



CZECH ENVIRONMENTAL  
INSPECTORATE

# ANNUAL REPORT 2022

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INSPECTORATE

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## Director's foreword



The Czech Environmental Inspectorate has an irreplaceable role within the environmental protection system of the Czech Republic. Its mission is primarily controlling, supervising and imposing of sanctions and corrective measures in all components of the environment. However, it performs many more tasks, and in the wake of the further development of European environmental policy and the constant increase in demands for environmental protection, also with regard to new knowledge and technologies, it can be safely expected that the role of the Inspectorate will continue to grow in the future.

Given that I did not take up my post until 2023, rather than evaluating the operation of the inspection in 2022, I will allow myself to present my visions for the future. Above all, I would like to show the Inspectorate in a different light than in which it has been perceived so far. Its activities are diverse, very important and fundamentally not limited to investigations of violations of the law or solving accidents. I also want to focus the Inspectorate's activities more on prevention and open communication and support the educational activities of the Inspectorate, as this is absolutely essential in environmental protection.

As a problem, I perceive the Inspectorate to be overwhelmed by initiatives, since the Inspectorate, as a specialized environmental protection body, must, according to the law, often solve problems of an exclusively local nature, although other environmental protection bodies, sometimes better familiar with the local situation, also have competence in this area. At the same time, the Inspectorate should have capacity to focus primarily on large cases, which is increasingly difficult under the current situation.

I perceive the functioning of the CITES agenda as essential – i.e. the regulation of trade in specimens of endangered species obtained from the wild or bred in captivity. The Czech Republic is a transit country for specimens and has also been a "breeding superpower" for a long time. The task of the inspektorat-

te is to ensure not only the protection of endangered animals and plants in the wild, but also the humane treatment of animals in farms.

One of the tasks of the Inspectorate is the solution of accidents on waterways. With the events in 2020 on the Bečva River, which unfortunately made the Inspectorate infamous, and the events that followed, from my position, I cannot strive for anything other than to ensure that this situation does not happen again. The Inspectorate will thus initiate negotiations and coordination of the procedure with the other affected components (fire brigade, water authority, basin management), as it is absolutely crucial that each component knows exactly how to act in a crisis situation.

Another important topic is the regulation of waste management, especially the importation of waste from abroad. It is necessary to ensure that the Czech Republic does not become the "dumping ground of Europe", and in this direction, the Inspectorate will develop action towards legislative activity in cooperation with the Ministry of the Environment, as well as through controls and consistent enforcement of legal requirements. In this direction, I also see cooperation with law enforcement authorities as key.

My important and not the last task is to try to ensure decent salary conditions for the employees of the Inspectorate, because despite the current reality of the state of public finances, I consider environmental protection to be a priority topic for today's society. And without high-quality and motivated employees, it is very difficult to fulfil all the set goals. Much is expected from the Inspectorate, and I will expect the most from it. In this regard, however, it is necessary to ensure adequate conditions for inspectors. Finally, I would like to thank my colleagues for their work so far, which they often do with great commitment.

**Petr Bejček**

Director of the CEI

## Comprehensive information on activities in 2018–2022

	2018	2019	2020	2021	2022
No. of inspectors (as of 31.12.)	408	409	408	396	389
No. of inspections	16,572	16,896	11,784	11,231	12,622
<b>All decisions (fines and other decisions, including on charges) in force:</b>	<b>8,541</b>	<b>8,607</b>	<b>2,444</b>	<b>1,690</b>	<b>2,511</b>
All fines that entered into force	2,543	2,532	2,041	1,673	2,160
Number of other valid decisions (other decisions including fees)	5,998	6,075	403	17	351
<b>Total amount of fines in force, CZK</b>	<b>100,274,621</b>	<b>112,329,717</b>	<b>87,604,415</b>	<b>79,387,735</b>	<b>109,624,411</b>
<b>Other decisions in force:</b>	<b>424</b>	<b>412</b>	<b>309</b>	<b>244</b>	<b>318</b>
Instances of halting or restriction to operations, a facility of part of it, in force	38	71	75	55	65
No. of confiscations in force	157	119	104	101	132
No. of remedial measures in force	229	222	130	88	121
EIA statements (Act no. 100/2001 Coll.)	610	657	667	742	878
Other expert statements issued	5,333	5,538	4,378	5,179	3,860
No. of suggestions and petitions received	3,044	3,493	2,972	2,853	2,489
No. of suggestions submitted to public authorities from own inspection work	322	309	293	250	274
No. of submitted crime reports	14	18	11	14	15
No. of accidents and emergencies	413	369	315	457	385
Number of requests for information received (Coll. No. 106/1999 and Col. No. 123/1998)	325	362	382	316	311
The number of received complaints about the activities of the CEI or inspectors - § 175 of the Administrative Code	43	57	54	50	30
Number of relevant infringement notices	0	0	0	0	0
Number of systemized workplaces as of 31.12.	589	601	571	571	571

**Note: the overview is processed for 5 years, in ascending order**

\* In previous years, the number of extraordinary events (accidents and breakdowns) was not collected and reported in tables in the Air Protection Department, the numbers became significant only after the amendment of the Air Protection Act at the end of 2016 and the EC requirement to report refrigerant leaks.

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

\*\*\* In 2018, the EIA Act was amended, which led, among other things, to a decrease in required statements.

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







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## 1 Characteristics of the activity

### 1.1 Role of the CEI

#### CEI organisation

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 Praha 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 department, 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[1], 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 or 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 Inspectorate 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 (landfill fires, chemical industry) etc. 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 2022 at [www.cizp.cz/Plany-cinnosti](http://www.cizp.cz/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 Procedure), 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 a favourable environment is also exercised by the public through the so-called information laws, which are Act No. 123/1998 Coll., on the right to information about the environment, 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.

## CEI prevention and penalty work

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

The prevention work in its broader sense consists in 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 cured.

Another dimension of the CEI's work is inspection and penalty work. This work 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 Procedure. If a CEI inspector finds out during inspection that the inspected entity 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 authority to handle the unlawful conduct, it shall notify the applicable authority about the unlawful conduct or transfers the matter to the applicable 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 by way of its Departments of State Administration (DSA), which are organisational entities of the MoE and are decentralised territorially with offices in Praha, 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 his rights by the decision of the authority (DSA), he 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.

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[1] Activities of the CEI resulting from the CITES-Convention on International Trade in Endangered Species





## 1.2 Organizational structure

The CEI is divided into 10 territorial inspectorates, two branch offices and headquarters. As of 31 Dec 2022, it employed 533 persons, including 412 expert employees.


### **Territorial inspectorates:**

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

The head of the civil service authority performing his duty in the Czech Environmental Inspectorate is appointed by the State Secretary.



Overview of powers by environmental component



		Professional departments of environmental protection					
	CEI powers	Air	Water	Waste	Integrated prevention	Nature	Forest
Supervision	Inspections, reviews, checks, investigations, etc.	•	•	•	•	•	•
Penalties	Fines to legal entities	•	•	•	•	•	•
	Fines to natural persons	•	•	•		•	•
	Restriction or halt of operations	•	•		•	•	•
Measures	Measures to remedy identified shortcomings as well as serious status under Waters Act	•	•	•		•	•
	Seizing and confiscation of individuals of endangered animal or plant species					•	
	Seizing of illicitly held individuals, sampling	•			•	•	
Accidents records	And cooperation in solving them	•	•				
Statements	Position statements, statements, approvals for other authorities	•	•	•	•	•	•
Suggestions	Handling of suggestions	•	•	•	•	•	•







## 1.3 Intensity of inspection work

In 2022, the CEI made 12,622 checks and issued 2,511 decisions in force, including 2,160 decisions on fines. Compared to 2021, the total number of inspections increased (+1,391) as did the number of decisions on fines issued and in force (+487). The reason for the increase was mainly the end of the measures taken in connection with the covid-19 epidemic.

The total number of CEI inspectors in 2022 was 412. One inspector therefore had an average of about 30 inspections. The CEI issued a total of 3,860 opinions and statements in 2022, of which 878 opinions and statements were related to the EIA process.

### Numbers of inspections by territorial inspectorates, 5-year overview

	2018	2019	2020	2021	2022
Praha TI	2,200	2,221	1,353	1,532	1,766
České Budějovice TI	1,146	1,293	907	853	910
Plzeň TI	1,667	1,635	1,137	1,150	1,338
Ústí nad Labem TI	1,393	1,564	1,055	967	1,279
Hradec Králové TI	1,682	1,782	1,610	1,272	1,657
Havlíčkův Brod TI	1,408	1,405	1,012	1,089	1,212
Brno TI	1,962	2,064	1,454	1,248	1,313
Olomouc TI	1,244	1,227	977	810	902
Ostrava TI	1,705	1,705	1,226	1,212	1,452
Liberec TI	788	900	590	634	698
Headquarters	669	776	463	417	95

*Not: Presented for 5 years, in ascending order*

### 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)
2022	2,208	2,160	109,624,411
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

*Note: presented for 5 years, in descending order*

## 2 Overview of work of territorial Inspectorates

Territorial inspectorate	No. of inspectors	No. of controls	Statements		Fines			Other decisions			No. of emergencies (under air acts) and Accidents (under Waters Act)	No. of suggestions handled	No. of suggestions submitted to public authorities from own inspection work	No. of crime reports
			EIA statements (Act no. 100/2001 Coll.)	Other statements	All fines imposed in report period	All fines that entered into force in report period	Total amount of fines in legal force (CZK)	Instances of halting or restriction to operations, a facility of part of it, in force	No. of confiscations in force	No. of remedial measures in force				
<b>Praha</b>	52	1,766	187	937	217	192	21,386,610	2	0	18	45	548	43	0
<b>České Budějovice</b>	29	910	66	160	186	195	10,175,720	33	0	11	16	214	24	2
<b>Plzeň</b>	35	1,338	46	271	198	189	9,671,270	0	2	4	5	165	10	1
<b>Ústí nad Labem</b>	44	1,279	85	399	168	172	7,483,000	15	0	10	30	240	19	0
<b>Hradec Králové</b>	34	1,657	103	154	316	301	14,356,900	5	4	13	91	328	35	0
<b>Havlíčkův Brod</b>	30	1,212	94	246	274	279	5,512,942	1	0	5	11	270	51	1
<b>Brno</b>	46	1,313	125	812	211	212	15,466,620	0	3	21	58	352	25	0
<b>Olomouc</b>	26	902	40	247	123	127	6,776,500	3	1	16	32	209	21	1
<b>Ostrava</b>	41	1,452	76	429	269	262	10,524,680	3	2	9	85	274	23	2
<b>Liberec</b>	25	698	56	172	120	106	5,900,269	3	0	6	12	175	23	0
<b>CEI TI Total</b>	<b>362</b>	<b>12,527</b>	<b>878</b>	<b>3,827</b>	<b>2,082</b>	<b>2,035</b>	<b>107,254,511</b>	<b>65</b>	<b>12</b>	<b>113</b>	<b>385</b>	<b>2,775</b>	<b>274</b>	<b>7</b>





## 3 Dealing with stakeholders

### 3.1 Cooperation with the public – suggestions and providing information

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 agenda is an integral part of the activities of the CEI in all components of the CEI territorial inspectorates and the CEI headquarters. This activity is also enshrined in the Organizational Rules of the CEI.

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

Any natural person, a natural person running a business, or a legal entity can notify the CEI of a request for an investigation. The CEI has published information on submitting initiatives on its website in the "Practical advisor" section ([www.cizp.cz/prakticky-radce](http://www.cizp.cz/prakticky-radce)).

#### CEI and the citizen public

Suggestions are an important element in the CEI communication with the public. The citizens often point to violations of laws that would otherwise remain hidden. Suggestions 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. Suggestions for which the CEI does not have the legal competence to investigate are forwarded for investigation to other substantively competent public administration bodies. The CEI also submits initiatives to other state administration bodies, in cases where, during its own control activities, it discovers facts indicating violations of legal regulations in areas that do not fall within its competence.

#### Number of suggestions received

The CEI received a total of 2,489 suggestions in 2022. The number of suggestions received by individual territorial inspectorates and the CEI's headquarters in 2022 is shown in the table below. The largest number of suggestions in 2022 was dealt with, similarly to previous years, by the territorial inspectorate of Prague. Not infrequently, a situation arises when the CEI receives a suggestion that it does not have the legal competence to investigate. Such suggestions are forwarded for investigation to the materially and locally competent state administration body. In 2022, there were 349 suggestions. One suggestion can draw attention to threats or damage to several components of the environment, so the suggestion is dealt with by several specialist departments. Data on how individual departments participated in the resolution of suggestions received in 2022 are shown in the following table.



## Numbers of suggestions received by TIs and HQ in 2022

Territorial inspectorate	Suggestions received	Suggestions handed over as irrelevant
Praha	498	47
České Budějovice	214	29
Plzeň	165	44
Ústí nad Labem	229	30
Hradec Králové	262	30
Havlíčkův Brod	215	21
Brno	305	51
Olomouc	158	19
Ostrava	264	19
Liberec	125	16
Headquarters	54	43
<b>Total</b>	<b>2,489</b>	<b>349</b>



The TI and HQ departments contributed to handling of suggestions received in 2022 as follows:

Territorial inspectorate	Air protection	Water protection	Waste management	Nature protection	Forest protection	Integrated agendas
Praha	85	89	110	228	35	1
České Budějovice	15	40	44	94	17	4
Plzeň	21	17	50	68	9	0
Ústí nad Labem	18	40	43	119	20	0
Hradec Králové	50	84	86	87	21	0
Havlíčkův Brod	35	68	37	121	8	1
Brno	60	62	85	123	22	0
Olomouc	22	45	42	89	9	2
Ostrava	24	39	65	130	12	4
Liberec	19	26	31	50	12	3
Headquarters	9	10	17	17	1	0
<b>Total</b>	<b>358</b>	<b>520</b>	<b>610</b>	<b>1,126</b>	<b>166</b>	<b>15</b>





## The main topics of the suggestions investigated in 2022

The CEI **Air Protection Department** most often dealt with suggestions pointing to nuisance by odorous substances (agricultural operations, biogas stations, composting plants, paint shops, operations with chemical production, etc.), and also investigated suggestions about pollution by dust particles (wood processing, production and processing operations of construction substances), suggestions for the darkness of smoke (wood burning boilers, etc.) and the burning of unauthorized materials in an open fireplace.

The CEI **Water Protection Department** most often investigated suggestions regarding the pollution of waterways and unauthorized discharge of wastewater, as well as suggestions regarding the control of the operation of wastewater treatment plants, the observance of minimum residual flows during the operation of small hydroelectric power plants, and the handling of harmful substances in violation of the Water Act.

The CEI **Waste Management Department** dealt with citizens' suggestions related to the management of waste, packaging, chemical substances and chemical mixtures. These are mainly the activities of waste dumps, illegal loading of waste/unauthorized landscaping carried out with the use of waste, take-backs of electrical equipment and tires and illegal activities of car scrap yards.

The CEI **Nature Protection Department** most often dealt with suggestions to investigate the felling of trees growing outside the forest and damage to trees (cuttings, interventions in the root system, etc.). Interventions in the natural development of specially protected species of animals and plants and interventions in important landscape elements were also addressed.

The CEI **Forest Protection Department** investigated suggestions related to the compliance of logging operations with Act No. 289/1995 Coll. and unauthorized use of forest land for purposes other than the fulfilment of forest functions. Furthermore, it investigated the issues of damage to soil cover and approach roads as a result of logging and removal of wood. The weighing of waste on forest land also posed problems.

## Green Line

With effect from September 1, 2008, a so-called Green Line (800 011 011) has been established at the CEI.

It is a direct and free telephone contact between the CEI and citizens. The number is primarily used for receiving citizens' suggestions. Through it, citizens' questions regarding environmental issues are also dealt with, and at the same time, citizens are informed about the legal competences of the CEI in this form. The line is open every weekday from 8:00 a.m. to 4:00 p.m.

## Numbers of received suggestions in 2018-2022 by TI and HQ of the CEI

Territorial inspectorate	2018	2019	2020	2021	2022
Praha	704	943	656	563	498
České Budějovice	209	216	204	213	214
Plzeň	232	232	260	226	165
Ústí nad Labem	367	337	276	270	229
Hradec Králové	299	328	336	284	262
Havlíčkův Brod	236	279	224	256	215
Brno	331	381	374	359	305
Olomouc	153	167	144	150	158
Ostrava	274	325	281	284	264
Liberec	158	162	163	196	125
Headquarters	81	123	54	52	54
<b>Total</b>	<b>3,044</b>	<b>3,493</b>	<b>2,972</b>	<b>2,853</b>	<b>2,489</b>

*Note: presented for 5 years, in descending order*





### 3.1.2 Provision of information

In 2022, the Czech Environmental Inspectorate handled a total of 311 requests for information, of which 20 requests under Act No. 106/1999 Coll., on Free Access to information, as amended, and 291 requests under Act No. 123/1998 Coll., on the Right to Environmental Information, as amended. In addition to the information that the CEI provides in accordance with the aforementioned information laws, the CEI communicates with the public through press and annual reports, brochures, leaflets, operating the free "Green Line", etc.

The provision of information contributes to the creation of a stronger feedback loop between the CEI and the public. The main goals are to maintain contacts with the professional and lay public and with the media, as far as possible to provide answers to questions related to the control and supervisory powers of the CEI, and to provide objective information on the results of the CEI's control activities.

#### Provision of information according to Act No. 106/1999 Coll., on Free Access to Information

Pursuant to § 18 of this Act, the CEI publishes on its website an annual report for the year 2022 on its activities in the provision of information, which, among other things, contains the mandatory information listed in the table below on this page.

#### Required data according to Act No. 106/1999 Coll. for the year 2022

Number of information requests submitted	20
The number of decisions on the rejection of the requests	3, 1 partial rejection
Number of appeals filed against the decision	1
A 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 § 16a, paragraph 5 of the Act, the complaint was fully complied with and the information provided.
Additional information related to the application of this law	1 request for information was postponed according to § 17 paragraph 5 of the Act due to non-payment of costs





## Provision of information pursuant to Act No. 123/1998 Coll., on the Right to Environmental Information

According to this law, 291 applications were accepted in 2022. The Hradec Králové TI and the CEI Headquarters processed the most requests, the Liberec TI handled the least.

### Overview of the number of requests for information for the year 2022 by individual TI

TI	Total number of requests received	No. of requests under Act no. 106/1999 Coll.	No. of requests under Act no. 123/1998 Coll.
Praha	34	0	34
České Budějovice	20	0	20
Plzeň	15	0	15
Ústí nad Labem	23	0	23
Hradec Králové	75	0	75
Havlíčkův Brod	16	0	16
Brno	19	0	19
Olomouc	24	0	24
Ostrava	13	0	13
Liberec	6	0	6
Headquarters	66	20	46
<b>Total</b>	<b>311</b>	<b>20</b>	<b>291</b>



## Numbers of information requests received in 2018–2022



Year	Total number of requests received	No. of requests under Act no. 106/1999 Coll.	No. of requests under Act no. 123/1998 Coll.
2022	311	20	291
2021	329	23	306
2020	382	15	367
2019	362	13	349
2018	325	15	310

*Note: Presented for 5 years, in descending order*

The total number of requests for information in 2022 has decreased. Compared to 2021, the CEI received 15 fewer requests pursuant to Act No. 123/1998 Coll. and three fewer requests according to Act No. 106/1999 Coll. Although the number of requests has decreased, public interest in providing information is still relatively high.

### Green line

Since September 1, 2008, the CEI has implemented a so-called "Green Line" (800 011 011). This is a direct and toll-free telephone connection for the general public with the CEI. The line is primarily used for receiving input from citizens, and through it, citizens' inquiries related to environmental issues are addressed. At the same time, citizens are informed about the CEI's legal competencies through this channel. The line operates every weekday from 8:00 AM to 4:00 PM. On average, one call is handled per day.





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



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

- ▶ <http://www.cizp.cz/Institute-verejne-spravy>
- ▶ <http://www.cizp.cz/Vedecke-a-vzdelavaci-institute>
- ▶ <http://www.cizp.cz/Neziskove-organizace>



## 3.3 International cooperation

In 2022, there was a significant shift in the situation surrounding the global epidemic of the COVID-19 disease. Restrictions persisted until mid-year, especially in travel policies, but from July onwards, there was a gradual reopening of subdued interactions and related personal meetings. The CEI took advantage of this trend, and its employees **embarked on a total of 20 foreign trips**. The spectrum of international trips was diverse. These included journeys to our closest neighbours, such as Slovakia, Germany, Poland, or Austria, trips within the broader European context to countries like Belgium, Romania, or Finland, but also to more distant destinations like Montenegro, Malta, or the United States of America. Throughout the year, CEI employees remained active in the online environment, including **collaboration with IMPEL**.

Collaboration within **the IMPEL organization** is one of our most significant international activities. IMPEL represents organizations from EU member states, accession and candidate EU countries, EEA, and EFTA countries that are involved in the implementation and enforcement of environmental law. The mission of the IMPEL organization is to contribute to environmental protection by actively participating in the effective implementation and enforcement of EU environmental law through capacity building, sharing best practices, developing and disseminating guidelines and tools, promoting cooperation, and providing feedback to legislators and regulators on the practicality and enforceability of environmental legislation. The core activities of the IMPEL network involve individual projects led by expert teams (ET).

In 2022, IMPEL had two **General Assembly (GA) meetings** planned. Due to the current epidemiological situation, the 23rd GA took place on June 28-29 via video conference from Paris. **The 24th GA, scheduled for November 29-30, was conducted in a hybrid format in Prague.** The Prague GA occurred during the Czech Presidency of the EU Council and was hosted at the Diplomat Hotel with 52 out of a total of 76 IMPEL member representatives attending in person. The opportunity to meet in person after two years was a very welcome boost to revive and rekindle the subdued communication, which was also in line with the nature of the conducted meetings.

Employees of the CEI are actively involved in **IMPEL project work** within expert teams (ET) on the following topics: Air and Industry, Waste and Transboundary Shipments of Waste, Water and Soil, Nature Protection, and Cross-Cutting Tools and Approaches. They are also engaged in external projects of the Network - SWEAP and Bioval.

**In 2022**, the Inspectorate, through its employees, participated in numerous IMPEL projects. **It participated in seven projects and within them, in 16 working groups**, which allowed it to actively contribute and gain valuable information in the following areas: Various aspects of BAT conclusions and permits, Operator's self-monitoring, Air quality improvement, Waste incineration, IRPP BAT for intensive poultry and pig farming (ET Industry & Air), REACH and circular economy, WEEE Article 17 Free-riders project (implementation of Article 17 of the WEEE Directive 2012/19/EU), Plastic waste transport, Meetings of National Contact Points, Annual Conference on Waste and Transboundary Shipments



(ET Waste & Transboundary Shipments of Waste), Combating illegal activities related to hunting tourism, and Information exchange on IKB between enforcement authorities and other involved parties, "IMPEL-ESIX" (illegal handling of wildlife and transboundary criminal activities), EU Action Plan against wildlife trafficking, and Implementation of the Habitats Directive and Birds Directive at European airports (ET Nature Protection).

**In the field of air protection, the head of the Air Protection Department of the Territorial Inspectorate of the CEI in Ostrava** attended the 13th meeting of the Working Group of the Czech and Polish Ministries of the Environment on air protection in November. The meeting took place in Prague at the Ministry of the Environment of the Czech Republic. An employee of the Inspectorate has been representing the CEI in this working group for an extended period, focusing on supervisory activities related to the operation of stationary air pollution sources and facilities under integrated prevention in the field of air. The long-term work of this group has been dedicated to addressing air quality and protection issues, especially in the border regions of the Czech Republic and Poland. Furthermore, **the head of the CEI HQ Air Protection Department**, along with her team, participated in a Seminar on the illegal trade of hydrochlorofluorocarbons (HCF) organized by the European Fluorocarbons Technical Committee (EFCTC) in collaboration with the PROZON Foundation (Climate Protection Foundation) in December, held in Prague.

**In the field of waste management, the head of WMD HQ CEI** plays a significant role in international cooperation. Throughout the year, he participated in several working meetings and conferences, which he also helped organize, and where he actively contributed. For example, his participation in a workshop within the project *"EMPACT Environmental Crime 2022, Operational Action (OA) 8.4"* aimed at improving cooperation in the "pollution and waste crime" issues in the Balkans, particularly in the exchange of information, experiences, and coordination with third countries. This workshop took place in June in Montenegro. He also attended the IMPEL conference *"Waste/TFS + NCP meeting"* in November in Malta, in his capacity as a member of the Steering Group for ET Waste & TFS. This group within IMPEL strategically manages and organizes ET activities. During the November IMPEL GA, he was elected as the representative of the head of ET Waste & TFS. In the area of waste management, the head of the WMD HQ CEI also actively contributes to the creation and preparation of working documents for ET and working groups, meeting outputs, discussion materials, and more.

As part of the *"IMPEL ET Waste & TFS 2022 – 2024"* project, the head of **WMD TI CEI České Budějovice** participated in the *"Plastic Waste Shipments"* working group in the January webinar *"IMPEL Webinar Road Inspections: Best Practices"* and in March the webinar *"IMPEL - Inspections : Data Sharing & Meeting with Europol"* with issues highly beneficial for the implementation of control activities within the Czech Republic in relation to cross-border transport of waste. The CEI was actively involved in the *"Plastic Waste Project"* by continuously providing information through collection tools (questionnaires, polls). The output was a manual for classifying plastic waste for the purposes of cross-border transport of waste, which is available on the IMPEL website. In January, **the head of WMD TI CEI Olomouc** participated in the online meeting organized by the University of Limerick in Ireland *"Final STRIKE Online Training Session: Practical Perspectives on Waste Enforcement Planning and Inspections With a Focus on Forensic and Damages Analysis Relating to Waste Crime"*. The program included a discussion about illegal waste disposal, fraud in cross-border transportation, and illegal waste disposal.

The CEI has traditionally been involved in the **LIFE SWEAP** project, coordinated by IMPEL. In March, **an inspector from WMD HQ and the head of WMD TI České Budějovice** participated in the international online meeting *"The Recycling Myth"*. Furthermore, **the head of WMD TI České Budějovice** also participated in the online webinar *"SWEAP WEBINAR - TFS of Wood/Asbestos Waste"* in April. The Czech Republic is among the countries where the newly developed *"SWEAP APP"* application, designed for reporting inspection data related to waste movement monitoring, is being tested in practice. It has been included among the countries that will participate in testing GPS trackers for monitoring domestic waste movement.

**In the field of water protection**, a team of inspectors from **WPD TI CEI Havlíčkův Brod** visited wastewater treatment facilities and hydroelectric power plants in Linz and Kaprun, Austria, in June. The main objective of the excursion was to acquire new information and deepen their knowledge regarding water management, with the subsequent integration of this knowledge into the work of CEI. Also in June, **an inspector from WPD TI CEI Ostrava** participated in the 30th meeting of the Working Group for the Protection of Border Waters from Pollution within the Czech-Polish Commission for Border Waters in Bielsko-Biała, Poland. The agenda included the evaluation of the quality of border waters from 2018 to 2021, including an assessment of exceptional events in border rivers and a visit to the wastewater treatment plant in the town of Żywiec in the Sola River basin. In August, **an inspector from WPD HQ CEI** participated in the 63rd meeting of the Working Group on Emergency Pollution of Waters of the International Commission for the Protection of the Elbe (ICPER) in Magdeburg, Germany. The agenda primarily focused on reviewing and evaluating reports, updating the International Alarm and Emergency Plan for the Elbe (IAEPE), and visiting the wastewater treatment plant in Magdeburg/Gerwisch. In October, **an inspector from WPD TI**

**CEI Brno** participated in the 14th meeting of the Expert Group on APC within the framework of the International Commission for the Protection of the Danube River (ICPDR) in Munich, Germany. The agenda included topics such as testing the warning system on rivers, accident prevention, ICPDR projects, and information about planned projects for the protection of watercourses, such as the "WACOM Project" or the planned update of the database of contaminated sites that could potentially pose a threat to watercourses in the Danube River basin. In October, **an inspector from WPD TI CEI Ostrava** participated in a comprehensive exercise involving the reporting process under the International Warning and Alarm Plan for the Oder, associated with the 29th meeting of the Working Group on Emergency Pollution of the International Commission for the Protection of the Oder (ICPO) in Eisenhüttenstadt, Germany, and Slubice, Poland.

As part of the collaboration with IMPEL, the Water and Soil Remediation Working Group has built on the successful completion of projects in the field of remediation technologies such as "Multi Phase Extraction" and "Soil Washing" with a Czech authorship footprint. They have initiated another project, a case study, focused on two new technologies, (bioremediation and thermal desorption). **The head of WPD TI CEI Ostrava**, as a co-author of the outputs from the mentioned projects and an active member of the working group, participated in the "Water and Land Remediation Conference" in November, which was held in Bucharest, Romania, as part of the IMPEL organization, during an official trip.

**In the field of nature protection**, employees of the CEI were active both within the framework of cooperation within IMPEL and outside this network. Within the framework of the IMPEL Nature Protection Expert Team, **inspectors from the NPD HQ CEI** participated in two virtual meetings, one in May and another in November. The participants were informed about ongoing projects and the outlook for the years 2023 and 2024. Through its **employees from the NPD HQ and NPD TI Havlíčkův Brod**, the CEI participated in an international conference on Project 220 in Schönsee, Bavaria, Germany, in April. The conference focused on the impact of agricultural activities on soil quality and environmental contamination in the Czech-Bavarian border region. It involved research implementation, an overview of legislation, and the presentation of findings, comparing the situation on the Bavarian and Czech sides of the border, with a focus on potential effects of climate change on soil conditions and fertility. **The employees of the NPD HQ CEI** also participated in numerous webinars and online meetings throughout the year. Some of these include the "OP Lake" webinar, which focused on international operations for the protection of eels and included the presentation of work results and plans for 2022 and 2023, a meeting regarding the acceptance of the revised EU Action Plan against wildlife trafficking in 2022, a webinar on the exchange of experiences among organizations Wildlife Crime in Central Europe within the "Envi Crime Empact" discussions, meetings related to "OP Thunder" for pre-operational talks on special operations, and the "EU Wildlife Trade and Enforcement Group" webinar.

As part of the "Bioval" project, **the CEI has its representative from NPD HQ** at the online "Virtual Nature Protection Expert Team Meeting" held in May. Additionally, employees from the **Department of International Protection of Biodiversity and CITES** participated in the online meeting "Nature Protection Expert Team Meeting Autumn 2022" in November, focusing primarily on ongoing projects („Bioval“, „Development of a Planning Tool Concerning Inspection of Nature 2000 Sites – NIRAM“, „The Implementation of the Bird and Habitat Directives at European Aerodromes“).

In the area of the **CITES** international convention, the CEI employees represent the Czech Republic at meetings of expert groups and commissions focused on the enforcement of laws related to the protection of endangered species. In September, the "Group of Experts of The Competent CITES Management Authorities" webinar was held with the participation of an inspector from **Department of International Protection of Biodiversity and and CITES HQ CEI** to prepare materials for the CoP 19 conference and then the May online meeting "EnviCrime – The Operational Action 3. 2 OAP 2021 EnviCrime EMPACT and in The Project AMBITUS", where the General Directorate of Customs, the Police of the Czech Republic and the CEI, as an institution actively involved in ENVI issues in the Czech Republic, presented their activities related to "enviocrime" in the field of CITES and waste management. In October, the "WPIEI (Working Party on International Environment Issues)" meeting was held in Brussels, Belgium, as part of the preparation of documents for the 19th session of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP 19). **A representative from the Department of International Protection of Biodiversity and CITES from HQ CEI** participated as an expert representative of the control and sanctioning body of CITES CR as part of the CR delegation. In November, the 19th regular meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP 19) was held, organized by the CITES Secretariat in Geneva in cooperation with the Government of Panama, this time in Panama City, Florida, USA, with the personal participation of **an inspector from the Department of International Protection of Biodiversity and CITES HQ CEI**. The 2nd CITES International Conference was held in Bojnice, Slovakia in September with the participation of **a team composed of employees of the Department of Inspection Activity Support and Chemical Safety, NPD HQ and NPD TI CEI Havlíčkův Brod**. The issue of CITES was discussed, especially in relation to the different approaches of the Czech and Slovak Republics with regard to the exchange of experience in the practical enforcement of the CITES convention and problems associated with legislation. In December, the annual "33rd INTERPOL Wildlife Crime Working Group (WCWG) Meeting" took place. On behalf of the CEI, **the inspector of the Department of International Protection of Biodiversity and CITES HQ** participated in this meeting.



In December, the Euractiv organization hosted a roundtable discussion on the topic of "Bohemian Forest/Oberpfälzer Wald in the times of climate change". The discussion forum on climate change in Europe and its impact on forest ecosystems on the shared border of Germany and the Czech Republic took place in Schönsee, Germany, with the participation of **the head of the FPD CEI Plzeň TI**.

Another area in which employees of the CEI regularly and significantly engage at the international level is inspection activities **in the field of chemical safety**, particularly within the framework of the European Chemicals Agency (ECHA). Throughout the year, **the head of the Department of Inspection Activity Support and Chemical Safety HQ CEI**, in selected cases alongside a colleague, participated in the 40th and 41st Plenary Meetings of the ECHA Forum, associated with the 15th and 16th Meetings of the Biocides Subgroup, the 42nd Plenary Meeting of the ECHA Forum, and two other meetings as the chairman of the working group for the ECHA Forum's pilot project on recovered substances. In May, he also participated in the meeting of the ECHA Forum's Working Group on Prioritization, and in November, he attended a workshop on the results of the ECHA Forum's pilot project on recovered substances. The workshop presented the project's outcomes and recommendations, including information exchange on the topic. During this project, 107 products were inspected in 11 EEA countries, including 12 in the Czech Republic, which is the second-highest number of inspections conducted. In November, training for trainers focused on safety data sheets took place, organized by the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, along with introductory meetings of national coordinators for the REF 11 project. **The head of the Department of Inspection Activity Support and Chemical Safety HQ CEI**, who is active within ECHA as a member of the Forum for Exchange of Information on Enforcement, is also a member of IMPEL ET Waste & TFS, the Waste Management and Circular Economy (WMCE) project, and the REACH and Circular Economy working groups. The topics of both working groups significantly overlap.

**In the field of integrated agendas**, experts from the **IAD CEI** participated in the international conference "ENVIRO 2022" in Štrbské Pleso, Slovakia, in May. The primary goal of the conference was to exchange practical and legislative experiences between both countries in the fields of waste management, air protection, climate, EIA issues, integrated prevention, BREF/BAT technologies. As part of the conference, there was also a field trip to a local paper manufacturing plant, which falls under the scope of the Slovak Integrated Prevention Act (IPKZ). Another activity within the integrated agendas, **involving employees from IAD CEI**, was the October visit to the international conference "IPKZ Process in the Slovak Republic and the Czech Republic" in Jasná – Demänovská Dolina, Slovakia. The so-called Slovak-Czech BAT FORUM 2022 was dedicated to the exchange of practical and legislative experiences between both countries in the field of integrated prevention, best available techniques, and environmental areas affected by integrated prevention.

In March, at the invitation of the Slovak Environmental Inspectorate, the inspector from the Department of Inspection Activity Support and Chemical Safety HQ CEI travelled to Slovakia, where he presented the findings of the CEI acquired in the field of experience with aerial work and methods of obtaining and processing data from unmanned vehicles at the seminar "Presentation and training seminar for increasing theoretical and practical knowledge in the use of spatial data collection technologies using unmanned devices and working with spatial data". In addition to the theoretical part, the seminar also consisted of a practical part. The data obtained from practice was used for sample data processing using programs for aerial photogrammetry and aerial laser scanning.

In September, a working visit from Slovakia took place **at the CEI premises**, when our colleagues from the **Department of Inspection Activity Support and Chemical Safety HQ** presented to their Slovak colleagues the method of measuring ivory using a spectrometer.

Foreign trips are typically undertaken to fulfill the contractual obligations of the Czech Republic within international organizations, agreements, and protocols on one hand, and activities directly related to EU membership on the other. In total, the CEI spent CZK 321,136 on foreign trips in 2022.



### 3.4 Communication with the public and media

In 2022, 43 press releases were issued and 340 media inquiries were answered. Due to the pandemic situation, the CEI did not hold any press conferences in the first half of the year.

According to the company Newton media, the CEI was mentioned in 3,005 articles in the media. Of these, 126 contributions were broadcast on radio, 129 on television, 612 articles were published in printed newspapers and regional titles, 2,119 in online titles. However, not all programs, especially in electronic media, are monitored by Newton media.



In 2022, the media were most interested in the following topics: accidents on the Bečva watercourse, waste dumps, illegal importation of waste, snowfall, fish deaths, destruction of nests, windstorms, illegal felling and forest clearance in connection with the construction of an entertainment centre Mole's world (Krtkův svět).

In June 2022, the CEI organized an Open Door Day for pupils and students on the grounds of the HQ and Olomouc TI, who could thus get to know the work of inspectors better.





## 4 CEI activity in 2022 by department

From the final decisions, examples of the highest fines imposed by individual CEI inspectorates on legal and natural business persons or decisions where operations/activities were restricted or stopped are selected in Chapter 4. These decisions are listed for each environmental protection component (air, water, waste, forest, nature) and for each CEI inspectorate. Examples of decisions for integrated agendas are given for the CEI as a whole.



