the accuracy of control activity and therefore also the defensibility of the results of control activity before the appeals body, possibly courts, in recent years has been achieved thanks to the use of Trimble R1 GNSS (global navigation satellite system) receivers and, on some TIs, in particular Trimble GEO 7X (plus the Pathfinder Office program) and later also thanks to the activity FPD HQ (headquarters) aimed at the purchase of additional Forester GPS tablets and forestry software, including Forester WIN programs and, in some departments, the use of the QGIS program, including the implementation of training.

The use of unmanned devices, acquired by CEI, which are capable of scanning even difficult-to-access, larger areas, and when georeferencing the scanned grid, can create an up-to-date digital model of the terrain at a given location can be a qualitative shift in improving control activities.

By using the purchased OILCHECK OLK605 test device within all FPD OI in cooperation with the FPD CEI, the current status of the use of biodegradable oils and hydraulic fluids in mechanised equipment on forest land will be determined and possibly specified.

Finding the current owners during a change in ownership relationships has repeatedly caused problems.

Still currently a major problem in inspection activities is the difficult enforcement of the law, especially in connection with the adoption of the new Act No. 250/2016 Coll., on liability for delicts and their proceedings, for example proving the subjective culpability of a natural person. Another problem is the decision-making and permitting activities of some administrative bodies and authorities (e.g. building authorities, state forest administration authorities, etc.), which often act against the interests of forest and environmental protection.

A new trend in control activity will be the continuous control of forest restoration on harvested areas (clearings) created after the bark beetle disaster. It cannot be excluded that for some owners the afforestation of clearings will become so economically difficult that they will either become victims of "entrepreneurs" operating on the edge of the law with subsidies, or they will want to get rid of their properties themselves and will try to bear the burden of afforestation of clearings and the subsequent provision of young forest stands to be transferred to hard-to-find persons. In such cases, close and interconnected cooperation with SFAD or the Police of the Czech Republic will be necessary.

In the year under review, the benefit of holding the regular annual meeting of DSA MoE (Ministry of the Environment) with FPD CEI inspectors was confirmed. The discussion of comments, reservations, or proposals from the appellate bodies brings valuable lessons from each case and is beneficial for other FPDs who may encounter a similar case in the future.

Controls of reproductive material have been carried out in cooperation with the Forest Management Institute (FMI) for many years, and cooperation in this area is functional and problem-free.

Again, we present for consideration the possibility of negotiations between the CEI and the Ministry of the Environment on the subject of the special requirements of the MoE for control work in forests by the CEI in the coming year 2022.

## 4.6 CEI involvement in accident resolution

### Central record of accidents on water in 2021

According to the Water Act, the CEI has been keeping a central record of accidents since 2002. In 2021, 297 accidents were entered into this register, which met the definition of an accident according to Section 40 of Act No. 254/2001 Coll., on water.

The most frequent accidents are still those caused by traffic. In 2021, 87 were registered, which represents 29% of the total number of cases. The death of fish was an accompanying phenomenon in 30 cases this year, which represents 10% of the total number. Only in two cases did groundwater pollution occur. The cause of the accident was known in 162 cases.

During 2021, additional events were reported to the CEI that were not evaluated as accidents and therefore were not included in the central register of accidents due to their insignificant scale, without having any impact on water quality.

### Breakdown of accidents according to the main causes of occurrence in 2021

The cause of the accident	Number of accidents	%
human factor	70	23,6
technical factor	39	13,1
human + technical factor	61	20,5
natural factor	19	6,4
not detected	108	36,4
<b>TOTAL</b>	<b>297</b>	<b>100</b>

### Breakdown of accidents by a group of leaked substances in 2021

A group of substances	Number of accidents	%
petroleum substances	155	52,2
wastewater	26	8,7
chemicals other than heavy metals	27	9,1
sludge and suspended solids	2	0,7
agricultural activity	12	4,0
oxygen deficit	7	2,4
other substances	40	13,5
not detected	28	9,4
<b>TOTAL</b>	<b>297</b>	<b>100</b>

## Major cases

### Illegal boiler house in Velké Hamry

On September 10, 2020, the Tanvald Water Authority was notified by citizens of the occurrence of an oil spill at the confluence of the Rejdický stream and the Kamenice river. An FRS unit was dispatched to the scene, and the investigation was immediately attended to by the employees of the Water Authority. The place of origin of the pollution was identified - the building of the company GOLEM Velké Hamry, a.s. From this sump, the material flowed through an overflow into the inlet on the Rejdické stream. Subsequently, further pollution was prevented by clogging the drain from the sump, and a specialist company was ordered to empty the contents of the sump and transport it for disposal.

The leak itself occurred as a result of damage to the fitting after pressurising it with heating oil, followed by a free flow of oil onto the floor of the shut-down boiler room and a leak (approx. 300-500 l) and partial seepage into the open, vegetated terrain in front of the boiler room. Part of the oil therefore got into the sump described above and then into the surface waters of Rejdický potok and Kamenice. There were no fish killed.

The Water Authority ordered the necessary remedial works to be carried out - pumping out the remaining contents of the sump and extracting contaminated soil. A subsequent investigation verified that the liable person had secured these works. The Water Authority then forwarded the matter to the CEI for further investigation. In 2021, an inspection was carried out by the inspectorate, the result of which was the finding that the above-mentioned entity violated the Water Act. The CEI properly discussed the offence with the accused subject and after the procedure, a fine of CZK 100,000 was imposed on the responsible person. The accused accepted the punishment without appealing against the inspection's decision. The decision became final.

### Pollution of the Bystřice watercourse

The company PRESBETON Nova, s. r. o. is engaged in the production of concrete prefabs at its premises in Bystrovany, Olomouc. During the investigation of an extraordinary event - an accident that was reported by the FRS, the CEI found that on 13/04/2021, a company employee deliberately discharged the contents of a sump with wastewater contaminated with an impregnating agent with a capacity of 15 m<sup>3</sup> into the storm sewer, which then flowed into the Bystřice stream, thereby causing its pollution. For this dereliction, a fine of CZK 100,000 was imposed on the company by an order dated 7 December 2021. The decision became final.

## 4.7 Integrated agendas

Integrated Pollution Prevention and Control (IPPC - Integrated Pollution Prevention and Control) is the basis of CEI's activities within the framework of integrated agendas. It is a preventive and progressive method of regulating industrial and agricultural activities in relation to the environment, which is a superstructure of a separate component approach and a strategy of end technologies, which removed the resulting pollution at the outlet mainly using separators, filters or other cleaning devices, which often due to the protection of the environment as a whole only led to the transfer of pollution from one component of the environment (air, waste, water) to another. The main emphasis is placed on a preventive approach, where environmental pollution is prevented before it occurs by choosing suitable production procedures and technologies, the so-called best available techniques (BAT - Best Available Techniques), and further by using substances that are as environmentally friendly as possible.

This integrated approach to the protection of the environment as a whole is at the CEI, under the coordination and cooperation of experienced inspectors specialised in these agendas, i.e. coordinators of integrated agendas, secured by technical protection components of the environment Inspection (air protection, waste management and water protection).

The basic activity in this area is a supervisory (control) activity. Another essential and preventive activity is a non-supervisory activity consisting, for example, in issuing expert opinions of the Inspection (in the framework of Environmental Impact Assessment EIA, International Plant Protection Convention IPPC, Scheme for Environmental Management and Audit EMAS, etc.).



Demolition of the former Vítkovice steel plant - photo taken by the CEI inspector from the roof the 84-metre-high MAN gas tank before its demolition in June 2021

### 4. 7. 1 Legal basis for activities in the field of integrated agendas

The inspection in the field of integrated agendas ensures the performance of the state administration, which is delegated by legal regulations for the protection of the environment, in the use of valid and effective wording and directly effective EU regulations, in particular laws:

- No. 76/2002 Coll., on integrated pollution prevention and control, on the integrated pollution register and on the amendment of some other laws (the Integrated Prevention Act),
- No. 25/2008 Coll., on the integrated register of environmental pollution and the integrated system of fulfilling reporting obligations in the field of the environment and on the amendment of certain laws (IPR = Integrated Pollution Register Act),
- No. 167/2008 Coll., on the prevention of ecological damage and its correction and on the amendment of certain laws,
- No. 100/2001 Coll., on the assessment of impacts on the environment and on the amendment of some related laws,
- By regulation of the European Parliament and of the Council (EC) No. 166/2006 establishing the European Pollutant Release and Transfer Register (E-PRTR – European Pollutant Release and Transfer Register).



## 4. 7. 2 Overview of the task performance in the area of integrated agendas, supervision (controls)

### Total integrated agendas – aggregated data for inspection

The activity of the professional components of the inspection with regard to integrated agendas, directly carried out by them or with participation, is mainly included in the previous chapters (4.1, 4.2 and 4.3) of this annual report.

The priority of the inspections of facilities within the scope of the Act on Integrated Prevention is the acceptance of the provisions given in particular Section 19 b, Section 20 b, Section 34 and Section 37 of the Act on Integrated Prevention, within the framework of the implementation of Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions dated 24/11/2010.

According to these provisions, among other things, the time between two on-site inspections must be observed (one to three years depending on the risk of the facility). However, this places significant demands on the frequency and scope of inspections as well as on the inspection's further activity in this area (even regardless of the pandemic).

In total, within the scope of its competence in the area of integrated agendas, the inspection carried out were 1,205 inspections in 2021, 109 administrative/criminal proceedings were initiated, 100 decisions and orders were issued, and on the basis of a total of 96 final decisions (also from previous periods) fines to the amount of CZK 4,408,000 in a legal capacity. Of these, one decision on reprimand and three decisions on corrective measures became legally binding.

The range of fines imposed by law in relation to integrated agendas ranged from CZK 2,000 to CZK 480,000 (judicially imposed on the company Hydrogeologie Chrudim spol. s r.o., which operates the Decontamination and Recycling Centre DEKOS Hradec Králové).

The average amount of the fine imposed per decision (order) in legal force in connection with integrated agendas in this period was approximately CZK 47,900.

### Integrated prevention (Act No. 76/2002 Coll.) - data for inspection

The control plan was drawn up based on the determination of the risk of the facilities for a period of three years, i.e. 2020 to 2022, thus following on from the plans for the periods 2014-2016 and 2017-2019, it was updated for the year 2021 and affected a total of 1,490 active IPPC facilities with a valid integrated permission (IP). The control plan also reflects the departmental tasks of the specialist departments.

The program of routine inspections on IPPC facilities for 2021 (736), which was prepared on the basis of the Inspection Plan, was operatively adjusted by transferring part of the inspections to 2022 due to the Covid-19 pandemic, the state of emergency repeatedly declared by the government and other restrictions. Inspections in 2021 carried out 797 checks. This also includes the execution of extraordinary inspections, especially on the basis of suggestions, media cases, on the basis of accidents or non-standard operation, or the possible execution of repeated inspections in the event of a serious violation of binding IP (integrated permission) conditions (approx. 12% in total).

In total, within the scope of its mandate in the field of integrated prevention, the inspection carried out 797 inspections in 2021, 87 administrative/criminal proceedings were initiated, 87 decisions and orders were issued, and on the basis of a total of 83 decisions in force (also from previous periods) fines were imposed to the total amount of CZK 4,218,000. Of these, one decision on reprimand and three decisions on corrective measures became legally binding.

The average amount of a fine imposed for a decision (order) in force in this period within the framework of integrated prevention was approximately CZK 53,400.

### Main inspection findings

Through inspections, the inspection found a violation of legal regulations on the protection of Environment and non-fulfilment of the binding conditions of IP operation, which concerned, for example:

#### Water protection:

- discharge of wastewater without a permit or after its expiry,
- excess discharge of any kind,
- exceeding the permitted amount of groundwater or surface water abstraction,
- handling of harmful substances on an area not secured by water management,
- not updating the emergency plan,
- failure to carry out monitoring (e.g. of landfill leachate before it is transported to the WWTP (wastewater treatment plant), water quality in control wells),
- failure to conduct leakage tests,

#### Air protection:

- exceeding pollutant emissions (e.g. carbon, sulphur oxides),
- odour nuisance,
- failure to monitor landfill gas or violations of operating regulations consisting of leaks or failure to connect gas collection wells of the landfill to the cogeneration unit.

### Waste management:

- not sorting waste,
- incorrect handling of hazardous waste (waste similar to municipal waste), handing over waste to an authorized person, failure to keep records, incorrect reports on production and waste management, failure to report the transfer of substances in wastes, insufficient documentation of the quality of received waste (waste oil) as for HW (hazardous waste),
- storage of other than permitted waste on the body of the landfill,
- insufficient filling in of basic descriptions for accepted waste, failure to measure the dust content of the landfill,
- contamination of the surface of undeveloped terrain, for example by placing car wrecks containing dangerous components outside the dismantling hall,
- not operating in accordance with operating regulations (technical conditions of operation, etc.), etc.

### Non-fulfilment of reporting obligations under the IPPC (integrated authorization) Act:

- IP (integrated prevention) changes,
- reports on the fulfilment of binding IP conditions,
- transfers (overlap) or leakage of substances,
- emergency situations,
- failure to report the measurement on the required date.

### Other violations:

- non-compliance of approved documents with the device description,
- exceeding the capacity of the device,
- failure to meet the conditions set for device disposal,
- operation without IP.

The issue of changes to component laws and their projection into IP still remains a separate chapter.

### Integrated pollution register – data for the Inspectorate

From the point of view of compliance with the Act on the Integrated Pollution Register (IPR), in 2021, 301 establishments were inspected by inspectors, of which 293 inspections were carried out as part of integrated inspections (according to the Act on Integrated Prevention), 8 IPR inspections were independent. No checks were carried out in the so-called correspondence form, i.e. by comparison from notifications in the area of environment in the Integrated System for Fulfilling Reporting Obligations (ISFRO). 266 inspections were planned, 301 of them were carried out.

The total amount of legally imposed fines for non-compliance with reporting obligations to the IPR amounted to CZK 190,000. With the 13 final decisions, the average fine was approximately CZK 14,600.

As in previous years, the imposed sanctions ranged from CZK 5,000 to CZK 30,000 (Mondelez CR Biscuit Production, s.r.o.).

Violations in the area of IPR related mainly to the failure to report to ISFRO at all or punctually, reporting of incorrect data and failure to report transfers of waste or pollutants in waste.

Therefore, these are mostly formal offences or misunderstandings and delayed reports in relation to the protection of the environment, and this is how inspections are approached. It is almost a rule that large equipment operators, for example with an IP issued, fulfil the obligations given by the relevant legislation significantly better than other subjects, especially small and medium-sized agricultural operations and equipment. However, based on the results of the inspection's control activities in the area of the IPR, it can be stated that, overall, awareness of the obligations arising from the relevant legislation and its compliance is improving, and as a result, the number of offences is also decreasing.