### Overview of the CEI's work in 2022 by department

		Air protection	Water protection	Waste management	Nature protection and CITES	Forest protection	Integrated agendas	Total 2022
<b>Number of inspectors</b> ( <i>heads of departments + inspectors; final as of 31<sup>st</sup> December</i> )*		73	82	90	86	46	17	394
<b>Number of inspections</b>		2,946	2,468	3,101	2,387	1,072	648	12,622
<b>EIA statements (Act No. 100/2001 Coll.)</b>		Reported by IAD	Reported by IAD	Reported by IAD	Reported by IAD	Reported by IAD	893	893
<b>Other statements</b>		2,079	664	145	147	79	746	3,860
<b>Fines</b>	All fines imposed	289	421	702	668	84	44	2 208
	All fines that entered into force	287	412	689	646	80	46	2 160
	Total amount of fines in legal force (CZK)	11,081,000	30,462,261	42,528,000	10,588,150	8,305,000	6,660,000	109,624,411
<b>Other decisions</b>	Instances of halting or restriction to operations, a facility or part of it, in force	0	0	/	29	34	0	63
	No. of confiscations in force	0	/	/	132	/	/	132
	No. of remedial measures in force	1	19	6	36	59	0	121
<b>No. of emergencies (under air acts) and accidents (under Waters Act)</b>		170	210	/	/	/	/	380

\*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 2022

In 2022, inspection activities were carried out by inspectors from the Air Protection Department in areas related to air protection, ozone layer protection, and the Earth's climate system. This was done in full accordance with the scope defined in the current and effective legal regulations covering these environmental protection areas. Inspections covered both the fulfilment of obligations established by directly effective national legal regulations and EU regulations. Additionally, they included compliance with the obligations specified in permits for the operation of stationary air pollution sources. In total, 2,946 inspections were conducted, comprising 49.2% planned inspections and 50.8% unplanned inspections.

The numbers and distribution of inspections conducted in 2022 in various areas of jurisdiction corresponded to the severity of the activities being carried out and their impact on the environment. The highest number of inspections were conducted at facilities with stationary air pollution sources (2,425 inspections), along with related inspections of individuals authorized to measure emissions and prepare expert assessments (76 inspections). Furthermore, two inspections of individuals authorized to measure emissions and four inspections of individuals authorized to process dispersion studies were carried out. To a lesser extent, inspections were conducted to ensure compliance with conditions related to the protection of the Earth's climate system (377 inspections, including 78 inspections of facilities included in the emissions trading system for greenhouse gases permits, and 299 inspections of individuals handling fluorinated greenhouse gases) and protection of the ozone layer - stratospheric ozone (20 inspections). In connection with inspections related to compliance with obligations regarding the handling of regulated substances and fluorinated greenhouse gases, seven individuals performing activities requiring certification by the Ministry of the Environment were inspected. Additionally, a total of 35 inspections were conducted, which cannot be categorized into any of the aforementioned groups.

As a result of inspections conducted in 2022 and inspections conducted in the previous period with implications for proceedings in 2022, there were 287 legally binding decisions on fines for violations of obligations in the protection of the air, ozone layer, and Earth's climate system.

Specifically, there were 265 fines initiated in 2022 (totalling CZK 8,705,000), 18 fines initiated in the previous year (totalling CZK 1,760,000), and four fines initiated before 2021 (totalling CZK 616,000). The total amount of fines that became legally binding in 2022 was CZK 11,081,000. These legally binding decisions on fines addressed a total of 465 offenses (in 2021 - 414 offenses). An additional 7 offenses were resolved through admonishment (in 2021 - 6 offenses). In addition to individual inspections of compliance by operators of stationary air pollution sources, inspectors from this department also participated in 383 integrated inspections of facilities with integrated permits, where compliance with environmental protection conditions was checked (in 2021 - participation in 374 integrated inspections).

The total amount of fines imposed by air protection inspectors for violations of air protection conditions in separately conducted proceedings by this department reached CZK 9,262,000. For violations of conditions related to handling fluorinated greenhouse gases, fines amounted to CZK 679,000, and for violations of conditions related to handling regulated substances, fines reached CZK 1,080,000. In 2022, one fine became legally binding, imposed on the operator of a facility included in the emissions trading system for greenhouse gases (carbon dioxide) in the amount of CZK 60,000.

### 4.1.2 Overview of the performance of departmental tasks

#### 4.1.2.1 Air protection

**In the field of air protection**, departmental tasks in 2022 were fulfilled as part of five groups of departmental tasks, which are (1) monitoring the operation of sources based on permits from the air protection authority and in accordance with these permits, (2) compliance with prescribed pollution levels (emission limits and emission ceilings) and technical conditions that supplement or replace emission limits and emission ceilings, (3) assessing the level of air pollution, (4) record-keeping and reporting obligations, and (5) other obligations of entities operating stationary air pollution sources.

## 1. Inspections of the operation of stationary air pollution sources

During the inspections, it was found in 61 cases that operators of stationary air pollution sources listed in Annex No. 2 to the Air Protection Act, for which operation a permit from the air protection authority is required, were **operating sources without the necessary permits**. Fines totalling CZK 2,773,000 were imposed for these proven offenses.

During the inspections, it was found in 47 cases that operators of stationary air pollution sources listed in Annex No. 2 to the Air Protection Act, for which operation a permit from the air protection authority is required, were **operating sources in violation of their permits**. Fines totalling CZK 2,287,000 were imposed for these proven offenses.

During the inspections, it was found in 24 cases that operators of stationary air pollution sources with integrated permits were **operating sources in violation of the air protection conditions specified in the integrated permit**. Fines totalling CZK 1,907,000 were imposed for these proven offenses.

Since 2012, the operating permits also include **conditions for the operation of sources when exceeding threshold values of air pollutants** (smog warning and regulatory system), previously approved by the Czech Environmental Inspectorate as regulatory orders before 2012.

In 2022, no smog situation (with particulate matter expressed as PM10 as the key pollutant) was declared in the territory of the Czech Republic. Furthermore, since no regulation was imposed, the inspectors of the Air Protection Department did not conduct any inspections of sources with operating conditions when exceeding the threshold value of air pollutants.

The Czech Environmental Inspectorate did not issue any final decisions **to cease operations**.




## 2. Inspections of compliance with specified pollution levels and technical conditions

Exceeding **specific emission limits of pollutants and technical conditions that replace or complement emission limits** was detected in 21 cases. In proceedings with one offense and in proceedings with multiple offenses (cases where the most severe offense was involved), fines totalling CZK 747,000 were imposed for these violations, including CZK 467,000 (17 offenses, failure to comply with specific emission limits), CZK 80,000 (three offenses, failure to comply with technical operating conditions), and CZK 200,000 (one offense, failure to comply with emission ceiling, actions contrary to integrated permits). The most frequent violations included exceeding specific emission limits for nitrogen oxides (11 cases - combustion of gaseous and solid fuels in boilers), particulate matter (11 cases - combustion of solid fuels in boilers, foundry industry, spraying), carbon monoxide (nine cases - combustion processes), and volatile organic compounds (four cases - surface treatments involving painting, degreasing).

The control of compliance with prescribed levels of pollution (specific emission limits) and the impact of sources on the air were also carried out through measurements conducted by the staff of the Air Protection Department of the Czech Environmental Inspectorate Headquarters. Direct measurements determined the concentrations of ten pollutants (eight gaseous substances and two solid substances), and two samples of odorous substances were analysed in the laboratory. In order to assess the impact of sources emitting odorous substances on the air, air samples were collected by inspectors of the Air Protection Department of the Headquarters and analysed using dynamic olfactometry. In both cases, it concerned sources for which specific emission limits for odorous substances were not set. The results of these measurements were used to objectify the pollution levels in addressing complaints.



### 3. Inspections of air pollution level determination



In 2022, the Czech Environmental Inspectorate reviewed **compliance with the obligation to determine and assess the level of air pollution** through direct measurements by authorized individuals, either through one-time measurements or continuous measurements conducted by the operator. Operators of pollution sources were required to submit measurement results protocols to the Inspectorate within the specified timeframe. In 44 cases, violations of the obligation to perform one-time emission measurements were identified. For these violations, fines totalling CZK 796,000 were imposed in proceedings with one or multiple violations (cases involving the most serious violations). In 41 cases, operators failed to fulfil the obligation to submit measurement result protocols to the Inspectorate. For these violations, fines totalling CZK 167,000 were imposed in proceedings with one or multiple violations (cases involving the most serious violations). Five cases of late submission of protocols were addressed through warnings.

In 2022, the Czech Environmental Inspectorate conducted inspections in 82 cases to verify compliance with the obligations of individuals authorized by the Ministry of the Environment to prepare expert assessments and dispersion studies, conduct one-time emission measurements, and perform emission measurements. During these inspections, no violations of the obligations of authorized individuals were identified. The reviewed expert assessments did not exhibit any formal deficiencies.

### 4. Inspections of Record-Keeping and Reporting Obligations

Failure to **maintain or retain operational records or to report data from summary operational records** was identified in 136 cases involving operators of stationary air pollution sources (128 cases of failure to report data from summary operational records and eight cases of failure to maintain/retain operational records). For this violation, fines totalling CZK 442,000 were imposed in single-offense cases and cases involving multiple offenses, with the breakdown as follows: CZK 395,000 for failure to report data from summary operational records and CZK 47,000 for failure to maintain/retain operational records. One case of failure to report data from summary operational records within the specified timeframe was addressed through a reprimand.

### 5. Inspections of other obligations of operators of stationary air pollution sources

During the inspection activities, violations of other obligations and prohibitions for air protection were identified. In nine cases, the burning of unauthorized materials in an open fire was identified, and fines for violating this prohibition amounted to a total of CZK 125,000. In four cases, the incineration of waste in an unauthorized source was identified, and fines totalling CZK 133,000 were imposed. Furthermore, sanctions were applied for failure to provide information about the source, failure to create conditions for inspection, failure to report a hazardous condition, and operation in violation of conditions stipulated by legislation, manufacturers, and suppliers.

#### 4.1.2.2 Protection of the Earth's Climate System

One of **the tools for protecting the Earth's climate system** is the prevention of greenhouse gas leakage and gases that absorb infrared radiation. This involves monitoring compliance with conditions for handling fluorinated greenhouse gases and adhering to the conditions set for facilities included in the greenhouse gas emissions trading system.

As a result of the conducted 297 inspections of operators of equipment containing fluorinated greenhouse gases and other entities handling fluorinated greenhouse gases, 28 violations were identified, leading to the imposition of 17 fines totalling CZK 387,000. In one case, the operator did not have records of equipment with F-gases on the premises at the time of inspection. In other cases, the violations consisted of failing to ensure the tightness of equipment containing F-gases. This year, the Air Protection Department also focused on targeted inspections of operators of equipment with fluorinated greenhouse gases in banks. Banks were inspected in specific designated periods. The results of these inspections subsequently led to joint proceedings led by selected territorial inspectorates.

Further inspections were conducted on certification bodies. As a result of these two inspections, 19 violations were identified, and two fines were imposed, totalling CZK 40,000. These violations pertained to certification bodies that failed to inform the Ministry of Environment and the Czech Environmental Inspectorate of the location and date of the relevant examination. Additionally, these cases involved violations related to the failure to submit a list of individuals who obtained certificates in the previous calendar year and the failure to report changes in the identification details of the certification body to the Ministry of the Environment.

Another area of inspection involved importers of F-gases in equipment that were introduced to the market in the Czech Republic. These inspections took place at the end of 2021, and for 22 proven violations, 11 fines were imposed in 2022, totalling CZK 252,000. These violations included the introduction of equipment with F-gases to the market without accounting for quotas, as well as the failure to submit a verification document to the European Commission or the failure to prepare a declaration of conformity confirming the inclusion of F-gases in the quota system.

In 2022, a total of 78 inspections were conducted on stationary facilities included in the emissions trading system for greenhouse gases. One violation was proven, which involved operating without a permit from the Ministry of the Environment, resulting in a fine of CZK 60,000.

#### 4.1.2.3 Protection of the ozone layer

**Protection of the ozone layer** (stratospheric ozone) from the effects of substances that harm it ("regulated substances") involves preventing the release of regulated substances from equipment that contains these substances, particularly as refrigerants and extinguishing agents. Regulated substances are gradually being replaced by substances with lower Ozone Depletion Potential (ODP), and the numbers of equipment containing them are decreasing. However, one type of regulated substances, known as "halons," is still used for critical applications as extinguishing agents. Considering the overall reduction in their use, relatively fewer inspections were conducted in this area compared to equipment containing fluorinated greenhouse gases.

As a result of 20 inspections regarding compliance with obligations related to handling regulated substances, a total of three violations were identified. The most serious violation involved not decommissioning fire protection systems containing halons installed in a nuclear power plant before the deadline specified in Annex VI of Commission Regulation (EU) No 744/2010, i.e., by December 31, 2020, and failing to ensure the recovery of these halons from the systems for disposal, along with their transfer to a holder of a certificate for their disposal. A fine of CZK 1,000,000 was imposed for this violation. In the other two cases, it involved not conducting leakage checks on equipment containing regulated substances. Fines totalling CZK 80,000 were imposed for these violations. These proceedings also addressed violations related to the failure to conduct leakage checks on equipment containing F-gases.

The Czech Environmental Inspectorate, as the administrator of the fee for the import and production of regulated substances, inspected compliance with the fee obligation of individuals who introduced regulated substances to the market. A total of CZK 121,318 was remitted to the account of the Czech Environmental Inspectorate based on the obligation stipulated by Act No. 73/2012 Coll. This includes the fee for importing regulated substances, which must be individually calculated and paid to the account of the fee administrator by April 30th of the year following the calendar year in which the fee obligation arose, along with any accrued interest on arrears.



#### 4.1.3 Overview of specific task fulfilment

Due to the extensive nature of the departmental tasks covering all inspection activities of air protection inspectors in the areas of air protection, the Earth's climate system, and the ozone layer, no specific tasks were assigned for 2022.





#### 4.1.4 Significant cases based on the amount of fines imposed and decisions on cessation of operation

##### Praha TI

The CEI imposed a fine of CZK 250,000 on the LASSELSBERGER, s.r.o. company for operating a facility for the production of porous ceramic tiles in Lubná u Rakovníka in violation of a binding condition specified in the integrated permit, which involved exceeding the emission limit for organic compounds expressed as total organic carbon (TOC) in the pre-dryer.

##### České Budějovice TI

The CEI imposed a fine of CZK 150,000 on the company MABA Prefa spol. s r.o., located in Veselí nad Lužnicí, for operating stationary air pollution sources – a concrete plant and a steam generator for the concrete plant's technology without the permission of the air protection authority and for not reporting data in the comprehensive operational record.

##### Plzeň TI

The CEI imposed a fine of CZK 280,000 on the company NOTEZA, spol. s r.o., for operating a technology for painting metal structures in outdoor spaces in Rokycany without the permission of the air protection authority and for not reporting data in the comprehensive operational record.



The application of coating materials in the outdoor area of the facility in Rokycany.



### Ústí nad Labem TI

The CEI imposed a fine of CZK 200,000 on the company ENERGY Ústí nad Labem, a.s. for operating the facility "Energetika - combustion of fuels in facilities with a total nominal thermal input of 50 MW and more" in violation of the integrated permit, as the emission limit for sulphur dioxide was not adhered to.

### Liberec TI

The CEI imposed a fine of CZK 55,000 on the company BENEŠ ENERGO s.r.o. for operating a stationary combustion source in Velké Hamry without the permission of the air protection authority and for not measuring the pollution levels at this source.

### Hradec Králové TI

The CEI imposed a fine of CZK 150,000 on the company Trivium Packaging Czech Republic s.r.o. for operating a facility for the surface treatment of objects and products in Skřivany in violation of the conditions set in the integrated permit. The company did not quantify the specific production emissions of volatile organic compounds in the mass balances of organic solvents and did not determine the proportion of fugitive emissions by calculation.



Surface treatment of objects and products in Skřivany - printing.



### Havlíčkův Brod TI

The CEI imposed a fine of CZK 180,000 on the production cooperative Dřevozpracující výrobní družstvo for violating obligations in operating air pollution sources in the production plants in Jaroměřice nad Rokytnou and Nové Syrovce. This includes operating two paint shops and furniture production technologies without current permits, inadequate maintenance of operational records, exceeding the emission limit for volatile organic compounds in the paint shop, failure to submit emission measurement protocol to the CEI, and operating a reconstructed gas boiler room without a change in the operating permit.

### Brno TI

The CEI imposed a fine of CZK 80,000 on the company Franver, s.r.o. for operating a mobile crushing unit for the purpose of recycling construction waste in the Brno Exhibition Centre without the required permit.



Dust generated by the operation of the mobile crushing unit in the Brno Exhibition Centre area.



### Olomouc TI

The CEI imposed a fine of CZK 700,000 on the company EKOTERMEX, a.s. for operating a waste incineration plant in the municipality of Pustiměř in violation of the conditions stipulated in the operating permit, especially for waste disposal at a lower temperature and for failing to ensure the proper operation of technical means for continuous emission measurement.

### Ostrava TI

The CEI imposed a fine of CZK 80,000 on the company SKATLOP a.s., Ostrava, for operating the "Steel Production and Processing" facility in violation of the integrated permit, specifically for carrying out oxygen lance heating of materials in an outdoor area of the billet storage yard, outside the indoor premises.



Oxygen lance heating of materials in an outdoor area of the billet storage yard.

### Headquarters – Air Protection Department

The CEI imposed a fine of CZK 1,000,000 on the company ČEZ, a.s. for failing to decommission fire protection systems containing halons at the Dukovany Nuclear Power Plant within the specified deadline.





#### 4.1.5 Conclusions of inspection activities

The inspections carried out by the Czech Environmental Inspectorate covered the entire scope of its activities in the areas of air protection, ozone layer, and the Earth's climate system, as defined in both directly effective national legally binding regulations and EU regulations.

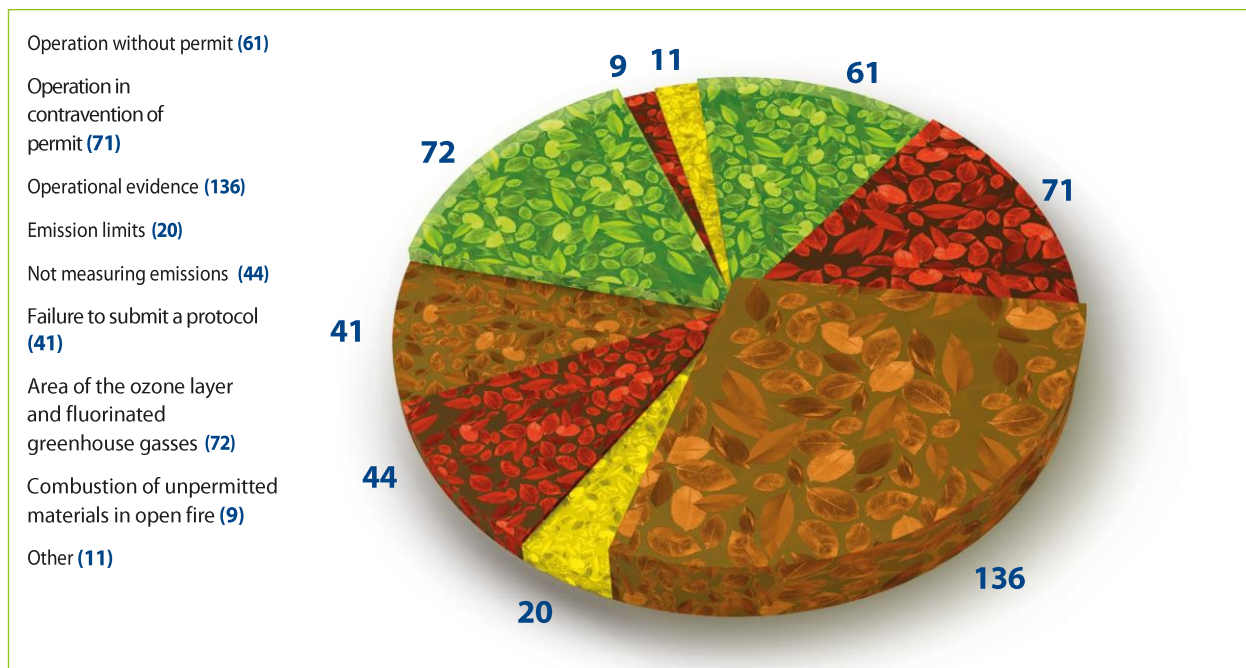
Compared to 2021, the activity in terms of numbers was not significantly different, but there was a slight numerical increase. This can be attributed to the fact that the activities were carried out without restrictions related to the COVID-19 pandemic throughout the entire year. Specifically, in 2021, a total of 2,813 inspections were conducted, and 414 violations were processed. In 2022, there were 2,946 inspections and 465 violations processed in the form of final fines.

The numbers of cases related to operating air pollution sources without permits and operating in violation of valid permits have remained at a similar level compared to 2021. The same trend is evident in cases of exceeding specific emission limits, with the main pollutants being nitrogen oxides, particulate matter, carbon monoxide, and volatile organic compounds, as observed in the previous year. The majority of findings in this area were related to combustion sources listed in Appendix No. 2 to the Air Protection Act under code 1.1. Similarly to 2021, common and most frequent violations in the record-keeping and reporting area include failure to submit summary operational records on time, incomplete record-keeping, and failure to submit emission measurement protocol to the Inspectorate on time, making up 38 percent of the total number of violations. Operating without a permit and operating in violation of it accounted for 28 percent of violations.

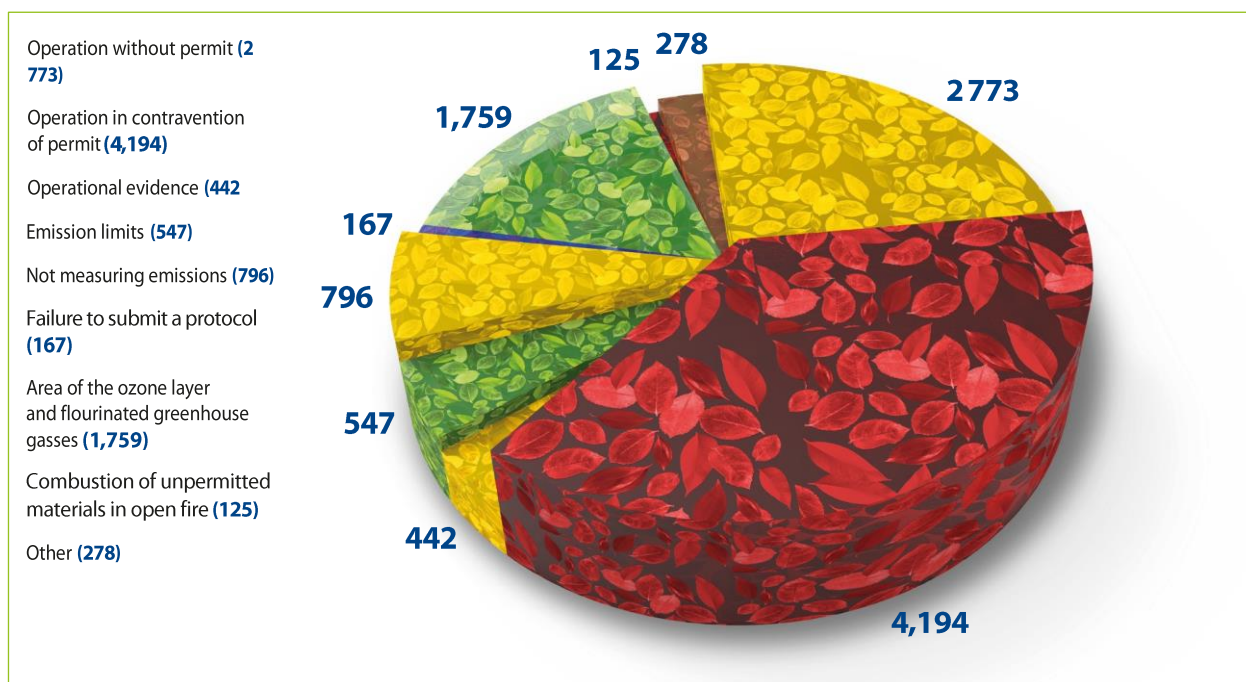
The Inspectorate paid attention to the protection of the Earth's climate system, both in terms of preventing the release of fluorinated greenhouse gases and ensuring compliance with the conditions for facilities included in the emissions trading system for greenhouse gases. Despite the decreasing use of substances harmful to the ozone layer - regulated substances, three violations of the conditions for handling these substances were processed in 2022 (failure to remove a fire protection system containing halons, failure to conduct leak tests on equipment containing regulated substances).



**The number of violations in the field of air protection, ozone layer, and the Earth's climate system discussed in penalty proceedings in 2022.**



**Fines imposed for violations of air, ozone layer, and Earth's climate protection conditions by offenses in 2022 (in thousands of CZK)**





## 4.2 Water protection and prevention of major industrial accidents

### 4.2.1 Overview of inspection activity in 2022

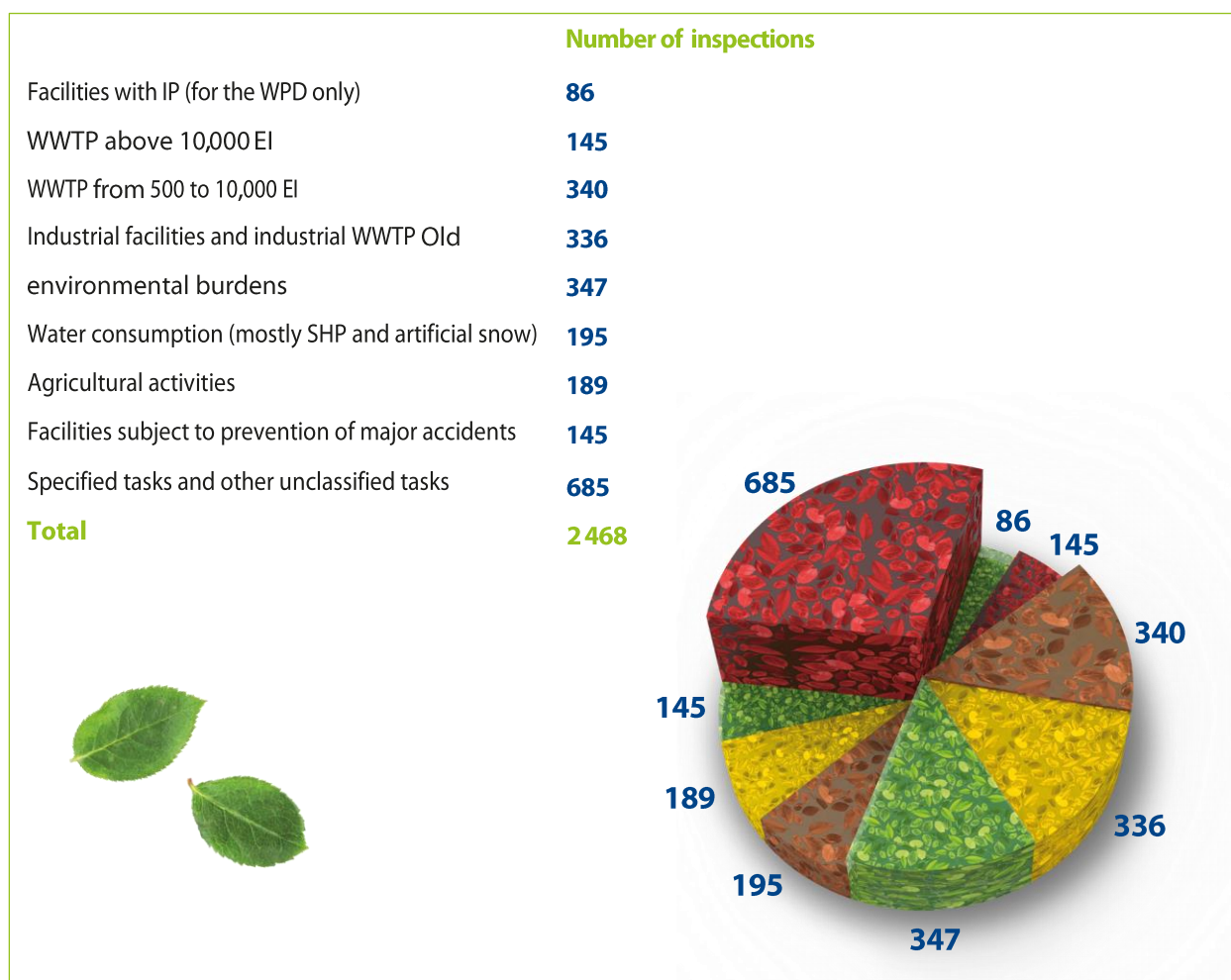
The inspection activities in 2022 were carried out in the entire scope of responsibility in the area of water protection and the prevention of serious accidents. Compliance with the obligations arising from Act No. 254/2001 Coll., on Water, and Act No. 224/2015 Coll., on the Prevention of Serious Accidents, as well as obligations imposed by water management decisions, was inspected.

In 2022, the WPD conducted a total of 2,468 inspections under the Water Act and the Act on the Prevention of Serious Accidents. This number included 50% planned inspections (1,232) and 50% unplanned inspections (1,236). In addition, inspectors from the WPD conducted 404 additional inspections in collaboration with other authorities to ensure compliance with the obligations set forth in Act No. 76/2002 Coll., on Integrated Prevention.

The primary focus of the Water Protection Department (WPD) inspectors' activities lies in conducting inspections as part of planned main and component tasks, which address the priority issues in water protection throughout the country. Furthermore, they perform inspections as part of specific tasks that target region-specific concerns. An important portion of their activities consists of unplanned inspections, which are carried out based on suggestions or responses to extraordinary events.

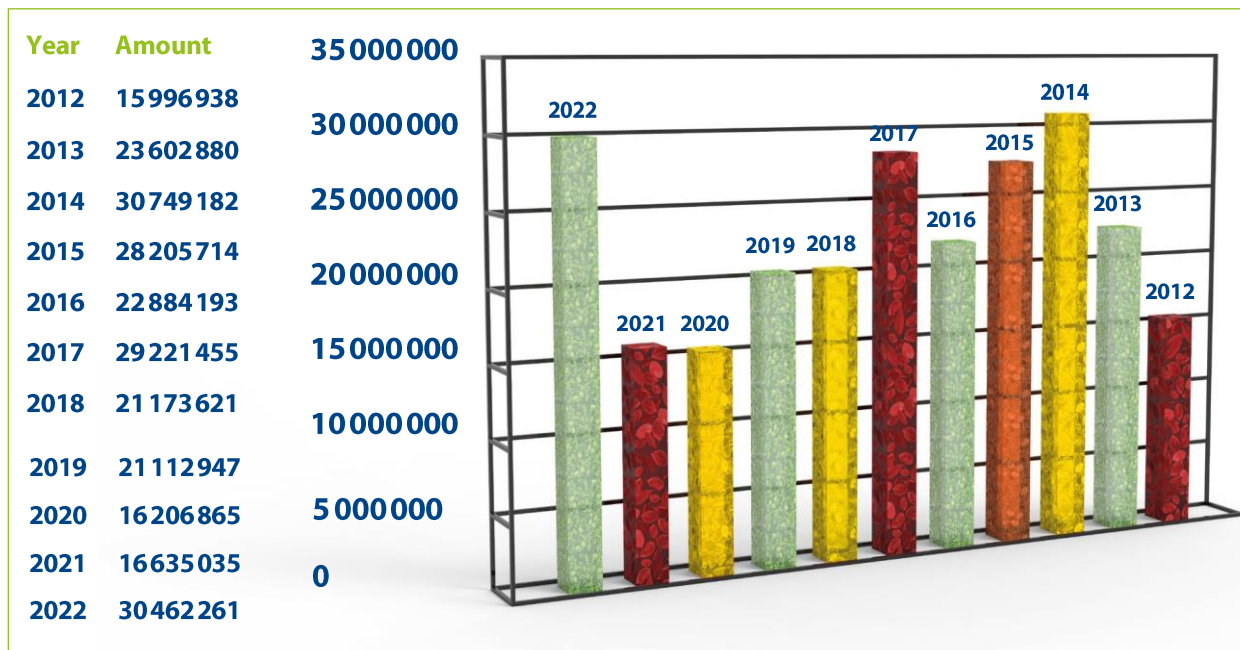
The numbers and distribution of inspections corresponded to the significance of the operations and their impact on the environment. The majority of inspections were conducted at wastewater treatment plants, industrial facilities, including those falling under the Act on the Prevention of Serious Accidents, water abstractions, agriculture, and sites with the presence of old environmental burdens (OEB).

### Distribution of inspections carried out in 2022



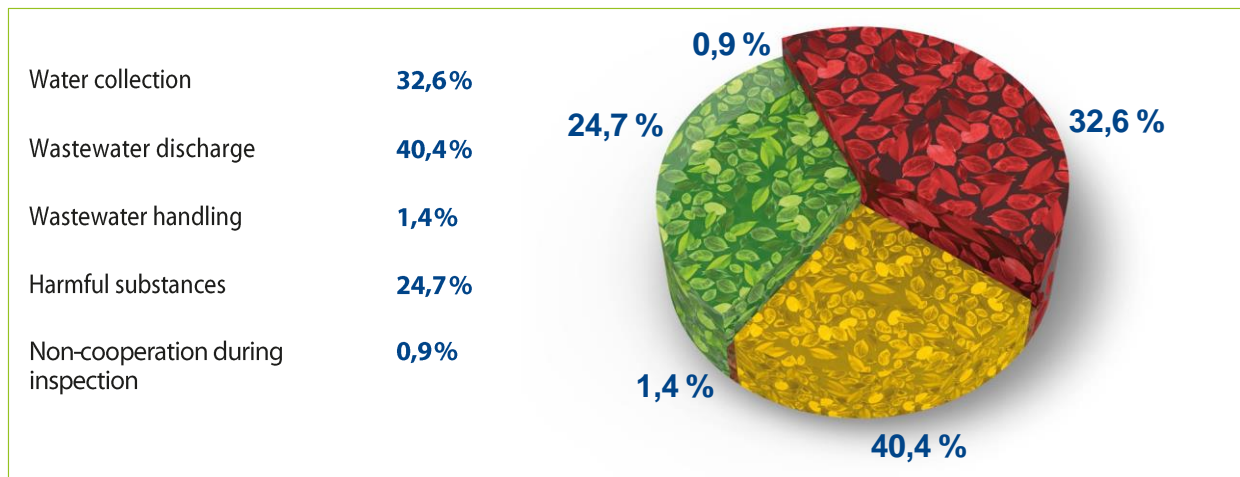
A total of 430 misdemeanour proceedings were initiated based on the inspection activities, resulting in 421 final penalty decisions with a total penalty amount of CZK 30,462,261. Additionally, WPD inspectors collaborated on issuing seven decisions within inspections of enterprises with integrated permits (IP), as noted in Chapter 4.7. and in one case, the WPD also cooperated in issuing a decision related to the handling of waste mercury without the permit of the respective regional authority (Section 21 Para. 2 of Act No. 541/2020 Coll.). In this joint proceeding by the WMD and the WPD, a final penalty of CZK 1,200,000 was imposed. The majority of fines were imposed by WPD based on the results of unplanned inspections. To address the identified deficiencies and faulty conditions, 22 decisions with imposed corrective measures were issued in 2022, of which 19 decisions became legally effective in 2022.

### The amount of fines in force



In terms of delicts committed, the decisions on fines can be divided into five 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 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.).

### The proportional distribution of fines in legal force into five basic categories according to the committed delicts





By Act No. 113/2018 Coll., the issuance of advance payments was abolished as of January 1, 2019. Simultaneously with this amendment to the Water Act, all fee matters were transferred to the State Environmental Fund of the Czech Republic. In 2022, the CEI did not issue any decisions in the fee agenda.

A significant part of the inspection activity of the WPD inspectors involves handling complaints - as detailed in Chapter 3. WPD inspectors prepared a total of 1,945 responses, both independently on behalf of the WPD (664) and as part of consolidated responses (1,281).

WPD inspectors collaborate with other state authorities and institutions (such as water management authorities at all levels, the State Environmental Fund of the Czech Republic, the Ministry of Finance of the Czech Republic, the Povodí Companies, the Fire Rescue Service, the T. G. Masaryk Water Research Institute, Regional Offices, etc.). In the context of international cooperation, they interact with environmental authorities in neighbouring countries and participate in negotiations of international commissions for water protection. Further details are specified in Sections 3.2 and 3.3.



## 4.2.2 Overview of fulfilment of main and departmental tasks

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

The Integrated Prevention Act covers the most significant sources of water pollution. The focus of inspections is determined based on the specific conditions of the facilities and the requirements of territorial inspectorates. The inspections conducted by WMD inspectors were aimed to ensure compliance with the water management aspects of the integrated permit (IP), particularly related to groundwater and surface water collection, wastewater discharge, handling of hazardous substances, validation of the IP, verification of operational records, the currency of emergency plans, and their preparation in accordance with Act No. 450/2005 Coll.

Within the scope of this task, 490 inspections were conducted. WPD inspectors, in collaboration with other authorities, conducted 404 integrated inspections, and they also independently conducted an additional 86 inspections. A total of 42 sanction decisions issued by the WPD gained legal force, resulting in a total penalty of CZK 3,333,000. This includes two decisions amounting to CZK 150,000 for non-cooperation during inspections under the Control Act. The most frequently identified offense was exceeding emission limits in discharged wastewater. Detailed information regarding inspections conducted under the Integrated Prevention Act is presented in Chapter 4.7. Integrated Agendas. In 2022, the WPD did not issue any reprimands or corrective measures.

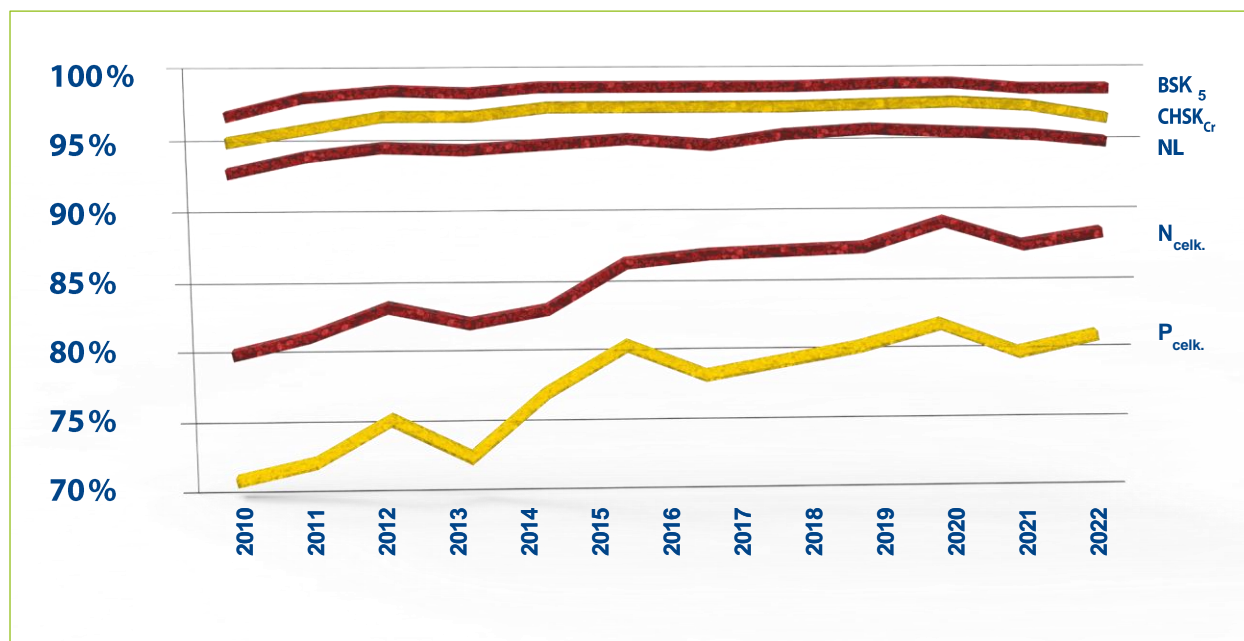
### Inspection of the most significant municipal wastewater treatment plants with a capacity exceeding 10,000 EI

The aim of the inspections of the most significant municipal wastewater treatment plants (WWTPs) was to physically verify the water law status of the WWTPs, compliance with Council Directive 91/271/EEC on urban wastewater treatment, and Government Regulation No. 401/2015 Coll., on indicators and values of permissible pollution of surface waters and wastewater, requirements for permits to discharge wastewater into surface waters and sewers, and sensitive areas. Emphasis was placed on determining the actual state of pollution generated and discharged from individual sources and all other factors that could affect the functioning of the WWTPs and thus the amount of discharged pollution.

In 2022, 145 inspections of municipal wastewater treatment plants with a capacity exceeding 10,000 EI were conducted. Based on these inspections, the WPD inspectors found that sources in this category do not frequently or significantly violate the Water Act. As a result of the inspections carried out in 2022 and those from previous periods, five legally binding fines were imposed, totalling CZK 250,000. The statistics from the period 2015-2022 show that only an average of 3.4% of inspections resulted in sanctions annually. Legal fines were imposed for exceeding permitted emission limits of pollution specified in water permits and for discharging wastewater without a permit from the water authority. In 2022, the WPD did not issue any reprimands or corrective measures.

In WWTP with a capacity exceeding 10,000 EI, regular inspections are carried out at specified intervals. The results of these inspections unequivocally demonstrate that the realized reconstructions of the structural and technological units of the WWTP lead to a gradual improvement in the quality of the discharged wastewater at the plant's outlet, thus resulting in a significant reduction in the discharged waste into the surface water. This observation is also supported by the observable trend of increasing efficiency in wastewater treatment, especially concerning the widely discussed indicator of total phosphorus (see the schematic graph of average pollutant removal efficiency). The need for higher efficiency in removing dissolved phosphorus and nitrogen remains an important topic in wastewater treatment.

### Efficiency balance from 2010 to 2021



For all municipal WWTPs of this category, the balance data for the year 2021 have been examined, and it shows that 5.4 million cubic meters of wastewater were treated, which is 400,000 cubic meters less than in 2020. The efficiency of treating urban wastewater in these WWTPs was 98.4% for the BOD<sub>5</sub> indicator, 94.9% for the COD<sub>Cr</sub> indicator, 97% for the NL indicator, 81% for the N<sub>total</sub> and 88.3% for the P<sub>total</sub>. Government Regulation No. 401/2015 Coll. in Annex 7 establishes attainable concentration values and efficiencies for individual pollution indicators when using the best available technology in the field of municipal wastewater treatment. The efficiency of wastewater treatment in the monitored WWTPs exceeds the efficiency values established as the best available technology by 3% for the BOD<sub>5</sub> indicator, 10% for the COD<sub>Cr</sub> indicator, 6% for the N<sub>total</sub> indicator, and 3% for the P<sub>total</sub> indicator. The required efficiency of wastewater treatment set by Government Regulation No. 401/2015 Coll. and Council Directive No. 91/271/EEC has been achieved in the monitored WWTPs.

### Inspection of municipal wastewater treatment plants in the category of 500 to 10,000 EIs

The physical inspection of wastewater treatment plants in the category of 500 to 10,000 EI was focused on compliance with the conditions set by the water management authority for the establishment of these waterworks, adherence to the conditions of the permit for wastewater discharge, considering the manner in which they are operated and monitoring their operation by polluters. Additionally, it aimed at ensuring compliance with the provisions of the Water Act regarding fees for discharging wastewater into surface waters by polluters.

In the year 2022, a total of 340 inspections were conducted as part of this task, of which 126 were unscheduled. Inspections were primarily carried out for the review and documentation of wastewater treatment plants that had not been previously inspected, those that had not been inspected for an extended period, or those with identified legal violations or other operational issues. The inspection results resulted in the issuance of 48 legally binding penalty decisions totalling CZK 2,888,000 and 26 administrative penalty proceedings for violations discovered in 2022 will be conducted in 2023. From the statistics for the period between 2015 and 2022, it is evident that an average of 14% of inspections were concluded with sanctions each year. The most common violations over the long term included exceeding permitted pollution emission limits and discharged wastewater volume, failure to adhere to the frequency of sampling inspections, and discharging wastewater without the authorization of the water management authority. In 2022, no corrective measures were imposed by the WPD and only one reprimand was issued.



From the list of penalties, it is apparent that more significant operational deficiencies persistently and regularly occur at WWTPs operated by municipalities, small towns, or voluntary municipal associations. Water supply companies, based on their long-term experience, the expertise of their personnel, and the scope and availability of technical resources, typically operate treatment plants with few major deficiencies and without technological deviations affecting the quality of discharged wastewater.

Inadequate removal of biogenic elements ( $P_{\text{total}}$ ,  $N_{\text{total}}$ , and ammonium nitrogen) is a persistent problem in the field of wastewater treatment. For smaller WWTPs categorized between 500 to 10,000 EI, Government Regulation No. 401/2015 Coll. does not establish maximum or permissible concentration values for phosphorus. Many smaller WWTPs lack the technology for phosphorus removal and do not monitor the amount of discharged phosphorus. This unsatisfactory situation could potentially be addressed through a revision of the European Parliament and Council Directive on urban wastewater treatment 91/271/EEC, which, among other things, proposes new requirements for tertiary wastewater treatment, including emission standards for total phosphorus in treated wastewater.

With the increasing public interest in the condition of surface and groundwater in recent years, the number of unplanned inspection checks based on citizen suggestions has significantly risen.

#### Inspection of industrial entities handling hazardous substances.

The inspections were primarily focused on significant industrial areas where hazardous substances are stored or handled on a larger scale. The inspection investigations also included checking industrial WWTPs (neutralization or emulsification stations). These inspections primarily focused on ensuring compliance with the conditions of permits for wastewater discharge into surface waters and sewers. An integral part of these inspections was the examination of industrial entities operating ammonia systems (such as winter stadiums or refrigeration facilities).

Within the scope of this task, 336 inspections were conducted, including the examination of 28 entities with ammonia systems and 49 entities operating neutralization stations. The most common deficiencies observed included the absence of an emergency plan for accidents, exceeding emission limits at industrial WWTPs, unauthorized discharge of wastewater, and non-compliance with obligations for handling hazardous substances (waterproofing reservoirs against leaks of stored substances, tank leak tests, etc.). In 2022, 63 decisions became legally effective, totalling CZK 4,038,000, including one decision for CZK 10,000 for non-cooperation during an inspection according to the Inspection Act. In 2022, no reprimands or corrective measures were imposed by the WPD.



A view of the internal part of the technology



A view of the internal part of the technology



Among the significant cases within this task, there is a case involving **the company SPRESO s.r.o. in liquidation**. The CEI imposed corrective measures on the company by decision in the wording of the appellate body's decision, which became legally effective on October 18, 2021. The measures require the removal of sediment sludge deposits located on an area of approximately 12,373 square meters designated as arable land in the cadastral area of Kralice na Hané, with a total quantity of approximately 15,323 cubic meters, or approximately 19,000 metric tons (at a coefficient of 1.24 t/m<sup>3</sup>). One of the conditions of the corrective measures was to remove at least 20% of the total sediment sludge deposits from the site within one year from the legal effectiveness of the decision, which is October 18, 2022. The company's activities were monitored continuously by the CEI. However, within the specified timeframe, no work was initiated. The removal of sludge only began in December 2022 and is ongoing. After evaluating the situation, the CEI will decide to initiate non-monetary execution proceedings. Considering that the mentioned company has taken legal steps towards its dissolution and removal from the commercial register, which could thwart the state's claim for compliance with the mentioned corrective measures, the CEI issued a decision in January 2022 according to Section 84, paragraph 1 of the Offenses Act, which prohibits the dissolution of the company.

### **Inspection of the remediation of old environmental burdens and long-term incidents affecting groundwater**

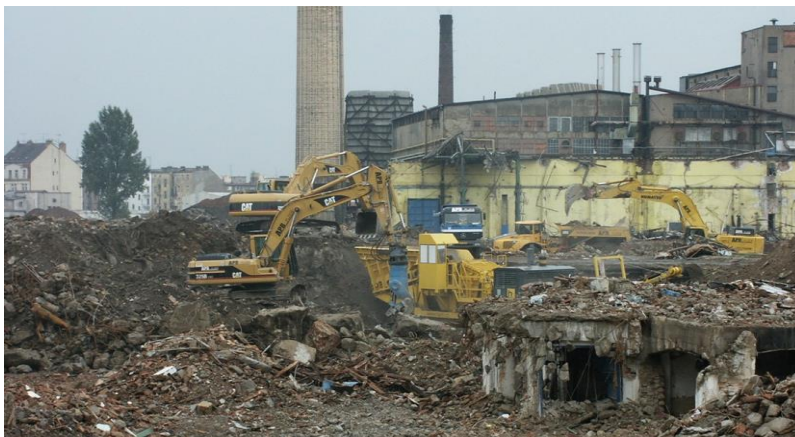
In 2022, as part of the ongoing component task, inspectors continued to oversee the progress in resolving problematic conditions at sites with old environmental burdens, long-term incidents affecting groundwater, and areas contaminated due to the presence of Soviet forces.

Sites with old environmental burdens (OEB) are remediated based on an environmental agreement concluded between the acquirer and the state, with the process being overseen by the CEI, which also issues corrective measures, with oversight by the Ministry of the Environment (MoE) and the Ministry of Finance (MF), which supervise the financing of remediation work. In addressing long-term incidents, significant assistance comes from national grant programs or EU programs, especially when the culprits of the problematic conditions are unknown. In such cases, the inspection authority cannot impose corrective measures. The remediation of sites related to the former Soviet army is handled by the MoE in cooperation with the CEI.

Supervision of OEB remediation takes place through participation in inspection days combined with on-site visits in the presence of all relevant stakeholders in the process. Ensuring the continuity of the remediation process between different work stages is crucial for its smooth progress. This primarily involves preventing situations where prolonged inactivity in subsequent work stages could lead to the recontamination of areas already remediated. This assumption is not always fulfilled, mainly due to the presence of new technical circumstances that often alter the process methodology and due to inadequate guarantees. In such cases, alternative solutions may involve monitoring or protective remediation pumping until the actual remediation work commences.

Significant remediation cases continue to include SPOLANA, a.s., where preparations for the remediation of additional specific sites within the Neratovice area are being made, the well-known Nelahozeves landfill, and the UNIPETROL, a.s. in Litvínov, where extensive remediation of contamination plumes within the plant area continued last year. Preparations for the remediation of the Uhlodehta landfill were made, and the reclamation of the R3 and R4 Růžodol Farmak, a.s. landfills was initiated, where comprehensive remediation work continued and at Laguny DIAMO, where excess sludge from the former refinery operation was successfully removed by 2020, but subsequent remediation work has been complicated by differing perspectives of the regulatory authorities on their execution.

In 2022, as part of this departmental task, WPD inspectors conducted 347 inspections at OEB and long-term incident sites. A total of 14 decisions on corrective measures were issued (13 of which became legally effective), and one decision on a fine became legally effective, with a fine amounting to CZK 200,000. Three environmental agreements were terminated during the year – LEMANT FINANCE, s.r.o. (formerly AVIA, a.s.), HARTMANN – RICO, a.s., and ČEZ korporátní služby, s.r.o., specifically at the MTZ site on Sokolská Street in Ostrava.



Demolition of the galvanizing plant operation



### **Inspection of water collection (especially from surface sources).**

In this task, inspection activities were focused on issues related to water collection, with an emphasis on compliance with water permits (specifically, adherence to minimum residual flow) and not exceeding the authorized volume of water extraction, whether from surface or groundwater sources. During the summer months, inspections primarily targeted water collections for small hydroelectric power plants. In the winter season, inspections were carried out at ski resorts where water is used for artificial snowmaking on ski slopes. In 2022, a total of 195 inspections were conducted. Legal force was gained for 35 decisions on fines, totalling CZK 4,527,092, and one decision on a reprimand. The most common findings were related to exceeding the authorized volume of water extraction for drinking or utility water supply, such as irrigation. For small hydroelectric power plant operations, non-compliance with the conditions set for equipment operation resulted in falling below the minimum residual flow in watercourses.



Failure to comply with the minimum residual flow.

Based on an investigation initiated by a complaint, the CEI issued a preliminary decision on November 11, 2022, regarding the cessation of all construction activities related to the "Bystrovany – kabelové vedení kVN" construction in the municipalities of Bystrovany and Holice near Olomouc. The reason for this action was that the work was being carried out without proper authorization within the protective zone of a second-degree water source, as defined by a public decree – a general measure, and was not supported by relevant administrative acts (binding opinions or decisions of the water management authority and consent from the water source operator). Simultaneously, a decision was made to initiate administrative proceedings to halt construction activities until the resolution of the water law-protected interest – the protection of the water source or the legal effect of the consent from the locally competent water management authority in the respective matters.

### **Inspection of agricultural enterprises in terms of compliance with the Water Act requirements**

Inspections at the entities were focused on complying with legal requirements, especially ensuring safe handling of specific hazardous substances used in agricultural activities. Physical inspections were carried out at the entities, with a particular focus on the water management safety of mineral and organic fertilizer storage, bulk feed storage, petroleum product storage (including fuel stations), and plant protection product storage. As part of the inspection activities, field storage, manure pits, stable areas, manure disposal, and the handling of solid and liquid manure were monitored. The handling

of fermentation residues, digestate, fugate, silage juices, and agrochemicals was also examined. The handling of water in pasture areas was also inspected, and the water supply to individual facilities as well as the drainage of wastewater and rainwater from these operations was examined. Operational procedures and emergency plans were also inspected as part of this task.

A total of 189 inspections were conducted. Based on these inspections and inspections from previous years, 76 legally binding decisions on fines were issued, totalling CZK 9,549,130. This includes one fine for non-cooperation during an inspection, amounting to CZK 30,000, in accordance with Act No. 255/2012 Coll., on Inspection.

The inspections revealed deficiencies in handling hazardous substances and identified shortcomings in water management practices. The CEI will continue to work with water management supervision at agricultural enterprises because ensuring compliance with legal requirements positively impacts the agricultural businesses' management concerning water protection.



The leak of digestate in the biogas plant area

### **Inspection of compliance with Act No. 224/2015 Coll., on the Prevention of Major Accidents**

The inspections were conducted in accordance with Act No. 224/2015 Coll., which incorporates current European regulations, particularly Directive 2012/18/EU of the European Parliament and of the Council on the control of major-accident hazards involving dangerous substances. These inspections were carried out by the CEI in cooperation with integrated inspection authorities (the State Labour Inspection Office and regional labour inspectorates, the Czech Mining Authority and regional mining offices, regional hygienic stations, and regional fire and rescue departments).

The Ministry of the Environment of the Czech Republic approved an annual plan according to which 144 inspections under the Act on the Prevention of Major Accidents were to be conducted in 2022. The objective was to verify entities classified into Group A and Group B and to perform an inspection of one unclassified entity. Furthermore, one inspection initiated in 2021 was completed in 2022, but due to the situation related to the COVID-19 pandemic, it was only partially carried out. In total, 145 inspections were conducted. In 2022, suitable objects classified in Group B for the systematic assessment of the risk of a major accident (Annex No. 2 to Decree No. 229/2015 Coll.) were selected by the CEI. All integrated inspection authorities express their opinions on the criteria for evaluating the results of the systematic assessment of the risk of a major accident.



### Inspections in 2022 were primarily focused on:

- local investigations in operation, operational changes,
- technical condition of the equipment (tightness tests, defectoscopy, and other elements of emergency readiness),
- checking emergency plans and related operating regulations and the timeliness of procedures related to extraordinary situations (the possibility of following them),
- compliance with the safety management system in the facility according to the current safety documentation,
- recording of extraordinary events.

During the year 2022, there were four serious accidents. In one accident, oil leaked from reconstructed piping onto the surrounding terrain. In this case, operational measures were taken to prevent further leakage. In other cases, there were explosions, fires, and injuries. The Police in the Czech Republic is also investigating this accident. During one inspection, a leakage of filtrate and sludge occurred in a facility, which was classified as an extraordinary event. The inspection activities of the CEI revealed one violation of obligations set by the Act on the Prevention of Serious Accidents.

After a three-year hiatus, a joint meeting of the Coordination Group was held, consisting of representatives from integrated inspection authorities and the Ministry of the Environment. This group evaluates the progress of inspections, assesses the cooperation among integrated inspection authorities, and exchanges information related to the prevention of serious accidents. Coordination meetings were also held this year to prepare the inspection plan for the upcoming calendar year at individual territorial inspectorates of the CEI. In the inspection activities and the overall execution of this agenda, there is good collaboration between the CEI, regional authorities, and integrated inspection authorities, resulting from the mutual activities of these entities. This collaboration has a positive impact on preventing the occurrence of emergency and extraordinary situations, which is a benefit in terms of its influence on the environment.

#### 4.2.3 Overview of specific tasks fulfilment – summary

Specific tasks significantly contribute to the inspection activities of the CEI. Territorial inspectorates select these tasks based on their knowledge of issues characteristic to their respective regions. The inspections primarily target smaller operators where the experience gained during inspection activities has shown a lack of awareness regarding compliance with the Water Act in the operation of their activities. In 2022, a total of 685 inspection investigations were conducted, of which 160 were planned.

The inspections in 2022 were focused on operators of wastewater treatment plants with a capacity of up to 500 equivalent inhabitants (Ústí nad Labem TI, Brno TI, Havlíčkův Brod TI, Ostrava TI), discharge of wastewater from open sewer outlets (Plzeň TI), public pumping stations (Plzeň TI), ponds (Plzeň TI), auto repair shops (Plzeň TI), mining areas (Plzeň TI, Olomouc TI), recreational and accommodation facilities (Ústí nad Labem TI, České Budějovice TI, Ostrava TI, Liberec TI), meat processing industry (Havlíčkův Brod TI), pollution sources in the protective zones of water reservoirs (Ústí nad Labem TI, Havlíčkův Brod TI). Prague TI and Hradec Králové TI evaluate this task as "Other," which consists of unplanned inspections, often initiated based on complaints or reports.

During inspections, violations related to the discharge of wastewater without permission from the water management authority, failure to adhere to balance and concentration limits specified in permits, absence of pollution level measurements for discharged wastewater, failure to comply with sampling intervals, unauthorized extraction of groundwater, failure to submit documentation for wastewater disposal from cesspools, discharging sewage water into underground or surface waters, failure to conduct leak tests for leakproof pits and tanks for storing hazardous substances were identified. The sum of fines in the 142 issued decisions with legal force for violations during inspections of specific tasks in 2022 amounted to CZK 5,677,039. This includes four decisions totalling CZK 90,000 for non-cooperation during control according to the Act on Inspection. Additionally, in 2022, three reprimands were issued, and six decisions for remedial measures to address the defective conditions became legally valid.

As an example, we can consider the specific task of Plzeň TI, whose results showed that errors are repeating in long-term monitoring. Therefore, in 2023, it will be included in the composite task S6 - Inspection of agricultural enterprises in terms of compliance with Water Act. This involved checks on ponds focusing on water management and the inspection of handling regulations. Plzeň TI has been including this task in its activities for a long time. Eight ponds were examined, and in five out of seven ponds where the inspection was completed, violations of water law were found. In two cases, the ponds were operated without an approved handling regulation, in two cases water level indicators were not installed, in one case, technical safety supervision was not carried out in conjunction with the water management authority, and in one case, overgrown trees on the dam were not removed. In all cases, the operators and owners of the ponds held permits for water management.

In conclusion, it is necessary to continue these inspections because operators of smaller facilities still inadequately familiarize themselves with regulations related to their activities, which could significantly contribute to environmental pollution.

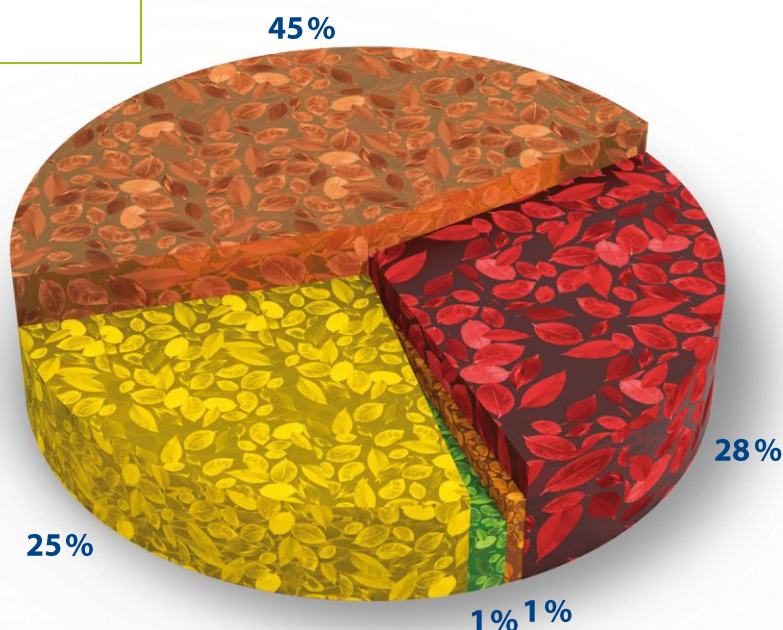


Leakage of waste oils in small business premises

From the perspective of offenses discovered during specific tasks, the amount of fines in legal force can be divided into five basic categories, including WWTPs up to 500 EI (discharging wastewater from WWTPs in violation of permits and/or without permits), Untreated wastewater (discharging wastewater from septic tanks and/or open sewer outlets in violation of permits and/or without permits, or disposing of wastewater from septic tanks without providing evidence of their removal method), Stream modifications (modifying watercourses without permits), Hazardous substances (handling hazardous substances, such as not conducting leak tests of storage facilities, failing to prepare an emergency plan, not taking adequate measures to prevent hazardous substances from entering surface or groundwater), and Non-cooperation during inspection (violating the provisions of Section 10, Paragraph 2 of Act No. 255/2012 Coll.).

### The proportional distribution of fines in legal force into five basic categories based on committed offenses

WWTPs up to 500 EI	25%
Untreated wastewater	45%
Hazardous substances	28%
Stream modifications	1%
Non-cooperation during inspection	1%





## 4.2.4 Significant Cases

### The highest final fines in the Water Protection Department per individual TI:

Name of the territorial inspectorate	Subject	Fine amount in legal force	Date when it became legally effective
Plzeň TI	Výrobně hospodářské družstvo Hradiště	CZK 3,713,770.00	14 <sup>th</sup> May 2022
Brno TI	Závlahy Dyjákovice, spol. s r.o.	CZK 3,000,000.00	21 <sup>st</sup> Feb 2022
Ostrava TI	Mayr-Melnhof Holz Paskov s.r.o.	CZK 1,200,000.00	8 <sup>th</sup> Oct 2022
Praha TI	VaK Zápy, s.r.o.	CZK 1,100,000.00	13 <sup>th</sup> Jan 2022
Olomouc TI	Zemědělské družstvo Kokory	CZK 1,072,000.00	14 <sup>th</sup> Jun 2022
Ústí nad Labem TI	Mondi Štětí a.s.	CZK 400,000.00	29 <sup>th</sup> Jun 2022
Liberec TI	Purum s.r.o.	CZK 350,000.00	5 <sup>th</sup> Aug 2022
České Budějovice TI	Zemědělské družstvo Hrejkovice	CZK 209,220.00	24 <sup>th</sup> May 2022
Havlíčkův Brod TI	Huhtamaki Česká republika, a.s.	CZK 150,000.00	1 <sup>st</sup> Nov 2022
Hradec Králové TI	An individual entrepreneur operating a small hydroelectric power plant.	CZK 120,000.00	1 <sup>st</sup> Jan 2022

### Highest imposed sanctions at individual TIs (listed in descending order by the amount of the fine):

#### **Plzeň TI: Výrobně hospodářské družstvo Hradiště (Hradiště Production and Economic Cooperative)**

(The highest final fine imposed by the WPD)

The Production and Economic Cooperative Hradiště, which operates the Hradiště, Zahorčičky, and Nedzdřev farms, was fined CZK 3,713,770 by a decision of the CEI. The company did not exercise its right to appeal, and the fine decision became legally binding on May 14, 2022. The CEI found violations of legal obligations under the Water Act in agricultural activities, specifically in the extraction of groundwater totalling 50,911 m<sup>3</sup> without the required water management permit. Additionally, violations of duties regarding the handling of hazardous substances without an emergency plan were identified on the farms, leading to the leakage of manure slurry and contaminated precipitation water onto the surrounding terrain. The fine was imposed for the most serious offence, namely, unauthorized extraction of groundwater.

#### **Brno TI: Závlahy Dyjákovice, spol. s r.o.**

For handling surface waters in violation of water permits, involving the extraction of surface waters from the Daniž stream in a total volume of 104,093 m<sup>3</sup> and from the Krhovice-Hevlín canal and the Dyjsko-mill channel in a total volume of 1,024,872 m<sup>3</sup>, a rate of CZK 40 per 1 m<sup>3</sup> of unlawfully extracted water was used to calculate the fine. The fine for the most serious offence was calculated at CZK 40,994,880, but since the maximum fine for unauthorized extraction of surface waters is CZK 10,000,000, the CEI reduced the calculated fine to this limit. The company appealed the decision, and the appellate body reduced the fine to CZK 3,000,000. The decision of the MoE became legally binding on February 22, 2022.

#### **Ostrava TI: Mayr-Melnhof Holz Paskov, s.r.o.**

For violations related to the failure to report an accident that occurred on June 8, 2022, causing the pollution of surface waters of the main drainage facility and the Olešná stream due to the discharge of organically polluted wastewater from the retention reservoir and the release of the aforementioned untreated wastewater without a permit from the CEI, a fine of CZK 1,200,000 was imposed on the company by decision. The company did not appeal the decision, and it became

legally binding on October 8, 2022. The accused company was significantly aggravated by the fact that the offense was committed repeatedly. The essence of the offenses is the fact that over extensive areas of the company, where wood and bark are manipulated, often involving heavy machinery, runoff water turns into wastewater. These waters are collected by a drainage system into a retention reservoir. During periods of excessive rainfall, the company is unable to properly dispose of these wastewater, and a portion of it is released into the nearby watercourse.

#### **Praha TI: VaK Zápý, s.r.o.**

The company VaK Zápý, s.r.o., which operates the Jirny WWTPnt, was fined by the CEI for operating a water facility in violation of the applicable operating regulations and for discharging wastewater with exceeded limits in indicators  $COD_{Cr}$ ,  $BOD_5$ ,  $NL$ ,  $N-NH_4$ , and  $P_{total}$ . The CEI imposed a fine for the most serious offence in the amount of CZK 1,100,000. The company appealed the decision, but the appellate body rejected the appeal and upheld the contested decision. The decision of the MoE became legally binding on January 13, 2022. The CEI, when assessing the case, took into account the numerous complaints received, which pointed out that the operation of the WWTP had been unsatisfactory for an extended period, resulting in significant environmental damage.

#### **Olomouc TI: Zemědělské družstvo Kokory (Kokory Agricultural Cooperative)**

Agricultural Cooperative Kokory, as the operator of a water source - a dug well - took a total of 21,440 m<sup>3</sup> of groundwater for its purposes beyond the scope of the water management permit and did not carry out leak tests of the storage pit for storing harmful substances. To the disadvantage of the agricultural cooperative, when determining the sanction, the CEI took into account in particular the fact that the accused could and did have the opportunity to use the backup source of water available on the Kokory farm in case of increased water withdrawal requirements. In its actions, however, it prioritized its business activity at the expense of the environment. At the same time, it was a repeated offense for which it had already been sanctioned in the past. The CEI imposed a fine of CZK 1,072,000 for the most severe criminal offence, i.e. unauthorized withdrawal of groundwater, using a reduced rate of CZK 50 per 1 m<sup>3</sup> of unauthorized withdrawal of groundwater. The company did not appeal against the decision, and it entered into force on June 14, 2022.

#### **Ústí nad Labem TI: Mondí Štětí a.s.**

Mondí Štětí a.s. company was found guilty of violating the conditions of an integrated permit according to Act No. 76/2002 Coll. when, on January 15, 2022, during the transfer of sodium hydroxide, they failed to secure the pipeline through which the sodium hydroxide was being transferred to prevent the release of hazardous substances into the soil or their undesirable mixing with wastewater. As a result, approximately 3 m<sup>3</sup> of sodium hydroxide leaked from this pipeline into the rainwater drainage and subsequently into the Labe river, where 538 kg of fish died. For the violation of the integrated permit conditions according to Act No. 76/2002 Coll., the CEI imposed a fine of CZK 400,000. The CEI took into account, in particular, the active approach of the accident's initiator in mitigating the harmful consequences of the accident and their overall cooperation in clarifying and managing the case. Mondí Štětí a.s. did not appeal the decision of the CEI, and the fine became legally binding on June 29, 2022.

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

Purum s.r.o. company violated the Integrated Prevention Act (Act No. 76/2002 Coll.) when, contrary to the operational regulations of the "Waste Treatment Plant - Hamr na Jizerou, Stará Lužice" facility, they failed to maintain the levels in all tanks at a safe level ensuring free tank capacity in the event of heavy rainfall, i.e., 50 cm below the maximum water level. On August 18, 2021, it was found that the percolation water from the percolation tank had overflowed at its lowest point into the open terrain, and on September 2, 2021, and September 15, 2021, the tank was full to the brim. Furthermore, on September 15, 2021, during the operation of the pump, there was an emergency leakage of percolation water between the casings, and for a long period (at least from August 18, 2021, to November 10, 2021), there was seepage through the casing dam. Consequently, there were discharges of percolation water outside the drainage system. As a result of these offenses (violations of the conditions of the integrated permit), the company was fined CZK 350,000 by the decision of CEI, which became legally effective on August 5, 2022. The company did not appeal this decision.

#### **České Budějovice TI: Zemědělské družstvo Hrejkovice (Hrejkovice Agricultural Cooperative)**

The company Hrejkovice Agricultural Cooperative, in order to supply the Pechova Lhota facility with drinking water, extracted 13,948 m<sup>3</sup> of groundwater from a drilled well without permission from the locally competent water authority for water management, i.e., permission for the withdrawal of groundwater. The violation was not committed under any special circumstances that would have required the company to act in a situation of extreme necessity. The unauthorized withdrawal of groundwater was due to the neglect of the obligations imposed by the Water Act. For the amount of groundwater unlawfully extracted without permission, the company was fined in the amount of CZK 209,220. The company did not appeal the decision of CEI, and the CEI's decision became legally effective on May 24, 2022.



#### **Havlíčkův Brod TI: Huhtamaki Česká republika, a.s.**

The company Huhtamaki Česká republika, a.s. violated the Water Act by discharging wastewater from the cooling system of the production of molded cartons into the surface waters of the Jihlava watercourse without permission to handle surface waters. Additionally, the company violated the Integrated Prevention Act (Act No. 76/2002 Coll.) by operating the "Huhtamaki Česká republika, a.s. - molded carton production" facility in contradiction to the conditions of the integrated permit. The CEI found a breach of the integrated permit condition as there were exceedances of the value "m" in the NL indicator (non-dissolved substances) during the controlled period from 2020 to 2022. For these violations, the CEI imposed a fine of CZK 150,000 on the company, in accordance with the strictest penalty provision related to the breach of the integrated permit condition under the Integrated Prevention Act. The company did not appeal, and the fine became legally effective on November 1, 2022.



The location of discharging cooling water into the watercourse is the Jihlava River.

#### **Hradec Králové TI: A natural person conducting business operations related to a small hydropower plant (SHP)**

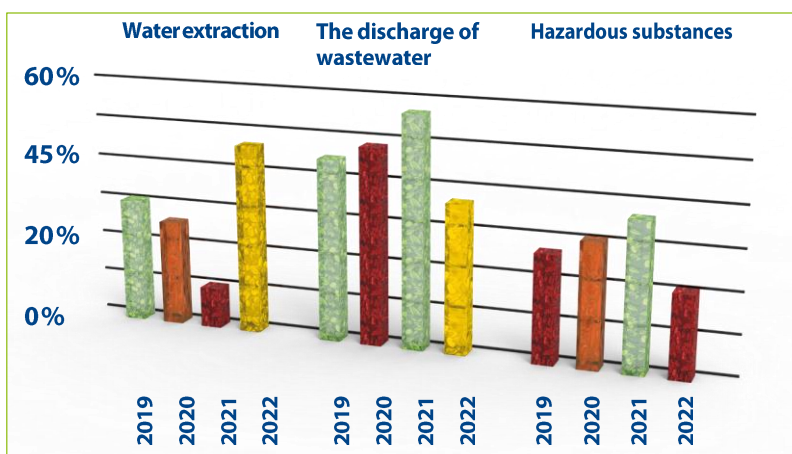
The CEI found a natural person conducting business operations guilty because, during the operation of the Small Hydropower Plant Krasíkov (SHP) between February 14, 2019, and October 6, 2021, they handled surface waters without the permission of the relevant water authority for water management. The handling of surface waters involved the utilization of their energy potential. For this violation, the CEI imposed a fine of CZK 120,000 on the natural person conducting business operations, who did not appeal the decision, and the fine, imposed by order, became legally effective on January 1, 2022.

## 4.2.5 Conclusion of inspection activity

During the monitored period, the Inspectorate carried out a wide range of inspections related to water protection in accordance with the relevant legal norms. When comparing the results with previous periods, the development can be characterized as stable, despite the first quarter of the year 2022 still being influenced by the government measures of the Czech Republic in connection with the COVID-19 pandemic.

The overall results of the inspection activities of the WPD in 2022 showed that the most violations were addressed in relation to the unauthorized discharge of wastewater into surface waters from smaller WWTPs, often operated by municipalities, and in the case of groundwater extractions. The inspection results indicate that proper management of wastewater will need to be monitored, even for relatively small WWTPs (over 500 EI), to which contents from septic tanks in their "catchment" area are often transported, or which historically partially process wastewater from local facilities (recreational facilities, hotels, small-scale industrial and agricultural production, services, etc.). Among the long-term issues, insufficient municipal sewerage or the method of wastewater disposal, especially in recreational resorts, still present significant challenges. The noticeable increase in the total amount of fines for water extractions in 2022 is primarily due to three specific violations, which are further specified in Chapter 4.2.4 Significant Cases (Plzeň TI, Brno TI, and Olomouc TI).

### Proportional distribution of fine amounts for the most common violations in comparison between the years 2019, 2020, 2021, and 2022.



Once again, as in previous years, it is confirmed that the implementation of the best available technologies in WWTPs over 10,000 EI has led to a significant reduction in the pollution discharged into surface waters. Inspection findings indicate that these significant sources do not generally have major issues with complying with legislative obligations. Violations of the Water Act related to exceeding emission limits set in permits by water authorities were only sporadically found at large WWTPs. The CEI considers this as a positive finding and evidence of an ongoing improvement in the quality of discharged wastewater. However, given the importance of large WWTPs and especially the volume of discharged wastewater, supervision over these WWTPs remains essential.