### Ecological damage - data for Inspection

Delict proceedings in connection with Act No. 167/2008 Coll., on prevention of environmental damage and about its correction and about changing some laws so far have not been initiated even upon request nor ex officio.

In 2021, the Inspectorate carried out a total of 107 compliance checks of the Act on the prevention of environmental damage. The original plan of 86 inspections was fulfilled. A basic risk assessment was presented - 50 points were exceeded only in one case where a detailed risk assessment was also presented. No offense was committed.

As part of its activities, the Inspectorate dealt with seven initiatives that led to the potential occurrence of ecological damage in one locality in the South Moravian Region and six localities in the Olomouc Region. All these submissions were dealt with in accordance with the Act on environmental damage, when administrative proceedings were initiated to impose corrective measures under this Act in the matter of eliminating the consequences of possible environmental damage. In one location, the proceedings were stopped (Stříbrnice). For the other six locations, it is being investigated in cooperation with other state administration bodies to determine whether ecological damage may have occurred.

## Integrated Agendas Department – IAD

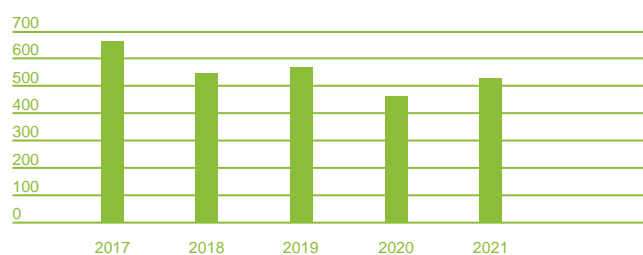
The specialised coordinators of integrated agendas (CIA), the department of integrated agendas of the CEI (IAD) in close cooperation with the expert departments of technical protection of the environment carried out, participated in, cooperated with or coordinated the implementation of 506 inspections on facilities and establishments. This number includes both inspections under the Integrated Prevention Act (237), as well as under the IPR Act (201) and the Environmental Damage Prevention Act (68). In the monitored period, a total of 49 administrative/offence proceedings were initiated directly by the CIA. The number of decisions (including orders) that entered into force in 2021 was 33, while the total amount of fines in force was CZK 1,654,000.

From this, two decisions on remedial measures became legally binding. Neither a decision to stop operations nor a decision for non-cooperation according to the inspection regulations was issued, and none became legally binding in the monitored period.

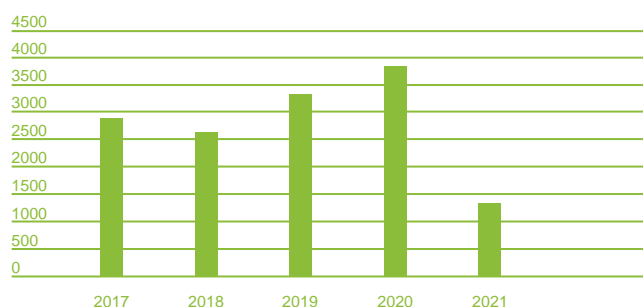
The range of fines imposed by law here ranged from CZK 3,000 to CZK 450,000 (judicially imposed on Purum, s. r. o., facility "Waste Treatment – Hamr na J., Stará Lužice").

The average amount of the fine imposed for a decision (order) in legal force in this period was approximately CZK 53,400.

## The number of equipment inspections carried out by IAD CEI



## Amount of fines imposed by IAD CEI (CIA - Coordinator of Integrated Agendas) within the framework of integrated agendas in thousands of CZK



## Departmental Tasks for IAD

The so-called integrated controls were performed as:

- OC, overall control - control of the entire integrated permit (IP), with the possibility of checking component laws,
- CC, component control - control of one or two IP components, with the possibility of checking component laws,
- CIRP, control of IRP (maintenance of records and possible reporting to the Integrated Pollution Register according to Act No. 25/2008 Coll., or E-PRTR according to EC Regulation No. 166/2006),
- CED, control of ecological damage - within the framework of the Act on the prevention of ecological damage, i.e. compliance with obligations under Act. No. 167/2008 Coll. and NV No. 295/2011 Coll. (financial security; basic or detailed risk assessment),
- SC, specific control of a device "suspected" of operation without IP,
- with advantage, more checks were also carried out, e.g. OC+CIRP, CC+CED, OC+CIRP+CED.

## Specific tasks

Among the specific tasks carried out in 2021 were primarily specific controls (SC), i.e. inspections of facilities to see if they fall under the IPPC (e.g. three inspections of Hradec Králové TI - no violations) and inspections of all types according to tasks related to current issues in the region (e.g. inspections at facilities where there have been serious violations of the Act on Integrated Prevention in the past, accidents, media-watched, etc.).

## Accidents

The coordinators of integrated agendas actively participated in solving 19 accidents or non-standard operations at IPPC facilities, e.g. at České Budějovice TI, Plzeň TI, Ústí nad Labem TI, Brno TI and Liberec TI.

## Ostrava TI

On 10 May 2021, a fire broke out at SPV RECYCLING CZ, a.s. - equipment for the collection, purchase and utilisation of waste in the Vítkovice district during the processing of toners at the mill - shredder (waste cat. no. 16 02 16 Other components removed from discarded equipment not listed under number 16 02 15). An investigation was carried out by the fire department, the police, and the CEI (inspection - not completed due to the police investigation). The waste was processed for the first time, but toner waste with the remains of printing inks was not allowed, because the printing powder is flammable and explosive under certain conditions (concentrations), i.e. it has the dangerous property of flammability and can cause an explosion.



Fire at the SPV RECYCLING CZ, a. s. mill - shredder at the facility for the collection, purchase and utilisation of waste in the Vítkovice district

### Initiatives and petitions, provision of information

See chapter "3.1 Cooperation with the public".

Coordinators of integrated agendas will actively participate in the resolution of initiatives and petitions, especially in cases affecting the competence of several component departments. Their main task was precisely to ensure a coordinated approach in dealing with these cases.

#### Liberec TI

Among the many complaints, we can mention PURUM, s. r. o., Hamr, Lužice - four odour complaints were resolved. A very strong odour was detected during the resolution of one of them. Several inspection investigations of the equipment were carried out to check compliance with the binding conditions of IP operation in the APD and WPD area. It was agreed with the operator to stop the delivery of waste with the greatest odour susceptibility to this establishment and a modification of the operating regulations for the use of odour removal products was requested.

#### Ostrava TI

After the end of smelting at the SKATLOP, a. s. (VÍTKOVICE HEAVY MACHINERY, a. s.) equipment, dismantling and disposal of the equipment, during the firing of moulds, casting pans, etc., smoke was emitted up to the residential area. The area is to be used for residential housing in the future. During the inspection, a violation was found in the collection of used oils and other harmful substances and a WPD fine was issued.



SKATLOP, a. s. - dismantling and disposal of equipment in the hall

## 4. 7. 3 Unsupervised activity of the CEI in the area of integrated agendas

### This activity includes, in particular, the creation of professional statements:

- within the environmental impact assessment process, i.e. EIA/SEA,
- to requests for the issuance of integrated permits or to IP changes or their reviews,
- to the environmental management and audit system – as part of the EMAS, EMS registration,
- within the Safe Enterprise (SE) program,
- in the framework of territorial and construction management, for project management documentation,
- to permit the operation of IPPC equipment from the point of view of air protection and approval of operating regulations
- to environmental audits,
- within the framework of requests for information pursuant to Act No. 123/1998 Coll., Act. No. 106/1999 Coll. etc.



### EIA/SEA – aggregate data for inspection

In 2021, the Inspectorate processed a total of 742 comments on plans, documentation, assessments, concept notifications and concept proposals within the EIA/SEA process. Compared to last year, this is a slight increase in the number of statements issued (667).

It can be stated that notifiers or submitters like Section 15 of Act. No. 100/2001 Coll. on a preliminary hearing.

Commercial warehouse complexes, transport structures, construction of residential complexes, extension and modernization of farms prevail in the objects of the plans. We find the taking of the most creditably valuable land to be the biggest problem with constructions that are expected to be implemented on agricultural land.

The inspection finds that another problem with the projects is where the specific use of the halls is not specified, therefore the presented dispersion studies do not comprehensively assess the state that will actually occur after the implementation of the project during its actual operation. Dispersion studies thus evaluate only the traffic load related to the operation of the project. Therefore, if it is not clearly established for what purpose the halls will be used, or what specific activity will take place in them, it is not possible to properly assess the effects of the plan on the individual components of the environment, while the actual use of the halls may end up being completely different.

In the opinion of the Inspectorate, the intentions of business companies (notifiers) to build production premises (in addition without a specific purpose) and storage premises on arable land should not prevail over the public interest in the protection of ALF. Given that there are unused industrial and agricultural areas throughout the Czech Republic (see the national database of brownfields), it is primarily these locations that should be used in the interests of environmental protection.

## Major cases EIA

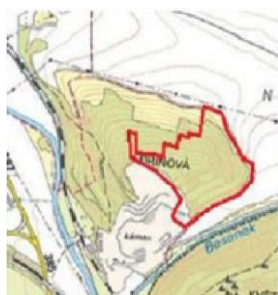
### Brno TI

As part of the expansion and deepening of the Lomnička quarry, the Regional Authority of the South Moravian Region (RASMR) sent two separate EIA plans to the CEI, namely: "Expansion of mining in the Lomnička quarry in the district of Předklášteří and Lomnička near Tišnov" (the total area of the quarry expansion is 12,119 ha) and "Deepening of mining in the Lomnička quarry in the district of Předklášteří and Lomnička near Tišnov" (deepening by approx. 20 m). The interconnectedness of the two plans can be seen from the figure below; CEI also incorporated them into the comments sent to the documents received by the Regional Authority.

CEI sent negative opinions on both projects, where it also pointed to the so-called "salami method", which goes against the very meaning of the environmental impact assessment act itself, and due to the temporal and spatial continuity of both projects, it demanded that they be assessed together. CEI considered the submitted documents to be incomplete, ambiguous and misleading (among other things, a dispersion study, a hydrogeological assessment, an evaluation of the effects on the landscape, an evaluation of synergistic and cumulative effects, etc. were not prepared). On the basis of the submitted documents, the CEI considered that possible negative effects of the project on the environment cannot be ruled out based on the submitted notification, and therefore the CEI requires the next level of assessment of the project in accordance with the Environmental Impact Assessment Act, namely the processing of EIA documentation.

On the basis of the comments received by the CEI and the statements of the affected municipalities and the Regional Hygienic Station of the South Moravian Region, the Regional Authority issued the conclusion of the investigative procedure with the conclusion that possible negative effects of the plans on the environment cannot be ruled out and that both plans must be assessed together.

Expected expansion in the Lomnička quarry submitted notice (JHM1574) p. 8



Anticipated deepening in the Lomnička quarry from of the submitted notice (JHM1575) p.8



From the above comparison, it is clear that the expected deepening of the quarry, especially on plots No. 656/1, 656/6, 664/1 and 701/2, cannot be carried out without prior expansion of the quarry, which is assessed in a separate plan. It is therefore obvious that both intentions follow each other and are related to each other.

Related EIA plans – expansion of the Lomnička quarry

### Ostrava TI

The Inspectorate assessed the plan to revitalise the area of the Tesla Horní Bečva recreation centre - ski slope (ZLK940), consisting of the reconstruction of the existing area in the Horní Bečva ski resort by replacing the now obsolete personal mountain transport equipment technology (three ski lifts) with safer and more reliable ones (one chair lift cable car and three new lifts), supplementing snowmaking and building the absent catering and social facilities with seasonal operation for visitors to the Solisko sports and recreation area. From the point of view of PPE, the Inspectorate had fundamental comments on the plan, and the whole process was therefore suspended.

### Applications for the issuance of an integrated permit and changes

The inspectorate actively cooperates with regional authorities in the area of integrated prevention, and this cooperation also includes issuing statements on IP, substantial changes to IP (much more often), and IP reviews.

For the year 2021, the inspectorate processed a total of 641 comments on applications for the issuance of an integrated permit or their changes. This is a slight decrease compared to last year (668). In eight cases, CEI representatives also took part in oral negotiations regarding the request to issue or change the IP.

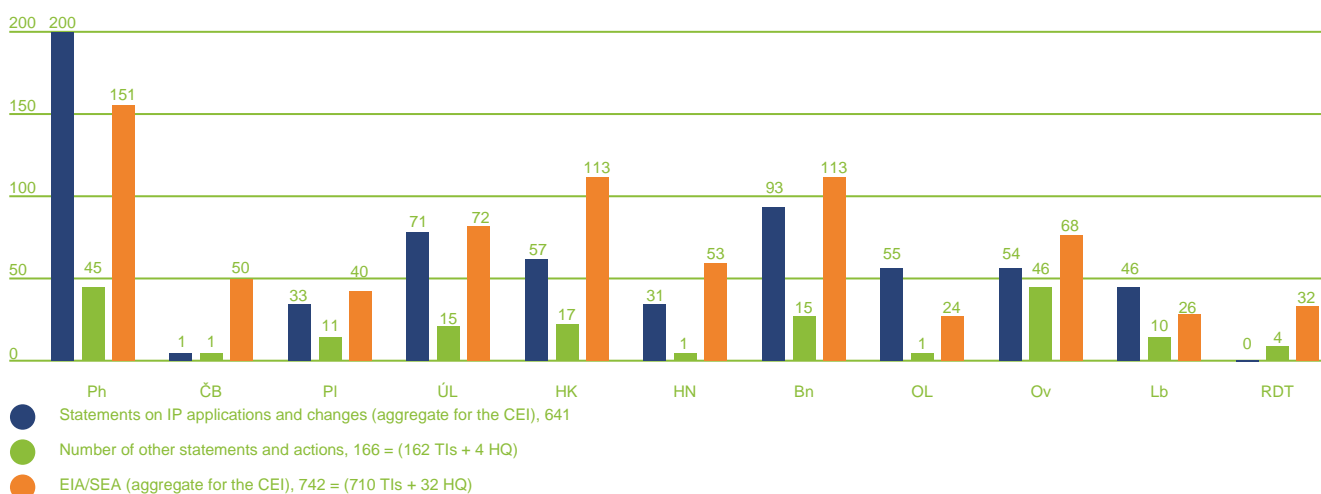
In its comments on IP changes regarding the expansion of the capacity of landfills, the Inspectorate adopted a unified opinion and still points to the change in legislation in the area of waste management and the ban on the storage of mixed municipal waste in landfills from 2030, when the amount of waste stored should significantly be reduced. For these reasons, it is therefore rigorously checked why the operators strive for the expansion of landfills, because in the interest of protecting the environment, the activity of these facilities should be gradually reduced.