In 2022, significant deficiencies persisted in industrial and agricultural enterprises, primarily concerning the insecure storage and handling of hazardous substances, solid fertilizers and their liquid components, petroleum products, or chemicals. Shortcomings were also found during warehouse inspections (lack of leakage tests, absence or incompleteness of emergency plans), and several problematic agricultural operations were identified, especially biogas plants. Inspection findings indicated that significant sources of pollution only rarely violate legislative regulations in water protection. The decrease in the number of violations is a result of consistent and long-term inspection activities. Nevertheless, the CEI should continue systematic oversight of larger and more significant pollution sources and continue seeking out new sources. Long-term inspection results in the handling of hazardous substances emphasize the need to focus on medium and smaller businesses in the coming years, which may have less awareness of the current legislation in the field of water management.

Problematic situations also include addressing issues at sites without a known responsible party, where there is no legal entity to impose corrective measures. Another ongoing issue is completing remediation efforts, which involves meeting the target remediation limits at sites of environmental burden (OEB), where there may not be sufficient financial resources available at present.



Although one accident was recorded in 2022 among entities subject to the Act on the Prevention of Serious Accidents, the value of the inspection supervision carried out under the Act on the Prevention of Serious Accidents can be assessed as effective in preventing emergencies and exceptional situations.

Another problem is the inadequate level and lack of consistency in permits for water management and waterworks operations, which are subject to the WPD control. In many cases, final inspection decisions are not in line with water permits, or vice versa. Conditions within permits can be of such a nature that they cannot be effectively monitored to ensure compliance (for instance, minimum residual flow in the absence of a designated flow profile).

In the following years, the WPD inspectors will continue to collaborate with other environmental protection authorities and, as part of prevention, educate and inform business entities and the general public about their obligations arising from legislation. This approach provides controlled entities with the opportunity to proactively protect the environment. Inspections in the field of water protection remain a significant preventive tool contributing to the societal protection of groundwater and surface water resources.



## 4.3 Waste management, chemical substances, and biocidal products

### 4.3.1 Overview of inspection activity in 2022

The inspection activities of WMD are planned and divided into a total of eight component tasks, encompassing all supervised laws. These tasks are thematically focused and selectively targeted on specific priority areas or entities. The criteria for selecting and focusing inspection activities generally include legislative requirements for mandatory inspections of specific entities or areas, specific problematic or new areas of supervision (e.g., requirements from the Ministry of the Environment), past experience with selected areas from previous periods, or the history of the entity. This involves primarily targeted selections for planned inspections, based on available analytical data or collaboration with other authorities. Additionally, territorial inspectorates choose specific tasks based on their own reasoned judgment. However, the capacity of inspection activities is limited by the number of inspectors and the number of mandatory inspections (primarily IPPC).

The inspectors from the Waste Management Department (WMD) of CEI conducted a total of 3,101 inspections, with approximately 40% of them being part of planned inspection activities. These inspections focused on ensuring compliance with legislation related to waste management, end-of-life products, packaging, and chemical substances. Unplanned inspections (1,791 inspections) also included those conducted in response to received complaints or reports. In the past year, the waste management and chemical safety component handled a total of 610 complaints. WMD inspectors were involved in 374 cases of inspections according to Act No. 76/2002 Coll., on Integrated Prevention (IPPC).

In 2022, a total of 708 proceedings were initiated, and 702 decisions imposing sanctions were issued. The majority of proceedings were related to the Waste Act (398 proceedings), and there were 101 proceedings under the Chemicals Act. A total of 689 decisions on fines became legally effective in 2022. In seven cases, corrective measures were imposed. During the monitored period, fines amounted to a total of CZK 42,528,000. The total amount of fines was 20% higher compared to 2021, although 25% more decisions were issued than in the previous year. The highest legally effective fines imposed were in the amount of two million CZK for violations of the Waste Act. An integral part of the work of WMD inspectors was issuing opinions on EIA and IPPC matters and other relevant agendas in the field of waste management.

A total of 143 complaints were submitted to other government authorities in connection with findings. In one case, a criminal report was filed, suspecting environmental damage and endangerment due to cross-border waste transport and unauthorized waste handling.

### 4.3.2 Overview of fulfilment of departmental tasks

#### WASTE DISPOSAL FACILITY

As part of the departmental task focused on inspections of waste disposal facilities, such as waste landfills, waste incinerators, or facilities for energy recovery from waste, as well as decontamination facilities, solidification lines, or demulsification stations (i.e., facilities for waste treatment before disposal), a total of 130 facilities were inspected by inspectors in 152 investigative controls in 2022. Twelve inspections were initiated based on received complaints. In 2022, 26 administrative proceedings concluded with legally effective decisions on fines, resulting in a total amount of CZK 2,953,000.

Unfortunately, landfilling remains the primary method of waste disposal in the Czech Republic. However, landfill sites primarily function as regional waste centres for "comprehensive" waste management. These sites encompass various activities and types of facilities alongside landfilling, such as associated operations involving collection, transshipment, sorting areas and lines, alternative fuel production, storage, composting, biodegradation, solidification, and potentially other decontamination technologies.

##### Waste landfills

The primary focus of inspections is on hazardous waste landfills, as well as other waste landfills in their initial operational phase, including actively operated landfills and the rehabilitated sections of landfills (second operational phase). Integrated permit facilities are given priority in inspections. Attention is also directed towards inspections of landfills in the third operational phase (subsequent care regime). A total of 105 inspections were conducted in the context of landfilling.

A total of 84 actively operated landfills, 12 landfills in the subsequent care regime, nine old landfills were inspected. There were ten complaints related to landfilling received. Furthermore, in 2022, five inspections were carried out based on the Ministry of the Environment's request for documentation for the European Commission. These inspections focused on the treatment of bulky waste and mixed municipal waste before disposal into the landfill body, as well as issue of landfill gas emission, capture, and management in accordance with relevant standards.



During landfill inspections, a focus was placed on verifying the size of active areas, ensuring adequate cover for deposited waste, and inspectors also paid attention to proper landfill gas emission control and the functionality of gas extraction systems. The inspections also emphasized the allocation of financial resources to dedicated accounts for reclamation reserves.

For the identified shortcomings, administrative offense proceedings were initiated, and a total of 22 cases were concluded in 2022 with a binding decision to impose financial penalties amounting to a cumulative sum of CZK 760,000. In one instance, a reprimand was issued alongside the sanctions.

Common deficiencies observed in some received waste included insufficient documentation of professional judgment, failure to specify the origin and source of waste, failure to provide the required basic waste descriptions, lack of necessary analyses as per regulations (Act No. 294/2005 Coll. or Act No. 273/2021 Coll.). For selectively chosen waste received at landfills and used as technological material for technical landfill security (TLS), the conditions specified in regulations (Act No. 294/2005 Coll. or Act No. 273/2021 Coll.) were not met. This included insufficient covering of stored waste with suitable TLS or inert material and neglect of waste compaction. The most frequently observed violation was the failure to comply with the waste disposal plan (WDP). Errors in waste reporting were also identified.



In the case of municipal waste landfills, a problematic issue is the visible waste litter in the surrounding area. In several cases where extremely significant littering of lightweight fractions was identified on neighbouring properties over a vast area outside the landfill site, administrative offense proceedings were initiated.

Also in 2022, there were cases of waste fires at landfills, where the Fire Rescue Service of the Czech Republic (FRS CR) managed to control the emergency situation. The CEI considers landfill fires as a significant negative occurrence in the operation of waste landfill facilities. Some operators have installed thermal cameras to monitor temperatures within the landfill, which can help detect potential ignition points in a landfill in a timely manner.

In the issue of waste landfilling, sampling of landfill waste was conducted to determine leachability. Moreover, samples of groundwater and seepage water were collected, and their chemical analysis was carried out.

Intensive inspection activities continued at the CELIO landfill near Litvínov, including partner companies, focusing on the presence of drums containing hazardous waste, category 07 02 08 Other distillation and reaction residues originating from the implemented state order "Measures leading to the remediation of OEB created before the privatization of the Nelahozeves landfill, a.s. Kaučuk, a part of the company Unipetrol, a.s.". Additionally, inspections were conducted regarding illegally transported waste declared as product GEM5000, and in these serious cases, there is close collaboration with the Police of the Czech Republic due to criminal proceedings. The CEI issued over two dozen expert opinions in these matters. Cooperation with the Police of the Czech Republic continued in the case of criminal proceedings involving LADEO - Lukavec landfill and unauthorized waste handling at the Femme Plus company's premises.

### **Usage of an unmanned aerial system (drone)**

In the case of certain waste dumps in the first and second phases, aerial work (AW) was performed, and detailed aerial photographs were obtained to survey the active area of the landfill (or with the use of GNSS station) and accurately measure the area of the active site (m<sup>2</sup>). Aerial photographs also determine the covered (inactive) part of the landfill and measure the elevation (m above sea level) of the landfill body for comparison with permitted elevation levels. The CEI utilizes drones at landfills primarily to compare the amount of waste disposed of at the landfill with waste records and the condition of the landfill body from the previous monitored period. The processed data serves as an important basis for conducting administrative offense proceedings.

### **Old landfills**

The continued investigation of old closed landfills aimed to determine the condition of the reclamation work performed, whether reclamation was done in a proper and high-quality manner, or if there were environmental protection issues. These are not landfills in the sense defined by the Waste Act but rather sites where legal or sometimes illegal waste disposal occurred during the previous regime until the early 1990s, before the first Waste Act was enacted. Many of these sites are recorded in the SRCS database (System of Records of Contaminated Sites). In rare cases, it was even found that municipalities were misusing closed landfills for further waste disposal, leading to administrative proceedings for such illegal actions.

A significant portion of the complaints consisted of reports regarding illegal dumps. The Waste Act No. 541/2020 Coll. newly addresses the issue of handling illegally concentrated waste in connection with landowners, which the previous law completely overlooked. Since the effectiveness of the new Waste Act, the competent authority for addressing illegal dumps is the municipal authority with extended powers (MEP) in cases involving illegally concentrated waste, as defined in the Section 14 of Act No. 541/2020 Coll. Many reports regarding illegal dumps, which involve illegally concentrated waste under the terms of the Section 14 of Act No. 541/2020 Coll., were subsequently referred to municipalities with extended powers. Within its defined legal competencies, the CEI cannot address reports such as "a single illegally dumped couch by the bins," "discarded toner," "disorder at a public transport stop," etc.

### **Waste incinerators**

In 2022, a total of seven inspections of hazardous waste incinerators or municipal waste incinerators (energy recovery facilities) were conducted. Of the conducted administrative offense proceedings, three decisions became final, with a total amount CZK 93,000 imposed as penalties.

The identified violations of the Waste Act or the Integrated Prevention Act were primarily related to the management of medical waste due to inadequate thermal treatment capacity in the Czech Republic, including the operation of technologies without the required intensification and modernization.

In 2022, when dealing with medical waste, attention was more intensively focused on its producers. However, inspections of the incineration of infectious waste continued as in previous years due to the pandemic, which resulted in increased medical waste production. Sanctions were imposed for identified issues with the proper procedure for thermal disposal of infectious medical waste, and in an exceptional case, corrective measures were implemented to ensure compliance with legal requirements for waste incineration. In addition to issues related to the thermal treatment of medical waste, discrepancies with IPPC conditions were identified in the case of industrial waste incineration facilities. Violations were found, such as operating facilities in contravention of approved operating procedures, handling waste outside facilities designated for a specific type and category of waste, and failing to deliver waste in accordance with the waste hierarchy.

### **The handling of waste mercury**

The CEI investigated the handling of waste mercury, category 16 03 07 "Metallic mercury," a hazardous category, and imposed significant sanctions on several entities for improper handling, transfer, and storage. It was specifically proven, among other things, that there were hazardous waste handling activities in facilities or on sites that were not designated or permitted for this purpose. There were violations such as storing metallic mercury waste in a manner inconsistent with the requirements set by the regulation (co-storage with other hazardous waste, inadequate monitoring equipment for potential vapor emissions, collecting means not placed in containment systems with suitable surfaces without cracks and fissures and impermeable to metallic mercury, and lacking a retention capacity corresponding to the amount of stored mercury). Additionally, waste mercury was stored in containers that lacked proper ventilation systems or sensors continuously detecting the mercury content in the air. Furthermore, activities were carried out without the required permit from the relevant regional authority for the specific operation of the facility for storage, collection, treatment, utilization, or disposal of waste (conversion of mercury to solidified mercury sulfide).

### **Other waste removal or treatment facilities**

Inspectors conducted inspections of decontamination areas and facilities, as well as demulsification or neutralization stations, primarily for the treatment of liquid waste or other waste treatment facilities. A total of 39 inspections of these types of facilities were carried out, including two inspections based on received complaints. Inspectors initiated administrative proceedings for identified operational deficiencies, resulting in eight penalty decisions with a total amount of CZK 2,035,000.

In 2022, fines were primarily imposed for improper handling of healthcare waste, with significant deficiencies identified in the operation of facilities for decontaminating healthcare infectious waste. Several fundamental obligations for waste management in the hazardous waste category (as well as waste in other categories, including associated waste collection within decontamination facilities) were violated. In isolated cases, it was found that the operator did not properly label containers for the accumulation of hazardous waste. Additionally, instances of accumulating hazardous waste with a particular catalogue number in facilities not intended for that type and category of waste were identified.

## **WASTE UTILIZATION FACILITIES**

As part of the inspections focused on waste utilization, a total of 238 inspections were carried out, of which 68 inspections were based on received complaints. Inspections covered facilities for processing biodegradable waste (composting, biogas plants, sludge application to soil), as well as the utilization of construction and excavation waste for land reclamation, terrain adjustments, or backfilling. Additionally, facilities for the treatment and recycling of construction waste (recycling facilities), plastic recycling, waste sorting, and alternative fuel production were inspected.

For the identified deficiencies in 2022, a total of 101 fines became legally binding, with a cumulative amount of CZK 15,424,000.

### **Landscaping and filling with construction waste**

Mostly, the suggestions draw the attention of the CEI to the import of construction and demolition waste, as well as waste soil, illegal dumping on lands, and unauthorized landscaping or extensive filling, where there is massive importation of up to thousands of tons of construction waste. This is associated with construction activities, including transportation infrastructure construction, such as linear structures (structures where one dimension, i.e., length, greatly predominates over width and height, such as highways, expressways, engineering networks, etc.). The highest penalties are imposed for illegal handling of construction rubble and excavation soils. Illegal use of waste through landscaping or reclamation has led to 38 administrative proceedings, with 24 sanctions totalling CZK 4,845,000 becoming legally effective last year.



Significant deficiencies have been consistently identified, particularly in the handling of construction and demolition waste, with its illegal importation onto the terrain, often involving large quantities of waste materials (ranging from several thousand tons of construction and demolition waste). The reasons for the creation of illegal landfill sites are mainly of a financial nature (reducing the costs of disposal and transportation). However, in many cases, it is merely an unwillingness to go through the administrative process of obtaining approval for landscaping by the relevant building authority or approval of a landfill facility according to the Waste Act. The most common violation was the disposal of waste in areas not designated for this purpose. Furthermore, operating facilities were found to be in violation of operational regulations, lacking documentation of the quality of disposed waste in terms of environmental parameters, and failing to process risk assessments for the given location. Handling waste steel mill slag transported across borders, which was subsequently used in the Czech Republic as artificial aggregate for unbound applications, was also addressed. Similarly, extensive importation of crushed tyres for the purpose of performing landscaping was identified and addressed. These cases are still being investigated.

In many cases, inspections often encounter insufficient activity on the part of the relevant building authorities (lack of building permits for landscaping, problematic demolition measurements). Often, the CEI must address problems through inspection activities that should primarily be addressed at the local level by the building authority (or local municipal office or Regional Office). These authorities have temporal and local accessibility, including inspection competencies, and in many cases, addressing illegal activities could be prevented through their involvement.

### **Recycling of Waste**

Facilities conducting waste treatments, especially for construction waste, were inspected. Recycling centers that process construction waste into recyclables, effectively ending the waste regime (transition from waste to product), have been on the rise. Additionally, facilities handling plastic waste were inspected. There were also checks on facilities processing wooden waste, edible oils and fats, and those using metal waste in metallurgy (waste rhodium, residual silver). Issues and errors were identified in waste record-keeping or the lack thereof, in annual reports on waste production and management, mistakes in hazardous waste transport manifestos, and unsorted accumulation of generated waste. A total of 35 proceedings were initiated, with 34 resulting in legally binding fines, totalling CZK 2,350,000. Out of this total amount, two fines were procedural (failure to submit documents within the specified timeframe or not attending a scheduled inspection without proper justification), amounting to CZK 150,000.

### **The utilization of biodegradable waste**

During the inspections of facilities designated for waste utilization, a portion of the inspections focused on the mandatory priority treatment of biodegradable waste in composting plants, biogas stations, and the proper fulfilment of obligations regarding the handling of sludge from wastewater treatment plants injected or applied to the soil. A total of 51 inspections were conducted, involving 42 composting plants (including two community and seven small facilities), seven biogas stations, and two cases of sludge use in agricultural land. Seven control investigations were carried out based on reports. The inspections aimed to verify compliance of facility operation with issued permits and approved operating regulations.

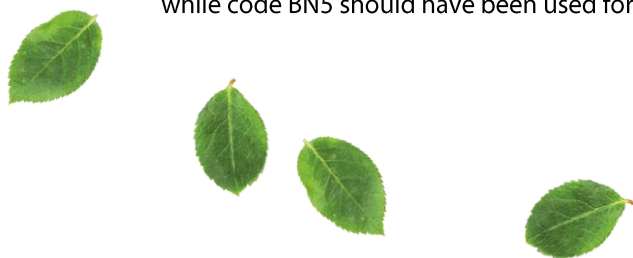
Out of the conducted offense proceedings, a total of 29 decisions became legally effective in 2022, with an overall sum of CZK 1,294,000.

### **Composting facilities**

The amount of fines imposed on the operators of composting facilities through 24 enforceable decisions reached CZK 974,000 in total. The targeted inspections aimed at mandatory utilization of biodegradable waste during composting (including the operation of so-called small facilities) revealed violations of operational regulations, which involve a series of the following deficiencies:

- Long-term creation and shaping of windrows (even for several months) when the waste should have been incorporated into remediation compost windrows within a matter of days from arrival. For example, waste received at the facility in 2019 was not processed until 2021, leading to its degradation and uncontrolled decomposition.
- The windrows were unevenly spread across the area, making it impossible to perform excavations. The prescribed amount of waste in one windrow was not adhered to.
- Uncontrolled processes were leading to undesired decomposition.

- Wastes arising from the facility (sorted undesirable impurities present in the received wastes) were not reported.
- Analysis of composting facility outputs was not conducted, and the facility's output was handed over for agricultural use to a private farmer, even though the compost from the composting facility was classified as "reclamation compost," and the compost quality was not verified.
- Capacity exceeded.
- Inadequate waste records, no report submitted on waste production and handling for all facilities where waste was managed, and facilities were not marked with informational signage.
- Failure to conduct a controlled composting process (wastes were only piled up and left without proper composting).
- The sanitation process was not monitored during the reception of sludge from WWTPs.
- A valid fertilizer registration decision was not issued by the Central Institute for Supervising and Testing in Agriculture.
- The received wastes were incorrectly classified as hazardous waste code 02 01 03, even though they were waste from the maintenance of municipal or local green areas or from non-business individuals.
- A false report was submitted when uncomposted waste was reported under code BN13 for that year, while code BN5 should have been used for carrying it over to the next year.



The case of the facility for processing organic waste can be negatively evaluated as the operator applied the outputs to their own agricultural land, despite the analysis showing an exceedance of the limit value for PAU according to Regulation No. 341/2008 Coll., Table 5.1, for group 2, class I. Additionally, the requirements of Act No. 156/1998 Coll., on Fertilizers, Auxiliary Soil Substances, Auxiliary Plant Preparations, and Agrochemical Testing of Agricultural Land, were not met.

In isolated cases, there have been incidents of spontaneous combustion in composting facilities. Operators of facilities for handling biodegradable waste often face difficulties in selling the resulting compost. As a result, there is an accumulation that leads to exceeding the facility's capacity and incorrect storage of compost in large volumes, increasing pressure and temperature in the piles with overripe compost, which can lead to the mentioned fires or spontaneous combustion.

From the inspections of composting facilities conducted in 2022, it is evident that a persistent issue is the record-keeping, specifically the use of code BN13 for all wastes received at the facility in a given year, even though not all of these wastes actually underwent controlled decomposition processes. As a result, no waste transfer to the following year is carried out by the end of the year, even though physically, the facility contains compost piles and waste (wastes outside of the windrows or still in windrows with incomplete processes). This often leads to the facility exceeding its capacity. Unfortunately, operational guidelines frequently lack sufficient recipe descriptions, resulting in compost that does not meet quality standards. In response to the new legislation, communities that established community composting facilities in the past are considering closure due to the increasing demands for compliance with technical operational conditions and the growing administrative burden.

### **Biogas Stations**

In the investigation of the operation of the biogas station (BGS), waste was found deposited on the private land of a self-managing farmer. This waste was supposed to be processed at the BGS, but instead, waste was continuously dumped into a former silage pit within the BGS area, leading to spontaneous decomposition. Undesirable and non-compliant waste materials were also identified (meat and bone meal, waste from turkey slaughter, and cutlery...).





## Sludge from WWTPs

While handling sludge from WWTPs, unauthorized aggregation of waste category 19 08 05, specifically sludge from the treatment of municipal wastewater, was identified outside the facility for waste utilization. This occurred on open terrain without proper security measures (including arable land and permanent grassy areas).

In an exceptional case, the CEI submitted a request to the Central Institute for Supervising and Testing in Agriculture regarding the application to Agricultural Land Fund.

## Energy Recovery from Waste

In 2022, facilities for the production of alternative fuels, facilities designated for co-incineration of waste, and facilities for energy recovery from waste were also examined. Nine inspections were conducted in this matter. Two penalties were imposed with a total sum of CZK 60,000.

## WASTE COLLECTION AND RECYCLING FACILITIES

In 2022, a total of 192 inspections were carried out on waste collection and recycling facilities, storage facilities for other and hazardous waste, as well as traders. This number represents an increase of 19 inspections compared to 2021. Among these, 42 inspections were conducted based on received reports, with three of them highlighting potential illegal activities. A total of 85 penalty proceedings were initiated, and 85 decisions have gained legal force, resulting in fines totaling CZK 8,998,000, which is an increase of CZK 4,591,000 compared to 2021. Out of the total fines, 11 were related to procedural violations (such as failure to provide documents within the specified timeframe or not participating in a scheduled inspection without a valid excuse), totalling CZK 2,210,000.

In both 2021 and 2022, the inspection focused its activities on facilities involved in waste collection and recycling, as well as storage facilities for other and hazardous waste. This emphasis was due to the impact of the COVID-19 pandemic and the limitations on certain end facilities for receiving medical waste (such as the limited capacity of waste incinerators and the prohibition on depositing healthcare waste in landfills for a portion of 2022). The inspections specifically targeted facilities that handle infectious medical waste originating from various healthcare institutions, including hospitals, clinics, testing facilities, laboratories, and companies conducting COVID-19 tests. The primary purpose of these inspections was to verify the physical handling of this waste and the adherence to timelines for its disposal (72 hours without freezing or refrigeration, one month in frozen or refrigerated storage). The most common shortcomings observed among operators of waste collection and recycling facilities and waste storage facilities included violations of operational rules and exceeding the established capacities of these facilities. In 2022, the highest penalty imposed for mishandling medical waste in violation of waste management laws amounted to CZK 100,000.

In 2022, the Waste Management Department focused on issues such as mobile waste collection and recycling facilities that store waste without proper authorization under waste management legislation. Subsequently, these facilities report these waste remnants in their annual waste production and handling reports. The CEI also encounters cases of waste storage, including hazardous waste, in locations that often differ from those specified in waste records.

Across territorial inspectorates, inspections of waste collection and recycling facilities primarily revealed cases where the operation of these facilities was in violation of their approved operational rules. Examples include the acceptance of unauthorized waste into the facility, incorrect classification of purchased waste into waste categories according to the Waste Catalogue, instances where the transferring individuals were not properly identified during waste acquisition, waste accumulation in areas not designated for it in the operational rules, and exceeding the annual, immediate, or processing capacity of the facility. Inspectors also documented cases of delayed, false, or incomplete submission of the Waste Production and Handling Reports, which were required to be prepared by the facility operator.

In 2022, the highest legally enforceable fine of CZK 500,000 was imposed on two companies. One of these companies engaged in illegal handling (aggregation) of construction waste in an unauthorized location, on land that was not designated for such activities under waste management laws. The second company, as an operator of a facility for waste collection, recycling, and utilization, failed to meet the technical requirements for the interim and permanent storage of waste mercury according to Regulation No. 294/2005 Coll. During the controlled period, they also transferred waste mercury to a company that was not authorized to handle that particular type and category of waste.



Illegal aggregation of a large quantity of construction waste

### Waste and Hazardous Waste Storage Facilities

During inspections of waste and hazardous waste storage facilities, significant deficiencies were predominantly found in the aggregation and storage of waste and hazardous waste in outdoor areas, i.e., in locations not designated or permitted in the facility's operational rules. On rare occasions, inspections of storage facilities identified instances of exceeding the allowed maximum annual or immediate capacities of the facility.

Similar to the previous year, in 2022, the CEI conducted specific inspections focused on the handling of waste mercury. In one case, a legally enforceable fine of CZK 1,200,000 was imposed for illegal handling (storage) of hazardous waste "mercury metal" in a quantity of approximately 70 tonnes in an unauthorized location, i.e., on land not designated for this purpose under waste management laws. The illegal storage of waste "mercury metal" violated additional specific conditions for the storage of mercury metal set by regulation, such as the storage areas not being equipped with air handling systems or continuous sensors for detecting mercury content in the environment, among others. The company appealed the fine, and the penalty was upheld by the appellate authority, becoming legally binding in October 2022.

### Facilities for the collection and processing of scrap vehicles

In the field of end-of-life vehicle management, the CEI conducted a total of 83 inspections in 2022, with 29 of these inspections initiated based on received suggestions. Nearly half of these reports raised concerns about the illegal dismantling or aggregation of end-of-life vehicles. Throughout 2022, CEI inspectors initiated 24 administrative offense proceedings in this matter, and 25 decisions gained legal force, resulting in fines totalling CZK 2,082,000. In four additional cases, fines totalling CZK 190,000 were imposed for violations of the inspection regulations (i.e., failure to allow inspections or provide requested documents during inspections).

In the context of handling end-of-life vehicles, the CEI inspects both operators of authorized facilities for the collection and potentially processing of such vehicles, and also investigates suspicions of the illegal acquisition, storage, or dismantling of end-of-life vehicles. In the area of illegal handling, CEI inspectors, as in previous years, have dealt with cases where vehicles purchased from abroad (e.g., Germany and the United Kingdom) were illegally dismantled in the Czech Republic after being involved in accidents or found to be in poor technical condition, with these vehicles serving as a source of parts or scrap. The CEI also investigated the dismantling of vehicles that were stored in so-called depots (i.e., temporarily taken out of service) and the dismantling of vehicles that had already been officially



deregistered in the Vehicle Register because they were involved in so-called "half transfers," and the vehicle owners did not report within the specified time frame. During inspections, the CEI sometimes discovers that entities with valid permits are involved in illegal dismantling, for example, by providing end-of-life vehicles taken to authorized dismantling facilities to other individuals who do not possess the necessary permits for operating such facilities.

The highest fine in this area in 2022 was imposed on a company that illegally dismantled both end-of-life vehicles imported from abroad (primarily from the United Kingdom) and end-of-life vehicles that were originally taken to an authorized facility. This case was exceptional in its scope, as the inspection revealed over 300 end-of-life vehicles (including those with hazardous substances and components as well as those without) on the inspected premises. It was evident from the inspection that illegal dismantling of end-of-life vehicles and subsequent sale of spare parts was taking place on these premises. Spare parts were offered directly at the facility and to interested parties via the internet. Out of the total number of identified end-of-life vehicles, 80 of them were proven to have originally been accepted into an authorized facility, where the vehicle owner was issued a certificate of receipt (a document confirming ecological disposal). These vehicles were supposed to be processed or transferred to another authorized facility at this permitted facility. Instead, these end-of-life vehicles were transferred to a company that did not possess the necessary facility operation permit, and the end-of-life vehicles were illegally dismantled for spare parts. A fine totalling CZK 800,000 was imposed on the company for the discovered illegal activities, which was confirmed by the appellate authority. When imposing the fine, in addition to the large number of identified end-of-life vehicles, consideration was given to the fact that it was a repeated violation of the same obligation. Inspectors from the CEI also dealt with five other cases involving the dismantling of end-of-life vehicles that were accepted into authorized facilities by other entities at different locations where they were not permitted for this activity. In these cases, the CEI investigates both the individuals illegally dismantling the vehicles and the operators of authorized facilities that issued a certificate of receipt for the end-of-life vehicle.

During inspections of authorized facilities for the collection and processing of end-of-life vehicles, the CEI, similar to previous years, most commonly identified violations of the facility's operating regulations. This included exceeding the approved capacity, storing and dismantling end-of-life vehicles on areas not approved by the operating regulations, storing more than two end-of-life vehicles on top of each other, failure to invalidate the VIN code, or errors in recording or photographing (for example, not sending photographic documentation within the stipulated timeframe or when the photographic documentation does not clearly show whether the end-of-life vehicle was present at the facility at the time as required by legislation). In one specific case, the CEI dealt with an operator of an authorized facility who, during an inspection, found that more than 90 end-of-life vehicles in the hazardous category (containing hazardous fluids and other hazardous substances) were concentrated on a site that was not designated for this purpose by the facility's operating regulations. This operator also exceeded the immediate maximum capacity of the facility, failed to maintain an operational diary, didn't invalidate the VIN, made errors in inputting photographic documentation into the MA ISOH system, provided insufficient information on the information board, did not maintain proper ongoing records, and failed to mark hazardous waste in accordance with legislation. The CEI imposed a fine of CZK 160,000 on this operator, and the fine became legally effective.

TAKE-BACK OF PRODUCTS, END-OF-LIFE PRODUCT PROCESSORS

In the field of the take-back of selected products (electrical and electronic equipment, batteries and accumulators, and tyres), inspectors from the CEI conducted a total of 181 inspections in 2022, of which 56 inspections were focused on investigating received suggestions. One of the received suggestions pointed out the insufficient network of take-back locations of the collective system for electrical and electronic equipment and the dysfunction of established locations. Therefore, as part of its investigation, the CEI conducted 28 inspections of take-back locations in 22 municipalities across the entire Czech Republic. Otherwise, it can be said that the complaints most frequently highlighted the dysfunction of tyre take-back locations and the possibility of free-riding regarding selected products, especially electrical and electronic equipment.

Product take-back	Number of inspections
Electrical equipment	114
Tyres	55
Batteries and accumulators	18
Total	187

The table below shows the number of inspections according to the different types of products subject to take-back, with some inspections potentially relating to multiple products:

Just like in previous years, the CEI mainly inspected individuals or entities responsible for introducing various products to the market (i.e., manufacturers), the final retailers, operators of take-back points, and also processors of these products. During inspections of take-back points, the CEI verifies whether these locations are functional, accessible to end-users, and whether the take-back process is conducted free of charge.

In 2022, the CEI initiated a total of 32 offense proceedings related to selected products, with 31 decisions becoming legally binding, resulting in fines totalling CZK 1,114,000. In some cases, concurrent violations of the law on products with completed lifecycles and the laws on packaging or waste were identified. The highest fine of CZK 400,000 was imposed on an importer and retailer of electrical equipment (light fixtures and light sources) who did not fulfil the manufacturer's obligations, particularly concerning the lack of establishing a take-back system for electrical equipment and failure to meet other associated obligations. The appellate body later reduced the fine to CZK 360,000, but upheld CEI's findings.

## **Tyres**

In the area of tyre take-back, the CEI conducted inspections of 10 manufacturers, 19 final retailers, 30 take-back locations, one tyre waste processor, and one entity involved in tyre retreading. In some cases, the inspected entity could simultaneously be a manufacturer, final retailer, and a take-back location. In tyre take-back matters, the CEI inspectors investigated 15 notifications, with 11 of them raising concerns about issues related to tyre drop-off at take-back locations (refusal to accept, or the potential charging for take-back). This included both individually established take-back locations by individual manufacturers, often located in auto service or tyre service centres, as well as take-back locations within the collective ELTMA system.

In 2022, the CEI inspectors also conducted inspections of tyre manufacturers, primarily importers, and cross-border carriers of tyres suspected of not fulfilling their obligations or performing them individually (i.e., in their name and at their own expense). Inspections of individually performing manufacturers primarily focus on determining whether the manufacturer has established an adequate collection network and meets the minimum level of take-back. In the case of the final dealers, the CEI primarily inspected the implementation of take-back, ensuring it was carried out free of charge and that the obligation to inform the end-user was met.

In the field of tyre recycling, a total of eight enforceable fines amounting to CZK 200,000 were imposed. For instance, a fine of CZK 80,000 was imposed on an individual complying manufacturer for not establishing a sufficient collection network for end-of-life products, as required by the End-of-Life Products Act. The accused appealed this fine, which was subsequently confirmed by the appellate body of the CEI. Furthermore, the CEI imposed two fines for charging fees for tyre recycling on tyre service centres, which also served as collection points for the ELTMA collective system. According to the CEI's findings, in one case, a handling fee was charged, and in the other case, a fee was imposed for storing tyres before disposal, which contradicts the fundamental principle of tyre recycling, which is supposed to be free of charge for the end user.

## **Electrical equipment and batteries and accumulators**

As part of the electrical equipment take-back, the CEI conducted a total of 114 inspections, with 42 inspections focused on manufacturers' obligations, 24 inspections on the obligations of last sellers, 50 inspections on the obligations of collection point operators, and 12 inspections on processing obligations for electrical equipment. In one instance, inspectors addressed illegal processing of electrical equipment. In the context of battery and accumulator recycling, CEI inspectors examined a total of 18 entities, with the majority being manufacturers (11 inspections).

In the field of electrical equipment and battery and accumulator take-back, CEI's decisions imposing fines totalling CZK 628,000 became legally binding. Most frequently, fines were imposed similarly to those in 2021 for so-called "free riding" by importers of electrical equipment and batteries and accumulators, totalling 14 enforceable decisions. For example, the CEI imposed a fine of CZK 100,000 on an importer of lithium-ion batteries for electric bicycles who did not fulfil manufacturer's obligations, especially those related to ensuring take-back. After CEI's inspection, this manufacturer entered into an agreement with the relevant collective system, thus remedying the situation. In four other cases where suspicions of "free riding" were investigated, the CEI inspectors imposed fines for violating the Inspection Procedure (i.e., for not providing cooperation during inspections), totalling CZK 180,000. Specifically, the CEI imposed a fine of CZK 70,000 on a company that is an importer of electrical equipment, as well as an importer of packaging and operates an e-shop selling a wide range of consumer goods, including consumer electronics. An inspection was initiated with the company under the End-of-Life Products Act and the Packaging Act. However, the company's representative did not participate in the inspection and did not submit the required documents for the inspection, thus violating the Inspection Procedure.



## INSPECTIONS OF INDUSTRIAL ENTERPRISES AND OTHER WASTE GENERATORS

In 2022, inspectors conducted a total of 890 inspections of waste generators. A total of 174 sanction proceedings were initiated, and by the end of 2022, 171 decisions imposing fines became legally binding, amounting to CZK 5,522,000. Additionally, one corrective measure was issued.

Traditionally, in 2022, the majority of waste generator inspections were primarily focused on large industrial enterprises and agricultural cooperatives with integrated permits. Inspectors from the WMD CEI also prioritized investigations into reports of illegal waste handling. Among large waste producers with integrated permits and specialized ecologists, no serious violations of waste management laws were detected. The actions of large waste producers in accordance with their valid integrated permits have become somewhat stereotypical. During inspections in 2022, particular attention was paid to outdated conditions in integrated permits that still referred to obligations under the no longer valid Act No. 185/2001 Coll., even though integrated permits had not been updated to reflect the new or modified obligations under Act No. 541/2020 Coll., on Waste, which has been in effect since January 1, 2021. In 2022, during the inspection activities of CEI, waste generators were found to have mainly minor shortcomings. These included issues such as improper waste sorting due to employee indiscipline, errors in fulfilling record-keeping and reporting obligations, lack of identification forms for hazardous waste at waste handling locations, as well as incorrect or incomplete input of data related to the transport of hazardous waste into the SEPNO system. Inspectors also encountered issues such as incorrect waste classification, failure to comply with the relatively new obligation regarding the separation of all five components of municipal waste (paper, plastic, glass, biodegradable waste, and metals) for visitors to waste handling facilities, the absence of a written contract ensuring the transfer of municipal and construction waste that the waste generator does not handle themselves prior to its generation, and the unauthorized transfer of waste to individuals. Furthermore, inspectors continued to come across waste generators of construction and demolition waste who disposed of these wastes in unauthorized locations, often due to the apparent harmlessness of such waste, which was subsequently handed over to individuals without the necessary authorization.

In 2022, for instance, a fine of CZK 280,000 became legally binding, which was imposed by the Inspectorate on a company engaged in construction and demolition activities for improper waste disposal in unauthorized locations. From 2019 until September 2021, the company temporarily accumulated various types of construction, demolition waste, and soil, totalling over 67,000 tonnes, intended for use on an authorized mobile crushing plant and subsequent distribution to the construction sites the company was currently working on. However, waste accumulation in that specific location was not permitted. On another plot, the construction company was illegally accumulating approximately 150 damaged railway sleepers, which originated from the reconstruction of a railway track and were supposed to be subsequently removed. Adjacent to these sleepers, there was a pile of biodegradable waste, including grass, branches, shrubs, small trees, stumps, as well as damaged pallets, damaged pieces of small furniture, and damaged wooden window frames. Next to this pile, there was a smaller pile of soil mixed with wooden waste. On the same plot, there were seven large steel containers, one container for scrap metal, another for sorted plastics, and the rest of the containers were empty. This site was also not designated for waste handling. The construction company did not report waste production and handling for the construction projects carried out in 2019 and 2020. In the reports for the mobile crushing equipment for the same years, the inspection identified errors.