## Other professional statements

The coordinators of the integrated agendas at individual TIs and at HQ CEI further developed or collaborated on another 166 statements (EMAS, within the safe enterprise program, on ecological audits, etc.), as shown in the graph below.

## Statements issued according to TI and HQ CEI in 2021

250



Furthermore, in 2021, the coordinators of the integrated agendas actively participated in the activities of technical working groups, especially at the Ministry of the Environment (Regions and integrated prevention) and at the Ministry of Industry and Trade (Forum for the exchange of information on BAT).

An important activity of IAD inspectors in 2021 was also cross-border cooperation within IMPEL, the expert group for Industry & Air. In 2021, several meetings of the project team, which is a part of the IED implementation project, and meetings of the Industry and Air expert team took place online. Individual subprojects are already underway within ET Industry and Air/2021/01/Supporting IED Implementation 2021-2024. They include WG5 Various aspects of BAT conclusions and permits, WG6 Operator self-monitoring, WG8 Improving air quality, WG9 Waste incineration and WG10 Poultry and pigs IRPP BAT.

## Inspection reports

According to Section 20 b, Para. 9 of the Act on Integrated Prevention, following each on-site inspection, the inspection is obliged to draw up a report in addition to the inspection report, which contains a description of the inspection findings and conclusions on any further measures, i.e. inspection report. Furthermore, according to Section 20 b, Para. 11 of this law, this report must also be published through the integrated prevention information system (IS IPPC), managed by the MoE, within four months of the on-site inspection. However, the report can only be processed after the deadline for submitting objections to the control finding stated in the protocol according to Section 13 of Act No. 255/2012 Coll., on control, has expired.

The individual Territorial Inspectorates post these inspection reports on the IS IPPC at the appropriate times.

From 8/15/2016 to 12/31/2021, 4,144 CEI inspection reports were identified in IS IPPC. By 8/15/2016, it was 1,934 incl. RHS.

## 4. 7. 4 Major cases from control activities

### Hradec Králové TI:

#### HYDROGEOLOGIE CHRUDIM, s. r. o.

The Czech Environmental Inspectorate, Territorial Inspectorate of Hradec Králové, during the inspection started on 20/01/2021 in the above-mentioned facility, found a serious violation of the integrated permit issued for the facility "Decontamination and recycling centre DEKOS Hradec Králové". This violation consisted in the fact that the company HYDROGEOLOGIE CHRUDIM, s. r. o. at least in the period from 19/05/2020 to 20/01/2021, did not comply with the five remedial measures set by the CEI in decision No. ČIŽP/45/2018/753 of 26/01/2018. Specifically, these were the rectification measures set out in the statement I. of this decision in points no. 1), 3), 4), 5) and 6). At the same time, the company operated the facility in violation of the valid integrated permit issued by the decision of the Regional Authority of the Hradec Králové Region No.: 21942/ZP/06-Mt-P dated 02/02/2006 as amended Nos. 1 to 6. Specifically, that on the one hand, in the period from 13/05/2020 to 20/01/2021, it placed at least 630 m<sup>3</sup> in sump No. 1 (designated by the integrated permit exclusively for the concentration of waste of the category other, cat.no.20 03 03 "Street litter") of liquid oily waste and in the period from 13/05/2020, repeatedly failed to monitor the possible impact of the equipment on groundwater and did not ensure, at least for the 3rd and 4th quarters of 2020, the collection of groundwater samples from boreholes No. I1, I2, I3 and from the well, and did not carry out any chemical analysis of the samples taken in the prescribed frequency and scope. The CEI issued an order imposing a fine of CZK 480,000 on the company as part of the delict proceedings, which took effect on March 18, 2021.

### Liberec TI: Purum, s. r. o. -

#### Waste treatment plant Hamr na J., Stará Lužice

A fine of CZK 450,000 was imposed on the company for not having a valid certificate on the exclusion of hazardous properties of waste catalogue number 19 03 05 – stabilised waste not listed under number 19 03 04 and for not fulfilling obligations regarding groundwater monitoring. The decision on the fine was entered into force on 27<sup>th</sup> December 2021.

### České Budějovice TI:

#### Kostelecké uzeniny, a. s., place of business Planá

The company was legally fined the amount of CZK 70,000 for not updating the operating regulations from the point of view

of air protection and for not submitting reports on the fulfilment of IP conditions in accordance with applicable legislation.

### Havlíčkův Brod TI: MikroChem LKT Co., s. r. o. (resolved by WPD in cooperation with CIA)

By checking the equipment of the operator MikroChem LKT spol., s. r. o., i.e. a facility in which industrial activity of category 5. 1. takes place. Removal or use of hazardous waste with a capacity of more than 10 t per day: The "Neutralisation and demulsification station" was found to be in violation of the conditions of the valid integrated permit in point "A) Emission limits, air protection measures, water and against noise pollution and related monitoring 2) Water" by the fact that in 2021 the controlled entity exceeded the set limit "m" in the CHSKCr indicator ("m" = 400 mg/l). Exceeding the set emission limit "m" in the CHSKCr indicator was detected in the discharged wastewater from 7<sup>th</sup> to 8<sup>th</sup> April 2021 – detected value 490 mg/l, from 20<sup>th</sup> to 21<sup>st</sup> April 2021 – detected value 600 mg/l and from 28<sup>th</sup> to 29<sup>th</sup> April 2021 – detected value 1000 mg/l. By the aforementioned action, the operator of the facility violated the obligation according to the provisions of Section 16 Para. 1 letter a) of the IP Act and committed an offence according to the provisions of Section 37, Para. 4 of the IP Act, for which a penalty of CZK 180,000 was imposed in the delict proceeding, the decision became final on 9<sup>th</sup> November 2021.

### Brno TI: SIGNUM, spol. s r.o., hot-dip galvanising operation (CIA for IPR)

For the reporting year 2017, the operator did not report the correct data to the IPR within the statutory deadline regarding the transfer of hazardous waste outside the premises in Hustopeče near Brno, and the transfer of other waste was not reported at all. The operator submitted the amended report to the IPR one year later, i.e. on 26 March 2019. By his actions, the operator committed an offence under Section 5 Para. 1 letter b) of the Act on IPR and according to Section 5 Para. 1 letter a) of the IPR Act and a fine of CZK 15,000 was imposed on him, which entered into force on 28<sup>th</sup> April 2021.

### Hradec Králové TI:

#### A complex media case with the support of the MoE

On the "Equipment for the production of cement clinker" operated by CEMEX Czech Republic, s.r.o. (Cementárna Prachovice), three integrated inspections were carried out in 2021 as part of the planned overall integrated inspection of Hradec Králové TI and were also based on repeated complaints about the occurrence of odours in the vicinity of the cement plant. A study was also commissioned at the Czech Hydrometeorological Institute (CHI) with



the result that in 66 percent of the episodes the possible influence of the considered source cannot be excluded, in 24 percent the influence of the source is less likely and in only 10 percent the influence of the source is almost certainly excluded.

The elimination of odour, if it is not addressed in the company's administrative acts (permits and operating regulations), and if the source of the odour has been proven, the inspection can rely on the provisions of point 21 of Annex 12 of Decree No. 415/2012 Coll. stipulating the requirements of the operating regulations ("Operator of a stationary source emitting pollutants with an unpleasant odour, especially category 2.3, etc., Annex No. 2 to the Act (No. 210/2012 Coll., on air protection), shall state in the operating regulations technical and operational measures to limit the emissions of these substances.").

At the same time, Section 1, Para. 1 of Act No. 76/2002 Coll. (high level of environmental protection as a whole) and Section 14 Para. 3 of Act No. 76/2002 Coll. (best available techniques) apply, where BAT 24 for cement production states that: "In order to maintain low emissions of total organic carbon from flue gases from kiln firing processes, BAT should avoid the addition of raw materials with a high content of volatile organic compounds (VOCs) to the furnace system by the input of the raw material."



Cement plant CEMEX Prachovice

## 4. 7. 5 Conclusions

### Legislative insufficiency

There is certain legislative ambiguity in the relationship between wastewater (according to Act No. 254/2001 Coll.) vs. water-based liquid waste (wastewater according to Act No. 541/2020 Coll.). For the disposal of waste, "garbage" companies demand a higher price compared to disposal at municipal wastewater treatment plants (WWTP), which are prioritised for the treatment of municipal wastewater. In the case of specific pollutants contained in water-based liquid waste, WWTP technology cannot remove these specific pollutants from wastewater, which, moreover, are not monitored due to the nature of WWTPs, and thus only dilution of these specific pollutants occurs at WWTPs after mixing water-based liquid waste (according to Act No. 541/2020 Coll.) issued by the producer for wastewater according to the Water Act. If water-based liquid wastes are received into the facility under the Waste Act regime, then the output in the form of treated wastewater under the Water Act regime did not correspond to the provisions of the existing "waste" law regarding the specification as to when the waste can be "non-waste". In addition to the lower price, the fact that the production of waste and its management is recorded as required by law is also important, while the movement of wastewater is not recorded or monitored.

In the first seven months of 2021, the implementation of integrated controls was significantly affected by the fact that the implementing decree (No. 273/2021 Coll.) for the new Waste Act No. 541/2020 Coll. was not issued, and that Act No. 185/2001 Coll. , incl. of the implementing regulations to it was cancelled, and therefore facility operators and other obliged entities as well as public administration bodies in their activities were dependent on methodological instructions, published to ensure certain obligations arising from Act No. 541/2020 Coll. on the website of the Ministry of the Environment. Decree No. 273/2021 Coll., on the details of waste management, which was published on 23/07/2021 and entered into force on 8/08/2021, i.e. during the summer holidays and vacations.

### Organisational problems

With respect to the epidemiological situation, the year 2021 was more demanding in terms of ensuring the mutual safety of controlled subjects and control participants by control authorities. A larger part of the control time fund was used to check the submitted documents in the office. The physical inspection itself was focused mainly on inspecting the inspected technologies, equipment, etc., with an effort to minimise the length of contact with the inspected person, i.e., the inspection records were subsequently written again

in the inspection offices. The preparation of the final version of the control records was more time-consuming than with the conventional method. On the other hand, this method enabled a more detailed insight into the controlled issue.

In 2021, the control activity plan was operatively adapted to the developing situation. A shift in the date or, in the case of several inspections, a change in the type of inspection from total to component inspection was considered. It was essential to carry out inspections with the three-year cycle running out and inspections of those facilities that show non-compliance with the set obligations arising from the integrated permit or from the component regulations as a matter of priority. Operational transfers require the cooperation of the technical environmental protection units, as they will interfere with their control activity plans.

Since the last amendment to the IPPC Act, there has been a relatively significant increase in the scope of obligations for operators (basic reports already at the first change), regional authorities (BAT conclusions and exceptions), CEI and RHS (increase in control activities, reports on controls).

### Cooperation, prevention

Web meetings of the Industry and Air Expert Group and the workshop of the IMPEL project "Implementation of the Industrial Emissions Directive" were implemented. A member of the Industry & Air expert group is an IAD inspector from Brno TI, level of involvement - 2/ Participation just in meetings, workshops, conferences.

The Inspectorate also actively cooperated with other state administration bodies, in particular with regional authorities, which authorised the operation of individual facilities in accordance with the Act on Integrated Prevention. The goal of this mutual cooperation is the effort to increase the quality of IP, to ensure compliance of IP with the current state of the equipment, to formulate individual binding conditions of operation with regard to their enforceability, and therefore to ensure a high level of protection of the Environment.

However, the gradual increase in the number of IP changes results in the increasing complexity of the performed controls. Controls in the field of integrated prevention therefore require, in particular, precision in preparation and sufficient time.

Furthermore, as part of the cooperation with regional authorities, reviews of compliance with BAT (best available techniques) conclusions were handled for:

- intensive poultry or pig farming - Commission Implementing Decision (EU) 2017/302 of 15. February 2017,
- for waste processing – Implementation decision of the Commission (EEU) 2018/1147 of 10 August 2018, waste treatment – Commission Implementing Decision,
- for large combustion plants - Commission Implementing Decision (EU) 2017/1442 of July 31, 2017,
- (EU) 2019/2010 of 12 November 2019, waste incineration - Commission Implementing Decision
- For the food, beverage and milk industry – Commission Implementing Decision (EU) 2019/2031 of 12 November 2019,

However, within the framework of its activities, the inspection does not strictly focus only on the imposition of fines, it pays attention to prevention and also uses so-called soft methods.





## 5 Ethics and integrity, anticorruption activities, solutions and data protection



## 5 Ethics and integrity, anticorruption activities, solutions and data protection

### 5.1 Ethics and integrity

#### Ethical rules

Ethical rules for civil servants and staff in employment doing work pursuant to Section 5 of Act no. 234/2014 Coll. on Civil Service, as amended (the CSA) are defined by the CSA, notably Section 77, Para. 1 and Para. 2 and Section 81, and the Deputy Minister of the Interior Service Regulation for Civil Service no 13/2015 of 14 December 2015<sup>1</sup>. Article 9 of the Deputy Minister of the Interior Service Regulation for Civil Service deals with preventing corruption and fraud risks and undesirable external influences that might endanger proper service performance. Ethical rules for staff in employment are defined by Act no. 262/2006 Coll., the Labour Code, as amended, notably Sections 303 and Sections 304.

The documents that govern civil servants and CEI employees in the area of ethical conduct include the MoE Employee Code of Conduct, published on the CEI web site (<https://www.cizp.cz/cizp/protikorupcni-program>).

The purpose of ethical rules valid in the CEI is that all employees and civil servants consciously and actively comply with ethical rules in performing their tasks. The employees are periodically trained in ethical rules and demonstrably familiarised with new documents. The manager/head of each CEI organisational unit is responsible for compliance with ethical rules.

#### Reporting suspicion of illicit or corruption conduct

Pursuant to Government Regulation no. 145/2015 Coll. On Measures related to reporting suspicion of illicit conduct in a service authority (hereinafter "Government Regulation No. 145/2015 Coll."), the CEI passed the CEI Director's Service Regulation setting rules and procedure for reporting suspicion of illicit conduct, including corruption conduct, and defines the framework for reporting persons' protection. At the same time, the Service Regulation specifies two civil servants to accept reports and investigate the contained suspicions (hereinafter investigators).

A report on suspicion of corruption or illicit conduct can be made by a CEI employee or CEI civil servant or another civil servant. Reports are handled as confidential and can be made at any time (in writing or by e-mail). The process of investigating the reported concerns is defined by

Government Regulation no. 145/2015 Coll., Deputy Minister of the Interior Methodological Instruction for Civil Service no. 8/2015, and Czech Environmental Inspectorate Director Service Regulation no. 7/2015. Among other things, these documents lay down non-repressive policy against reporting persons.