### Municipalities

In 2022, the WMD CEI conducted a total of 89 inspections of municipalities. Twenty sanction proceedings were initiated, and by the end of the year, 27 decisions imposing fines became legally binding, amounting to CZK 990,000.

In 2022, inspections of municipalities traditionally focused on ensuring designated locations for separate collection of components of municipal waste, namely hazardous waste, paper, plastic, glass, metals, biodegradable waste (BDW), and edible oils and fats. Most of the inspected municipalities in the Czech Republic have a well-established and operational local waste management system. Separate collection of municipal waste is typically organized by municipalities through the use of generally binding decrees (referred to as GBD). In 2022, the Inspectorate found that the failure to provide designated locations for the disposal of individual components of municipal waste occurred in only one instance, and improper aggregation of multiple components of municipal waste was also identified in just one case. Violations related to the arrangement of the municipal waste management system were relatively minor. Similar to previous years, the infringements observed in municipalities were primarily related to improper waste handling in unauthorized locations. This included the accumulation of biodegradable waste, burning of biodegradable waste, sometimes in combination with furniture, or the disposal of construction and demolition waste.

In 2022, a fine of CZK 140,000 became legally binding for the municipality of Cizkrajov, which mishandled waste in unauthorized locations. The municipality accumulated and utilized soil with additional waste content, even though it was not a designated waste handling facility as required by the Waste Act. Furthermore, the municipality submitted inaccurate and incomplete waste production and handling reports for the years 2018 and 2019. Additionally, the municipality failed to secure the waste collected by residents before its degradation, theft, or leakage, resulting in the burning of various waste items during the "Burning of Witches" event. These items included branches and stumps with additional waste content such as grass, branches with leaves, wood chips, plywood, window and door frames, window sills, car tires, parts of upholstered furniture, a radio receiver, plastic films, foamed construction polyurethane, fiberglass-reinforced plastic hoses, and glass food containers.

## ILLEGAL WASTE HANDLING

Common and often the most serious findings from waste handling inspections conducted in 2022 are generally illegal methods of dealing with waste, both within authorized facilities designated for this purpose and outside the premises and designated areas of such facilities. This includes unauthorized handling and manipulation of waste materials, completely outside the context of the facility. According to the new Waste Act, this is considered a violation of Section 13, paragraph 1, letter b, which is equivalent to a violation of Section 12, paragraph 2, under the now-expired Waste Act No. 185/2001 Coll.

A significant number of received reports are investigated with the conclusion of violations of the mentioned legal provisions. These violations most commonly involve field modifications (or "filling"), which entail extensive spatial, and potentially surface and depth (thickness) anthropogenic interventions into the natural, unsecured terrain, with significant negative impacts on various components of the environment and irreversible (non-reversible) actions in local ecosystems. This primarily includes illegal dumping of construction and demolition waste contaminated with various impurities onto open terrain, the import of contaminated soil, and the establishment or expansion of "illegal dumps".

A specific form of illegal activity is the unauthorized burning of waste (in open fires) or incineration of waste products (in inadequate facilities or boilers) from various activities, especially in furniture production, carpentry, building clearance, and organizing "Burning of Witches" events, among others. Burning waste in open fires has particularly negative impacts, such as burning materials like wood chips, laminated boards, wood with paint residues, plywood, fresh branches of conifers and junipers, plastic bags and sheets, carpets, tyres, construction waste, asphalt insulation, doors with cavities filled with assembly foam, and more.

Other forms or types of unauthorized activities include disposing of waste outside of authorized facilities, getting rid of waste in unauthorized locations, various methods of freely deposited, abandoned, released, stored, or left waste (unauthorized waste storage, spreading brick debris on forest roads, etc.).

In 2022, the Inspectorate conducted more than 200 inspections of illegal waste handling activities. Out of this number, 85% of the inspections regarding illegal activities were initiated based on received suggestions. Nearly 50 legally binding decisions were issued for illegal waste handling, imposing fines exceeding four million CZK.

## CHEMICAL ACT AND BIOCIDES

One of the areas supervised by the CEI inspectors is the issue of chemical safety. This encompasses regulations, both Czech and European, governing the handling of chemical substances, chemical mixtures, and articles containing these substances. This includes, in particular, the Chemical Act No. 350/2011 Coll., the Biocides Act No. 324/2016 Coll., and related directly applicable European regulations, such as Regulation No. 1907/2006 on the registration, evaluation, authorization, and restriction of chemicals (REACH Regulation), Regulation No. 1272/2008 on the classification, labeling, and packaging of substances (CLP Regulation), Regulation No. 648/2004 on detergents, Regulation No. 528/2012 on biocides, and others. The CEI conducted a total of 705 inspections of the regulations mentioned above. The majority of these inspections were related to the REACH Regulation (substance registration, safety data sheets, restricted and authorized substances; a total of 224 inspections) or obligations arising from the CLP Regulation (classification, packaging, and labeling of substances; a total of 199 inspections). Biocidal products were inspected in 73 cases (examining 108 biocidal products and treated articles, of which 33 exhibited deficiencies). Some inspections are carried out under the Product Safety Act No. 102/2001 Coll., based on notifications of non-food dangerous products in the Safety Gate system (190 inspections based on 158 notifications were conducted).

In 2022, 124 fines and warnings issued by the Inspectorate for violations of the Chemical Act, the Biocides Act, and the Inspection Order (Act No. 255/2012 Coll.) became legally binding, totalling CZK 2,942,000. A total of 127 offense proceedings were initiated in that year. The most common violations involved incorrect labelling of substances and mixtures, internet advertising, biocidal products, and safety data sheets.



The Inspectorate participated in the work of the European Chemicals Agency (ECHA), specifically in its Forum for Exchange of Information on Enforcement and its Biocides Subgroup. The Inspectorate's staff actively took part in several working groups within the forum, which included selecting inspection projects and preparing and conducting a pilot project on recovered substances.

### **Inspection projects**

In 2022, the CEI participated in two pan-European projects organized by ECHA. The first project was REACH-EN-FORCE 10 (REF- 10), which involved conducting "integrated product checks" throughout the year. In essence, the compliance of one or more regulations concerning the content of chemical substances in products was determined for one inspected product. These regulations include restrictions on substances listed in Annex XVII of the REACH Regulation (e.g., asbestos, phthalates, CMR substances in textiles, bisphenol A in thermal paper, etc.), restrictions on the content of POPs in products (perfluorinated substances, polybrominated diphenyl ethers, short-chain chlorinated paraffins), and obligations related to substances of very high concern (SVHC substances).

The second project was named BPR-EN-FORCE 2 (BEF-2) and focused on biocidal products containing approved and unapproved active substances. Inspections were centered on the approval of biocidal products, labelling, packaging, and the content of active substances from suppliers listed under Article 95 of the Biocidal Products Regulation. Inspection activities often took place in conjunction with the staff of regional hygiene stations. The results of both of these projects, on both national and European levels, will be known during the course of 2023.

### **Significant case – Sportsdirect.com Czech Republic s.r.o.**

The inspection was carried out based on a report from the Safety Gate system (notification number A12/00538/21). During the inspection, it was determined that the accused committed an offense under Section 11 Paragraph 1 Letter e) of the Biocidal Products Act. As a legal entity, they placed on the market, in the Czech Republic, a treated product from the United Kingdom, which, in violation of Article 58 Paragraph 2 of the Biocidal Products Regulation, is a black facial sports mask under the brand UNDER ARMOUR, with the declared presence of the substance polyhexamethylen-biguanide hydrochloride (PHMB), which is not approved for the intended use (i.e., for product type 09 - preservatives for fibres, leather, rubber, and polymer materials). The substance PHMB is furthermore classified as acutely toxic, causing serious eye damage, skin sensitization, acute toxicity category, carcinogenic, toxic to specific target organs with repeated exposure, and highly toxic to aquatic organisms (with long-term effects). The controlled entity violated Article 58 Paragraph 2 of the Biocidal Products Regulation. For the above-mentioned offense, an administrative offense procedure was initiated, and a fine of CZK 50,000 was imposed on the accused by an order. The participant in the proceedings did not appeal against the decision of the CEI, and the decision became legally binding.

## **PACKAGES**

In 2022, the CEI inspectors conducted inspections of a total of 111 entities with a focus on fulfilling the obligations stipulated by the Packaging Act. Eight of these inspections were carried out based on received complaints. The total number of inspections is slightly higher in comparison to previous years, with 77 inspections in 2020 and 101 inspections in 2021. During 2022, 64 administrative offense proceedings were initiated, resulting in 63 legally binding decisions for violations of the Packaging Act. These decisions imposed fines totalling CZK 1,322,000. Furthermore, in eight cases, the CEI imposed fines for not allowing inspections or failing to provide requested documents or information (i.e., violations of the Inspection Act), amounting to a total of CZK 95,000.

In 2022, the CEI inspectors, in the field of packaging and waste packaging management, continued their focus on entities suspected of non-compliance with their obligations as stipulated by the Packaging Act. These entities had not entered into contracts with authorized packaging companies and were not listed as individual fulfilling entities in the Register of Persons. This primarily involved importers of packaged goods (in these cases, the CEI utilized data provided by the General Directorate of Customs regarding imports of various packaged products) and entities that package goods for their customers, such as e-shop operators or catering service providers and food retailers offering home delivery of goods in disposable packaging (mainly plastic and paper bags and boxes). Inspections were conducted both individually and in conjunction with issues regulated by the End-of-Life Products Act (e.g., importers and sellers of electrical equipment) or the Chemicals or Biocidal Products Act (e.g., adhesive suppliers or cosmetics retailers).

In 2022, the CEI inspectors also conducted inspections on individuals listed in the Registry of Entities under Section 14 Paragraph 1 of the Packaging Act who were suspected of not fulfilling their obligation for packaging materials they introduce into the Czech market, including the obligation to recycle and recover packaging waste to the required

extent, as well as non-compliance with reporting requirements. These suspected violations were often confirmed during the inspections, with the most common findings being the failure to achieve the specified recycling and recovery rates for packaging waste or incorrect completion of annual reports.

In the field of packaging management, the highest fine of CZK 200,000 was imposed on an importer of food products from Vietnam, who operates a wholesale food business in the Czech Republic and had not fulfilled the obligations under the Packaging Act prior to the CEI inspection. Only after the CEI inspection did they enter into a contract with an authorized packaging company, thus rectifying the situation. In this case, it involved a larger quantity of packaging materials, with more than half being sales packaging (such as plastic bags, glass bottles, metal cans). In 2022, the CEI also imposed fines on other importers of various packaged products (e.g., beverages, confectionery, cosmetics, electrical appliances) and food and beverage retailers.

## TRANSBOUNDARY WASTE TRANSPORT

The WMD CEI conducts inspections within its jurisdiction, focusing on the fulfilment of obligations related to the cross-border transportation of waste, primarily targeting waste generators and waste recipients according to EU Regulation on Waste Shipments No. 1013/2006 (hereinafter "the Regulation"). These are mandatory planned inspections in accordance with the requirements of the Regulation carried out at waste generators or facilities engaged in waste trade (import and export). Furthermore, cases were addressed based on the notifications from the MoE (international cooperation) and customs authorities (CA) who conduct inspections on roadways, especially at former border crossings. The purpose of these inspections was to verify compliance with the regulations (particularly bans and restrictions, waste categorization), including the administrative part of transportation (documentation of the transport). Collaboration between the CEI, CA, and law enforcement and judicial authorities continues as many cases of illegal transportation potentially show signs of criminal activity related to unauthorized waste management.

In 2022, 69 waste senders and receivers were inspected, primarily involving entities transporting waste under the so-called Green List regime. Ongoing regional cooperation with customs authorities was maintained. A total of 26 administrative offense proceedings were initiated as part of this departmental task. In 2022, 27 sanctions became legally binding, totalling CZK 5,205,000.

In 2022, the CEI cooperated with the Customs Administration, the police, and the Ministry of the Environment to address cases of illegal waste transportation, primarily involving mixed non-recyclable plastics. The most common violations identified were related to the transportation of waste with improperly completed transport documents. If the information in these documents was intentionally falsified regarding the actual route, recipient, and nature of the waste, such transportation was classified as illegal, leading to consequences typically in the form of administrative offense proceedings against the waste sender or receiver. Furthermore, carriers and their drivers must have all the required and fully completed documents during waste transportation. However, the Customs Administration, in cooperation with the Inspectorate, encounters errors in documents, especially in cases of waste transportation under the Green List system. These errors include incorrect recipient information, waste declaration, weight, sender's signatures, and more. Repeatedly, there are instances where, during the transportation of waste from abroad to a facility engaged in the preliminary treatment of waste R12/R13, the document lacks information regarding subsequent uses other than preliminary treatment, even though this obligation has been firmly established in the Waste Act since January 1, 2021. The transportation of waste solely for preliminary utilization operations (sorting, treatment, storage) does not constitute environmentally friendly waste utilization. Additionally, the Inspectorate encounters cases where no agreement has been concluded between the sender and recipient regarding waste utilization, import to a recipient not authorized to accept imported waste, or waste import without the consent of relevant authorities. The so-called "Green List" of waste continues to be misused to facilitate waste importation.

The Czech Republic continues to face cases of unauthorized waste transport into its territory. In 2022, this mainly involved waste transport characterized as mixed plastics with impurities, with suspicion that the plastics originated from sorted municipal waste. Despite limitations on waste export to Asian countries in previous years, the EU still lacks sufficient processing and recycling capacity for plastic waste. Support for recycling primarily benefits clean and easily processable plastics, especially single-type plastics used for packaging and production. However, plastic waste is highly diverse, and not all types and mixtures of plastics are easy to recycle. Due to the shortage of recycling capacity in Europe, there's a search for economically viable destinations where difficult-to-process or unusable waste can be exported, often using the "Green List" of waste regime to, ideally, legitimize the entire operation in the documents. The situation of importing waste for the pretence of recycling, where the actual purpose may be landfilling waste, continues. The Czech Republic still faces illegal waste imports, primarily from Germany, Italy, and Austria, benefiting Czech entities that arrange and organize these imports. In connection with waste imports to the Czech Republic, mainly from Germany in 2022, the Inspectorate filed criminal reports based on reasonable suspicion of committing the crime of illegal waste transport.



However, the issue of repatriating waste from illegal transport remains problematic. When waste is unloaded in the Czech Republic, there is often no consensus between the relevant authorities regarding returning the waste to the country of origin and setting clear deadlines for this process. This disproportionately increases the risk associated with illegally dumped waste. Given these findings, it is still necessary to focus on inspections and sanctions, particularly for entities that repeatedly engage in illegal waste transport. Intensive cooperation in this regard needs to be maintained with the Customs Administration and law enforcement authorities.

The most significant case in this departmental task, as evaluated by the Inspectorate, involved a company that repeatedly participated in illegal cross-border waste shipments as the waste recipient, specifically waste under code 19 12 04 Plastics and rubber, amounting to several thousand tons from Germany. In Annex VII of Regulation (EC) No 1013/2006 of the European Parliament and the Council on waste shipments, the method of waste utilization was specified as R10 Application to land, benefiting agriculture or improving ecology. However, the final facility, where the waste was intended to be used, was authorized to only utilize waste under code R12. In addition to the illegal cross-border waste shipments, the company also committed other violations of the Waste Act (e.g. providing false and incomplete reports for the facility, breaching the approved operational rules of the facility). The company was fined CZK 350,000. The company exercised its right to appeal the fine. The appellate body reduced the fine to CZK 300,000 (taking into account that the waste belonged to the category of "other" as a mitigating circumstance) but confirmed the violations identified by the Inspectorate. The fine became legally binding in November 2022.

#### 4.3.3 Overview of fulfilment of specific tasks

In addition to departmental tasks addressed at the national level, individual TI of the CEI set specific tasks that correspond to local needs, previous experiences with similar or recurring issues in the region, or they may select specific entities for follow-up inspections monitoring the waste streams. In the context of specific tasks, in 2022, activities such as discrepancies in records based on data analysis, old environmental burdens, cross-border waste transport, scrap yards, specific entities, and so on were inspected. These actions, apart from the standard inspection activities that lead directly to initiating administrative offense proceedings, also involve field monitoring or gathering additional information for further inspection inquiries, and potentially for cooperation with other state authorities or law enforcement authorities.

#### 4.3.4 Significant cases – the highest fines

##### Praha TI

RPR Recyklace a.s.

The CEI, during its inspection of waste management in an industrial area located on the plot number 472 in the Kralupy nad Vltavou municipality, found that the company RPR Recyklace a.s. was misusing its operating permit for its mobile facilities, especially inappropriately taking ownership of waste materials and subsequently unlawfully and uncontrolledly accumulating them on the site in question. The company RPR Recyklace a.s. unlawfully accumulated a total of 10,106.08 tonnes of waste category 19 12 12 - Other wastes (including mixtures of materials) from the mechanical treatment of waste not specified under code 19 12 11, and waste category 19 12 04 - Plastics and rubber. This case appears to be significant primarily due to the extent of unauthorized and uncontrolled accumulation on the site in question, which subsequently led to a large-scale fire. It was determined that the waste most likely originated from abroad. For this serious violation of Act No. 541/2020 Coll., on Waste,



The portion of the industrial area with waste disposal.

as amended, the company RPR Recyklace a.s. was imposed a final fine of CZK 2,000,000 by the CEI. The decision became legally effective on October 18, 2022. Simultaneously, the Inspectorate filed a request with the Regional Office of the Central Bohemian Region to revoke the issued permit for the operation of the mobile facility. The Regional Office of the Central Bohemian Region granted this request and revoked the permit due to the violation of the Waste Act. The CEI filed a criminal report against the company RPR Recyklace a.s. on suspicion of committing a criminal offense related to unauthorized waste handling under Section 298 Paragraph 1 and Section 298 Paragraph 2 of Act No. 40/2009 Coll., the Criminal Code, as amended.

### České Budějovice TI

MOLITOR servis s.r.o.

Illegally accumulated waste at the Silva (Samoty) area in Písek - apparently, it is a "straw man". A significant amount of waste, including tyres, plastics, rubber, textiles, etc., was dumped on the leased plot, likely originating partially from abroad and partially from domestic suppliers. The company has only one director and no employees. In 2021, the CEI conducted an inspection in this location, leading to the initiation of a fine proceeding, which was concluded as of April 5, 2022, with a final fine of CZK 2,000,000. The CEI collaborated with the Písek Municipal Office (MEP), the South Bohemian Regional Office, and the Czech Police in this matter, continuously sharing its findings from the past year.



Site with an illegal dumping of waste tyres

### Plzeň TI

The town of Hartmanice

The CEI imposed a fine of CZK 180,000 for the misuse of an already closed landfill for further waste disposal. By comparing aerial images and performing mathematical calculations, the development of illegal waste disposal extending towards the ravine was mapped. Administrative offense proceedings were initiated as early as 2021 by an order, followed by a decision and subsequent confirmation of this decision by the appellate body.

### Ústí nad Labem TI

CARS WRECK s.r.o.

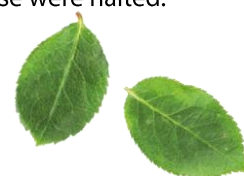
During the inspection of the facility CARS WRECK s.r.o. (referred to as "CW") in the Lišnice municipality in the Most district, it was discovered that there was a total of 333 car wrecks at the facility in various stages of disassembly. A representative of the company stated that the company does not handle waste (car wrecks) but rather deals with personal vehicles that have been involved in accidents or partially disassembled. These vehicles are purchased in various conditions and then repaired and resold. The inspection revealed that most of the car wrecks were without registration plates, some were missing wheels, engines, and sometimes parts of the body or seats. There were no trays or other means to prevent operational fluids from leaking into the surrounding environment beneath the car wrecks. VINs were identified and recorded for 80 car wrecks. By verifying the VINs of these 80 car wrecks in the MA ISOH system, the Inspectorate determined that these car wrecks were originally handed over by their owners for ecological disposal to the facilities of the company SK METAL recycling s.r.o. The company CW provided a "Vehicle Storage Agreement" for these car wrecks, which was concluded between both parties. According to this agreement, the custodian (CW) is not authorized to use the stored item or allow its use by third parties. During its investigation of CW's activities, the Inspectorate further found that this company operates the website [www.vrakac.cz](http://www.vrakac.cz), where, among other things, it offers car wrecks identified during the inspection for disassembly and spare parts, including those that, according to the provided storage agreements, belong to the company SK METAL recycling s.r.o. .





Illegal car scrapyard

The company CW conducted the aforementioned activities without being the operator of a facility for the collection or processing of end-of-life vehicles. For violating Act No. 542/2020 Coll., on end-of-life products, the company was fined CZK 800,000 by the decision of the CEI dated September 29, 2021. When determining the amount of the fine, the CEI took into account the fact that this was a repeated violation of the same obligation, namely the illegal handling of car wrecks, for which the company had already received final fines on two prior occasions. The company appealed the CEI's decision, but the appellate body upheld the CEI's decision to impose the fine in full. Additionally, the Inspectorate filed a proposal with the trade licensing authority to initiate proceedings for the revocation of the trade license; however, the proceedings to revoke the trade license were halted.



## Hradec Králové TI

UMBRELLA s.r.o.

The basis for the proceedings were the results of the inspection of the company UMBRELLA s.r.o. conducted in 2021, focusing on the operation of mobile equipment for processing construction and demolition waste. The inspection took place in the Poříčí area, based on information provided on the company's own website, referring to the operation of the "Recycling Centre" in Poříčí. The reference to the operation of the "Recycling Centre" in the Poříčí municipality, part of Trutnov, was situated within the area of waste utilization facility operations as part of terrain adjustments conducted by another entity. However, this facility had not been physically operated since 2014. The operation of this waste utilization facility was known to the CEI from previous inspection activities conducted in 2014. During the period under scrutiny by the CEI, the operation of the facility was properly permitted by decisions of the respective regional authority but only as a mobile facility. The collected waste was concentrated in piles not only on the lands permitted for waste utilization facility operations but also on adjacent lands. Once a sufficient quantity had been accumulated, their processing was directly carried out in the given area. The output after processing in the company's facility resulted in two fractions: oversize fraction, which, when meeting legislative requirements, became recyclable material (a product), and undersize fraction, which constituted residual waste and was left in piles within the area. Based on all the findings, the CEI concluded that the company was handling various types of construction waste in the Poříčí area without being the operator of a stationary facility designated for handling these specific types and categories of waste on the property. During the period under

scrutiny by the CEI, a total of 39,320 tonnes of various types of construction waste were received in the Poříčí area. Additionally, the CEI found violations of several operational rules, including violations of conditions related to waste records, the method of waste acceptance, the extent of required analyses, the interpretation of the output as a product, operational logs, and others. In 2021, the CEI initiated an administrative offense proceeding against UMBRELLA s.r.o. for violating the operational rules of the facility and improper waste handling in unauthorized areas. For these mentioned offenses, the company was fined CZK 2,000,000. The company appealed this decision to the Ministry of the Environment, which rejected the company's appeal and upheld the CEI's decision in its entirety.

Operation of an unauthorized construction waste recycling facility



### Havlíčkův Brod TI

METALŠROT TLUMAČOV a.s.

In 2022, based on a complaint, the Inspectorate conducted an audit of the vehicle scrapping and acquisition facility located in the Pávov municipality (Identification Number: CZJ00047). During the inspection, it was found that the company Metalšrot Tlumačov a.s. violated the valid operational rules in four aspects. Specifically, there were errors in taking photographic documentation (it was not clear from the photographic documentation whether end-of-life vehicles were present in the facility at the time of their receipt), errors in entering data into the MA ISOH system (specifically, missing vehicle parts were not recorded), the immediate maximum capacity of the facility for hazardous waste was exceeded, and on the day of the inspection, the facility was also operating on land that had not been approved for this purpose. Furthermore, the inspection found that in the controlled facility, waste category 16 01 04\* - End-of-life vehicles, with a total quantity of 3.44 tonnes, had been stored for at least 12 months in 2021, which is longer than 9 months. This resulted in the storage of this type of waste, even though the controlled facility was not permitted for waste storage. The Inspectorate imposed a final fine of CZK 80,000 on the company Metalšrot Tlumačov a.s. for the aforementioned violations of the Waste Act.

### Brno TI

THERMOSERVIS-TRANSPORT s.r.o.

The company was fined CZK 450,000 for failing to comply with the operational rules of the mobile waste utilization facility in the preparation of a product from construction waste called "STAVOZEM," with a quantity exceeding 900,000 tonnes (a mixture of soil and demolition waste). However, the vast majority of this waste had been deposited by another entity in violation of waste regulations on the territory of the reclaimed Smolín sandpit, on the area of the reclaimed landfill of the town of Břeclav in the Charvátská Nová Ves municipality, and on three other properties in the cadastral area of Němčičky near Hustopeče. The company did not provide any certificates issued by an accredited laboratory for the product "STAVOZEM" for the period from 2017 to 2020. It should be noted that the company was producing "STAVOZEM" for a specific location and intended use (incorporation into construction or terrain adjustments), and the composition of the produced product should correspond to that use. An appeal was filed against the CEI's decision, and the fine was reduced by half in a decision by the Ministry of the Environment (MoE). Although the appellate body largely agreed with the Inspectorate's assessment of the case, it chose to reduce the imposed fine, mainly due to subsequent evaluation by an accredited laboratory, which concluded that "STAVOZEM" could be used for purposes such as filling, excavations, trenches, terrain adjustments, or the reclamation of surface mining works.

### Olomouc TI

Bergasto a.s.

In December 2022, the company Bergasto was fined CZK 500,000. This company was storing hazardous waste category 16 03 07\* - Mercury metal in a facility located in a building in the immediate vicinity of the Zábřeh train station in Moravia without meeting the technical requirements for the storage of waste mercury set by the relevant implementing regulation. During the inspections conducted, containers filled with mercury metal were placed directly on the warehouse floor without any safeguards against potential leakage. Mercury metal is a highly toxic chemical element, and for handling mercury metal, some of the strictest criteria are established due to its significant health risks for humans (e.g., it can cause death when inhaled, harm the fetus in a mother's womb, and damage organs with prolonged or repeated exposure), animals (it is highly toxic to aquatic organisms), and the environment.



### EKOTERMEX, a.s.

In 2022, inspectors conducted an inspection at the hazardous waste incinerator operated by EKOTERMEX in Pustiměř, focusing on the handling of healthcare infectious waste as part of the Waste Act. During this inspection, a violation of the Waste Act was identified, as the operator failed to transfer the accumulated waste for disposal after the expiration of the permit. The operator was instructed to take corrective measures. Since a subsequent inspection revealed that these corrective measures were not being implemented, the operator will be called upon to fulfill them through an enforcement notice, and if necessary, enforcement proceedings will be initiated.



Illegal handling of waste mercury metal.





Medical waste in a facility for which the permit was not renewed.

## Ostrava TI

GLOBODERA GROUP, s.r.o. (v likvidaci)

The inspection of this company was initiated in 2019 based on a report highlighting the illegal handling of waste plastic category 19 12 04 - Plastics and rubber by the way it was being stored in the facility designated for waste handling under the name "Revitalization of the former Dukla mine area - Kašpárkovice landfill," operated by ČEZ Energetické produkty, s.r.o. The report highlighted a situation that resembled the disposal of plastic waste in a reclamation structure. During the inspection, it was found that in the facility's area, there was an unspecified quantity of a heterogeneous mixture of waste, mainly various types of plastic waste, including municipal waste in the form of compressed bales, as well

as loose waste. All the quantities of deposited plastic waste in the facility's area were brought in by the legal entity GLOBODERA GROUP s.r.o. in liquidation (hereinafter "the GLOBODERA company"), which was preceded by an oral agreement with the legal entity OVEX Plus s.r.o. The waste originated from abroad (Italy, Germany) and was transported by foreign carriers. ČEZ Energetické produkty, s.r.o. orally consented to OVEX Plus s.r.o. to deposit plastic waste in the facility's area. Part of the plastic waste was incorporated into the body of the emerging reclamation structure, then removed. The rest was transported from the facility to a nearby waste landfill operated by DEPOS Horní Suchá, a.s. (207 tons), and further waste was transported from the facility's area and handed over to ESET, spol. s r.o., totalling 324.7 tons.

The company GLOBODERA transported waste category 19 12 04 across the border into the Czech Republic with the purpose of its utilization. The provided documents indicated that the destination and utilization place (handling code R3) should have been the facility located at Lihovarská 679/40, Ostrava-Kunčičky. However, in this facility, the waste was not actually utilized or recycled. It was also found that the company unlawfully handled plastic waste in the facility in Šenov without the required permit - a decision of the Moravian-Silesian Region Office for the operation of the facility. In this matter, joint proceedings for offenses were initiated in 2021, and on November 3, 2021, a decision with reference number ČIŽP/49/2021/6720 was issued, imposing a fine of CZK 2,000,000. An appeal was filed against the decision, and by a decision of the Ministry of the Environment dated April 5, 2022, the fine was upheld.

In connection with the mentioned case, the company ČEZ Energetické produkty, s.r.o. was also fined CZK 450,000 in 2020 for allowing unauthorized handling of plastic waste within the facility for waste utilization and its unauthorized incorporation into the recultivation structure. Furthermore, in connection with the waste removal from the Kašpárkovice area, fines were imposed in 2020 on STEPHANE Corp s.r.o. (CZK 100,000) and ESET, spol. s r.o. (CZK 50,000) for violating the control order (failure to submit documents for inspection) and also for violating the Waste Act. In this matter, the CEI submitted a report to the Police of the Czech Republic regarding suspicion of committing a criminal offense related to unauthorized waste disposal under Section 298 paragraph 1 of Act No. 40/2009 Coll., the Criminal Code, against the company GLOBODERA. According to available information, the Regional Court in Ostrava imposed a sentence on the responsible natural person for the offense of unauthorized waste disposal under Section 298 paragraph 1 of the Criminal Code in the context of criminal proceedings.

## Illegal import and deposition of mixed plastic waste in the ash landfill





By its decision, the CEI imposed a fine of CZK 750,000 on Purum s.r.o. for handling hazardous waste in facilities located on land that was not designated or permitted for this purpose. Unauthorized collection and storage of hazardous waste was found on the outdoor premises of the PURUM Rynoltice facility. Furthermore, it was found that mercury metal waste was stored in violation of the conditions stipulated by the decree on the details of waste management. Common storage with other hazardous waste was identified, and the location and means of storage were not equipped with monitoring devices for potential vapor emissions. Storage containers were not placed in suitable tanks with surfaces devoid of cracks and fissures, impermeable to mercury, and with retention capacity corresponding to the quantity of stored mercury.



Storage of hazardous waste outside designated areas

#### 4.3.5 Findings from inspection activities

In 2022, in contrast to the two previous "COVID" years, the Inspectorate was able to conduct regular inspection activities, including full field investigations at the premises. This resulted in a higher overall number of inspections and an increased number of findings of unlawful conduct, leading to more administrative offense proceedings. In 2022, there was a 25% increase in the number of decisions issued compared to the previous year. Among all the divisions of the CEI, the Waste Management and Chemical Safety division issued the highest number of decisions with the highest total amount of administrative penalties. It is positive to note that in the field of waste management, the Inspectorate is mostly successful in both appeal proceedings, and subsequent proceedings are generally successful in administrative courts. Only exceptionally are cases returned to appeal authorities or courts for further review. In this regard, for more complex cases, a consistently high quality of administrative offense proceedings can be observed.

The control activities were significantly influenced by the new or amended obligations of the "new Waste Act" and the Act on End-of-Life Vehicles, which became effective on January 1, 2021, as well as their transitional provisions that expire gradually, along with new implementing regulations. In practice, this is also linked to the issue of consents, where old consents issued by regional authorities are gradually being replaced by new ones. Furthermore, certain interpretational issues continue to persist in practice, such as the distinction between waste and non-waste, by-products, technological waste designated for landfilling, waste disposal, new record-keeping obligations, and more. Both companies and permitting authorities grapple with these issues in practice, and ultimately, the CEI faces challenges related to these factors. These factors have a significant impact on the Inspectorate's field control activities. Within the framework of these activities, it is necessary to apply the new legal framework in terms of substance, methodology, and process.

A positive trend is the increasing involvement of customs authorities and the Czech Police in the enforcement of the law and the fight against criminal activities related to waste. This is due to ongoing educational activities, cooperation, regular meetings, and effective communication, often with substantial support from the Supreme Public Prosecutor's Office in Prague. Collaboration on cases occurs, either initiated by the CEI based on its own findings or with active CEI participation as an expert consultant. This typically involves complex cases that require the use of investigative methods or cases where administrative sanctions alone may not be sufficient to deter offenders of offenses. It's essential to consider that some entities or individuals may never cooperate with regulatory authorities, and in some cases, administrative sanctions may not be a sufficient deterrent for highly profitable activities. The activities of the Inter-ministerial Working Group for the Prevention and Combating of Criminal Activities Related to Waste continue as outlined in the "Strategy for the Prevention and Combating of Criminal Activities Related to Waste for the Period 2021-2023". However, it's crucial to maintain and develop this cooperation and establish long-term goals, such as education, awareness campaigns, organizational structures, resource allocation, changes in legislation, etc.,



to ensure that this collaboration and activity continue to be effective in the long term and positively contribute to the safety of the shared environment and the health of people in the Czech Republic. At the same time, this collaboration can contribute to a long-term alignment of compliance with environmental legislation, as some companies may not respect these některé requirements or apply their own standards for enforcement.

In terms of the most serious and common violations of the Waste Act, the Inspectorate most frequently encountered the improper handling of waste, including illegal waste storage, waste dumping in undesignated areas, land modifications, and illegal disposal of waste by its producers, among others. These illegal activities constituted approximately one-quarter of all cases related to waste management. The total amount of fines imposed under the Waste Act amounted to CZK 18.3 million, representing 60% of the total fines imposed under the Waste Act.

In the case of individual departmental tasks, it can be noted that in the field of waste management and chemical substances, similar deficiencies to previous years were identified, and no significant negative trend was observed in any of these areas. The most common problem continues to be the handling of construction and demolition waste in violation of the legal regulations.

A long-term problem appears to be the insufficient capacity for the thermal treatment of hazardous waste, and the amount of such waste is increasing, especially in healthcare. Legislative restrictions on landfilling this waste are anticipated. Unfortunately, regional citizens often oppose the construction and development of incinerators for the thermal treatment of waste, especially healthcare waste. The same applies to the energy recovery from waste, such as mixed waste and waste resulting from waste sorting, as legislation anticipates a gradual reduction in landfilling (current practice). Another practical challenge is that a significant amount of liquid waste is being removed from the regulated waste management regime and transferred under the wastewater regime within the Water Act. This often happens due to pressure from certain waste management companies on waste producers. This complicates oversight of the quality and final disposal facilities for these liquids. Another threat is the purposeful transformation of waste into products, especially for unauthorized landfilling. This illegal practice can also be observed when importing waste from abroad. For instance, some slags, waste from tyre shredding, or various waste mixtures do not meet the criteria for "end-of-waste," and their utilization in these ways is prohibited. There is potentially high financial motivation for some entities involved in "land reclamation" in these practices. Generally, increased attention is still needed in the area of handling hazardous waste, especially among selected authorized persons, such as during supervision of the OEB. These entities seek the cheapest, and potentially illegal, ways of dealing with waste, either by reclassifying the waste to hide its true properties and subsequently deposit it in landfills, avoiding the fee obligation during landfilling, or creating temporary illegal depots or improper disposal methods.

In 2022, concerning chemical safety issues, inspectors focused primarily on biocidal products (many inspections were coordinated with the Regional Hygiene Station) and the content of substances in articles (regulated by REACH and POPs regulations). Inspections for both these issues were conducted as part of pan-European inspection projects supervised by ECHA.



## 4.4 Nature protection and CITES



### 4.4.1 Overview of the inspection activity in 2022

In 2022, inspectors from the Nature Protection Department and CITES Department focused their activities on verifying situations, activities, and entities that could pose a threat to the interests protected by departmental laws on nature and landscape protection, the protection of agricultural land resources, the protection of species of free-living wildlife and wild plants regulated by trade, the handling of genetically modified organisms, zoological gardens, and the conditions for the utilization of genetic resources under the Nagoya Protocol. Inspection activities can be divided into planned activities, following previous findings, reflecting the current situation, and making up approximately 40% of inspection capacity, activities carried out based on public suggestions (also around 40%), and those conducted reactively based on their own findings (approximately 20%).

In 2022, the inspectors of nature protection and CITES conducted a total of 2,387 inspections and investigations (more than a 10% increase compared to the previous year) under the relevant departmental laws. With a team of 86 inspectors, this averages to over 27 inspections per inspector per year. Additionally, within their scope of work, they participated in 82 further inspections in collaboration with other specialized units. During the year 2022, a total of 857 decisions became legally binding, marking an increase of nearly 38% compared to the previous year. These decisions included 646 penalty decisions (265 for legal entities and natural persons conducting business, and 381 for individuals), 14 reprimands, 29 decisions to restrict or cease activities, 132 decisions for confiscation or removal, 36 corrective action decisions, and 21 preliminary measures.

The total amount of fines imposed in 2022 reached CZK 10,588,150, representing an increase of more than 31% compared to the previous year. Of this amount, CZK 7,920,500 were fines imposed on legal entities and individuals conducting business, while CZK 2,667,650 comprised fines imposed on non-business individuals. In 2022, the nature protection and CITES inspection also submitted a total of 13 reports to authorities involved in criminal proceedings, especially in the field of CITES, and 90 notifications directed to other levels of state administration authorities. In most of the monitored indicators, a significant increase in the extent of inspection and administrative activities can be observed, especially in comparison to previous years affected by the epidemic situation and implemented measures.

A significant portion of the Inspectorate's supervisory activities involves investigating citizens' and associations' suggestions, which serve as a valuable source of information, especially regarding the protection of trees growing outside of forests and the protection of agricultural land resources. In 2022, inspectors specifically addressed 1,126 suggestions within the scope of nature protection. On average, this equated to just over 13 inquiries investigated per inspector per year.

The work of the Nature Protection Department is most significantly reflected in the inspection and administrative activities related to compliance with the provisions of **Act No. 114/1992 Coll., on the Protection of Nature and Landscape**. In the field of nature protection, traditionally, the largest share of inspection (2,012 out of a total of 2,387 investigations and inspections) and administrative (fines totalling CZK 8,959,150 out of CZK 10,588,150) activities was observed. This includes all issued preliminary measures and the majority of decisions to restrict or cease activities. Furthermore, more than two-thirds of the issued corrective action measures and a significant portion of reports submitted to other state administration authorities fall within the realm of nature protection. The spectrum of inspection, administrative, and regulatory activities in the field of nature protection is very extensive. The following sections provide a more detailed overview of the specific tasks and significant cases carried out by the Inspectorate in this year.

An integral part of the standard activities of the Nature Protection Department is the inspection of compliance with the provisions of **Act No. 334/1992 Coll., on the Protection of Agricultural Land Fund**. In 2022, a total of 62 inspections or investigations were conducted under this Act, with 13 of them being carried out in collaboration with other specialized units of the CEI, especially the Waste Management Department and the Water Protection Department. During the observed period, the Inspectorate also investigated 48 suggestions that raised concerns about possible violations of legal regulations in this area. In total, five suggestions were forwarded to other state administration authorities because the CEI concluded that violations of the Agricultural Land Fund Protection Act were occurring, which fell outside their jurisdiction. Most of the received suggestions traditionally pointed to the issues of soil dumping, waste disposal, or the deposition of other materials on land designated as agricultural land. In 2022, fines for violations of Act No. 334/1992 Coll. were imposed on 8 entities, with the total amount of these fines amounting to CZK 168,000.



In the course of their inspection activities, the Inspectorate closely collaborates with the Central Institute for Supervising and Testing in Agriculture (CISTA) and investigates their suggestions. The CISTA conducts agrochemical testing of agricultural soils to assess the presence of hazardous elements and substances in agricultural land. If excessive levels of these elements and substances are detected in the soil, the CISTA submits a suggestion to the CEI for the investigation of soil contamination. In 2022, the Inspectorate received a total of 8 suggestions for investigation, which pertained to approximately 11 different locations within the territory of the Czech Republic. The CEI conducted inspections of the agricultural entities at those specific locations and notified the relevant state administration authorities of any findings indicating the exceedance of hazardous elements or substances according to the current legislation.

In the **CITES** sector, a total of 263 inspections were carried out in 2022 (compared to 130 inspections in 2021) under Act No. 255/2012 Coll., on Inspection, along with approximately 1,500 inspection inquiries and investigations, particularly in border control activities (airports, customs posts). The Inspectorate also handled a total of 98 suggestions in the CITES sector (compared to 39 in 2021). Compared to 2021, there was a significant increase in inspection activity in both the field of offenses and administrative proceedings. In 2022, the Inspectorate imposed a total of 213 fines (of which 202 were on individuals and 11 on legal entities and individuals conducting business) in the total amount of CZK 1,282,000 (CZK 1,207,000 on individuals and CZK 75,000 on legal entities and individuals conducting business). They also issued 6 reprimands and 11 corrective measures. (In 2021, a total of 134 fines were imposed, amounting to CZK 423,800 in total.) In 2022, a total of 129 decisions for confiscation became legally binding (compared to 92 in 2021). The focus on streamlining the Inspectorate's work in the CITES sector resulted in nearly a 100% increase in most of the reported items.

The Czech Republic plays a significant international role in the field of wildlife crime as **a breeding, cultivating, and collecting power, as well as a destination, transit, and country of origin**. In 2022, the Inspectorate continued to **uncover illegal activities in cross-border movements of people and goods, which intensified after the relaxation of anti-epidemic measures**. In total, in 2022, the Inspectorate received approximately 900 notifications of imports and exports, similar to the number received in 2021. Each of these notifications was individually examined by the Inspectorate. For all these notifications, the Inspectorate provided feedback or consultation to the notifier, and in 455 cases, they also cooperated with customs authorities during inspections. At **Ruzyně Airport**, the CEI recorded a total of 453 active collaborations with customs authorities in 2022, which is comparable to the numbers in 2021 (506). The majority of illegal trade consisted of **individual imports of products related to traditional Asian medicine**, carried out by members of Asian communities. In 2022, more than 70 cases of these imports were detected, which represents a nearly threefold increase compared to the previous year. A significantly smaller proportion (approximately 10 cases) of illegal imports were categorized as "tourist imports," including items such as corals, mollusc shells, products made from animals and parts of their bodies (bird feathers, crocodile products, and hides). In the case of declared **postal shipments**, the Inspectorate conducted a total of 336 inquiries and inspections in 2022, which is a significantly larger volume compared to the previous year (272 inquiries). Violations of CITES regulations during inspections of shipments of **live plants**, which had been problematic in the past, were only found to a minimal extent by the Inspectorate (one case). Other illegal cases, typically numbering in single digits, primarily involved postal imports of **dried insects** and items made from **crocodile leather**.

**In the area of uncovering illegal trade in large felid species**, particularly in the disposal of carcasses, the Inspectorate collaborated intensively with law enforcement authorities and addressed several cases involving the seizure of both live animals and skeletal parts. In 2022, the Inspectorate examined around 700 exported specimens of birds of prey and continued to inspect breeders of raptors within the country.

The Inspectorate cooperated intensively with **law enforcement authorities** to which it submitted a total of 9 criminal reports, a number comparable to the previous year (8). The Inspectorate provided cooperation to customs and police authorities, particularly in actions involving the handover of detained specimens for further procedures, taking custody of secured specimens, providing expert consultations during home searches, and producing expert opinions in more than 100 cases.

In the field of non-administrative and preventive activities, the Inspectorate, in collaboration with other authorities, contributed to the fulfilment of the goals of the **Action Plan** for combating illegal trade in endangered species of wildlife and plants until 2023. The Inspectorate also continued its involvement in the advisory group of the **IMPAKT VJ01010026** project at the Institute for Environmental Studies, Faculty of Science, Charles University, focusing on the utilization of forensic methods in the context of wildlife crime. Several dozen **consultations** provided by the Inspectorate to citizens, particularly in areas related to intended individual and commercial imports and exports, significantly contributed to the reduction of illegal tourist imports in 2022.

A significant part of the Inspectorate's activities involves international cooperation. In 2022, the Inspectorate once again actively participated in a European project aimed at **preventing illegal international trade in European eel**, particularly focusing on transit from Western Europe to Eastern Asia. They conducted inspections not only of European eel imports but also verified all reported exports of fish from the Czech Republic to Asia. The Inspectorate also took part in EU programs targeting the fight against wildlife crime, with individual inspectors participating in **European Commission meetings and working groups, international conferences organized by INTERPOL, and contributing to the organization of the global CITES CoP19 conference**.

Inspections to ensure compliance with the provisions of **Act No. 78/2004 Coll., on the Handling of Genetically Modified Organisms and Genetically Modified Products**, **Act No. 162/2003 Coll., on the Conditions for Operating Zoos**, and **Act No. 93/2018 Coll., on the Conditions for the Use of Genetic Resources under the Nagoya Protocol**, are part of thematic departmental tasks, the evaluation of which is included in the following section. These areas currently concern a limited number (on the order of tens) of entities.

#### 4.4.2 Overview of fulfilment of departmental tasks

The overall inspections, so-called departmental tasks, primarily include mandatory controls arising from interdepartmental links (Cross Compliance), activities within specific agendas based on existing knowledge, experiences, or requirements from the Ministry of the Environment (handling of genetically modified organisms, zoos, compliance checks with imposed measures).

##### 1. Inspections of agricultural entities as part of the Cross Compliance (CC) process.

In connection with the allocation of agricultural subsidies, the Inspectorate carried out inspections of agricultural entities within the planned scope. Specifically, in the past year, they conducted what is referred to as the conditionality checks for a total of 316 applicants for agricultural subsidies. Compliance with the Statutory Management Requirements (referred to as "SMR") stemming from Council Directive No. 79/409/EEC on the conservation of wild birds (SMR 2) was assessed by the Inspectorate in 204 cases. Additionally, they examined compliance with the requirement originating from Council Directive No. 92/43/EEC on the conservation of natural habitats (SMR 3) for 114 entities.

The inspections focused on meeting the requirements arising from the mentioned European directives and compliance with the relevant provisions of Act No. 114/1992 Coll. are aimed at areas where there is a higher risk of conflicting agricultural activities and protected interests. In the case of SMR 2, this concerns land where unauthorized interference may occur with non-forest trees, significant landscape features, watercourses, and river valleys, or bird nesting sites, or land with occurrences of selected specially protected species associated with grassy areas (blue butterflies, water rails). The requirement of SMR 3 is verified in connection with the existence of the subject of protection of a European significant site within the area managed or its immediate surroundings.

The majority of conditionality checks were carried out based on a centrally prepared control plan, which includes at least 1% of the total number of applicants for agricultural subsidies. Only two checks, focusing on compliance with the requirements arising from the directive for the protection of wild birds, were carried out exceptionally based on a submitted suggestion during the reporting period. In the past year, no deficiencies were found during conditionality checks that would warrant a reduction in subsidies. However, during one compliance check within the competence of the Havlíčkův Brod TI, prohibited activity involving the unauthorized application of chemical preparations and biocides in the Zubří Nature Reserve and simultaneously in the Zubří European significant site within Zone 1 of the Železné hory Protected Landscape Area was identified. A legally binding fine of CZK 33,000 was imposed on the agricultural entity for this violation.

The entities subject to inspection typically cooperate with the Inspectorate and respect its instructions to implement preventive measures to prevent potential conflicts between agricultural activities and the public interest in the form of nature and landscape protection. During inspections, the Inspectorate continually highlights selected protected interests and potential risk aspects of agricultural activities, including possible implications for the reduction of agricultural subsidies. This can be attributed to the relatively low number of violations detected, especially in recent years.

##### 2. Inspections of handling genetically modified organisms

Inspections of handling genetically modified organisms are carried out according to a pre-prepared plan that, given the limited number of entities dealing with genetically modified organisms, allows for regular monitoring of each GMO user at specified intervals.

In 2022, a total of 33 inspections were conducted in this area. In 30 cases, these were inspections of closed handling of GMOs in risk categories 1-2. Two other inspections of closed handling, planned for 2022, were conducted in the first few days of 2023 due to operational reasons. Violations of Act No. 78/2004 Coll., on the Handling of Genetically Modified Organisms, were found



during inspections in only one case. This was an administrative error involving failure to submit the final report on the completion of GMO handling within the legally prescribed deadline to the Ministry of the Environment (MoE), along with the inclusion of false information in annual reports on closed handling. Proceedings for administrative offenses will be conducted in this matter.

In 2022, 2 inspections were conducted, focused on the release of transgenic plants into the environment, known as field trials. As previously mentioned in the previous reports, authorized entities significantly reduced the establishment of field trials. In 2022, only a long-term trial with GM plums and a trial with GM barley, initiated in 2019, continued.

Another way of releasing GMOs into the environment is through clinical evaluations of medicinal products using genetically modified cells. In 2022, the compliance with Act No. 78/2004 Coll., regarding this type of GMO release into the environment, was inspected for one entity authorized for both confined use and conducting clinical trials.

During the inspections of GMO release into the environment, no violations of the Act on the Use of Genetically Modified Organisms were found.

### 3. Zoo Inspections

During 2022, a total of 17 inspections of zoos operating under licenses issued by the Ministry of the Environment (MoE) were conducted. These inspections encompassed the verification of compliance with obligations stipulated by Act No. 162/2003 Coll., on Zoos, as well as the management of specimens covered by the CITES as per Act No. 100/2004 Coll. Additionally, these inspections included the handling of specially protected animal species and wild birds in line with Act No. 114/1992 Coll. Due to the fact that these are usually inspections of facilities that house a significant number of specimens and require processing a large volume of documents, including verifying facts with other state authorities, not all of the inspections initiated in 2022 have been completed yet. Out of the inspections initiated in 2022, the inspection of 1 entity has not been finalized. In the case of 4 zoos operated under licenses, violations of Act No. 100/2004 Coll. were identified. In all instances, these were relatively minor administrative errors, related to the failure to report changes concerning several specimens to the registration authorities within the timeframe specified by law. In all 4 cases, the operators of zoos were fined by the Inspectorate for offenses under the Act on Trade in Endangered Species. In 2 cases, violations of Act No. 162/2003 Coll. were identified, consisting of repeated failure to submit annual activity reports of the zoo to the Ministry of the Environment within the statutory deadline. In one case, the operator of the zoo was fined for this offense, while in the other case, the administrative offense proceedings have not yet been initiated.

The Inspectorate further collaborated with the MoE, providing it with information and documents necessary for the implementation of its inspection activities, mainly in the form of opinions on MoE's regular inspections or responses to license applications. In 2022, the Inspectorate prepared a total of 13 opinions on MoE's regular inspections and 1 response to a request for a license to operate a zoo. In this case, it was a response to the application of a subject who already held a zoo operating license, but in 2022, the validity of this license, issued for a fixed term, was expiring.

An integral part of the inspection activities focused on compliance with Act No. 162/2003 Coll. were inspections of breeding facilities that, through their activities, could exhibit characteristics of a zoo. Inspections of facilities of this type were carried out based on a complaint or the Inspectorate's own findings. In 2022, a total of 3 such facilities were inspected. During the inspection of these facilities, it was found that in one case, the facility met the definition of a zoo as defined in Section 2 Paragraph 1 Letter a) of Act No. 162/2003 Coll. This facility has already been closed to the public by a final decision of the Inspectorate, and the operator has been fined for the offense of operating a zoo without a license. In the case of the second facility, it was determined that it is not considered a zoo under Act No. 162/2003 Coll. However, its operator was using the name "ZOO" for this facility without authorization. The Inspectorate also imposed a fine on the operator for this offense. The inspection of the third facility has not been completed yet.

In 2022, a facility that met the definition of a zoological garden and was operated without a license was closed to the public by a legally binding decision based on inspection findings made in 2021. The CEI imposed a fine on this entity for the offense of operating a zoological garden without a license in 2022.

#### 4. Inspections of compliance with measures imposed by the CEI under Section 66 and Section 86 of Act No. 114/1992 Coll.

Among the significant competencies of the Inspectorate are imposing restrictions or setting conditions for the execution of activities, determining conditions for corrective measures regarding harmful activities, or prescribing alternative measures for remedy. The essence of this task is to inspect the fulfilment of imposed obligations and, if necessary, take further steps to enforce them. The selection of obligations imposed for monitoring their fulfilment lies within the purview of individual territorial inspectorates, with the aim of progressively verifying all decisions of this kind. This task is also partially related to inspecting the fulfilment of measures imposed by other state administration authorities, typically those involving alternative plantings specified in felling permits.

A total of 65 inspections were conducted by the Inspectorate, with a predominant focus on inspecting the implementation of alternative tree planting measures among the measures for remedy. Significant attention was given to inspections of compliance with specified conditions for conducting activities related to the protection of habitats of specially protected plant and animal species and protected areas, typically in connection with landscape management or construction activities. The imposed restrictions or prohibitions on activities were primarily aimed at ensuring the protection of habitats for specially protected plant and animal species. Among the inspected cases, it is worth mentioning the restoration of the breeding habitat of the tundra vole to its original state, ensuring the protection of the field vole in connection with the ban on rodenticide application, and securing the protection of bats in human structures. Inspections were also carried out for temporally and spatially diversified mowing, or mowing aimed at targeted support of selected endangered species. These tasks were imposed as compensation for irremediable damage caused at an adjacent location. Finally, two inspections were conducted regarding the ban on tree felling or the prohibition of spreading limestone dust in the area of KRNP (Krkonos National Park).

The imposed measures and obligations were predominantly adhered to by the obligated entities. Non-compliance with the specified restrictions or measures imposed by the Inspectorate was identified in a total of 10 cases. Almost exclusively, these cases involved a failure to carry out the alternative tree planting or the neglect of subsequent care, resulting in the subsequent loss of the planted trees. The identified violations will be the basis for initiating offense proceedings. One of the conducted inspections revealed that a previously imposed measure (reducing the water level in a reservoir) had lost its relevance since the protected interest (the loss of the present trees) that prompted the measure had ceased to exist. A fine had already been imposed for the non-compliance with this measure in the past.

#### 5. Full inspection review

The full inspection review took place in the Broumovsko Protected Landscape Area (PLA) from the 2nd to the 5th of May 2022. The individual inspections were primarily focused on ensuring compliance with the basic protective conditions of the protected landscape area, the basic protective conditions of national nature reserves, national natural monuments, and natural reserves, as well as the basic protective conditions for specially protected animals specified by Act No. 114/1992 Coll. within the PLA. The Inspectorate, in collaboration with the Nature and Landscape Protection Agency, the administration of the Broumovsko PLA, and the Police of the Czech Republic, specifically addressed the control of the prohibition of entry and access by tourists or climbers, the ban on camping and making fires outside the designated areas designated by the nature protection authority. It also focused on monitoring compliance with the prohibition or restriction of rock climbing activities at selected locations.

During the inspection, 9 offenses by individuals were identified, and they were issued on-the-spot fines totalling CZK4,900. The majority of the offenses were recorded in the Adršpach-Teplice Rocks National Nature Reserve (NNR), with 5 cases involving violations of the prohibition of entering areas not designated with the consent of the nature protection authority, and in two instances, there were breaches of the prohibition of making fires outside the areas designated by the nature protection authority, related to smoking tobacco products. Penalty notices were also issued for unauthorized entry off the road and local roads in the NNR Broumov Walls, and for a case of non-compliance with the conditions for an exemption to engage in rock climbing activities in the NNR Adršpach-Teplice Rocks. With the exception of the last case, these were offenses committed by foreign nationals, specifically Polish and Ukrainian citizens.

#### 6. Nagoya Protocol

Inspections focused on the conditions for the utilization of genetic resources under the Nagoya Protocol, implemented into national legislation by Act No. 93/2018 Coll., are, in terms of their scope, still a rather peripheral part of the authority's activities. The subject of these inspections is to verify whether the inspected entity qualifies as a user of genetic resources according to the legal regulations associated with this law. In such cases, there is an obligation to exercise due care when utilizing genetic resources.



In 2022, one inspection of a genetic resource user under the Nagoya Protocol was initiated, and it was concluded at the beginning of 2023. No violations of Act No. 93/2018 Coll. and related European regulations were found. During inspections of genetic resource users, the CEI closely collaborates with the Ministry of the Environment. Due to the Czech presidency in the EU Council in 2022 and the resulting workload of the national focal point for the Nagoya Protocol, the originally planned number of inspections for 2022 was reduced. Lastly, in collaboration with the Ministry of the Environment, a yearly plan for user inspections for 2023 was prepared using a risk-based approach.

## 7. CITES – potentially problematic subjects

Within the scope of inspecting compliance with the handling of CITES specimens, inspections in the previous year focused on the owners of large carnivores, rarer species of large parrots, and other potentially problematic species. These inspections are aimed at verifying the origin of the held specimens, checking labelling, and ensuring compliance with registration requirements. In justified cases, biological material samples are collected for genetic analysis. As part of the task, inspections of several previously unexamined tigers or lions have been initiated or have already been completed, as well as a larger number of identified specimens of large parrots, typically representing one of the less commonly bred species.

Mistakes have been identified in connection with the possession of one hyacinth macaw specimen, specifically related to the failure to comply with the registration requirements of one Cuban amazon, two specimens of golden-headed amazon, and one specimen of African grey parrot. Penalties have been imposed on two of the owners for their offenses, and two more offense proceedings will be initiated. In several other cases, inspection procedures are still ongoing. Some discrepancies have been resolved by updating records in the CITES register, while other findings will be the basis for inspecting other breeders or holders.

## 8. Protection of birds- "glass" walls

Based on previous findings, inspections of structures with larger transparent surfaces lacking protective measures to reduce the risk of collision with free-flying birds and potential fatalities have been included in the activity plan. The basis for these inspections was the identification of high-risk structures, especially modern administrative buildings with large transparent surfaces, transparent noise barrier walls, or newly installed bus stops. The field part of the inspections involved assessing the risk by searching for signs of bird collisions or deceased birds and inspecting the installation of protective elements for bird protection. Some of the investigations were carried out in cooperation with relevant municipal authorities with extended jurisdiction, and requests for cooperation were particularly addressed to the MEPs in the Liberec and Karlovy Vary regions. Some high-risk objects were identified based on reports of bird fatalities in the past. Specific cases are subject to consultation with experts, especially ornithologists dealing with this issue.

More specifically, the inspections focused on identifying high-risk structures in Liberec in cooperation with the Liberec Municipal Authority and an ornithologist from the North Bohemian Museum. A total of three inspections revealed a significant number of untreated surfaces within the jurisdiction of the České Budějovice Tl, where, currently, due to the absence of deceased birds, no immediate risk was identified. Similar inspections took place in the jurisdiction of the Havlíčkův Brod Tl, where, in cooperation with the building authority, various matters, including the construction of a cottage in a young forest stand with a portion of its exterior cladding made of mirrors, are being addressed.

Furthermore, an inspection of four potentially risky buildings in Olomouc was conducted, with the absence of protective elements being identified in three cases. This will be discussed with their owners. The need for the installation of protective elements in accordance with building standards was also brought to the attention of the owner of a glass noise barrier wall in Prostějov, where bird fatalities have been recorded in the past. A noise barrier wall in Hradec Králové was also inspected, where the technical design of the structure itself has proven to be sufficient prevention. On the contrary, one of the noise barrier walls without protective elements in Pardubice was identified as risky, with five deceased birds found during the investigation. Proceedings will be initiated with the owner to establish conditions for the continued operation of the structure.

In Brno, as part of the task, seven unsecured public transport stops were identified. After inspections, three of their owners managed to rectify the situation by adding reflective decals. The same approach will be adopted for untreated stops in Zlín and Valašské Meziříčí. Inspections also focused on untreated bus stops in the Tachov and Sokolov regions, where in the past, the Inspectorate had recommended measures involving reflective elements. In this case, it seems that information decals for passengers and city visitors also serve as an effective prevention method.

Inspections of glass structures in Klatovy, Plzeň, Nepomuk and Horažďovice revealed the presence of numerous untreated surfaces. However, on the other hand, specific bird fatalities that would necessitate immediate action were not identified in these areas. In general, findings of deceased birds during the inspection process were rather rare. Many untreated structures, therefore, represent more of a potential risk, which can often manifest seasonally, especially among newly fledged, inexperienced individuals.

#### 4.4.3 Overview of fulfilment of specific tasks

Specific tasks reflect the activities and entities that represent current and potential serious threats to the interests of nature conservation within the jurisdictions of individual territorial inspectorates. Targeted inspection activities are based on local knowledge of each region and are focused on activities and entities where it can be assumed they pose potential significant threats to the interests of nature conservation protected by relevant laws within the competence of the inspection authority. Although the scope of specific tasks is much broader, we will mention here only the tasks to which we attach the greatest importance or those that, in their focus, demonstrate the wide range of activities of the NPD.

##### 1. Inspections of compliance with the basic and detailed protective conditions of small and large specially protected areas and sites of community importance

The Inspectorate considers inspections of compliance with the protective conditions of specially protected areas (SPA) as one of its long-standing priorities in the field of nature and landscape protection. Specially protected areas, among other things, contribute to the habitat diversity of the landscape and provide refuges for vanishing, rare, and specially protected species of animals and plants. All territorial inspectorates of the CEI conducted 149 inspections of small SPAs, at least 9 partial inspections within 4 large SPAs, and a total of 12 inspections of sites of community importance (SCI) in 2022. The inspections focused, among other things, on boundary marking, assessing the condition, compliance with the basic and detailed protective conditions of SPAs during management and by visitors, as well as preliminary or basic protection of SCIs. Last but not least, they involved the inspection of activities or interventions that can only be carried out with the prior consent of the nature conservation authority. Except for exceptions, these were planned inspections, with only a few carried out based on submitted suggestions. Many of the cases under consideration are a combination of inspections for compliance with territorial, species, and general nature conservation protection.

Out of the 12 inspections carried out within the jurisdiction of the Ostrava TI, violations were identified in 4 cases, with the use of intensive technology in the Vřesová stráň Nature Reserve (NR), where, in reference to the ordered management, grassland mulching and excessive goat grazing were considered a significant violation. A decision to impose a fine is currently under appeal. Deficiencies in the closed contract were also identified as one of the reasons for the undesirable progress of work. In the same TI's jurisdiction, an individual was fined CZK 80,000 for a violation involving the unauthorized deposition of wood chips in the II. zone of the Poodří Protected Landscape Area (PLA).

Within the jurisdiction of the Olomouc TI, an investigation based on a submitted suggestion revealed violations related to timber harvesting. The inspection demonstrated non-compliance with the issued exemptions for the Praděd NNR SCI. In this matter, an offense proceeding has already been initiated against the entity. Another significant violation was found in connection with unauthorized reconstruction of the ski lift in the Ramzová - Šerák ski area, leading to a fine of CZK 150,000 imposed on the company BONERA s.r.o. for unauthorized entry and carrying out unauthorized activities in the Jeseníky PLA and simultaneously the Kepník SCI.

Further violations of the protective conditions of SPAs were identified within the jurisdiction of the Havlíčkův Brod TI. These included the establishment of a hunting facility in the NM U Borovné without the required consent of the nature conservation authority, extensive disruption of soil cover during the eradication of the bark beetle calamity in the II. zone of the Železné hory PLA. A similar category of violation involved the manipulation of water levels, sediment removal, and their deposition on a meadow in the Ptáčovské rybníky NR without the necessary consent from the regional authority. Proceedings related to these offenses have not been concluded yet.

Within the jurisdiction of the Ústí nad Labem TI, an inspection revealed damage to the involved stands of trees due to the soil deposition within the protective zone of the Stráně nad Chomutovkou NR. In addition to imposing sanctions, the responsible individual was also ordered to carefully remove the deposited material. Lastly, a violation was identified in one of the inspections carried out by the České Budějovice TI within the jurisdiction of the small SPA, where non-compliance with issued exemptions from prohibitions was found. In this case as well, an offense proceeding will be initiated. No breaches of legal regulations by specific entities or significant deviations in ensuring the protection of individual sites were found in the other inspections conducted. Any potential formal shortcomings, such as inadequate marking of the area in the field, are continuously discussed with the relevant nature protection authorities.



## 2. Inspections to ensure the legal protection of selected memorable trees

Memorable trees (referred to as MT) are landmarks that hold a significant cultural and historical value. Often, due to their age, they also have invaluable ecological significance. Therefore, their enhanced protection and their identification in the landscape are essential to prevent any potential damage from human activities. The protection of MTs is ensured through decisions that prohibit interventions in them and their protective zones. Any interventions can only be carried out with the consent and under the conditions set by the relevant nature protection authority. The identification of MTs in the landscape is facilitated by a plaque bearing the inscription "memorable tree" and a small state emblem. These identifiers are a legal obligation overseen by the respective administrative authority.

In 2022, various territorial inspectorates were involved in the inspections of memorable trees to varying extents. The condition and protection of a total of 107 memorable trees, tree groups, or tree avenues were assessed. The majority of these inspections did not identify any legal violations or significant shortcomings. Most of the inspected memorable trees receive proper care, and the process of their declaration and marking in the field complies with legal requirements. However, in a few cases, substantive or formal deficiencies were identified, typically related to inadequate or outdated markings, insufficient care, or an outdated status (non-existence) of memorable trees. These issues were addressed through discussions with the relevant nature conservation authorities.



## 3. Inspections of registered significant landscape features and significant landscape features of watercourses and floodplains

A significant landscape feature (referred to as SLF) is an ecologically, geomorphologically, or aesthetically valuable part of the landscape that contributes to its typical appearance or helps maintain its stability. Watercourses, floodplains, peat bogs, and water bodies are some of the SLFs explicitly listed in the law. The relevant nature protection authority can also register additional landscape components that share the values mentioned, and these parts will then enjoy the protection of a significant landscape feature. Landscape features have long been considered one of the currently endangered elements of the landscape, especially due to human activities that often impact riparian vegetation and riverbeds. These activities can disrupt their ecological and stabilizing functions, and they can only be carried out with the consent of the relevant nature protection authority and under specific conditions.

In 2022, the Inspectorate carried out 62 planned checks of registered significant landscape features (SLFs). The majority of these inspections did not identify any unauthorized interventions or legal violations. Only one case identified by the Ostrava TI will lead to the initiation of an administrative offense procedure. The situation is quite different for SLFs established by law, especially watercourses and floodplains, which are frequently the subject of submitted complaints. During the observed period, dozens of inspections were conducted to ensure compliance with the protection of legally established SLFs, resulting in 13 fines totalling nearly CZK 150,000 imposed on individuals and 14 fines totalling CZK 425,000 imposed on legal entities and self-employed individuals. Among the highest fines were the penalties of CZK 70,000, imposed for harmful interventions related to path reinforcement (Frymburk municipality) and sediment deposition in the floodplain (Dlouhopolsko municipality).

A portion of the planned inspections of significant landscape features (SLFs) was specifically focused on ensuring compliance with the protection of SLFs related to watercourses in the context of **the construction, reconstruction, and operation of small hydropower plants**. This also involved ensuring the minimum residual flow in the watercourse and maintaining a favourable environment for aquatic life. Out of the 18 inspections of this type conducted (8 of which were initiated based on complaints), violations of regulations were found among operators of a total of 8 small hydropower plants in the jurisdiction of the Olomouc TI. In all cases were, or will be initiated, administrative offense proceedings. A fine of CZK 30,000 for harmful interference with a significant landscape feature (SLF) in violation of the minimum residual flow has been imposed on one of the operators, with five administrative offense proceedings from 2021 in the same matter already concluded. The total amount of five final fines imposed in the joint proceedings of the nature protection component and water protection component was CZK 190,000, inclusive.

## 4. Inspections of compliance with the protection of habitats and populations of especially protected species of plants and animals

The primary means of protecting populations of especially protected species is their in situ protection, which is ensured through the protection and restoration of suitable habitats and the elimination of risk factors that affect the current or potential distribution of the species in the area. As in previous years, the Inspectorate conducted a wide range of planned and unplanned inspections during this period focused on the protection of species, often in combination with other protected interests. Many of these inspections are carried out based on received suggestions that highlight possible violations of the protective conditions of especially protected species.



The Inspectorate repeatedly encounters unauthorized interventions in the natural development of amphibians, fish, or crayfish in connection with technical interventions in watercourses, non-compliance with residual flows, or manipulation of water levels in reservoirs. Dozens of conducted inspections focused on the protection of especially protected species were related to construction activities, typically involving excavation works or the reconstruction of existing buildings and other structures. Among the more serious cases, there was a harmful impact on the habitat of the especially protected Czech bellflower due to the construction of a family house carried out beyond the scope of territorial decisions and building permits, thus in violation of both species and territorial protection (the construction is also located within the area of KRNP). A fine of CZK 100,000 was imposed on the perpetrator for the established illegal activity.

In the jurisdiction of the Liberec TI, there were, among other activities, 10 inspections focusing on the protection of habitats for the Scarce Large Blue (*Maculinea teleius*) and Dusky Large Blue (*Maculinea nausithous*) butterflies, whose populations are often threatened by urban development or environmental changes resulting from inappropriate land use. These inspections did not reveal any specific damage to the habitats of these species. Nevertheless, one of the outcomes was raising awareness among property owners and tenants regarding the presence of these specially protected species and their requirements.

A significant portion of the inspections focus on **compliance with protective conditions for specially protected species utilizing human structures, particularly bats, swifts, storks, and other birds**. The use of human structures by specially protected species of wildlife that thrive in urban environments is a chronic issue. This primarily involves cases where the construction interferes with the habitat of a specially protected species, often related to the building's exterior, such as the building envelope and roofs. Specially protected species of wildlife in the Czech Republic are either endangered, rare, scientifically or culturally significant. As a result, legal regulations are in place to ensure the protection of their habitats, primarily in the form of human structures that they utilize seasonally. The reason these species utilize human settlements is primarily due to the lack of natural habitats for these species in the cultural landscape, such as old trees with cavities.

A specific case involves **inspections of caves, mining works, and other locations with bat populations**. Bats are considered specially protected species of wildlife, and these sites are crucial for their survival, as they use them as wintering grounds or summer roosts. Traditionally, the inspections in 2022 focused mainly on caves and mining works in the České Středohoří Protected Landscape Area (PLA). In the inspected cases, there were no unauthorized entries into these areas, disturbances or harm to hibernating bats, or damage or other interventions in the security of these spaces.

## 5. Inspections of breeding and handling of CITES specimens, individuals of specially protected species, and wild birds

Inspections focusing on compliance with legal regulations regarding the keeping, breeding, and other treatment of CITES specimens, individuals of specially protected animal species, and wild birds are regularly carried out by the CEI. The selection of controlled entities is based on various criteria, such as discrepancies found in the CITES Registry, a higher number of documented cases of illegal handling of specific species, and more. Specifically, the CEI systematically inspects the breeding of birds of prey and owls, parrots, and songbirds, as well as breeders of turtles and other reptile groups that are protected by the CITES convention.

In summary, this set includes inspection activities focused on compliance with a wide range of legal requirements in the field of CITES, species-specific and general nature conservation. This includes verifying the origin, complying with registration obligations, ensuring unmistakable identification, reporting acquisitions or changes, and adhering to the conditions specified by regulations, decisions on exceptions from the protective conditions for specially protected animal species, or decisions establishing a different procedure for wild birds.

During the inspections carried out in 2022, there were mostly isolated cases of non-compliance with legal regulations, most commonly related to failure to report or late reporting of acquisitions or changes, or the absence of unmistakable identification. The standard procedure involves taking corrective measures to ensure compliance with legal requirements and imposing fines at the lower end of the range stipulated by law, typically in the form of a fixed penalty. More serious cases involving multiple offenses related to proving origin, fulfilling registration obligations, or unmistakable identification and fines in the tens of thousands of CZK are subject to evaluation in the CITES area.

## 6. Inspections of the fulfilment of the conditions specified in the exemptions from prohibitions for specially protected areas and specially protected animals, and decisions on establishing an alternative procedure for wild birds

The inspections consider controlling the conditions specified in exemptions from prohibitions for specially protected areas as a long-term priority in the field of nature and landscape conservation. Specially protected areas contribute



to the habitat diversity of the landscape and provide refuges for vanishing, rare, and specially protected animals. Therefore, it is essential to comply with the conditions set by the relevant nature conservation authorities for activities conducted within these areas. For the same reasons, significant attention is given to plant and animal species that are endangered or rare within the territory of the Czech Republic, and are scientifically or culturally very significant. As a means of protection, legally established regulations are applied to limit interventions in their populations and habitats.

The aim of the established protective conditions is to ensure that the intended interventions in the natural development and populations of specially protected animal species consider the relevant public interests (project implementation and protection of SPA). These conditions are set to minimize any adverse impacts. Therefore, entities planning interventions that could affect SPA or populations of specially protected animal species must adhere to the conditions specified in the exemption decisions issued in connection with the intended activities. A unique aspect of these exemptions or decisions on a different approach is that they have been issued for the purpose of controlled regulation of selected specially protected animal species (e.g., European beaver) or free-living birds (e.g., sparrow).

In 2022, the Inspectorate carried out dozens of inspections to ensure compliance with the specified exemptions from prohibitions or decisions regarding the establishment of a divergent procedure, usually in combination with inspections for compliance with other legal provisions. With few exceptions, no significant errors were recorded that would warrant initiating offense or administrative proceedings. An exception to this are the inspections related to the breeding of species that are specially protected or protected under the CITES convention, which are addressed in a different section.

One of the areas of focus is inspections aimed at verifying compliance with the conditions of exemptions for interventions in the natural habitats of bats and swifts, which have a strong connection to human settlements. Each year, a lower number of inspections of this type are carried out, usually in relation to insulation or other building renovations. These inspections aim to ensure compliance with deadlines, specified procedures, the installation or modification of substitute habitats, and so on. In documented cases from recent times, no significant problems have been recorded. However, there are instances where investors do not consider the presence of specially protected species at all, which significantly limits the potential for conflict-free solutions in real situations.

## **7. Inspections focused on compliance with the provisions of Act No. 334/1992 Coll., on the Protection of Agricultural Land Fund**

In the jurisdiction of Plzeň TI, targeted inspections of shooting ranges have been conducted since 2019, focusing on the enforcement of the prohibition of introducing substances and preparations other than those permitted by special regulations into the Agricultural Land Fund (ALF). Specifically, the inspection aims to verify whether the soil in impact areas complies with the limits for lead content, for which a preventive value of 60 mg per kilogram of dry matter sample and an indicative value of 300 mg per kilogram of dry matter sample have been established. In 2022, inspections were carried out at 3 shooting ranges. Based on the soil sample analyses, it was determined that two shooting ranges exceeded the preventive value for the Pb content in the soil. The relevant authorities responsible for the protection of the Agricultural Land Fund and CISTA were informed of this fact. In the case of the remaining shooting range, an exceeding of the indicative value for Pb in the soil was identified, and CISTA will be contacted for an official sampling and analysis of soil samples.