The CEI has the following options for reporting suspicion of illicit (or corruption) conduct:

- Written report put in the marked box located in an unmonitored area to the right of the main entrance to CEI (Na Břehu 267, 190 00 Praha 9) – enables anonymous submissions.
- Report sent by electronic mail to the e-mail address: [prosetrovatel@cizp.cz](mailto:prosetrovatel@cizp.cz).

Information about the CEI investigators and options for reporting suspicion of illicit or corruption conduct are published on the CEI web site (<https://www.cizp.cz/prakticky-radce/podavani-oznameni-o-podezreni-ze-spachani-protipravniho-jednani-vcetne-korupcniho>).

Besides the above, every citizen and organisation can make use of another type of report, independent of the CEI report of suspicion of corruption conduct by CEI staff made directly to the Ministry of the Environment Anti-Corruption Contact Centre (<https://www.mzp.cz/cz/kontaktne-centrum-proti-korupci>). Of course, illicit conduct can be reported using the standard legal action method.

<sup>1</sup> The Service Regulation, as well as other Deputy Minister of the Interior Service Regulations for Civil Service, is available on the Ministry of the Interior web site <https://www.mvcr.cz/sluzba/clanek/sluzebni-predpisy.aspx?q=Y2hudW09Nw%3d%3d>.

## 5.2 Anti-corruption programme

The Czech Environmental Inspectorate Internal Anti-corruption Programme (CEI IAP) is based on requirements of the Government of the CR, which are repeatedly formulated in its resolutions and measures: Government Resolution no. 752 of 2 October 2013, as amended by Government Resolution no. 851 of 13 November 2013, passing the Framework Departmental Internal Anti-corruption Programme (FDIAP), Government Resolution no. 769 of 20 November 2018, passing the updated FDIAP, and Government Resolution no. 855 of 17 December 2018, passing the Government Resolution Anti-corruption Strategy for 2018-2022.

The CEI IAP is a set of procedures and measures for corruption risk management that CEI employees and civil servants have to observe in their decision-making. Its objective is to reduce opportunities for corruption conduct in the CEI and protect state property.

The CEI IAP consists of five parts: Creating and enforcing an anti-corruption climate; Transparency; Corruption risk management and inspection monitoring; Procedures for suspected corruption; Evaluation of internal anti-corruption programme.

The current CEI IAP is published on the CEI website (<https://www.cizp.cz/cizp/protikorupcni-program>).

The CEI IAP is met in accordance with legal regulations. The CEI identifies its corruption risks and sets rules for their management, sets procedures for reporting corruption conduct and generally reduces opportunities for corruption conduct.

In an effort for maximum transparency, the CEI publishes all its contracts and invoices via both the Register of Contracts and MoE Open Data. Twice a year, the CEI publishes its list of advisors and advisory bodies on its web site, section "Anti-corruption programme".

The CEI has in place a map of corruption risks, which is updated continuously. Corruption risks are evaluated at all CEI organizational units. All employees were familiarized with the organization's anti-corruption policy and procedures in this matter.

In the past five years (2017-2021), no case of corruption was reported. Also, no contracts with partners and suppliers have been terminated or not renewed due to violations of regulations related to corruption.

## 5.3 Complaint handling

### Complaints made by means of reports on concerns of unethical or illicit conduct

No relevant suspicions of corruption conduct pursuant to Government Regulation no. 145/2015 were reported to the CEI in 2021. Three submissions were delivered to the e-mail address [prosetrovatel@cizp.cz](mailto:prosetrovatel@cizp.cz). Among them, none were relevant reports of suspicion of corruption conduct in a service authority. All the submissions were handed under Section 42 or Section 175 of the Rules of Administrative Procedure. No written reports were cast in the marked box.

### Complaints over inappropriate inspector conduct or TI procedure

As part of its work, the CEI also investigates complaints made under Section 175, Para. 4 of Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended, including complaints both about the authority's procedure and inappropriate conduct of its officials, but they are minimal. The CEI has published information on filing complaints on its website (<https://www.cizp.cz/prakticky-radce>). Complaints about inappropriate conduct of CEI inspectors or proceedings of territorial inspectorates constitute important feedback that helps the organisation improve its work.

The CEI investigates the facts stated in the complaint and based on the investigation, finds it justified, partly justified or unjustified. In 2021, the CEI received 50 complaints, of which 44 were not found justified. Four other complaints were found partly justified and two complaints were found justified. An overview of the complaints broken down by territorial inspectorates is shown in the table below.

## Number of complaints about inappropriate conduct of inspectors or against TI/HQ procedure in 2021

Territorial inspectorate	Number of received complaints	Within that		
		justified	partially justified	Unjustified
Prague	5	0	0	5
České Budějovice	3	2	1	0
Plzeň	8	0	0	8
Ústí nad Labem	7	0	0	7
Hradec Králové	4	0	0	4
Havlíčkův Brod	0	0	0	0
Brno	9	0	0	9
Olomouc	3	0	2	1
Ostrava	0	0	0	0
Liberec	0	0	0	0
HQ	11	0	1	10
<b>Total</b>	<b>50</b>	<b>2</b>	<b>4</b>	<b>44</b>

## 5.4 Data protection and legislative compliance

In 2021, the Czech Environmental Inspectorate received an inquiry from the Office for the Protection of Personal Data, which was addressed by a citizen of the Czech Republic. The complaint concerned the outdoor camera system at the Territorial Inspectorate in Hradec Králové. The Czech Environmental Inspectorate answered all the questions it received from OPPD in due time and at the same time came to the opinion that the camera system in question complies with the GDPR in all respects.

In 2021, the Czech Environmental Inspectorate filed a complaint with the Office for Personal Data Protection against the company Krtkův park, s.r.o., when this company acquired its own audio-visual recording of the inspection and published the progress of the inspection on the social network Facebook without any editing (e.g. blurring the faces of CEI employees) in the public group "MOLE vs. HEDGEHOG". By publishing the audio-visual recording in this way, there was (in the opinion of CEI) a violation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in connection with the

processing of personal data and on the free movement of such data and on the repeal of Directive 95/ /EC (General Data Protection Regulation). Not one of the CEI employees gave consent or legal authorization for the publication of the audio-visual recording of the inspection. In addition, the publication of audio-visual records from inspections was initially made for the purpose of public defamation of CEI employees, for whom the criticized activity was a mandatory work act resulting from the law.

Although the Office for the Protection of Personal Data found the Czech Environmental Inspectorate to be right, it recommended that the concerned CEI employees use Act No. 89/2012 Coll., Civil Code, as amended, and use the provisions of the Civil Code governing the protection of personality and file a lawsuit against court in civil proceedings, according to the relevant provisions of Act No. 99/1963 Coll., Civil Procedure Code, as amended. It did not intervene from its position.

### In 2021, the CEI paid:

- a total of CZK 9,100 on fines for traffic offences,
- penalty for breach of budgetary discipline in the total amount of CZK 160,124 (in connection with the OP HRE CZ.1.04/4.1.00/48.00040 project).





# 6 Tenders and supply chain in 2021



## 6 TENDERS AND SUPPLY CHAIN IN 2021

The Czech Environmental Inspectorate is, among other things, a departmental organisation of the Ministry of the Environment, and thus conforms to centralised state procurement rules (centralised public contracting system); at the same time, it is a public contracting authority, and thus conforms to numerous statutory and own regulations (see details at website: <https://www.cizp.cz/cizp/verejne-zakazky>).

### Supply chain

The organisation's supply chain comprises primarily permanent outsourcing of:

- administration and maintenance of buildings,
- cleaning services,
- reception services,
- provision of personal protective work equipment,
- printer service,
- service and repair of professional units' equipment,
- IT orders, service and system support.

In addition, the CEI currently provides the necessary professional training, purchases and insurance of unmanned aircraft, and the completion of uniforms for forest protection department inspectors, contributing to the improvement of the performance of inspection activities.

In 2021, 33 public contracts were concluded with a total financial volume exceeding CZK 60,000,000 excluding VAT. Among the most significant and volume-largest public contracts was the above-limit public contract entitled: "Central Agenda and Information System (CAIS)" worth CZK 37,044,036 excluding VAT. For this public order, the CEI received an award from the Procurement Detective Team for the best IT procurement documentation for the month of April 2021. The Procurement Detective Team is an independent group of computer scientists, academics, lawyers and specialists who evaluate over-the-limit public contracts in the field of information technology. Their goal is to make high-quality IT contracts in the public sector visible and to make them available as inspiration for other contracting authorities.

Other important public contracts were "Delivery and implementation of a system for managing users and privileged accounts in the CEI IS", "Provision of cleaning services in the building of the CEI headquarters in Prague" and "Dismantling and installation of doors - Hradec Králové TI".

### Verification of suppliers' environmental impacts, labour-legal procedures and social impacts

In connection with the amendment to Act no. 134/2016 Coll. on Public Procurement, the CEI has applied rules of socially and environmentally responsible procurement and innovation as widely as possible since 2020. We divided public contracts into parts to allow participation of smaller contractors, reserved public contracts as much as possible for suppliers employing disabled people, and included environmental requirements into procurement. For example, the above-limit public contract entitled: "Framework agreement for the purchase of personal protective work equipment" was divided into parts to enable those participants who do not have the entire required assortment in their portfolio to submit an offer with regard to their regional scope.

Environmental requirements were applied in a total of 12 public contracts, for example when assigning a public contract for the provision of cleaning services in the CEI headquarters building in Prague, interior painting, facade cleaning, plumbing elements, roof repairs and others.

When screening public contract suppliers in the social area, we always audited the selected supplier for compliance with statutory requirements, contracting authority requirements and the bidding price. In the above-limit public contract entitled: "Provision of cleaning services in the building of the CEI headquarters in Prague", the public contract was reserved only for contractors who employ persons with disabilities - so-called reserved contracts, where the contractor must provide a certificate from the labour office in their offer meeting this criterion.



## **7 Employee environment and human resources**

## 7 Employee environment and human resources

The CEI regards employee care as a fundamental value and foundation of its expertise. The basic approach is direct contact between the management and the staff at all the territorial inspectorates, and an emphasis on systematic employee training and occupational safety. The human resource management strategy focuses primarily on controlling and reporting and professional growth of employees.

In 2021, the CEI personnel department focused mainly on optimizing the process of finding new employees. The situation associated with the Covid-19 pandemic directed us to emphasize the electronisation of the process. Due to the limited movement of people, the process of conducting interviews via video conferencing was put into practice. However, a personal meeting retains its advantages, in particular the possibility of a broader and more objective evaluation of candidates by selection committees.

Another important point for 2021 was the preparation of the personnel team for future changes resulting from

the old age of some employees and their ongoing retirement. The replacement must take place as quickly as possible, even with regard to the limited salary options resulting from the centrally determined table salaries.

As of December 31, 2021, the CEI had 540 employees, of which 301 were women and 239 were men. The CEI employees work at the headquarters, territorial inspectorates in 10 regions and two branches. The majority of employees work as professional inspectors (74.3%) and have a university education (81.7%). Employees with more than 10 years of experience at the CEI make up 58.7% of employees.

The CEI has civil servants, whose employment rules are defined by the Civil Service Act (CSA) and staff in employment, whose rights and obligations are defined by the Labour Code (LC). This necessitates two types of contracts: collective agreement for public service and collective agreement for employment.

### Numbers of employees /real figures/ by region (inspectorate)

Year	2017	2018	2019	2020	2021
<b>Total employees as of 31 Dec</b>	<b>536</b>	<b>550</b>	<b>557</b>	<b>546</b>	<b>540</b>
Prague and Central Bohemia	57	62	62	62	63
České Budějovice	38	36	39	36	37
Plzeň	43	44	43	43	40
Ústí nad Labem	48	49	50	52	50
Hradec Králové	42	44	44	44	43
Havlíčkův Brod	37	37	38	36	36
Brno	51	54	55	51	50
Olomouc	34	34	36	34	30
Ostrava	47	47	46	48	47
Liberec	32	32	33	30	31
Headquarters (Prague)	107	111	111	110	113

## Staff numbers by employment and contract type

Year	2017	2018	2019	2020	2021
<b>Staff as of 31 Dec, total</b>	<b>536</b>	<b>550</b>	<b>557</b>	<b>546</b>	<b>540</b>
Percentage of staff covered by collective agreement	100	100	100	100	100
Employees in top management: managers + heads of departments (civil servants)	14	15	17	17	16
within that, females	2	2	2	2	2
within that, males	12	13	15	15	14
Professional staff (civil servants)	429	437	446	421	439
within that, females	205	217	229	213	216
within that, males	224	220	217	208	223
Supporting staff (staff in employment)	93	98	94	108	101
within that, females	81	86	86	92	85
within that, males	12	12	8	16	16
Employment for an indefinite period of time	493	492	504	505	528
within that, full-time	486	484	490	496	519
within that, part-time	7	8	14	9	9
Employment for a definite period of time*	43	58	53	41	12
within that, full-time	42	53	52	40	12
within that, part-time	1	5	1	1	0
<b>FEMALES, as of 31 Dec</b>	<b>288</b>	<b>305</b>	<b>317</b>	<b>307</b>	<b>301</b>
Employment for an indefinite period of time (females)	259	269	278	278	294
within that, full-time	253	262	266	269	286
within that, part-time	6	7	12	9	8
Employment for a definite period of time (females)	29	36	39	29	7
within that, full-time	28	33	38	29	7
within that, part-time	1	3	1	0	0
<b>MALES, as of 31 Dec</b>	<b>248</b>	<b>245</b>	<b>240</b>	<b>239</b>	<b>239</b>
Employment for an indefinite period of time (males)	234	223	226	227	234
within that, full-time	231	222	224	226	233
within that, part-time	1	1	2	1	1
Employment for a definite period of time (males)	14	22	14	12	5
within that, full-time	14	20	14	11	5
within that, part-time	0	2	0	1	0

\* Definite period: pursuant to Section 21 of the CSA, civil servants who have not passed the servant exams are admitted for a definite period. As soon as they pass the servant exams, their contract changes to an indefinite period.



### Classification of employees by education and sex - as of 31 Dec 2021

Education attained	males	females	total	%
Primary	1	0	1	0.2%
Secondary professional	0	5	5	0.9%
Complete secondary	1	11	12	2.2%
Complete secondary professional	9	63	72	13.3%
Higher vocational	3	6	9	1.7%
University	225	216	441	81.7%
<b>Total</b>	<b>239</b>	<b>301</b>	<b>540</b>	<b>100.0%</b>

### Duration of employment - as of 31 Dec 2021

Duration	Quantity	%
Up to 5 years	171	31.7%
Up to 10 years	52	9.6%
Up to 15 years	110	20.4%
Up to 20 years	95	17.6%
Over 20 years	112	20.7%
<b>Total</b>	<b>540</b>	<b>100.0%</b>

## 7.1 Human resources management

The approach to CEI staff is governed by the Labour Code and the Civil Service Act and is further defined by internal regulations. The key internal guidelines include:

- Collective agreement and Collective contract
- Czech Environmental Inspectorate Working Regulations (effective since 1<sup>st</sup> May 2012),
- Salary Regulations (effective since 1<sup>st</sup> June 2012),
- 5/2012 CEI Staff Education Guideline (effective since 1<sup>st</sup> May 2013),
- 3/2015 Service Regulation on application of Czech Environmental Inspectorate Working Regulations to service contracts of civil servants pursuant to the Civil Service Act (effective since 10<sup>th</sup> August 2015),
- 8/2015 Service Regulation defining taking of service vows by civil servants in the Czech Environmental Inspectorate (effective on signing by CEI Director),
- 10/2015 Service Regulation defining application of the Civil Service Act in the Czech Environmental Inspectorate (effective on signing by CEI Director),
- 8/2017 Guideline on application of Section 81 of the Civil Service Act in the Czech Environmental Inspectorate (other profit-making activity, effective since 15<sup>th</sup> June 2017),
- 11/2018 Guideline on provision of occupational physician services in the Czech Environmental Inspectorate (effective since 1<sup>st</sup> July 2018),
- 1/2019 Guideline on remuneration of civil servants (effective since 7<sup>th</sup> February 2019),
- 10/2019 Service Regulation laying down the procedure for service evaluation of civil servants serving in the Czech Environmental Inspectorate (effective since 8<sup>th</sup> October 2019),
- 13/2019 Service Regulation issuing internal systemization of the Czech Environmental Inspectorate (effective since 1<sup>st</sup> January 2020).

In 2021, the HR department's activities focused on coping with the Covid-19 pandemic and ensuring the smooth running of the CEI. The consequence of the pandemic was not only the need to create agreements on the performance of activities from another location, which regulate work in the home-office mode, but also the need for maximum electronisation of processes with the aim of limiting the necessary personal contact.

### Employment

Due to its nature, the CEI offers primarily qualified jobs. The imperative is to retain employees, measured by the voluntary fluctuation indicator.

At the end of the year, the CEI had 33 vacant systematized jobs. A remaining current task for CEI management is stabilisation and development of key professions. The average percent of voluntary fluctuation is low in the CEI (4.4%).

Changes in the staff numbers are monitored by periodic internal reporting and assessed by the management. From 2021, wage funds are also tied to unfilled positions. The job and service vacancies are filled via public tenders. Employee stabilisation is aided by benefits, available in the same degree to both civil servants and staff in employment. The wage level, especially for graduates without experience, is given by the tables and is at a relatively low level.

Pursuant to the Civil Service Act (CSA), employee career progress cannot be planned and tenders have to be organised for each systematized vacancy.

## Total number and share of new employees, employee fluctuation rate, 2017 - 2021

	2017	2018	2019	2020	2021
<b>Employees admitted in the year, total</b>	<b>49</b>	<b>59</b>	<b>54</b>	<b>43</b>	<b>33</b>
within that, females	37	33	39	28	21
up to 30 years	10	16	9	5	6
aged 30-50	23	13	22	16	12
aged over 50	4	4	8	7	3
within that, males	12	26	15	15	12
up to 30 years	2	7	3	5	2
aged 30-50	4	10	6	6	6
aged over 50	6	9	6	4	4
Total employees as of 31 Dec	<b>536</b>	<b>550</b>	<b>557</b>	<b>546</b>	<b>540</b>
<b>Total number of employees leaving the organization in the year</b>	<b>55</b>	<b>51</b>	<b>50</b>	<b>55</b>	<b>46</b>
within that, males	23	25	19	16	18
up to 30 years	3	1	2	1	1
aged 30-50	7	15	6	7	4
aged over 50	13	9	11	8	13
within that, females	32	26	31	39	28
up to 30 years	4	4	5	4	5
aged 30-50	18	13	16	16	13
aged over 50	10	9	10	19	10
<b>% of voluntary fluctuation *</b>	<b>7.2</b>	<b>4.8</b>	<b>6</b>	<b>6.4</b>	<b>4.4</b>
(excludes forced departures, including due to organisational changes, retirements, departures due to injury or death)					
<b>% of total employee fluctuation</b>	<b>10.2</b>	<b>9.5</b>	<b>9</b>	<b>10.1</b>	<b>8.5</b>
Total number of terminated employments in the period (year) x 100 / average registered number of employees in the year.					

\* Employment and service terminated by the employee. Excludes voluntary retirements, service and employment terminated by the employer (termination during trial period, dismissal from management), termination of service by law, and service and employment terminated by expiry of definite period of time.

**Overview economic, health and social employee benefits  
(except pension scheme), relating to full-time employees  
for an indefinite period of time, 2021**

	<b>Staff in top management (managers + heads of departments) /civil servants/</b>	<b>Staff – professional employees /civil servants/</b>	<b>Supportive staff /employed employees/</b>
Average monthly number of employees in the year	16	423	101
Collective agreement	YES	YES	YES
% of staff covered by collective agreement	100%	100%	100%
Employee life insurance	NO	NO	NO
Healthcare allowance	YES	YES	YES
Disability insurance, insurance against permanent consequences of injury	NO	NO	NO
Parental leave	As per LC	As per LC	As per LC
Financial support for supplementary pension scheme	YES	YES	YES
Increased severance payment on departure due to organisational changes under Collective agreement	NO	NO	NO
Managerial life insurance, incapacity for work insurance	NO	NO	NO
Sick leave (5 days/year)	YES	YES	YES
13th salary	NO	NO	NO
Meal allowance	YES	YES	YES
Company catering services	NO	NO	NO
Protective beverages and vitamin products	NO	NO	NO
Children's recreation allowance	YES	YES	YES
Family recreation allowance	YES	YES	YES
Work with seniors	NO	NO	NO
Anniversary rewards	YES	YES	YES
University tuition fees for employees	NO	NO	NO
Culture and sports allowance	YES	YES	YES
Monetary rewards and gifts	YES	YES	YES
Reward for standby duty (by law), not a benefit	NO	NO	NO
Social assistance	YES	YES	YES
Annual holiday extension by 1 week per calendar year above baseline	NO	NO	NO
Interest-free loans	YES	YES	YES



### Diversity and equality of opportunities

The Czech Environmental Inspectorate is an organisation that respects equal opportunities for men and women. Employee selection considers primarily applicants' expertise. Wage transparency is achieved by wage scales. Wage equality is based on each employee's service evaluation.

The different departments are very diverse in terms of gender, age, and experience. The organisational culture does not tolerate any form of direct or indirect discrimination promoting gender stereotypes. The Working Regulations contain a requirement for work discipline and observance of rules of politeness and consideration.

The CEI promotes equal opportunities with flexible working hours and part-time employment as necessary, thus enabling each and every employee to harmonize their private and work lives.

A separate presentation is dedicated to equal opportunities as part of admission training. Passing the equal opportunities e-learning course was required for every newly admitted and existing employee in 2021.

### CEI employee-management relationships

Civil servants and staff in employment have to have separate collective agreements/contracts, which cover all CEI staff. The collective agreement (or contract for civil servants) defines most importantly employee privacy protection, provision of leave from work, occupational health and safety, wage policy, canteen meals, employee education at work, information sharing between management and trade union representatives, bargaining procedures and generation, and drawing of cultural and social fund. The minimum notice periods relating to organisational changes are governed by the Labour Code. For civil servants in a service relationship, organizational changes are governed by the Civil Service Act. Equal remuneration for men and women is assured by the wage levels systematized for the service or job position.

The standard method of CEI communication with staff is by means of meetings, extended with other communication platforms which facilitate information availability, such as email and intranet, where employees can find, e.g., all the CEI internal standards and information about organisational and staffing changes.

## Composition of managing bodies and employee categories in 2021

	males	females	total
Staff in top management (managers + heads of departments) /civil servants/	14	2	16
Employees – expert employees /civil servants/	209	214	423
Supportive staff /employed employees/	16	85	101
<b>Total</b>	<b>239</b>	<b>301</b>	<b>540</b>

### 7.2 Education

In 2021, a total of 713 employees were trained as part of face-to-face courses or conferences. Educational events are included in the mentioned number, which we divide into:

- Internal courses: CEI mass training (4 events, 103 participants, 31 hours),
- External courses: Individual training (80 events, 460 participants, 577 hours),
- Conferences (12 events, 85 participants, 150 hours).

The stated number does not include legally required training which was attended by a total of 1,495 employees last year. We divide these trainings into:

- OSH for managing employees (34 participants),
- OSH for employees (172 participants),
- GDPR (33 participants),
- Cyber security (34 participants),
- Fire protection for managing employees (34 participants),
- Fire protection for employees (171 participants),
- First aid (37 participants),
- Equal opportunities (42 participants),
- Drivers (501 participants),
- Work at heights (437 participants).

CEI employees also have access to the Rentel online educational platform, which offers a wide range of optional training in addition to the mandatory courses.

Due to the scope, in 2021, part of the Athena file service training was separated from Introductory education. This part is mandatory for all new employees but is also available for existing employees.

Another priority for 2021 was the area of cyber security. In the second half of the year, all CEI employees were trained in several waves. E-learning were focused on current risks in cyberspace and defence against possible attacks on computer systems.

Compared to 2019, in 2021, as well as in 2020, major changes in the structure of education caused by the ongoing Covid-19 pandemic continued. There was a drastic reduction in trainings involving personal participation, conferences

were stopped, on the contrary, the number of e-learning trainings increased several times. There is also a clear trend for training providers to offer both face-to-face and online options. According to the current situation, many training courses are only offered online.

### 7.3 Occupational safety and health protection

#### Principles ensuring occupational safety

Occupational safety and health protection are among the essential priorities of the CEI. The Directive on the Organization and Management of Health and Safety mainly governs the activities of CEI professional employees, who work in a very diverse and demanding environment of diverse companies and locations, where they control operations with sources of pollution or investigate damage or threats to the environment.

The OHS situation is checked by annual comprehensive audits, provided by an external company, and followed by an inspection of performance of guidelines assuring OHS by CEI staff.

The CEI carries out periodic safety training for its employees, and all its employees are familiarised with both general and internal occupational health and safety regulations in force. All the CEI employees are given protective equipment assuring maximum safety depending on their work description pursuant to standards and are replaced with new ones on the first sign of damage.

Occupational safety issues are a part of collective agreements and contracts. Section V of the collective agreement and contract deals with work environment, occupational health and safety and inspections of work environment, fire prevention and occupational health protection. Pursuant to the collective agreement or contract, occupational safety is supervised by a CEI trade union committee, which represents all the CEI employees and consults OHS issues with CEI management. They attend the periodic annual comprehensive audits of OHS situation, inspect occupational injury records and reports, etc.

#### Injuries, lost days, and absence

The high effectiveness of OHS management and employee discipline are illustrated by zero injuries in 2021. The principal causes of occupational injuries are unpredictable work risks and human error. There were no fatal injuries or occupational diseases in years 2014-2021. All workplaces consistently register all injuries, including investigation into their causes.

## Injuries, diseases, missed days and absence of CEI employees

	Unit	2017 males	2017 females	2017 total	2018 males	2018 females	2018 total	2019 males	2019 females	2019 total	2020 males	2020 females	2020 total	2021 males	2021 females	2021 total
Average monthly number of employees in year	Absolute no.	251	289	540	245	294	539	243	310	553	237	309	546	239	301	540
Number of all occupational injuries	Absolute no.	0	1	1	0	0	0	0	0	0	0	1	1	0	0	0
Number of registered occupational injuries leading to incapacity for work for at least 3 days. (GRI Injury)	Absolute no.	0	1	1	0	0	0	0	0	0	0	1	1	0	0	0
Total number of serious occupational injuries leading to hospitalization longer than 5 days	Absolute no.	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0
Total number of absence days due to injury and occupational disease (GRI lost day)	Days/shifts	0	12	12	0	0	0	0	0	0	0	88	88	0	0	0

## Injuries, diseases, missed days and absence of CEI employees

	Unit	2017	2018	2019	2020	2021
Injury frequency (Number of registered occupational injuries per 100 employees) (CZ standard)	Relative no.	0.19	0.00	0.00	0.18	0.00
Average number of lost calendar days per registered occupational injury	Absolute no.	12.00	0.00	0.00	88.00	0.00
Absence due to disease, occupational and other injuries (% of total time worked) (CZ standard)	%	4.04	3.65	4.63	6.19	4.32
Unscheduled absence rate Absence due to unscheduled absence: disease, occupational and other injuries (% of scheduled time) (GRI Absentee rate)	%	3.39	3.07	3.84	5.67	3.77
Percentage of incapacity for work Share of number of lost calendar days of incapacity for work times 100 in number of calendar days times number of employees GRI Lost day rate)	%	0.01	0.00	0.00	4.84	3.52
LTIFR (Lost Time Injury Frequency Rate) Represents number of injuries after at least three days of incapacity for work divided by total number of hours worked expressed in millions of hours.	Absolute no.	1.07	0.00	0.00	0.00	0.00





## 8 Energy and material intensity of CEI activity

## 8 Energy and material intensity of CEI activity

The CEI purchases all of its consumed energy from suppliers selected as part of the centralised public contracting system. Electricity was supplied by Centropol, a. s., natural gas by Pražská plynárenská a.s.

The CEI aims at reducing its consumption of all types of energy; the consumption is affected by climate conditions and petrol and diesel consumption is affected by the number of inspections and distances to inspected sites. The CEI does not use major quantities of any raw materials or materials.

Energy audits and building energy intensity passports exist for all buildings where the CEI has the right to manage state property. These inputs have resulted in measures implemented in order to reduce the energy consumption. In 2021, the roof covering including insulation was reconstructed at Plzeň TI and the air conditioning units with a lower energy load were reconstructed at Hradec Králové TI.

For the upcoming period, the installation of LED bulbs and fluorescent lights, the purchase of energy-saving household appliances with higher energy efficiency across the entire organization is planned.

For the following years, the CEI plans to gradually replace approximately 30% of passenger vehicles using petroleum-based fuels with vehicles with a hybrid drive.

The waste management is governed by a separate internal guideline. The CEI produces sorted (separated) waste, municipal waste, and large-volume waste, such as discarded furniture, batteries, electric waste and bio waste. Fluorescent lamps, light bulbs, etc., are handed over to authorised persons for recollection. The waste is handed over for disposal to regional companies. The wastewater is discharged into public sewerage.

### Weight of CEI waste (kg) and method of disposal – overview for 5 years\*

	2017		2018		2019		2020		2021	
	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste
Total production	29	42,324	27	43,960	37	85,510	25	50,551	3,511	36,824

\* The waste product was handed over to authorised persons in accordance with the Waste Act.