The same area includes inspections focused on the introduction of foreign substances into the Agricultural Land Fund through the disposal of waste or unspecified materials on the soil cover. More specifically, this area was addressed by Liberec TI, which conducted a total of 3 inspections of individuals who, in various contexts, carried out the deposition of material of unclear origin and composition, typically containing soil, stones, asphalt, or recyclables, or roofing material. The deposited materials identified affected the Agricultural Land Fund on areas of approximately 76, 160, and 170 square meters, with the volume of deposited material estimated at more than 1,500 cubic meters of material of unknown origin in one case. In all documented cases, offense proceedings will be initiated. In one of the cases, proceedings have already been initiated after the participant filed an objection against an order of CZK 15,000.

### **Additionally, the Inspectorate marginally addressed other specific tasks, such as:**

- the inspection of compliance with the prohibition of commercial use of inaccessible caves,
- the inspection of water retention in the landscape (illegal draining of wetlands, filling depressions, harmful activities in river valleys),

- the inspection of tree protection with a focus on the deposition of replacement plantings and monitoring of their implementation,
- the inspection of investment projects with a focus on potential violations of legal provisions,
- the inspection of compliance with the law at events with mass participation concerning the protection of habitats for specially protected animal species,
- the inspection of compliance with the legal protection of the Krkonoše National Park (KRNAP),
- the inspection of traditional hibernation sites for representatives of the bat Chiroptera,
- the inspection of tree felling under power lines,
- the inspection of tree protection during the maintenance of public green spaces lawns,
- the inspection of municipal authorities when granting permits for the felling of trees growing outside of forests.



#### 4.4.4 Significant cases

In 2022, the Inspectorate encountered a wide range of unlawful activities in the monitored area. Some of the investigated cases are exceptional in their scope, broader impact, or may indicate a new trend in the violation of regulations for nature protection. Outwardly, serious infractions are primarily manifested by imposing fines at the upper end of the range set by law. The Inspectorate dealt with significant cases of unlawful conduct in connection with land modifications and construction activities in specially protected areas or sites with the presence of specially protected species. Traditionally, this category saw extensive unauthorized tree felling outside of forests, or their damage through unprofessional pruning. Notably, some decisions to restrict or prohibit activities, typically in connection with investment projects, are among the significant actions taken.

##### Praha TI

In connection with the development activities, the company Residence Green Field s.r.o. carried out unauthorized felling of connected tree stands growing outside of forests in the cadastral area of Čakovice near Řehenice. The total area of felled stands exceeded 1.5 hectares, and within this stand was at least one group of mature (oversized) trees with stump surfaces and a diameter greater than 35 cm. The felling was carried out without the valid decision of the locally competent authority to permit the felling of trees growing outside of forests. Therefore, the Inspectorate imposed a legally binding fine of CZK 650,000 for the aforementioned act.

##### České Budějovice TI

The city of Zliv commissioned a private individual engaged in the felling of 23 mature trees (oaks, maples, and birches) without the necessary permission from the nature protection authority. For this activity, a fine of CZK 150,000 was imposed on the city of Zliv as the contractor, reduced to a final amount of CZK 125,000 following an appeals process. Simultaneously, a fine was imposed on the private individual conducting the felling, who physically carried out the activity.

##### Plzeň TI

The company RECYKLOCENTRUM s.r.o. felled a total of 28 trees and 4.4 hectares of tree stands growing outside of forests in the cadastral area of Ledce without the required permission. This activity was related to the planned construction of a recreational centre. No request for permission to fell trees was submitted to the locally competent nature protection authorities, and therefore, the Inspectorate imposed a legally binding fine of CZK 150,000 for the offense.

##### Ústí nad Labem TI

Cínovecká agrární s.r.o. constructed agricultural buildings in the location of Přední Cínovec, which is part of the Eastern Ore Mountains SCI, the Bird Area of the Eastern Ore Mountains, and the Eastern Ore Mountains Nature Park and also a habitat for a specially protected plant species, the *Sesleria heufleriana*. The buildings were constructed without a building permit, without the consent of the nature protection authority for activities within the SCI and bird area, without consent for changing the landscape character, and without an exemption from the protection of the specially protected plant species. For this action, Cínovecká agrární s.r.o. was fined CZK 500,000.



### Hradec Králové TI

The Inspectorate investigated the legality of construction activities related to the construction of a family house in Pec pod Sněžkou within the protective zone of the Krkonoše National Park. During the inspection, it was found that the employees of the company 3K stavby s.r.o. did not comply with the decision of the building authority, which had set both the extent of the family house construction site and the requirement for proper delineation of this construction site before commencing construction activities. As a result of this oversight, they unlawfully and harmfully impacted an area of at least 500 square meters, causing damage to the habitat of a specially protected, critically endangered plant species, the *Campanula bohemica* (Bohemian bellflower). The penalized entity cooperated with the Inspectorate in clarifying the offense and acknowledged its mistake, and the decision to fine CZK 100,000 became legally binding without appeal.

### Havlíčkův Brod TI

A legal entity, as part of the reconstruction of a castle in Krasnice, imported a layer of soil with the addition of construction rubble and stones into certain parts of the castle park. This area serves as a habitat for a specially protected species, the Golden-rayed Lily, and the unauthorized action interfered with the natural development of this specially protected species. The importation also resulted in damage to a significant number of tree roots in the castle park. A significant mitigating factor was that this entity complied with the measures ordered by the Inspectorate for remediation, and the soil importation from the areas of Lily occurrence, as well as from the tree root zones, was removed. The company EVASION s.r.o. was fined CZK 135,000 for the above-mentioned offence.

### Brno TI

In 2022, damage to 13 trees growing in front of the primary school building in Želechovice nad Dřevnicí was addressed. The damage to the trees involved excavations for sidewalks and pathways in close proximity to the trees in front of the school grounds. As a result, the root systems of these trees were significantly damaged, likely leading to a substantial reduction in their lifespan. In this case, it was an inadequately designed project, from which it should have been evident that a collision between the construction and the subsequently damaged trees was unavoidable due to their proximity. Nonetheless, a building permit was issued by the building authority, which included unfeasible conditions regarding the protection of trees during construction. An offense proceeding was initiated with the entity responsible for the established situation, and a fine of CZK 90,000 was subsequently imposed.

### Olomouc TI

In 2021 and 2022, inspections were initiated for two entities concerning the publicly monitored construction of the Velké Vrbno Small Reservoir - Phase I, in connection with the compliance of selected provisions of the Act on Nature and Landscape Protection (ANLP). During the inspections, in cooperation with the Nature Conservation Agency of the Czech Republic (NCA CR), monitoring of the occurrence of specially protected animal species and summarization of the occurrence of specially protected species of plants and animals based on findings in the NCA database were conducted. Additionally, the exact extent of the construction was measured using a drone. In connection with the potential endangerment of individuals and populations of specially protected animal species, administrative proceedings have been ongoing since 2021 to restrict activities under Section 66 of the Nature and Landscape Protection Act. These measures aim to protect previously unaffected areas with the occurrence of specially protected species of plants within the fenced construction site, expanded in 2022 with a preliminary injunction, which, according to findings by the CEI was not adhered to. In this context, the matter is also being investigated by the Police of the Czech Republic, with the CEI providing the necessary cooperation. A legally binding decision was issued in 2022 regarding the restriction of activities at the Velké Vrbno Small Reservoir - Phase I construction.

### Ostrava TI

Based on a suggestion, the CEI conducted an inspection of the MiniZOO Vendryně facility in a separate matter. It was found that in a barn adjacent to a residential building, an establishment with characteristics of a zoo was operated in a residential area (considering the number of mammal and bird species kept and admission fees charged). Additionally, some deficiencies related to the possession of CITES specimens were identified. The operators were fined CZK 50,000 for operating a zoo without a license and for violating certain provisions of Act No. 100/2004 Coll. A decision was also issued to close the zoo to the public.

### Liberec TI

The company USK s.r.o. carried out the felling of 39 trees growing outside of forests in the Český ráj Protected Landscape Area without the necessary permit from November 2021 to March 2022. They also performed inappropriate pruning on an additional 30 trees growing outside of forests and ignited fires in four locations within the Český ráj Protected Landscape Area, outside the areas designated with the consent of the nature protection authority. For these actions, the Inspectorate imposed a legally

binding fine of CZK 150,000 on the company USK s.r.o. The violation was conducted in a joint proceeding with the contracting entity, the Regional Road Management and Maintenance of the Central Bohemian Region, which was fined CZK 80,000 for the offense. Simultaneously, proceedings were initiated with both entities to impose compensatory measures to offset the ecological damage caused by the tree felling.



#### 4.4.5 Conclusion of inspection activity

The agenda of nature protection and CITES department, which the Inspectorate carries out, is exceptionally diverse and includes six component laws: Act No. 114/1992 Coll., on nature and landscape protection; Act No. 100/2004 Coll., on the protection of species of free-living animals and wild plants by regulating trade in them; Act No. 78/2004 Coll., on the handling of genetically modified organisms and genetic products; Act No. 162/2003 Coll., on the conditions for operating zoos; Act No. 334/1992 Coll., on the protection of Agricultural Land Fund; and Act No. 93/2018 Coll., on the conditions for the use of genetic resources according to the Nagoya Protocol.

The focal point of the Nature and Landscape Protection Department of the Czech Environmental Inspectorate traditionally lies in enforcing the provisions of Act No. 114/1992 Coll. In this field, the Inspectorate encountered a wide range of unlawful activities in 2022. Individuals, as well as legal entities and individual entrepreneurs, most frequently engaged in unauthorized tree felling or damaging trees growing outside of forests. Unauthorized interventions into significant landscape elements, habitats, or the natural development of specially protected species were also prevalent, typically in connection with construction activities, land modifications, or alterations to riverbeds. Significant unlawful activities were also identified in relation to damaging the preserved state of specially protected areas, particularly in the context of construction activities and land modifications.

A specific part of the Nature Protection Department's activities involves administrative proceedings to **prohibit harmful activities or establish conditions for carrying out activities** pursuant to Section 66 of Act No. 114/1992 Coll. The issued decisions aim to eliminate ongoing harmful activities and their impacts on legally protected interests. In 2022, a total of 29 decisions of this type became legally binding, with a slight predominance of legal entities among the obligated parties.

In the previous year, the most common "prohibition" proceedings related to the protection of the corn crane. There were a total of 5 natural persons and 2 legal entities that were subjected to conditions for mowing with consideration for the needs of this specially protected species. Another legal entity was prohibited from mowing, landscaping, and construction activities on one of the plots in the cadastral area of Drahůnky due to the presence of the corn crane. Another frequently addressed issue involves prohibitions or restrictions on activities in connection with the occurrence of specially protected species in human settlements. A total of 4 legal entities faced such restrictions while performing insulation work on buildings where the common swift and various bat species were present.

Protection of specially protected species is also a factor in other cases. A construction company was prohibited from handling 2 soil heaps with the presence of the sand martin. Another association had its activities restricted, such as organized bicycle rides in the area where specially protected plant species, the lesser butterfly-orchid and chamomile grape-fern, occur in the cadastral area of Velká Morava. Another legal entity was issued a prohibition on interfering with the vegetation where specially protected species, such as the lesser butterfly-orchid, monkshood, and clouded Apollo, are found in the cadastral area of Velké Vrbno. In connection with the presence of the specially protected orchid species, one company was prohibited from entering and removing harvested wood within the territory of the Švařec National Nature Reserve.

Frequently addressed issues include construction and other interventions that endanger the eco-stabilization function of SLF. The Inspectorate has imposed conditions on a fishing society for interventions in the littoral vegetation on the Poštovní Pond in the cadastral area of Dobroslavice, and it has set conditions for the reconstruction of a footbridge over the Jílovský Stream in the cadastral area of Podmokly. Additionally, the operation of a car campsite has been prohibited from any construction activities within the affected SLF forest. To prevent significant damage to the SLF, watercourse, floodplain, and the habitat of specially protected species, another legal entity has been issued a prohibition on excavation and sediment deposition, removal of vegetation, and other terrain modifications in the cadastral area of Paskov.

A portion of the issued decisions pertains to the prohibition of tree felling or damaging, while in specific cases, the protection of other conservation interests is ensured by the prohibition of removing planted or naturally grown trees and the requirement to carry out planting on the land in the cadastral area of Svinary. Cases of unauthorized extraction of moldavite, which falls under the forestry protection component, are also frequently addressed. In the past year alone, approximately 30 enforceable decisions were issued to ban this activity.







## 4.5 Forest protection

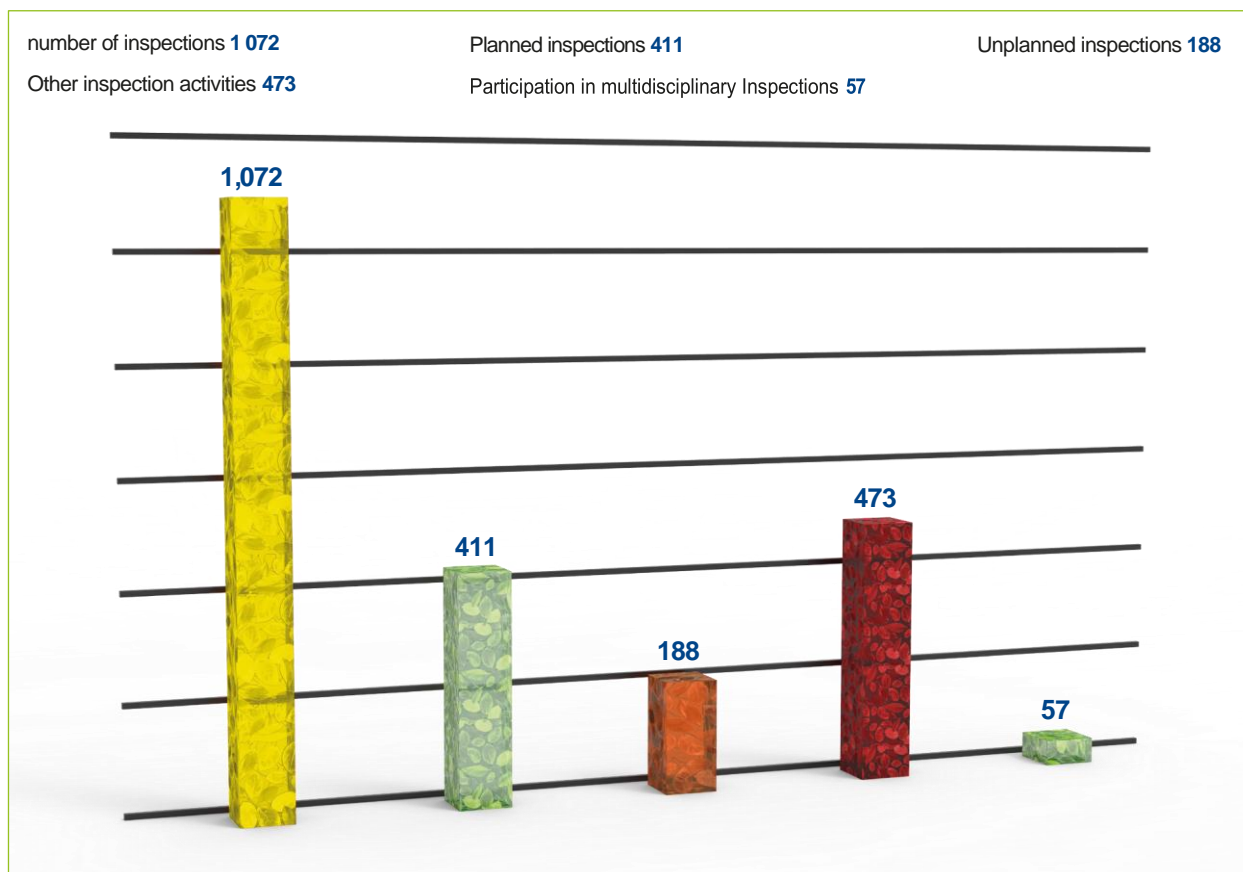
### 4.5.1 Overview of inspection activity in 2022

According to the personnel department records of the CEI, by the end of 2022, there were a total of 46 inspectors in the Forest Protection Department. This represents an increase of four inspectors compared to the previous year. Each inspector was responsible for approximately 60,000 hectares of supervised forests.

The inspection activities in the forests were carried out based on a similar legal framework as in previous years. The key legal regulations governing this included Act No. 282/1991 Coll., on the Czech Environmental Inspectorate and its competencies in forest protection, Act No. 289/1995 Coll., on forests and amendments to certain laws (Forestry Act), Act No. 149/2003 Coll., on the circulation of reproductive material of forest tree species of silvicultural importance and artificial hybrids intended for forest regeneration and afforestation, and amendments to certain related laws (Reproductive Material Trade Act), Act No. 114/1992 Coll., on nature and landscape protection, Act No. 255/2012 Coll., on inspection (Inspection Procedure), Act No. 500/2004 Coll., Administrative Procedure, Act No. 250/2016 Coll., on liability for offenses and proceedings related to them, as well as internal regulations within the framework of the CEI.

Inspectors from the Forest Protection Department carried out a total of 1,072 inspection activities during the monitored period, which is 159 more inspections compared to 2021. Among these, there were 411 planned inspections, 188 unplanned inspections, and 473 other types of inspections. As in previous years, field activities were conducted as preliminary actions before inspections, where the subsequent inspection was not always necessary. Various investigations were conducted based on received suggestions and information, including collaboration with other state authorities and, if applicable, the Police of the Czech Republic, and so on. In addition, FPD inspectors participated in 57 multidisciplinary inspections organized by other departments within the CEI (see chart no. 1). There was a total of 166 cases addressed in 2022.

### Number of inspection in the FPD in 2022





Inspections were carried out on forest properties of all ownership types, with a particular focus on the current state of bark beetle development, timber salvage, its transport, and the situation in forest regeneration preparation. The use of fines and measures for correction continued to be applied primarily in cases of repeated and severe violations of the laws during the assessed year.

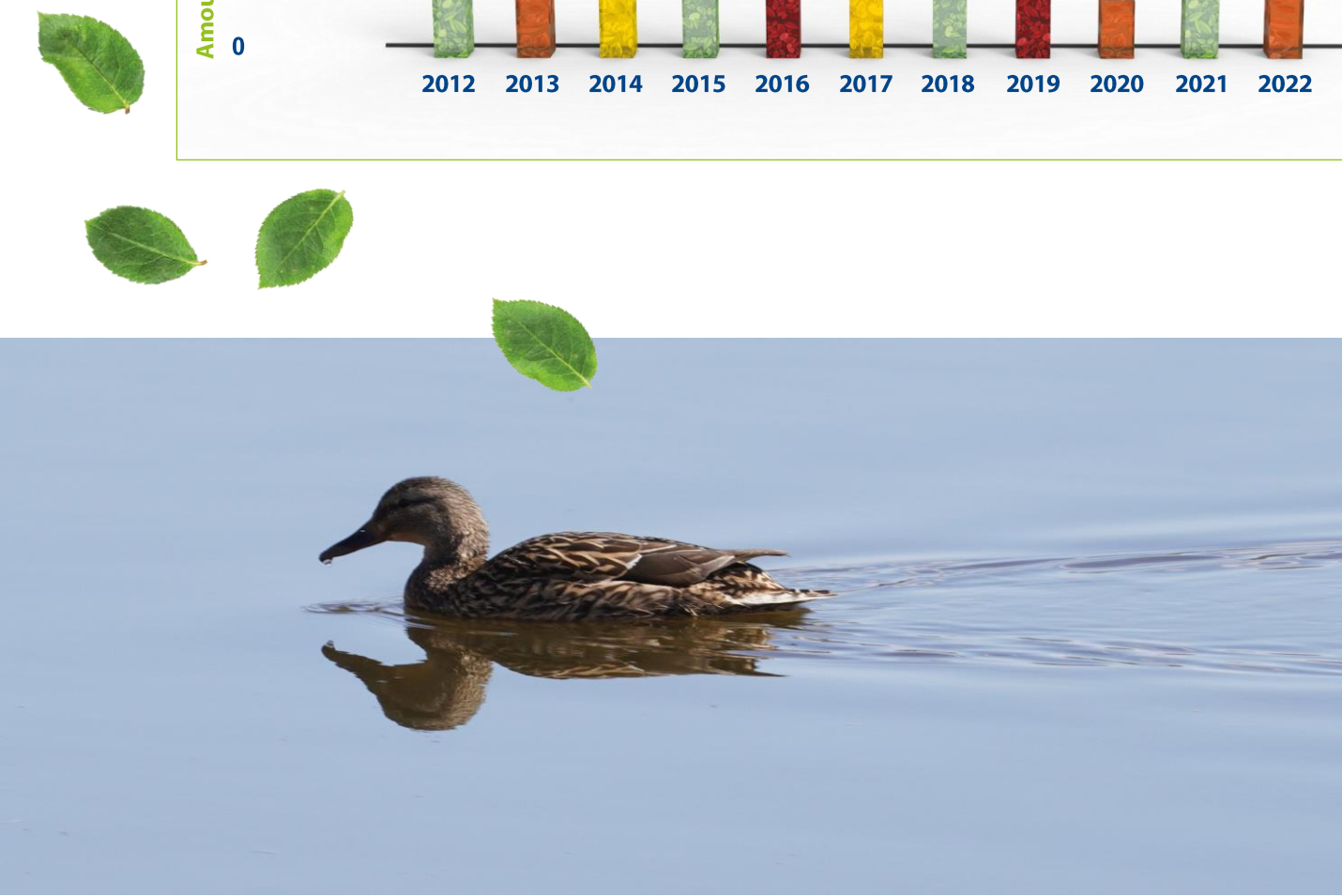
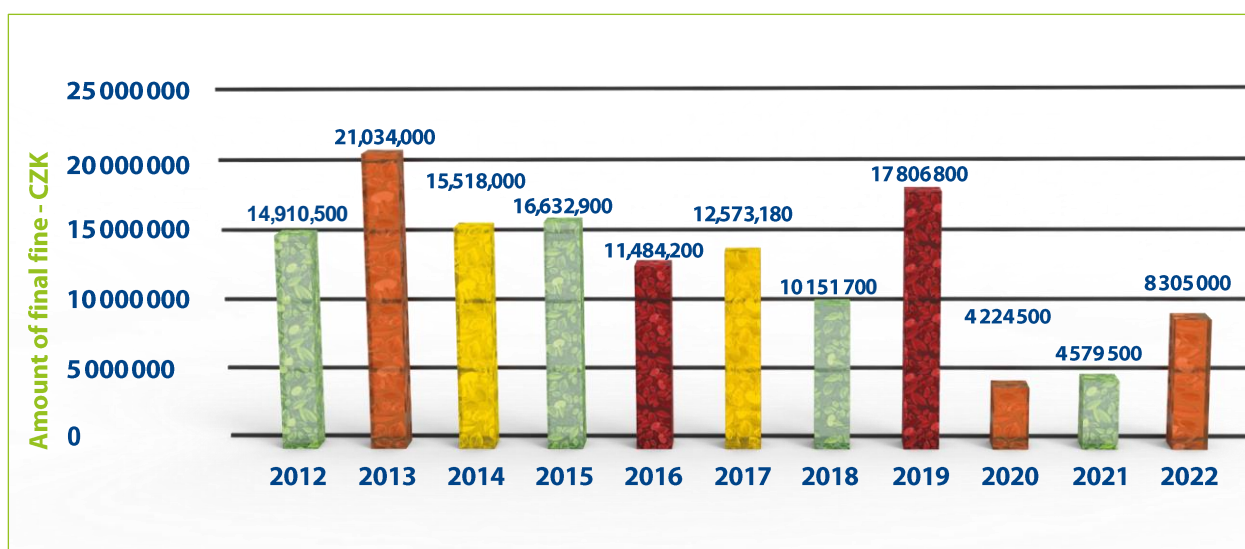
Within the scope of other inspection activities, 444 opinions on EIA assessments and 79 other statements and opinions were prepared, both for individuals and legal entities, as well as for government authorities and the Police of the Czech republic.

In 2022, a total of 84 penalty decisions were issued within the framework of administrative and offense proceedings. During the monitored period, 80 penalty decisions became legally binding, with 77 penalties issued during that time and three penalty decisions issued in the previous period. The total amount of legally binding fines was CZK 8,305,000 (see the graph below).

The individual departments of forest protection contributed to the imposed fines as follows: Prague CZK 3,000,000, České Budějovice CZK 2,214,000, Plzeň CZK 352,000, Ústí nad Labem CZK 117,000, Hradec Králové CZK 695,000, Havlíčkův Brod CZK 223,000, Brno CZK 1,390,000, Olomouc CZK 15,000, Ostrava CZK 159,000, and Liberec CZK 140,000.

The total fines for the department are CZK 3,725,500 higher compared to 2021. The increase can be attributed to the higher number of inspections and the adverse condition of forests due to the bark beetle calamity and its eradication.

### Development of binding fines in the 2012–2022



The offenses for which the mentioned fines were imposed are similar to previous years and include offenses such as neglecting forest protection and measures to prevent the development of biotic factors, violations of regulations for forest restoration, damage to land designated for forest functions by forest transport, unauthorized use of land designated for forest functions, waste and litter in forests, failure to implement prescribed measures to remedy illegal conditions of forest property, and so on.

Within the entire FPD, in 2022, the highest fines were imposed by the FPD Prague on the municipality of Souňov in the amount of CZK 2,500,000 for illegal land use. The FPD České Budějovice imposed a fine of CZK 1,500,000 on the company ARBARO SE for illegal timber harvesting and the FPD Brno imposed a fine of CZK 500,000 on the company Supreme Store, s.r.o. for failing to carry out proper and timely forest renewal in five cadastral areas. Furthermore, the FPD Brno imposed a fine of CZK 500,000 on the company MatPres, s.r.o. for endangering the environment in forests by creating conditions for the impact of harmful biotic and abiotic factors.

During the observed period, administrative proceedings were also conducted to impose corrective measures, resulting in 57 administrative decisions being issued. Legal force was acquired by 59 decisions on the imposition of corrective measures, of which two decisions on corrective measures were issued in the previous period and gained legal force in the observed year.

During the assessed year, three reprimands were issued with legal force, of which one was from Havlíčkův Brod TI and two from Brno TI.

There were seven complaints filed with the authorities of state administration, of which four were in České Budějovice TI, and three were in Plzeň TI.

Just like in previous years, in 2022, the institute of issuing calls for correction was used in cases where it was evident that there would be a violation of legal regulations or when a less serious violation had already occurred. From the perspective of environmental impact in forests, this approach towards forest owners has proven to be more efficient and effective compared to sometimes lengthy administrative proceedings with uncertain or delayed outcomes that could be detrimental to the state of the forest. This tool partially replaces administrative proceedings for corrective measures and is primarily used for small forest owners. They are alerted to the identified deficiencies and obligations arising from specific legal regulations in this manner. Only when the warning is not heeded or when there is a repeated violation of the law is an offense proceeding for fines or corrective measures initiated. In the evaluated year, one criminal complaint was filed.



#### 4.5.2 Overview of fulfilment of departmental tasks

##### **The departmental tasks for the year 2022 were:**

- Development of biotic factors and damaging forests through forest transport,
- restoration of forest stands with an emphasis on areas damaged by bark beetle infestations.

The tasks in question received attention within all types of inspection activities (comprehensive inspections, specific inspections, investigations of complaints, checks on compliance with corrective measures, actions preceding inspections, etc.), in accordance with the Inspection Act and in line with the internal regulations of the CEI, particularly the Methodological Instruction of the FPD No. 3/2014. Forest properties of all ownership types were subject to inspection.

##### **From the conducted inspections, the following observations can be summarized:**

- In the supervised area of Prague TI's jurisdiction, there was a reduction in the bark beetle infestation in the Central Bohemian Region. The worst situation was in the Votice and Vlašim MEPs. The future development and continuation of the bark beetle infestation remain uncertain and depend on climatic conditions. Infestations of the pest were



recorded on properties of all ownership types. In 2022, forest properties primarily affected by bark beetles were not the primary focus of inspections, mainly due to the active approach of individual owners. Nevertheless, within the conducted inspections, such as comprehensive ones, the issue of combating biotic factors (bark beetles) was monitored. Active processing of bark beetle-infested wood was taking place on all inspected forest properties, and therefore, there was no reason to initiate administrative proceedings. The motivation of forest owners to process bark beetle-infested wood included acceptable selling prices and available logging capacities, among other factors. In general, the approach to forest protection against biotic pests is better among large landowners and state forests compared to small forest owners.

- Within the South Bohemian region, České Budějovice TI's inspections revealed that the occurrence of calamitous bark-dwelling insects (bark beetles) - spruce bark beetle and shiny bark beetle - continues to be at an elevated to calamitous level. The most affected areas are the MEPs Tábor, Jindřichův Hradec, and Milevsko. The calamity is gradually subsiding in the MEPs České Budějovice, Prachatice, Strakonice, and Vodňany. It has completely subsided in the MEP Dačice. In these areas, there has been a significant decline in the representation of spruce forest stands of all age classes. It can be inferred that the bark beetle calamity is crossing (or has already crossed) through the central and northern parts of the South Bohemian region from the Vysočina Region into the Plzeň Region. Major forest owners, such as the Forests of the Czech republic, s. e. and Military Forests and Estates of the Czech Republic, s. e, have paid due attention to forest protection issues. The situation in the Šumava National Park area can be considered stabilized. In the case of small private owners operating under forest management plans, the FPD sees the most significant problems related to forest protection, especially in the areas of the MEPs Jindřichův Hradec, Tábor, and Milevsko. In several instances, these findings were addressed through administrative proceedings, resulting in fines. The FPD often dealt with repeated neglect of duties related to bark beetles, such as delayed processing of bark beetle wood, despite repeated warnings from forestry experts. Small forest owners face the most significant challenges with sanitation and limited opportunities to obtain processing capacity and sales outlets. Regarding other destructive insect pests, the situation in the South Bohemian region is stabilized, and their occurrence is at a baseline level or has not been detected at all. During the inspections, no significant damage caused by these pests was found. In the next part of the departmental task concerning the regeneration of young forest stands, with an emphasis on areas damaged by bark beetle infestation, the deadline for afforestation was extended in most cases, as set out by the Ministry of Agriculture's general measures. For this reason, only cases of old clearcuts that occurred before the bark beetle infestation were addressed in administrative and offense proceedings. For newer clearcuts resulting from the bark beetle infestation, it can be noted that owners managing according to the Forest Management Plan (FMP) are making continuous afforestation efforts without unnecessary delays, following the previous afforestation parameters and with unchanged seedling numbers.

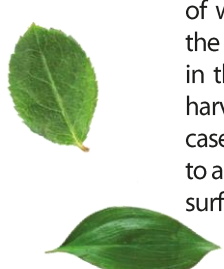
- In the supervised area of Plzeň TI throughout 2022, a total of 36 inspection actions were conducted, including 16 comprehensive inspections. No cases were addressed through administrative proceedings or in penalty proceedings.

- In the forests of the Karlovy Vary and Ústí nad Labem regions, there were 20 unscheduled inspections related to the component tasks.

- In the Hradec Králové and Pardubice regions, the Hradec Králové TI monitored the development of biotic factors - calamitous pests - during comprehensive inspections and during three separate inspections focused on controlling the development of harmful insects. Greater infestation of bark beetles and the threat to surrounding forest stands due to the spread of bark beetles was mainly found among small forest owners who inadequately monitor their forest property. Nevertheless, cases of neglect of forest protection were also addressed among larger forest owners throughout the year. The significant damage to spruce stands is mostly caused by the combined action of the spruce bark beetle, the northern spruce bark beetle, and the shiny spruce bark beetle. In the Hradec Králové region, a slight decrease in the bark beetle population was recorded, while in the southwestern part of the Pardubice region, the population remained at a high level. In the territorial jurisdiction of Hradec Králové TI, spruce trees are most affected in the areas around Dvůr Králové nad Labem, Nová Paka, and the Broumov region, as well as around Nasavrky, Hlinsko, and Polička. A significant amount of dying pine trees, especially in the vicinity of Hradec Králové, Pardubice, and Přelouč, is considered noteworthy. Also in 2022, many properties exceeded the annual quota, resulting in increased heavy machinery movement through the forests, primarily due to the harvesting of bark beetle-infested trees and their transport. The fact that forest owners primarily use timber transport complemented with chemical treatment for bark beetle infested wood as the main method for sanitation is considered problematic. With a significant increase in transported wood, there is pressure to maximize the use of transportation means. However, the observed condition of the road network corresponded to normal wear and tear, and there was no significant damage to forest land.

- In the Vysočina Region, under the supervision of Havlíčkův Brod TI, the population density of the bark beetle (including the spruce bark beetle, the northern spruce bark beetle, and the shiny bark beetle) in the forests

remains very high. However, there is no further massive spread at the moment, likely due to improved forest vitality. Currently, the affected areas include the Žďárské vrchy and Novoměstsko regions. The next area affected is the Železné hory Protected Landscape Area, where there is relatively more extensive infestation and spread, especially in the western part of the region, partially on the Pelhřimov and Pacov regions. The situation remains unfavorable in valleys along major watercourses, such as the Sázava River in the Ledec region. Controls were therefore primarily directed to locations where interventions against bark beetles can be effectively carried out for the time being. Another problem is the often poorly managed or even missing records of calamitous pests, as required by the relevant regulation. No significant damage to land designated for forest functions in connection with logging and transport activities was found. Forest roads mostly showed only normal operational wear and tear. In some sections of forest roads, improvements and reinforcement were visible using gravel. The presence of ruts in steep sections of forest roads was rather rare. The approach of landowners to this issue did not differ from the standard situation, and they make efforts to minimize such damage in their own interest.



- In the South Moravian and Zlín regions, which are under the control of Brno TI, there were two incidents of bark beetle swarming (*Ips typographus*), with the spring swarming being more intense in both regions. However, the number of bark beetles involved was smaller than in previous years. This can be explained by more favorable meteorological conditions and a smaller area of attractive spruce stands. There was a shift away from using preventive measures in stands and all resources were focused on processing bark beetle-infested wood. Given the favorable wood market conditions, larger forest owners aimed to financially cover the reforestation of calamity areas and to address damages to forest roads. Due to the transportation of significant amounts of wood after the bark beetle calamity, there was degradation primarily of category 3L roads. Rutting caused by the passage of logging and transport vehicles was also observed on skid trails and harvesting areas, resulting in the initiation of proceedings against forest landowners in two cases. However, it was generally noted that post-harvest, especially by larger entities, there are production improvements made to the road network. In some cases, new road networks are constructed, or modifications are made to forest skid trails (formerly referred to as forest roads 3L) to raise them to a higher category - forest road 2L. These enhancements typically involve surface strengthening and ditch adjustments.

- Olomouc TI - Based on findings, especially during comprehensive inspections of individual forest owners, there has been a decrease in random harvesting of bark beetle-infested stands. This is attributed to somewhat more favorable climatic conditions in the past year and the fact that most of the stands attractive to bark beetles have already been harvested in lower and mid-altitude areas. However, spruce stands, particularly in the first and second age classes, which are also affected by bark beetles, still remain on properties in general. In the course of comprehensive inspections (forests of municipalities, religious entities, and individuals), no facts were found that would require administrative proceedings. In the structure of random harvestings, the ratio of bark beetle-infested wood harvested decreased in favour of random harvestings caused by climatic factors, especially windbreaks. One of the reasons is the disruption of forest stability due to the harvesting of a large portion of bark beetle-infested spruce trees. During inspection surveys conducted in the absence of forest owners, deficiencies related to bark beetles were identified. These findings were made in the last quarter of the year, outside the bark beetle's active period. Sixteen requests for forest inspection and the processing of bark beetle-infested wood were sent to forest owners. Compliance will be monitored at the beginning of 2023 to prevent the spread of the pest.

The issue of forest damage due to forest transport was investigated concurrently with bark beetle-related damage. It can be noted that the processing of bark beetle-infested wood and its transportation worsened the condition of the road network. Larger forest owners gradually carried out road network repairs, but the situation is more challenging in forest complexes with a higher number of small forest owners.

Forest restoration, even on large calamity clearings exceeding five hectares, primarily involves direct planting of target climax tree species that require growth under the understory. This is mainly true for beech trees. "Spruce monocultures have turned into beech monocultures" in many places.

- Within the activities of Ostrava TI, the task "Development of biotic factors and forest damage by forest transport" was examined through eight inspection actions, partly or entirely focused on bark beetles or the protection of forest soil after forest transport. For untimely and inadequate measures against the development, impact, and spread of bark beetles, two fines were imposed in a total amount of CZK 8,000 as on-site payment orders in offense proceedings. Renewal of young forest stands was the subject of 11 inspection actions. For untimely or insufficient renewal, two fines were imposed in offense proceedings, totalling CZK 2,000, as on-site payment orders. A fine of CZK 5,000 was imposed on the post-calamity areas in 2022 by an order on-site.