### CEI energy, fuel, and water consumption – overview for 5 years

	Fuel type or energy type	Unit	2017	2018	2019	2020	2021
Purchased and consumed energy sources	Petrol	l	68,172	63,165	61,791	37,465	39,092
	Diesel	l	50,289	51,243	50,120	36,425	34,245
	Electricity*	kWh	511,156	462,409	592,471	437,085	511,851
	Natural gas	m <sup>3</sup>	93,601	93,397	80,866	82,249	98,712
	Thermal energy	GJ	1,589	1,681	2,032	1,517	2,430
Water consumption from municipal supply or other utility		m <sup>3</sup>	10,822	6,769	6,840	3,934	3,803

\* The origin of electricity supplied to CEI as an end customer by CENTROPOL ENERGY, a. s. in 2021 was: 50.88 % from coal, 30.36% from nuclear installations, 8.40% from natural gas, 10.11% from renewables, including guarantee of origin, 0.25% from secondary energy sources, 0.0% from oil and oil products and 0.0% from other sources.





## 9 Economy

## 9 Economy

In 2021, the CEI operated with non-investment budgetary funds amounting to CZK 463,415,192.08 (including UEC of CZK 46,051,048.56) and with investment funds of CZK 48,492,804.97, including UEC (unspent expense claims) of CZK 24,239,165.05).

The CEI also managed non-budgetary fund limit of CZK 235,215.00.

### Drawing of non-investment expenditures for 2021

Indicator	Adjusted budget	Drawing	Balance
Salaries of employed employees	48,006,979.00	34,728,812.00	13,278,167.00
Salaries of civil servants – SZ	215,871,576.00	215,871,576.00	0.00
WPD	3,851,007.00	2,715,132.00	1,135,875.00
Severance pay	2,801,571.00	97,590.00	2,703,981.00
Insurance – SS+HI	93,191,745.00	85,511,896.00	7,679,849.00
<b>Total wage expenditures</b>	<b>363,722,878.00</b>	<b>338,925,006.00</b>	<b>24,797,872.00</b>

Indicator	Adjusted budget	Drawing	Balance
Other current non-investment expenditures	87,700,587.86	62,231,705.10	25,468,882.76
Transfer to CSNF	5,128,102.00	5,128,102.00	
Non-budgetary resources	235,215.00	45,439.40	189,775.60
Social insurance company + health insurance company	93,191,745.00	85,511,896.00	7,679,849.00
<b>Total wage expenditures</b>	<b>363,722,878.00</b>	<b>338,925,006.00</b>	<b>24,797,872.00</b>

Indicator	Adjusted budget	Drawing	Balance
Non-investment expenditures – mobile phone	1,000,000.00	504,948.00	495,052.00
Non-investment expenditures – IT	4,823,502.82	4,608,628.64	214,874.18
Non-investment expenditures – chip cards	4,906.40	0.00	4,906.40
AM – Access Management	800,000.00	0.00	800,000.00
<b>Total non-investment expenditures EDS/SMVS</b>	<b>6,628,409.22</b>	<b>5,113,576.64</b>	<b>1,514,832.58</b>
<b>Total non-investment expenditures</b>	<b>463,415,192.08</b>	<b>411,443,829.14</b>	<b>51,971,362.94</b>



## Drawing of investment expenditures for 2021

Indicator	Adjusted budget	Drawing	Balance
Creation of WEB pages	600,000.00		600,000.00
Account Management (PAM)	868,054.00	868,054.00	
AM – Access Management	400,000.00		400,000.00
Multifactor identification	1,426,798.00		1,426,798.00
Printing provision	700,000.00		700,000.00
IDM – identity management	1,455,147.00		1,455,147.00
LAN reconstruction at TI	1,000,000.00	59,922.83	940,077.17
CAIS	17,000,000.00		17,000,000.00
Infrastructure at TI	2,875,134.81	1,254,153.00	1,620,981.81
Replacement - telephone exchanges	900,000.00		900,000.00
Server infrastructure at TI	1,600,000.00		1,600,000.00
Modernization of the Brno TI building	907,500.00	907,500.00	
Air conditioning Brno TI	420,000.00		420,000.00
Pacific shop windows	669,376.36	669,376.36	
HK TI – air conditioning	2,387,854.54	2,387,854.54	
Spa Kynžvart	88,790.00		88,790.00
Plzeň TI - roof	597,377.91	597,377.91	597,377.91
Kynžvart spa connection	407,000.00		407,000.00
Brno TI ESS	97,006.91	97,006.91	
Ostrava TI ESS	97,236.81	97,236.81	
Purchase of personal vehicles	2,137,170.85		2,137,170.85
Purchase of personal vehicles	1,600,000.00		1,600,000.00
HB elevator	1,174,929.00	1,174,929.00	0.00
Drone purchase	1,366,811.16	1,366,811.16	
Security upgrade at TI	1,500,000.00		1,500,000.00
Terminal equipment of ESS Spa Kynžvart	91,000.00		91,000.00
Purchase of vehicles with an alternative drive	2,500,000.00		2,500,000.00
Plzeň TI gas boiler room	1,500,000.00		1,500,000.00
Trimble R1	435,600.00		435,600.00
Trimble Geo 7x	1,600,000.00		1,600,000.00
Aggregate actions	90,017.62		90,017.62
<b>Total capital expenditures</b>	<b>48 492,804.97</b>	<b>9,480,222.52</b>	<b>39,012,582.45</b>
<b>Total investment and non-investment expenses</b>	<b>511,907 997.05</b>	<b>420,924,051.66</b>	<b>90,983,945.39</b>

## 9.1 Overview of transfers of budget fund savings to unspent expense claim report

The total value of savings of non-investment expenses in the amount of CZK 27,173,490.94 was fundamentally influenced by lengthy and, in many cases, repeated selection procedures and restrictions related to the epidemiological situation in the Czech Republic.

The total value of investment expenditure savings in the amount of CZK 39,0112,582.45, of which CZK 26,643,003.98 is IT investment, was, as with non-investment savings, fundamentally affected by lengthy and, in many cases, repeated selection procedures and restrictions related to the epidemiological situation in the Czech Republic.

In addition, for some events there were changes in the legislation (CAIS) and for some events the collection of requirements was not announced by the central contracting authority. All these reasons led to the fact that the deadlines for the implementation of investment actions were not met and moved to 2022.

## 9.2 Use of reserve fund and other non-budgetary resources

In 2021, the CEI did not create a reserve fund. The balance of the reserve fund as of 31<sup>st</sup> December 2021 was CZK 0.

### Non-budgetary resources

UEC not profiling	46,051,048.56
Insurance premium	235,215.00

Unspent expense claims in past years were spent on the following:

\*115V03100D004 – Privileged account management (PAM) – released claim in the amount of CZK 868,054.00.

\*115V03100D010 – Renewal of mobile phones – released claim in the amount of CZK 386,748.00,

\*115V03100D013 – Renewal of the server infrastructure – released claim in the amount of CZK 9,305.00,

\*115V03100D015 – Renewal of personal computer technology - released claim in the amount of CZK 636,913.75,

\*115V03300D07 – Modernization of the building of Brno TI – released claim in the amount of CZK 907,500.00,

\*115V03300D012 – HQ -replacement of storefronts in the object Pacifik - released claim in the amount of CZK 669,376.36,

\*115V03300D017 – Hradec Králové TI – modernization of air conditioning – released claim in the amount of CZK 2,387,854.54,

\*115V03300D019 – Plzeň TI – roof reconstruction – released claim in the amount of CZK 597,377.91,

\*115V03400D011 – CEI-installation of ESS Trade Fides end device for Brno TI - released claim in the amount of CZK 97,006.91,

\*115V03400D012 - CEI-installation of ESS Trade Fides end device for Ostrava TI – claim in the amount of CZK 97,236.81 released,

\*115V03400D030 – Havlíčkův Brod TI – modernization of the elevator in the building – released claim in the amount of CZK 1,174,929.00.

UEC not profiling	CZK	RPD
	7,473,520.00	5011
	815,052.00	5021
	2,801,571.00	5024
	4,098,637.00	5031
	1,402,050.00	5032
	289,540.90	5132
	20,778.12	5136
	576,316.19	5137
	400,492.92	5139
	172,629.00	5151
46,051,048.56 CZK	401,898.16	5152
	447,100.00	5153
	903,214.48	5154
	1,258,982.22	5156
	74,039.00	5161
	671,802.67	5162
	1,303,718.58	5163
	226,985.20	5164
	1,620,140.00	5166
	869,636.00	5167
	2,203,055.19	5168
	13,109,770.43	5169
	3,580,501.50	5171
	4,600.00	5173
	350,000.00	5176
	94,894.00	5172
	160,124.00	5363
	720,000.00	5424

## 9.3 Total income assessment

The total income of the CEI in 2021 was CZK 2,618,372.73.

Budgetary income	Approved budget	Adjusted budget	Reality
2132	350,000.00	350,000.00	339,456.12
2133	3,600.00	3,600.00	0.00
2310	0.00	0.00	37,655.00
2322	0.00	0.00	589,906.00
2324	496,400.00	496,400.00	905,522.61
4132	0.00	0.00	11,333.00
3113	0.00	0.00	734,500.00
<b>Total</b>	<b>850,000.00</b>	<b>850,000.00</b>	<b>2,618,372.73</b>

### Breakdown of income from sales of immovable property, nonbudgetary funds, etc.:

2132 – This budget item includes income from the rental of office space at the Territorial Inspectorates of Havlíčkův Brod and Liberec.

2133 – This budget item includes income for the rental of movable property at the Havlíčkův Brod Territorial Inspectorate.

2310 – This budget item includes income for the purchase of personal protective work equipment.

2324 – This budget item includes income from the costs of proceedings, executions and administrative fines.

2322 – This budget item includes income for insurance benefits - reimbursements from insurance companies.

4132 – This budget item includes income for unspent wage funds for 12/2021.

3113 – Income from the sale of long-term tangible assets is recorded on this budget item.



**10 Financial statement  
as of 31<sup>st</sup> December**



## Balance sheet

### Balance sheet as of 31<sup>st</sup> December 2021

Balance sheet as of 31 <sup>st</sup> December 2021			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT			PREVIOUS
			GROSS	CORRECTION	NET	
<b>ASSETS</b>			<b>915,965,521.63</b>	<b>364,367,838.59</b>	<b>551,597,683.04</b>	<b>540,026,381.71</b>
<b>A.</b>	<b>Fixed assets</b>		<b>808,526,846.80</b>	<b>364,367,838.59</b>	<b>444,159,008.21</b>	<b>447,515,954.19</b>
<b>I.</b>	<b>Long-term intangible assets</b>		<b>47,266,099.33</b>	<b>36,396,136.01</b>	<b>10,869,963.32</b>	<b>9,225,241.32</b>
1.	Intangible research and development results	012	0.00	0.00	0.00	0.00
2.	Software	013	27,914,827.16	19,163,604.84	8,751,222.32	9,218,478.32
3.	Valuable rights	014	183,000.00	181,517.00	1,483.00	2,407.00
4.	Emission permits and preference limits	015	0.00	0.00	0.00	0.00
5.	Low-value long-term Intangible assets	018	17,051,014.17	17,051,014.17	0.00	0.00
6.	Other long-term Intangible assets	019	0.00	0.00	0.00	0.00
7.	Unfinished long-term intangible assets	041	2,117,258.00	0.00	2,117,258.00	4,356.00
8.	Advances granted for long-term intangible assets	051	0.00	0.00	0.00	0.00
9.	Long-term intangible assets scheduled for sale	035	0.00	0.00	0.00	0.00
<b>II.</b>	<b>Long-term tangible assets</b>		<b>761,260,747.47</b>	<b>327,971,702.58</b>	<b>433,289,044.89</b>	<b>438,290,712.87</b>
1.	Land	031	12,527,113.00	0.00	12,527,113.00	12,527,113.00
2.	Cultural items	032	11,491.00	0.00	11,491.00	11,491.00
3.	Buildings	021	515,593,334.46	153,719,771.82	361,873,562.64	367,102,660.59
4.	Individual tangible moveable assets and sets of tangible moveable assets	022	126,459,394.12	68,899,270.14	57,560,123.98	58,402,703.49
5.	Cultivation wholes of permanent	025	0.00	0.00	0.00	0.00
6.	Low-value long-term tangible assets	028	105,352,660.62	105,352,660.62	0.00	0.00
7.	Other long-term tangible assets	029	0.00	0.00	0.00	0.00
8.	Unfinished long-term tangible assets	042	1,266,754.27	0.00	1,266,754.27	196,744.79
9.	Advances granted for long-term tangible assets	052	0.00	0.00	0.00	0.00
10.	Long-term tangible assets scheduled for sale	036	50,000.00	0.00	50,000.00	50,000.00

			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT			PREVIOUS
			GROSS	CORRECTION	NET	
<b>III.</b>	<b>Long-term financial assets</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
1.	Property interest in entities with decisive influence	061	0.00	0.00	0.00	0.00
2.	Property interest in entities with substantial influence	062	0.00	0.00	0.00	0.00
3.	Debt securities held until payable	063	0.00	0.00	0.00	0.00
4.	Long-term loans	067	0.00	0.00	0.00	0.00
5.	Long-term time deposits	068	0.00	0.00	0.00	0.00
6.	Other long-term financial assets	069	0.00	0.00	0.00	0.00
7.	Acquired long-term financial assets	043	0.00	0.00	0.00	0.00
8.	Advances granted for long-term financial	053	0.00	0.00	0.00	0.00
<b>IV.</b>	<b>Long-term receivables</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
1.	Long-term returnable financial aids granted	462	0.00	0.00	0.00	0.00
2.	Long-term receivables from ceded credits	464	0.00	0.00	0.00	0.00
3.	Long-term advances granted	465	0.00	0.00	0.00	0.00
4.	Long-term receivables from guarantees	466	0.00	0.00	0.00	0.00
5.	Other long-term receivables	469	0.00	0.00	0.00	0.00
6.	Long-term advances granted for transfers	471	0.00	0.00	0.00	0.00
7.	Long-term mediation of transfers	475	0.00	0.00	0.00	0.00
<b>B.</b>	<b>Current assets</b>		<b>107,438,674.83</b>	<b>0.00</b>	<b>107,438,674.83</b>	<b>92,510,427.52</b>
<b>I.</b>	<b>Inventory</b>		<b>0.00</b>	<b>0.00</b>	<b>0</b>	<b>21,327.90</b>
1.	Material acquisition	111	0.00	0.00	0.00	0.00
2.	Material in store	112	0.00	0.00	0.00	21,327.90
3.	Material on the way	119	0.00	0.00	0.00	0.00
4.	Unfinished production	121	0.00	0.00	0.00	0.00
5.	Self-made semifinished products	122	0.00	0.00	0.00	0.00
6.	Products	123	0.00	0.00	0.00	0.00
7.	Goods acquisition	131	0.00	0.00	0.00	0.00

Balance sheet as of 31<sup>st</sup> December 2021

			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT			PREVIOUS
			GROSS	CORRECTION	NET	
8.	Goods in store	132	0.00	0.00	0.00	0.00
9.	Goods on the way	138	0.00	0.00	0.00	0.00
10.	Other inventory	139	0.00	0.00	0.00	0.00
<b>II.</b>	<b>Short-term receivables</b>		<b>68,034,907.00</b>	<b>0.00</b>	<b>68,034,907.00</b>	<b>49,988,289.43</b>
1.	Clients	311	4,089.00	0.00	4,089.00	263.83
2.	Bills for cashing	312	0.00	0.00	0.00	
3.	Receivables for discounted securities	313	0.00	0.00	0.00	
4.	Short-term advances granted	314	3,097,583.42	0.00	3,097,583.42	2,776,573.00
5.	Other receivables from main operation	315	64,090,701.60	0.00	64,090,701.6	47,177,870.60
6.	Short-term returnable financial aid granted	316	0.00	0.00	0	0.00
7.	Short-term receivables from ceded credits	317	0.00	0.00	0.00	0.00
9.	Receivables for employees	335	1,188.00	0.00	1,188.00	2,883.00
10.	Social security	336	0.00	0.00	0.00	0.00
11.	Health insurance	337	0.00	0.00	0.00	0.00
12.	Pension plans	338	0.00	0.00	0.00	0.00
13.	Income tax	341	0.00	0.00	0.00	0.00
14.	Other taxes, charges and other similar pecuniary performance	342	0.00	0.00	0.00	0.00
15.	Value added tax	343	0.00	0.00	0.00	0.00
16.	Receivables from entities except selected governmental institutions	344	0.00	0.00	0.00	0.00
17.	Receivables from selected central governmental institutions	346	0.00	0.00	0.00	0.00
18.	Receivables from selected local governmental institutions	348	0.00	0.00	0.00	0.00
19.	Receivables from tax administration	352	0.00	0.00	0.00	0.00
20.	Clearance from tax redistribution	355	0.00	0.00	0.00	0.00
21.	Receivables from distraintment and other handling of foreign assets	356	0.00	0.00	0.00	0.00
22.	Other receivables from tax administration	358	0.00	0.00	0.00	0.00
23.	Short-term receivables from guarantees	361	0.00	0.00	0.00	0.00

			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT			PREVIOUS
			GROSS	CORRECTION	NET	
24.	Fixed time operations and options	363	0.00	0.00	0.00	0.00
25.	Payables from unfinished financial operations	369	0.00	0.00	0.00	0.00
26.	Receivables from financial security	365	0.00	0.00	0.00	0.00
27.	Receivables from bonds issued	367	0.00	0.00	0.00	0.00
28.	Short-term advances granted for transfers	373	0.00	0.00	0.00	0.00
29.	Long-term mediation of transfers	375	0.00	0.00	0.00	0.00
30.	Costs of future periods	381	731,660.98	0.00	731,660.98	0.00
31.	Incomes from future periods	385	0.00	0.00	0.00	0.00
32.	Active estimate accounts	388	0.00	0.00	0.00	0.00
33.	Other short-term receivables	377	109,684.00	0.00	109,684.00	30,699.00
III.	Short-term financial assets		39,403,767.83	0.00	39,403,767.83	42,500,810.19
1.	Asset securities for trading	251	0.00	0.00	0.00	0.00
2.	Credit securities for trading	253	0.00	0.00	0.00	0.00
3.	Other securities	256	0.00	0.00	0.00	0.00
4.	Short-term time deposits	244	0.00	0.00	0.00	0.00
5.	Other current accounts	245	38,119,875.22	0.00	38,119,875.22	41,361,394.38
6.	State financial asset accounts	247	0.00	0.00	0.00	0.00
7.	Treasury and state debt liquidity control accounts	248	0.00	0.00	0.00	0.00
8.	Accounts for tax sharing and split management	249	0.00	0.00	0.00	0.00
9.	Current account	241	0.00	0.00	0.00	0.00
10.	Current account CSNF	243	1,282,806.61	0.00	1,282,806.61	1,138,241.81
14.	Current accounts of state organisational component funds	225	0.00	0.00	0.00	0.00
15.	Postage stamps	263	1,086.00	0.00	1,086.00	1,174.00
16.	Money on the way	262	0.00	0.00	0.00	0.00
17.	Checkout	261	0.00	0.00	0.00	0.00



## Balance sheet as of 31<sup>st</sup> December 2021

Item number	Item name	Synthetic account	1	2
			ACCOUNTING PERIOD	
			CURRENT	PREVIOUS
<b>TOTAL LIABILITIES</b>			<b>551,597,683.04</b>	<b>540,026,381.7</b>
<b>C.</b>	<b>Equity capital</b>		<b>449,272,818.06</b>	<b>451,287,852.7</b>
<b>I.</b>	<b>Accounting entity property and adjusting items</b>		<b>488,915,507.33</b>	<b>488,915,507.3</b>
1.	Accounting entity property	401	727,357,406.25	727,357,406.3
2.	Privatisation fund	402	0.00	0.00
4.	Exchange rate differences	405	0.00	0.00
5.	Pricing differences on initial use of method	406	-238,435,713.18	-238,435,713.18
6.	Other pricing differences	407	-28,185.74	-28,185.74
7.	Adjustments to previous accounting periods	408	22,000.00	22,000.00
<b>II.</b>	<b>Accounting entity funds</b>		<b>1,282,806.61</b>	<b>1,138,241.81</b>
2.	Cultural and Social Needs Fund	412	1,282,806.61	1,138,241.81
4.	Reserve fund from other means	414	0.00	0.00
<b>III.</b>	<b>Economic result</b>		<b>-4,350,821,908.94</b>	<b>-3,930,356,630.54</b>
1.	Economic result for current accounting period		-420,465,278.40	-428,147,741.89
2.	Economic result in approval proceeding	431	0.00	0.00
3.	Economic result in previous accounting periods	432	-3,930,356,630.54	-3,891,590,734.13
<b>IV.</b>	<b>Income and expenditure account of budgetary activity</b>		<b>4,309,896,413.06</b>	<b>3,891,590,734.13</b>
1.	Income account of state organisational components	222	-2,618,372.73	-4,286,008.04
2.	Special expenditures account	223	420,924,051.66	433,493,903.99
3.	State budget activity account	227	0.00	0.00
4.	Aggregated incomes and expenditures of previous accounting periods	404	3,891,590,734.13	3,462,382,838.18
<b>D.</b>	<b>External resources</b>		<b>102,324,864.98</b>	<b>88,738,528.98</b>
<b>I.</b>	<b>Reserves</b>		<b>0.00</b>	<b>0.00</b>
1.	Reserves	441	0.00	0.00
<b>II.</b>	<b>Long-term payables</b>		<b>0.00</b>	<b>0.00</b>
1.	Long-term credits	451	0.00	0.00
2.	Long-term returnable financial aid received	452	0.00	0.00

			1	2
Item number	Item name	Synthetic account	ACCOUNTING PERIOD	
			CURRENT	PREVIOUS
3.	Long-term payables from bonds issued	453	0.00	0.00
4.	Long-term advances received	455	0.00	0.00
5.	Long-term payables from guarantees	456	0.00	0.00
6.	Long-term bills for payment	457	0.00	0.00
7.	Other long-term payables	459	0.00	0.00
8.	Long-term advances received for transfers	472	0.00	0.00
9.	Long-term mediation of transfers	475	0.00	0.00
III.	<b>Short-term payables</b>		<b>102,324,864.98</b>	<b>88,738,528.98</b>
1.	Short-term credits	281	0.00	0.00
2.	Discounted short-term bonds (bills)	282	0.00	0.00
3.	Short-term payables from bonds issued	283	0.00	0.00
4.	Other short-term loans	289	0.00	0.00
5.	Suppliers	321	0.00	0.00
6.	Bills for payment	322	0.00	0.00
7.	Short-term advances received	324	87,705.00	87,705
8.	Payables from split management	325	699,160.00	700,960
9.	Short-term returnable financial aid received	326	0.00	0.00
10.	Employees	331	0.00	0.00
11.	Other payables towards employees	333	19,052,380.00	16,461,683
12.	Social security	336	7,224,450.00	6,601,506
13.	Health insurance	337	3,134,327.00	284,7816
14.	Pension plans	338	0.00	0
15.	Income tax	341	0.00	0
16.	Other taxes, charges and other similar pecuniary performance	342	1,940,394.00	2,877,671
17.	Value added tax	343	0.00	0
18.	Payables to entities except selected governmental institutions	345	0.00	0
19.	Payables to selected central governmental institutions	347	40,368,677.60	33,581,234.6

			1	2
Item number	Item name	Synthetic account	ACCOUNTING PERIOD	
			CURRENT	PREVIOUS
20.	Payables to selected local governmental institutions	349	27,737,400.00	23,743,450.00
21.	Tax advances received	351	0.00	0.00
22.	Tax overpayments	353	0.00	0.00
23.	Payables from indirect tax returns	354	0.00	0.00
24.	Clearance from tax redistribution	355	0.00	0.00
25.	Payables from distraintment and other handling of foreign assets	357	0.00	0.00
26.	Other payables from tax administration	359	0.00	0.00
27.	Short-term payables from guarantees	362	0.00	0.00
28.	Fixed time operations and options	363	0.00	0.00
29.	Payables from unfinished financial operations	364	0.00	0.00
30.	Payables from financial securing	366	0.00	0.00
31.	Payables from subscribed unpaid securities and shares	368	0.00	0.00
32.	Short-term advances received for transfers	374	0.00	0.00
33.	Long-term mediation of transfers	375	0.00	0.00
34.	Payables from treasury and state debt liquidity control	248	0.00	0.00
35.	Expenditures of future periods	383	0.00	0.00
36.	Revenues from future periods	384	0.00	0.00
37.	Passive estimate accounts	389	0.00	0.00
38.	Other short-term payables	378	2,080,371.38	1,836,503.38

Profit and loss statement as of 31<sup>st</sup> December 2021

			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT		PREVIOUS	
			Main operation	Economic activity	Main operation	Economic activity
A.	TOTAL COSTS		423,754,622.38	0.00	433,031,381.24	0.00
I.	Costs of operation		423,754,866.30	0.00	431,459,616.88	0.00
1.	Consumed materials	501	5,831,778.34	0.00	5,231,443.23	0.00
2.	Energy consumption	502	4,913,242.30	0.00	5,485,522.95	0.00
3.	Consumption of other non-storable supplies	503	0.00	0.00	0.00	0.00
4.	Goods sold	504	0.00	0.00	0.00	0.00
5.	Capitalisation of long-term assets	506	0.00	0.00	0.00	0.00
6.	Capitalisation of current assets	507	0.00	0.00	0.00	0.00
7.	Change in own production inventory	508	0.00	0.00	0.00	0.00
8.	Repair and maintenance	511	7,886,960.48	0.00	5,065,525.26	0.00
9.	Travel costs	512	1,563,800.96	0.00	1,470,317.51	0.00
10.	Representation costs	513	256,771.37	0.00	131,782.44	0.00
11.	Capitalisation of internal services	516	0.00	0.00	0.00	0.00
12.	Other services	518	29,683,615.32	0.00	25,347,904.08	0.00
13.	Wages and salaries	521	255,086,299.00	0.00	266,661,692.00	0.00
14.	Mandatory social insurance	524	85,559,370.00	0.00	88,631,983.00	0.00
15.	Other social insurance	525	0.00	0.00	0.00	0.00
16.	Mandatory social expenditures	527	7,112,602.90	0.00	5,854,743.22	0.00
17.	Other social expenditures	528	0.00	0.00	0.00	0.00
18.	Road tax	531	0.00	0.00	0.00	0.00
19.	Property tax	532	1,460.00	0.00	1,970.00	0.00
20.	Other taxes and charges	538	212,078.00	0.00	294,901.44	0.00



## Profit and loss statement as of 31<sup>st</sup> December 2021

Item number	Item name	Synthetic account	1	2	3	4
			ACCOUNTING PERIOD			
			CURRENT		PREVIOUS	
			Main operation	Economic activity	Main operation	Economic activity
21.	Indirect tax returns	539	0.00	0.00	0.00	0.00
22.	Contractual penalties and interest on late payments	541	0.00	0.00	0.00	0.00
23.	late payment	542	168,624.00	0.00	168,898.00	0.00
24.	Other penalties	543	0.00	0.00	0.00	0.00
25.	Donations and other gratuitous	544	0.00	0.00	0.00	0.00
26.	transfers	547	698.00	0.00	0.00	0.00
27.	Materials sold	548	5,128,102.00	0.00	5,188,176.00	0.00
28.	Deficits and damages	551	12,827,863.50	0.00	16,456,137.47	0.00
29.	Fund generation	552	0.00	0.00	0.00	0.00
30.	Sold long-term tangible assets	553	0.00	0.00	467,259.00	0.00
31.	Land sold	554	0.00	0.00	0.00	0.00
32.	Reserve generation and clearance	555	0.00	0.00	0.00	0.00
33.	Creation and settlement of correction items	556	0.00	0.00	0.00	0.00
34.	Cost of excluded receivables	557	0.00	0.00	0.00	0.00
35.	Costs from low value fixed assets	558	7,521,333.13	0.00	4,991,281.85	0.00
36.	Other operating costs	549	267.00	0.00	10,079.43	0.00
<b>II.</b>	<b>Financial costs</b>		<b>-243.92</b>	<b>0.00</b>	<b>1,571,764.36</b>	<b>0.00</b>
1.	Sold securities and shares	561	0.00	0.00	0.00	0.00
2.	Interest	562	0.00	0.00	1,523,893	0.00
3.	Exchange rate loss	563	-243.92	0.00	-5,283.12	0.00
4.	Costs of real-value repricing	564	0.00	0.00	53,154.48	0.00
5.	Other financial costs	569	0.00	0.00	0.00	0.00
<b>III.</b>	<b>Costs of transfers</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
1.	Costs of transfers of selected central governmental institutions	571	0.00	0.00	0.00	0.00
3.	Costs of transfer pre-financing of selected central governmental	575	0.00	0.00	0.00	
<b>IV.</b>	<b>Costs of shared taxes and charges</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT		PREVIOUS	
			Main operation	Economic activity	Main operation	Economic activity
1.	Costs of shared natural person income tax	581	0.00	0.00	0.00	0.00
2.	Costs of shared legal entity income tax	582	0.00	0.00	0.00	0.00
3.	Costs of shared value added tax	584	0.00	0.00	0.00	0.00
4.	Costs of shared excise duties	585	0.00	0.00	0.00	0.00
5.	Costs of other shared taxes and charges	586	0.00	0.00	0.00	0.00
<b>V.</b>	<b>Income tax</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
1.	Income tax	591	0.00	0.00	0.00	0.00
2.	Additional income tax levies	595	0.00	0.00	0.00	0.00

<b>B.</b>	<b>TOTAL REVENUES</b>		<b>3,289,343.98</b>	<b>0.00</b>	<b>4,883,639.35</b>	<b>0.00</b>
I.	Operating revenues		3,286,188.98	0.00	4,882,974.35	0.00
1.	Revenues from own product sales	601	0.00	0.00	0.00	0.00
2.	Revenues from service sales	602	948,626.86	0.00	917,195.17	0.00
3.	Revenues from rental	603	339,456.12	0.00	329,138.16	0.00
4.	Revenues from goods sold	604	0.00	0.00	0.00	0.00
5.	Revenues from administrative charges	605	0.00	0.00	0.00	0.00
7.	Revenues from court charges	607	0.00	0.00	0.00	0.00
8.	Other revenues from own activities	609	0.00	0.00	0.00	0.00
9.	Contractual penalties and interest for late payment	641	0.00	0.00	0.00	0.00
10.	Other fines and penalties	642	554,500.00	0.00	631,601	0.00
11.	Revenues from excluded receivables	643	0.00	0.00	0.00	0.00
12.	Revenues from material sales	644	0.00	0.00	0.00	0.00
13.	Revenues from sales of long-term intangible assets	645	0.00	0.00	0.00	0.00
14.	Revenues from sales of long-term tangible assets except land	646	769,600.00	0.00	729,259.00	0.00
15.	Revenues from sales of land	647	0.00	0.00	0.00	0.00
16.	Fund drawing	648	0.00	0.00	0.00	0.00
17.	Other operating revenues	649	674,006.00	0.00	0.00	0.00

## Profit and loss statement as of 31<sup>st</sup> December 2021

			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT		PREVIOUS	
			Main operation	Economic activity	Main operation	Economic activity
<b>II.</b>	<b>Financial revenue</b>		<b>3,155.00</b>	<b>0.00</b>	<b>665</b>	<b>0.00</b>
1.	Revenues from sales of securities and shares	661	0.00	0.00	0.00	0.00
2.	Interest	662	0.00	0.00	0.00	0.00
3.	Exchange rate revenues	663	0.00	0.00	0.00	0.00
4.	Revenues from real-value repricing	664	0.00	0.00	0.00	0.00
5.	Revenues from long-term financial assets	665	0.00	0.00	0.00	0.00
6.	Other financial revenues	669	3,155.00	0.00	665.00	0.00
<b>III.</b>	<b>Revenues from taxes and fees</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
1.	Revenues from natural person income	631	0.00	0.00	0.00	0.00
2.	Revenues from legal entity income tax	632	0.00	0.00	0.00	0.00
3.	Revenues from social insurance	633	0.00	0.00	0.00	0.00
4.	Revenues from value added tax	634	0.00	0.00	0.00	0.00
5.	Revenues from excise duties	635	0.00	0.00	0.00	0.00
6.	Revenues from property taxes	636	0.00	0.00	0.00	0.00
7.	Revenues from energy taxes	637	0.00	0.00	0.00	0.00
8.	Revenues from road tax	638	0.00	0.00	0.00	0.00
9.	Revenues from other taxes and fees	639	0.00	0.00	0.00	0.00
<b>IV.</b>	<b>Revenues from transfers</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
1.	Revenues from transfers of selected central governmental institutions	671	0.00	0.00	0.00	0.00
3.	Revenues from pre-financing of transfers of selected central governmental	675	0.00	0.00	0.00	0.00
<b>V.</b>	<b>Revenues from shared taxes and charges</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
1.	Revenues from shared natural person income tax	681	0.00	0.00	0.00	0.00
2.	Revenues from shared legal entity income tax	682	0.00	0.00	0.00	0.00
3.	Revenues from shared value added tax	684	0.00	0.00	0.00	0.00
4.	Revenues from shared excise duties	685	0.00	0.00	0.00	0.00

			1	2	3	4
Item number	Item name	Synthetic account	ACCOUNTING PERIOD			
			CURRENT		PREVIOUS	
			Main operation	Economic activity	Main operation	Economic activity
5.	Revenues from shared property taxes	686	0.00	0.00	0.00	0.00
6.	Revenues from other shared taxes and fees	688	0.00	0.00	0.00	0.00
<b>C.</b>	<b>ECONOMIC RESULT</b>					
<b>1.</b>	Economic result before taxation		-420,465,278.40	0.00	-428,147,741.89	0.00
<b>2.</b>	Economic result for current accounting period		-420,645,278.40	0.00	-428,147,741.89	0.00



## Contacts

### Headquarters:

#### Czech Environmental Inspectorate

Na Břehu 267/1a 190 00 Praha 9  
tel.: +420 222 860 111  
podatelna@cizp.cz  
CITES emergency: +420 731 405 056  
Data box ID: zr5efbb

### Territorial inspectorates:

#### PRAGUE

Wolkerova 40/11  
160 00 Praha 6  
tel.: 233 066 111  
ph.podatelna@cizp.cz  
Accident reporting: +420 731 405 313  
Data box ID: 4dkdztz

#### PLZEŇ

Klatovská tř. 48  
301 22 Plzeň  
tel.: 377 993 411  
pl.podatelna@cizp.cz  
Accident reporting: +420 731 405 350  
Data box ID: 82bdy9x

#### HRADEC KRÁLOVÉ

Resslova 1229  
500 02 Hradec Králové  
tel.: +420 495 773 111  
[hk.podatelna@cizp.cz](mailto:hk.podatelna@cizp.cz)  
Accident reporting: +420 731 405 205  
Data box ID: skvdzan

#### ČESKÉ BUDĚJOVICE

U Výstaviště 16, P. O. BOX 32  
370 21 České Budějovice  
tel.: +420 386 109 111  
[cb.podatelna@cizp.cz](mailto:cb.podatelna@cizp.cz)  
Accident reporting: +420 731 405 133  
Data box ID: v3cdzr7

### ÚSTÍ NAD LABEM

Výstupní 508/9  
400 07 Ústí nad Labem  
tel.: 475 246 011 [ul.podatelna@cizp.cz](mailto:ul.podatelna@cizp.cz)  
Accident reporting: +420 731 405 388  
Data box ID: c6vdzus

### KARLOVY VARY branch office

Závodní 152  
360 18 Karlovy Vary-Tašovice  
tel.: +420 353 237 330  
[kv.podatelna@cizp.cz](mailto:kv.podatelna@cizp.cz)  
Accident reporting: +420 731 405 378  
Data box ID: c6vdzus

### HAVLÍČKŮV BROD

Bělohradská 3304  
580 01 Havl.čkův Brod  
tel.: +420 569 496 111  
[hb.podatelna@cizp.cz](mailto:hb.podatelna@cizp.cz)  
Accident reporting: +420 731 405 166  
Data box ID: htkdzar

### BRNO

Lieberzeitova 14  
614 00 Brno  
tel.: +420 545 545 111  
[bn.podatelna@cizp.cz](mailto:bn.podatelna@cizp.cz)  
Accident reporting: +420 731 405 100  
Data box ID: 6umdzr3

### ZLÍN branch office

Tř. Tomáše Bati 3792  
760 01 Zlín  
[bn.podatelna@cizp.cz](mailto:bn.podatelna@cizp.cz)  
Accident reporting: +420 731 405 100 Data box  
ID: 6umdzr3

### OLOMOUC

Tovární 1059/41  
779 00 Olomouc  
tel.: +420 585 243 410  
[ol.podatelna@cizp.cz](mailto:ol.podatelna@cizp.cz)  
Accident reporting: +420 731 405 265  
Data box ID: k93dzrd

### OSTRAVA

Valchařská 72/15  
702 00 Ostrava  
tel.: +420 595 134 111  
[ov.podatelna@cizp.cz](mailto:ov.podatelna@cizp.cz)  
Accident reporting: +420 731 405 301  
Data box ID: fmwdzsv

### LIBEREC

Tř. 1. máje 858/26  
460 02 Liberec  
tel.: +420 485 340 888  
[lb.podatelna@cizp.cz](mailto:lb.podatelna@cizp.cz)  
Accident reporting: +420 723 083 437  
Data box ID: 2kndzy8

## List of abbreviations

<b>ALF</b>	Agricultural land fund
<b>BAT</b>	Best available techniques
<b>BDW</b>	Biodegradable waste
<b>BGS</b>	Biogas station
<b>BOD</b>	Biochemical oxygen demand
<b>BWWTP</b>	Biological wastewater treatment plant
<b>CC</b>	Cross Compliance (political tool for implementing minimum standards in public health protection, animal health and wellbeing, plant health and environment – soil, water, biodiversity protection, etc.)
<b>CED</b>	Control of ecological damage
<b>CEI</b>	Czech Environmental Inspectorate
<b>CEI IAP</b>	CEI internal anti-corruption programme
<b>CHI</b>	Czech Hydrometeorological Institute
<b>CIA</b>	Coordinator of integrated agendas
<b>CIRP</b>	Control of Integrated Register of Pollution
<b>CIS</b>	Central information system
<b>CISTA</b>	Central Institute for Supervising and Testing in Agriculture
<b>CITES</b>	Convention on International Trade in Endangered Species of Fauna and Flora, Treaty of Washington
<b>CLP</b>	Regulation of the European Parliament and the Council (EC) no. 1272/2008 of 16 December 2008 on classification, labelling and packaging of substances and mixtures
<b>CFU</b>	Czech Fishing Union
<b>COD</b>	Chemical oxygen demand
<b>CSA</b>	Civil Service Act
<b>CSNF</b>	Cultural and Social Needs Fund
<b>CSO</b>	Czech Society for Ornithology
<b>CWWTP</b>	Central wastewater treatment plant
<b>DSA</b>	Department of State Administration
<b>EC</b>	Emission ceiling
<b>ECA</b>	Communication from the European Commission “EU actions to environmental compliance and governance”
<b>ECHA</b>	European Chemicals Agency
<b>EDS/SMVS</b>	Records and subsidy system and management of state-owned
<b>EEA</b>	European Economic Area
<b>EEE</b>	Electric and electronic equipment
<b>EFM</b>	Expert Forest Manager
<b>EFTA</b>	European Free Trade Association
<b>EI</b>	Equivalent inhabitants
<b>EIA</b>	Environmental Impact Assessment
<b>EH</b>	Environmental harm
<b>EL</b>	Emission limit
<b>EMAS</b>	Environmental Management and Audit System
<b>EMS</b>	Environmental Management System
<b>ENV</b>	Environment
<b>ERDD MoE</b>	Environmental Risk and Damage Department of the Ministry of the Environment

## List of abbreviations

<b>EU</b>	European Union
<b>FA</b>	Forest administration
<b>FMI</b>	Forest Management Institute
<b>FMR</b>	Forestry management records
<b>FCR</b>	Forests of the Czech Republic, s. p.
<b>FP</b>	Fire prevention
<b>FRS</b>	Fire Rescue Service
<b>GIOS</b>	Główny Inspektorat Ochrony Środowiska, Polish Environmental Inspectorate
<b>GMO</b>	Genetically modified organisms
<b>GMVP</b>	Genetically modified vascular plants
<b>GRI</b>	Global Reporting Initiative
<b>HQ</b>	CEI Headquarters
<b>HW</b>	Hazardous waste
<b>IA</b>	Integrated agendas
<b>IAD</b>	Integrated Agendas Department
<b>IMPEL</b>	Network of environmental inspection authorities of EU states
<b>IP</b>	Integrated permit
<b>IPPC</b>	Integrated Pollution Prevention and Control
<b>IPR</b>	Integrated Pollution Register
<b>IRI</b>	Impel Review Initiative (voluntary evaluation of organisations integrated in the international network of inspectorates and agencies in environmental protection)
<b>IRS</b>	Integrated Rescue System
<b>ISFRO</b>	Integrated System for Fulfilling Reporting Obligations
<b>IS IPPC</b>	IPPC information system
<b>KRNAP</b>	Krkonoše National Park
<b>LF</b>	Legal force
<b>LIPFF</b>	Land intended for performance of forest functions
<b>MFE CR</b>	Military Forests and Estates of the Czech Republic, s. p.
<b>MoE</b>	Ministry of the Environment of the Czech Republic
<b>MoF</b>	Ministry of Finance of the Czech Republic
<b>MIT</b>	Ministry of Industry and Trade of the Czech
<b>MEP</b>	Municipality with extended powers
<b>MMW</b>	Mixed municipal waste
<b>NLPA</b>	Nature and Landscape Protection Act
<b>NM</b>	Nature Monument
<b>NNM</b>	National Nature Monument
<b>NNR</b>	National Nature Reserve
<b>NP</b>	National Park
<b>NPČS</b>	České Švýcarsko National Park
<b>NPD</b>	Nature Protection Department
<b>NPŠ</b>	Šumava National Park
<b>NR</b>	Nature Reserve
<b>ODP</b>	Ozone depletion potential
<b>OHS</b>	Occupation Health and Safety
<b>PCDD/PCDF</b>	Polychlorinated dibenzodioxins and polychlorinated dibenzofurans



<b>PCR</b>	Police of the Czech Republic
<b>PFM</b>	Professional forestry manager
<b>PLA</b>	Protected landscape area
<b>PLF</b>	Prominent landscape feature
<b>PM</b>	Particulate matter
<b>RA</b>	Regional Authority
<b>RAPEX</b>	Rapid Alert System of Non-Food Products (European Union rapid alert information system on dangerous consumer products of non-food characteristics)
<b>REACH</b>	Regulation of the European Parliament and the Council (EC) no. 1907/2006 of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency
<b>RHS</b>	Regional Hygiene Station
<b>RIA</b>	Railway Infrastructure Administration
<b>RMD</b>	Road and Motorway Directorate
<b>RPHA</b>	Regional Public Health Authority
<b>RPLF</b>	Registered prominent landscape feature
<b>RS</b>	Regulated substances
<b>SAIF</b>	State Agricultural Intervention Fund
<b>SCI</b>	Site of Community Importance
<b>SEA</b>	Strategic Environmental Assessment
<b>SEF</b>	State Environmental Fund
<b>SEI</b>	Slovakian Environmental Inspectorate
<b>SFAD</b>	State Forest Administration Department
<b>SHPP</b>	Small hydropower plant
<b>SLF</b>	Significant landscape feature
<b>SPA</b>	Specially protected areas
<b>SPS</b>	Specially protected species
<b>TI</b>	Territorial Inspectorate
<b>TZS</b>	Technical landfill security
<b>UEC</b>	Unspent expenditures claim
<b>WMD</b>	Waste Management Department
<b>WPD</b>	Water Protection Department
<b>WWTP</b>	Wastewater treatment plant

cizp.cz