- During the inspection of the departmental task at Liberec TI, it was found that approximately 450 m<sup>3</sup> of unprocessed spruce bark beetle-infested wood had not been processed in a timely manner. This did not lead to administrative proceedings but was addressed by highlighting the necessary sanitation and subsequent protection. According to assessments, especially the spruce bark beetle, contributed to about 80% of the damage, while the remaining 20% was attributed to the shiny bark beetle. The most significant damages caused by bark beetles were identified at altitudes up to 500 meters above sea level. Serious damage in forests due to forest transport was not identified in most forest owners. A total of 23 notifications were sent to forest owners, highlighting the need for sanitation of bark beetle-infested wood and the maintenance of forest roads. In most cases, the identified deficiencies were addressed. In a few cases, planned inspections had a preventive educational effect on the forest owners. After being notified of the date of a comprehensive inspection, forest owners resolved any issues in their forests related to random logging. This was evident during field inspections as part of the checks. It can be assumed that a large number of bark beetles overwinter in the logging residues because the bark beetles often completed their development and left the trees on standing or harvested infested wood at the log yards.

### 4.5.3 Overview of fulfilment of specific tasks

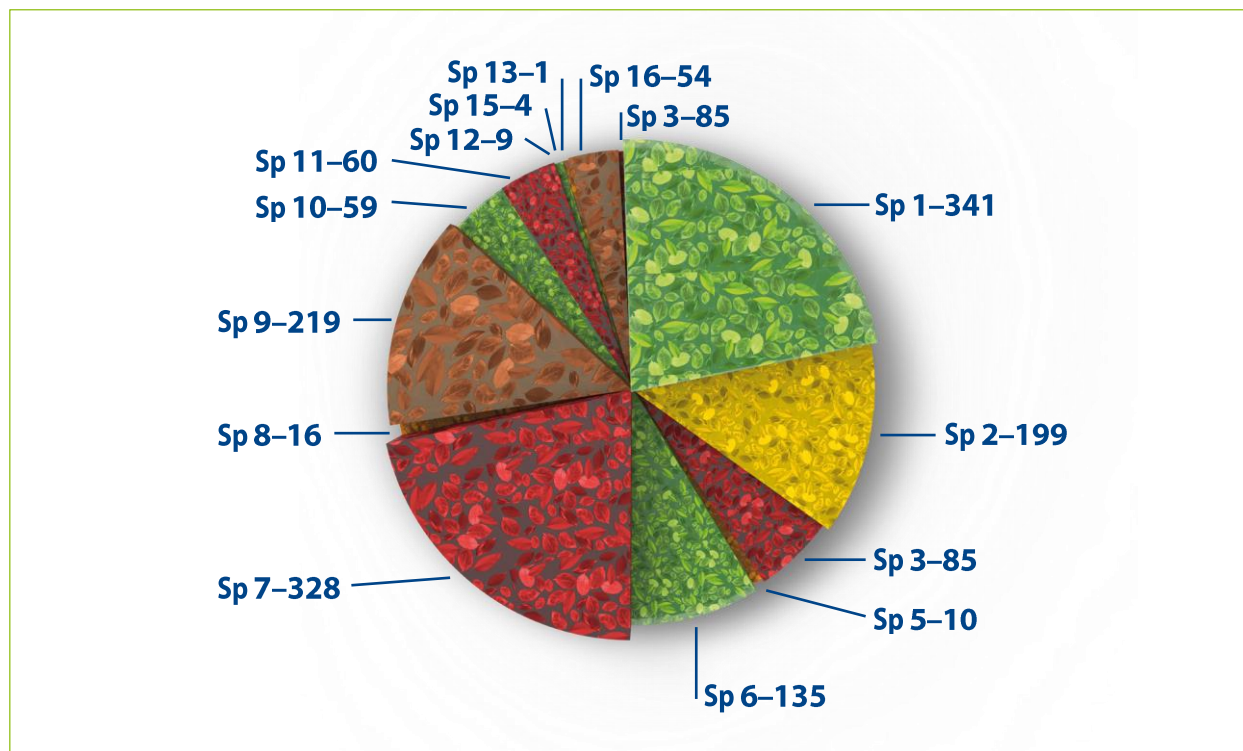
During planned and unplanned inspections, 15 topics were inspected by the FPD TIs:

Abbreviations of inspection topics	Inspection topic	Number of inspections
Sp 1	Comprehensive inspection	341
Sp 2	Development of biotic agents	199
Sp 3	Damage to game	85
Sp 5	Use of biodegradable oils and hydraulic fluids	10
Sp 6	Damage to forest by logging, skidding and upset stand stability	135
Sp 7	Protection of forest land fund, including use of surroundings of mining areas	328
Sp 8	Circulation of reproductive material of forest trees	16
Sp 9	Forest stand restoration, including stands after illicit logging	219
Sp 10	Adherence to binding provisions of FMP and FMG	59
Sp 11	Implementation of remedial measures from administrative decisions	60
Sp 12	Forest land fund protection – recreational activities	9
Sp 13	Ecological damage in forests	1
Sp 15	Afforestation of agricultural land fund	4
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.	5



The frequency of checking specific tasks mentioned above does not correspond to the total number of inspections due to the practice where many inspections encompass several specific topics simultaneously. This is especially the case with comprehensive inspections that focus on all topics (relevant to the inspected property). In 2022, specific tasks were thus checked in 1,525 inspections, out of which 341 were comprehensive inspections - see the chart.

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



### 4.5.4 Significant cases

#### Praha TI

The Prague Inspectorate imposed a fine on the company BEST Market s.r.o. for non-compliance with the prescribed remedy. The company in question purchased forest land in the cadastral area of Kouřim in 2020, subsequently clearing the forest on the land, which was younger than 80 years old, and brought various materials (gravel, insulation material, etc.), personal belongings, and household equipment (e.g., chairs, tables, a shower cubicle, a whirlpool, etc.) to the site to construct a building. The total encroachment on the forest land amounts to 0.08 hectares. The CEI issued a remedial measure to BEST Market s.r.o., requiring the removal of the mentioned items and reforestation of the cleared area. In 2021, BEST Market s.r.o. was fined for conducting the aforementioned activities (CZK 240,000), and in 2022, after joint proceedings for the most serious offense, i.e., a violation under Section 4 para. 1 let. d) of Act No. 282/1991 Coll., a fine of CZK 290,000 was imposed on the company.

#### České Budějovice TI

During the inspection in December 2021 and January 2022, in cooperation with the Forest Management Institute, violations of legal regulations concerning the release of reproductive material of forest trees into circulation were identified. The subject of the inspection was found guilty in the subsequent administrative proceeding for releasing into circulation reproductive material for 83,439 seedlings of white fir, giant fir, summer oak, and Norway spruce. This was done with accompanying documents containing incorrect information, as the quantity of reproductive material sold exceeded the amount that could have been grown and sold based on the purchased seedlings and seeds, considering their germination rate and the number of seeds. Therefore, discrepancies in the accompanying documents of the planting material were evident. For this planting material, accompanying documents could not be issued. As a result, the reproductive material was issued with fictitious accompanying documents. The origin of this planting material is not proven. A fine of CZK 250,000 became legally effective on June 13, 2022, following an appeals process.



## Plzeň TI

The company Holz-Krieg GmbH was fined a final penalty of CZK 352,000 for not fulfilling the imposed remedial measures concerning the failure to take necessary actions that would lead to reforestation of the created gaps on a reduced area of 3.52 hectares within the cadastral territories of the MEP Horažďovice, MEP Domažlice, and MEP Horšovský Týn.

## Ústí nad Labem TI

In 2018, an area of approximately 0.75 hectares in the cadastral area of Čeřeniště was logged. In March 2022, a forestation inspection was carried out, but despite being informed of the inspection's initiation, the owner did not participate. It was determined that afforestation had not been carried out, and after inquiring with the State Forest Administration in Ústí nad Labem, it was confirmed that no request for an extension of the afforestation deadline and measures had been submitted. Subsequently, an order was issued in administrative proceedings imposing a fine of CZK 75,000. The individual subject to the inspection filed an objection and was represented by a law firm. A decision was then issued to uphold the fine in the same amount, and the forest owner, through the legal representation of the law firm, appealed once more. At the beginning of 2023, the appeal was forwarded to the appellate authority.

## Hradec Králové TI

During the inspection of the forest property in Hodonín municipality, a substantial number of standing unremediated bark beetle-infested tree stumps were found, where the calamitous subcortical insects had concluded their development. From there, they spread to the surrounding spruce stands. The forest owner neglected the implementation of systematic logging, leading to the infestation of the nearby spruce forests by untreated barkwood. Failing to timely remedy the infested wood resulted in the termination of the bark beetles' life cycle and the propagation of a new generation into the surrounding forest stands. During the period between the conclusion of the inspection and the issuance of the decision, the Mayor of Hodonín municipality began actively showing interest in the forest's condition. Prior to the issuance of the decision, the CEI received invoices for the sale of timber and the repair of a forest road, which had experienced increased heavy equipment traffic since the inspection. The CEI took all these factors into account and determined the fine amount to be CZK 550,000. Hodonín municipality did not exercise its right to appeal, and the penalty became legally binding in its entirety.



Standing unremediated bark beetle-infested tree stumps in the municipal forests of Hodonín near Nasavrky





Felled barkwood (already abandoned by subcortical insects) in the municipal forests of Hodonín near Nasavrk

### Havlíčkův Brod Tl

The municipality of Ovesná Lhota endangered the environment by conducting unauthorized deliberate logging of forests younger than 80 years and simultaneously designating a clear-cut area as unsecured stands. The municipality was fined in accordance with Section 4, paragraph 1, letter c) of the Inspection Act in the amount of CZK 60,000. The deliberate logging resulted in the creation of a continuous unsecured area measuring approximately 2 hectares.

Unauthorized deliberate logging of the forest younger than 80 years, resulting in the formation of an unsecured area covering 2 hectares in the cadastral area of Ovesná Lhota.





#### Brno TBrno TI

The company Supreme Store, s.r.o. has been imposed a legally binding fine in the amount of CZK 500,000 for an environmental offense related to creating conditions for the operation of harmful biotic and abiotic agents. The company committed this offense by failing to carry out proper and timely forest regeneration on its forest properties within five cadastral areas (a total of 25 parcels), resulting in a cumulative area of approximately 5.87 hectares.

#### Olomouc TI

In 2022, the Forest Protection Department did not address any significant cases.

#### Ostrava TI

In 2022, the most significant case in administrative proceedings involved Capital group SERVICE s.r.o. The company was charged for not converting clearcuts older than two years into a forested state and for failing to provide timely and sufficient protection of soil cover against water erosion in the cadastral area of Dolní Lomná, located in the Moravian-Silesian Beskids, within the Jablunkov region. Additionally, the company did not remove the snowmaking technologies from the so-called "blue ski slope" in the Armáda ski area (it is important to note that the operation of the "blue ski slope" was not permitted by any of the relevant administrative authorities). On June 30, 2022, a decision was issued imposing a fine of CZK 2,400,000. An appeal was submitted along with the case file to the appellate authority, which subsequently annulled the decision made by the CEI and returned the matter for further review.



An area without timely forest regeneration in the cadastral area of Drahonín

#### Liberec TI

The owner of forest land, Land Value, a.s., is liable for failing to carry out proper protection of the forest land against disturbances and wildlife damage on an area of 1.80 hectares. Due to the owner's inaction, wildlife has caused damage by browsing on spruce, maple, rowan, beech, oak, and has allowed the spread of burdock, which suppressed the natural forest regeneration. The accused, as the forest owner, did not fulfil their obligation to implement measures to prevent and mitigate the impact of harmful factors on the forest. The owner has committed an offense and has been fined CZK 90,000 for it.

### 4.5.5 Conclusion of inspection activity

At the forest protection department level, the personnel situation has slightly improved compared to the previous year.

The activity of the FPD CEI in 2022 was no longer affected by the coronavirus pandemic. The number of inspection actions increased to 1,072. The total amount of fines imposed exceeded the figures from 2019 and 2020, approaching the average values of the past decade. Owners neglected measures to prevent the development of biotic factors, violated regulations during forest regeneration, damaged land designated for forest functions through forest transport, undertook unauthorized land appropriations intended for forest functions, and failed to implement required measures to rectify the illegal state of forest properties. In addition to issues related to protecting forests from insect pests, there is a persistent problem of unauthorized land encroachments on forest soil, unauthorized use of forest land for purposes other than fulfilling forest functions, waste disposal, and terrain modifications in forests.



The inspection procedures themselves are still influenced by factors that persist from the past. Inspection procedures have become more complex due to the challenging assessment of the situation, where relevant information is often lacking due to rapidly changing circumstances. Additionally, subsequent offense proceedings have become more demanding, as some cases require a more in-depth understanding of additional legislation, particularly in the areas of the Building Act and waste management.

Despite the slowly receding bark beetle calamity, it can be observed that the current forest management practices are at a good level for most forest owners. There is a visible effort to take timely measures to limit the negative impact on forests and forest land. Periodic monitoring in high-risk areas and the enforcement of corrective measures have proven to be highly effective. The educational activities, such as informing forest owners of their responsibilities, have also received positive feedback.

Looking ahead to the expected developments in 2023, assuming favourable temperature and precipitation trends, it is anticipated that the spread of bark beetles will slow down. However, even with this in mind, efforts to eliminate the bark beetle calamity need to be maintained, primarily through the timely processing of active beetle-infested trees. A significant problem looms in the form of increasing damage to newly emerging forest stands caused by wildlife.

We consider it essential to deepen our collaboration with locally relevant state forestry authorities and the Forest Management Institute.

A significant advancement in inspection activities in recent years is the deepening of knowledge and utilization of GNSS receivers, which enhance the accuracy of data collected by inspectors and, as a result, the defensibility of inspection results before the appellate body or in court. A very promising GNSS receiver is the Zenith06, which provides a positional accuracy of RTK 2 cm + 1 ppm and vertical accuracy of RTK 3 cm + 1 ppm.

An ongoing significant challenge in inspection activities is the difficult enforceability of the law, particularly in connection with the adoption of Act No. 250/2016 Coll., on the responsibility for administrative offences and on procedure on it. For example, proving the subjective fault of a natural person can be particularly challenging.

A new trend in inspection activities will involve ongoing monitoring of forest damage, with measures to minimize it, particularly in the case of calamity areas. Additionally, there will be monitoring of damage to the land designated to perform forest functions on areas affected by timber harvesting and transport. In these instances, close collaboration with locally relevant authorities of the State Forest Administration is anticipated.





## 4.6 The participation of the CEI in addressing accidents in 2022



### Central Records of Water Accidents in 2022

According to the Water Act, the CEI has maintained the central record of accidents since 2002. In 2022, this record included 210 accidents that met the legal definition of an accident as specified in Section 40 of Act No. 254/2001 Coll., on Water. Throughout 2022, additional accidents were reported to the CEI, but they were not included in the central record of accidents due to their insignificant scope with no impact on water quality.

Accidents caused by transportation have shown a yearly decline. In 2022, there were 50 such accidents recorded, which represents 24% of the total cases. In this year, fish mortality was an accompanying phenomenon in 41 cases, making up 19% of the total.

Groundwater contamination occurred in seven cases, and in two additional cases, both groundwater and surface water were contaminated simultaneously.

The originator of the accidents was known in 89 cases.

### The distribution of accidents by causes in 2022

Accident cause	Number of accidents	%
human factor	51	24.3
technical factor	19	9.0
human + technical factor	24	11.4
natural factor	31	14.8
human + natural factor	5	2.4
human + technical + natural factor	3	1.4
Not detected	77	36.7
<b>TOTAL</b>	<b>210</b>	<b>100</b>

### The distribution of accidents by leaked substances in 2022

Group of substances	Number of accidents	%
petroleum substances	103	49.1
wastewater	17	8.1
chemicals other than heavy metals	15	7.1
sediments and insoluble substances	5	2.4
agricultural activity	4	1.9
food products	4	1.9
oxygen deficit	15	7.1
other substances	5	2.4
not detected	42	20.0
<b>Total</b>	<b>210</b>	<b>100</b>



## 4.7 Integrated agendas

Integrated Pollution Prevention and Control (IPPC) 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), and further by using substances that are as environmentally friendly as possible.

This integrated approach to environmental protection as a whole is coordinated and facilitated by experienced inspectors who specialize in these areas, namely the Integrated Agenda Coordinators (IAC). They work closely with the technical components of the environmental protection within the Inspectorate (such as air protection, waste management, and water protection).

In this field, the core activity is supervisory (inspection). Another significant and preventive activity is non-supervisory, such as providing expert opinions by the Inspectorate (as part of EIA, IPPC, EMAS, etc.).

### 4.7.1 Legal basis for activities in the field of integrated agendas.

The Inspectorate in the field of integrated agendas ensures the performance of state administration delegated to it by the laws on environmental protection, in their current and effective wording, and by directly effective EU regulations, particularly the following 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 task fulfilment in the field of integrated agendas, supervision (inspections)

We distinguish between two documents: the **"IPPC Facility Inspection Plan,"** which, based on the assessed risk level of each facility with a valid Integrated Permit (IP), specifies the frequency of on-site inspections for each facility and designates the environmental protection technical component responsible for conducting the inspections. It is a three-year plan with a fixed term, annually updated and further elaborated into a specific **"Routine Inspection Program,"** which is equivalent to the plans of the technical environmental protection components and corresponds to them.

**The Inspection Plan** was developed based on **the assessment of facility risk**, covering a three-year period, **from 2020 to 2022**, in continuity with plans for the periods 2014-2016 and 2017-2019. It was also **updated for the year 2022**, encompassing **1,496 active IPPC facilities with IP**. The Inspection Plan also reflects and includes the component tasks of the professional departments.

The inspection activity plan (program) was modified as needed in 2022. There were shifts of inspected entities between the semesters and replacements when necessary.



During the planning process, the experiences from the previous year were taken into account, and inspections were prioritized to ensure compliance with the three-year cycle and directed towards periods with the maximum possible reduction of potential obstacles. Facilities that were approaching the end of their cycle in a given year were given priority for inspection. Efforts were made to minimize any potential delays in inspections for facilities beyond the three-year cycle, considering the uncertainty in the COVID-19 situation.

The Inspection Plan (program) of TIs within the integrated agendas **was adhered to according to the established number** (data as follows).

### Integrated agendas in total - summary data for the Inspectorate

**The activities of the professional components of the Inspectorate within the integrated agendas**, either directly performed by them or with their participation, are primarily included in the preceding sections (4.1, 4.2, 4.3, and if applicable, 4.4 - 4.6) of this Part 4 of the Annual Report of the CEI for the year 2022 by department.

The priority in inspecting facilities under the **IPPC Act** is to accept the provisions set forth in particular in Sections 19b, 20b, 34, and 37 of this Act, as part of the implementation of the Directive of the European Parliament and the Council 2010/75/EU on industrial emissions from November 24, 2010. In accordance with these provisions, it is necessary to adhere to the time between two on-site inspections (one to three years depending on the risk level of the facility). This places significant demands on the frequency and scope of inspections, as well as on other activities of the Inspectorate in this area.

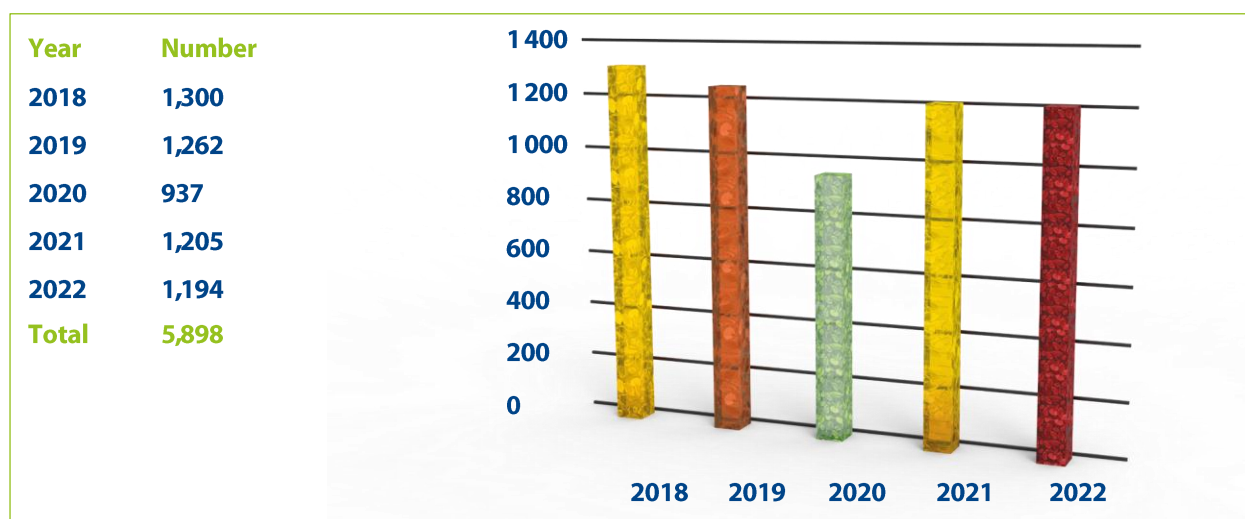
**The program for all inspections** within the integrated agendas for the year 2022, which was developed based on the Inspection Plan, was set at **1,026** facilities. In reality, the Inspectorate **conducted 1,194** inspections in 2022. This includes the conduct of extraordinary inspections, especially based on suggestions, media cases, accidents, or non-standard operation, as well as any repeated inspections of the same facilities, for example, in cases of serious violations of the IP conditions (approximately 13%). **The program was successfully completed.**

**In total**, within its jurisdiction **in the field of integrated agendas** in 2022, the Inspectorate conducted **1,194** inspections. There were **133** administrative/offense proceedings initiated, and **128** decisions and orders were issued. Based on a total of 129 legally binding decisions (including those from previous periods), fines amounting to a cumulative total of **CZK 12,703,000** were imposed. Of these, two decisions on reprimands and one decision on limiting the operation of facilities became legally binding.

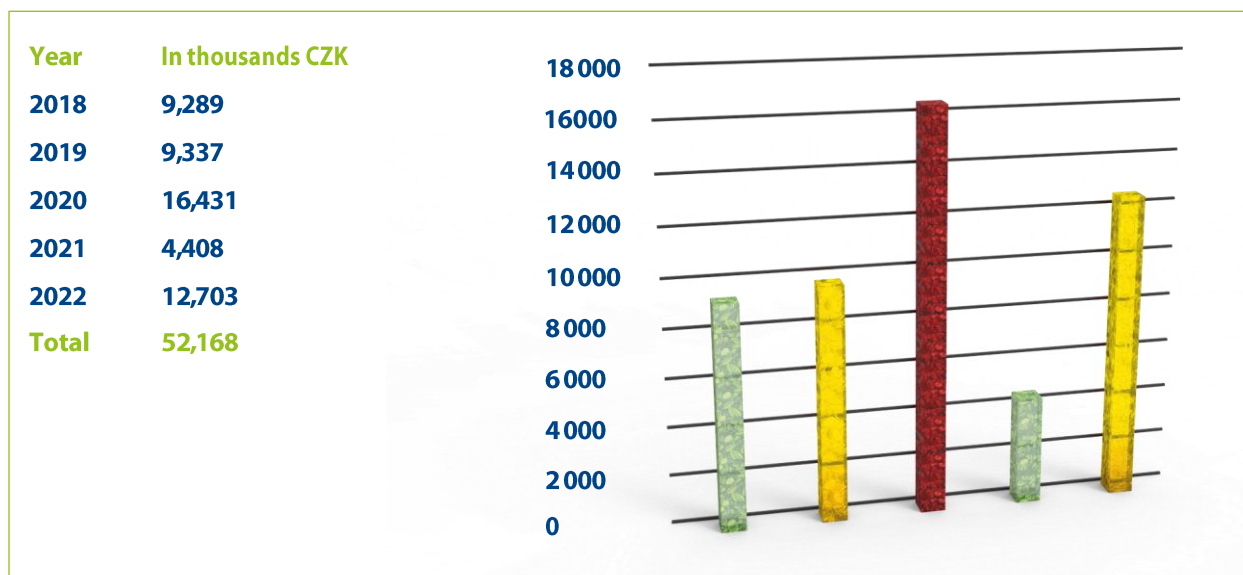
The range of fines imposed and legally binding with respect to integrated agendas varied **from CZK 3,000 to CZK 3,000,000** (the highest fine was imposed on the company OPIMO TRADE s.r.o., operating the facility "Nová lisovna – Kovárna 5" in Dubí near Kladno).

The average amount of fines imposed in legally binding decisions (orders) for integrated agendas during this period was approximately **CZK 100,000**.

### Inspections of TIs within the IAs 2018-2022



## Fines imposed by TIs within the IAs 2018-2022



## Integrated prevention (Act No. 76/2002 Coll.) - summary data for the Inspectorate

The **routine inspection program** within integrated prevention (Act No. 76/2002 Coll.) for the year 2022, which was developed based on the Inspection Plan, was set at **689** facilities.

In the **field of integrated prevention** (Act No. 76/2002 Coll.), the Inspectorate conducted a total of **778** inspections on IPPC facilities within its jurisdiction in 2022 - **the routine inspection program was successfully completed**. Based on these inspections, **124** administrative/offense proceedings were initiated, and **119** decisions and orders were issued. A total of **120** legally binding decisions (including those from previous periods) resulted in fines totalling **CZK 12,523,000**. Of these, two decisions on reprimands and one decision on suspending the operation of facilities became legally binding.

The average amount of fines imposed in legally binding decisions (orders) during this period within integrated prevention was approximately CZK 117,600.

### Main inspection findings

The Inspectorate, through inspections, identified violations of environmental protection laws and non-compliance with the binding conditions of IP operation, which primarily included:



#### water protection:

- discharging wastewater without a permit or after its expiration,
- exceeding wastewater discharge limits of all types,
- failure to report planned changes in the operation of facilities,
- exceeding the permitted amount of groundwater or surface water extraction,
- handling hazardous substances in areas without water management protection,
- failure to update the emergency response plan,
- failure to conduct monitoring (e.g., landfill leachate before transport to wastewater treatment plants, water quality in monitoring wells),
- failure to conduct leak tests.



- **air protection:**

exceeding pollutant emissions (e.g., carbon monoxide, sulphur dioxide),

causing odor nuisances,

failure to use biotechnological preparations,

failure to monitor landfill gas or violations of operational procedures, including leaks or non-connection, of gas collection wells to the cogeneration unit.

- **waste management:**

failure to separate waste,

improper handling of hazardous waste (waste similar to municipal waste), transfer of waste to an unauthorized entity, lack of record-keeping, incorrect reporting of waste production and management, failure to report substance transfers in waste, insufficient documentation of the quality of received waste (waste oils) in case of dangerous waste,

disposing of waste on the landfill embankment or other waste not permitted,

inadequate completion of basic descriptions of received waste, failure to ensure dust measurements at the landfill,

contamination of the surface of naturally grown terrain, such as placing scrap cars containing hazardous components outside the dismantling hall,

failure to operate in accordance with operational regulations (technical operating conditions) etc.

- **non-compliance with reporting obligations under the IPPC Act:**

changes to IP,

reports on the fulfilment of binding IP conditions,

transfers (overflows), or substance leaks,

extraordinary situations,

failure to report measurements within the required timeframe.

- **other violations:**

non-compliance of approved documents with the facility description,

exceeding the permitted capacity of the facility,

failure to meet conditions set for facility disposal,

operation without an IP.

The issue of changes in component laws and their incorporation into the IPs remains a separate chapter.

## Integrated Pollution Register (Act No. 25/2008 Coll.) - summary data for the Inspectorate

In terms of compliance with the **IPR Act**, in 2022, the Inspectorate conducted inspections in **298** facilities, of which **281** were part of integrated inspections (under the Act on IPPC), and **17** were standalone inspections related to the IPR. While **263** inspections were planned, **281** were actually carried out, so **the plan was fulfilled**. The total amount of fines imposed in legal proceedings for failure to comply with reporting obligations to the IPR amounted to **CZK 180,000**. With 9 final decisions, the average fine was **CZK 20,000**.

The imposed sanctions in 2022, as in previous years, remained at the lower end of the statutory range, which has a maximum of up to CZK 500,000, ranging **from CZK 3,000 to CZK 90,000** (the facility for the production of cement clinker, operated by CEMEX Czech Republic, s.r.o., in Prachovice).

Violations in the area of IPR primarily pertained to the failure to submit reports to the Integrated System for Fulfilling Reporting Obligations within the legal deadlines or at all. Furthermore, violations included reporting incorrect data and failing to report waste transfers or the presence of pollutants in waste.

It is almost a rule that large facility operators (e.g. those with issued IP) fulfil their obligations as per the relevant legislation significantly better than other entities, especially small and medium-sized agricultural operations and facilities. However, based on the inspection activities of the Inspectorate in the field of IPR, it can be noted that overall awareness of the obligations arising from the relevant legislation and compliance with it is continually improving.



## Environmental damage (Act No. 25/2008 Coll.) - summary data for the Inspectorate

Administrative proceedings in connection with the Act on the prevention of environmental damage and its remediation, and on the amendment of certain laws, have not been initiated as of now.

In 2022, the Inspectorate conducted a total of **118** inspections to ensure compliance with the Act on the prevention of environmental damage. The plan for **74** inspections was fulfilled. A basic risk assessment was submitted. **No violations were committed**.

In its activities, the Inspectorate continued to address eight suggestions related to the potential occurrence of environmental damage in one location in the South Moravian Region, one location in the Central Bohemian Region, and six locations in the Olomouc Region. All these submissions were processed in accordance with the Act on the environmental damage, resulting in the initiation of administrative proceedings, upon the requester's request, to impose corrective measures under this law to remedy possible environmental damage consequences.

Within the area spanning from the South Moravian Region to the Olomouc Region, the Inspectorate addressed three requests for corrective measures to remediate the probable environmental damage resulting from an accident on the Bečva River in September 2021. The proceedings were not concluded in 2022.

The suggestions concerning potential environmental damage focused on six locations within the Olomouc Region, including Velké Vrbno (two instances), Stříbrnice (two instances), Chrastice, and Hynčice pod Sušinou. Proceedings were discontinued at three locations (Stříbrnice, Hynčice pod Sušinou, and Velké Vrbno). For the remaining sites, investigations, conducted in cooperation with other government authorities, are ongoing to determine whether environmental damage may have occurred.

The appeal body has received the termination of proceedings concerning the imposition of remedial measures for the removal of possible environmental damage at the second location in Stříbrnice, as well as the decision to dismiss the proposal for interim measures submitted by the complainant, in which they requested the issuance of interim measures at the Velké Vrbno location (reservoir).



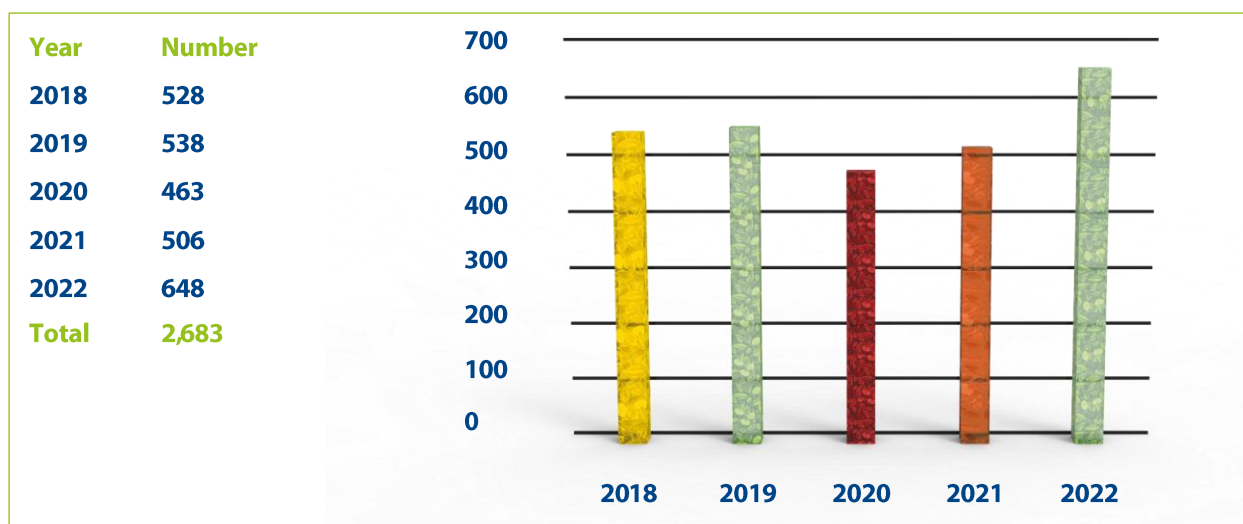
## Integrated Agendas Department - IAD (CIA)

Specialized Coordinators of Integrated Agendas (**CIA**), Integrated Agendas Department of the CEI (**IAD**), in close collaboration with specialized environmental protection departments, carried out, participated in, cooperated, or coordinated the execution of **648** inspections at facilities and premises. This number includes inspections under the Integrated Prevention Act (**232**), the Act on the IPR (**298**), and the Act on Preventing Environmental Damage (**118**). During the period under review, a total of **46** administrative/offense proceedings were initiated directly by CIA. The number of legally effective **decisions** (including orders) in 2022 was **46**, with a total fine amount of **CZK 6,660,000**. During this period, **two** decisions imposing reprimands became legally effective. No decisions to cease operations or decisions for non-compliance with the Inspection Procedure were issued or became legally effective during the observed period.

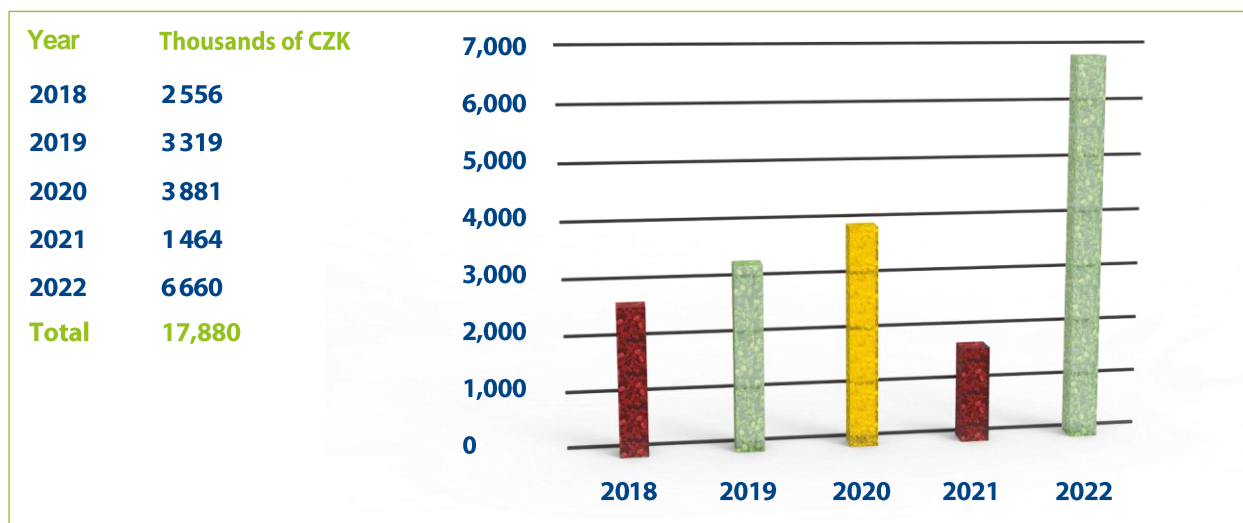
The range of fines imposed and legally effective in this area ranged **from CZK 3,000 to CZK 3,000,000** (imposed on the company OPIMO TRADE s.r.o. operating the facility "Nová lisovna – Kovárna 5" in Dubí u Kladna).

The average fine amount per decision (order) in legal force during this period was approximately **CZK 151,400**.

### Inspection of the IAD CEI (CIA) 2018–2022



### Fines by the IAD CEI (CIA) 2018–2022



## Departmental tasks (basic) for the IAD

The so-called integrated inspections were carried out as follows:

- **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,
- **CIPR**, control of IPR (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 facility "suspected" of operation without IP,
- More checks were **carried out** together, e.g. OC+CIPR, CC+CED, OC+CIPR+ CED.

## Specific tasks

Among the specific tasks carried out in 2022 were primarily specific controls (SCs), which involved inspecting facilities to ensure they do not fall under IPPC (for example, the inspection conducted by Hradec Králové TI at Bartoň textil Náchod facility resulted in no violations, or the inspection by Ostrava TI at Farma pro chov nosnic (Layer Hen Farm) Odřišov facility confirmed its operation without an integrated permit). Additionally, inspections of all types were performed according to tasks related to the current regional issues, such as inspections at facilities with a history of severe IPPC Act violations, incidents, or media attention.

## Accidents

The coordinators of integrated agendas actively participated in addressing 16 accidents or non-standard operations at IPPC facilities, for example, in České Budějovice TI, Ústí nad Labem TI, Ostrava TI, and Liberec TI.

Ústí nad Labem TI - Mondi Štětí, a.s. – facility "Production of sulphate pulp and paper, steam boiler K10, steam boiler K11, and related activities".

- On January 15, 2022, during the transfer of sodium hydroxide from tank N63 to tank N10, there was a leakage of approximately 3 m<sup>3</sup> of sodium hydroxide from this pipeline into the rainwater sewer and subsequently into the Elbe River. This incident resulted in the confirmed death of 538 kg of fish.
- This violated condition No. 2.4.1 of the IP, which states: "Facilities where hazardous substances are used, captured, stored, processed, or transported shall be secured to prevent the release of hazardous substances into the soil or undesirable mixing with wastewater or rainwater (discharge points and places for storing hazardous substances shall be equipped with impermeable sumps to prevent the release of hazardous substances into groundwater)..."
- On January 17, 2022, in addition to handing over the collected samples and samples from fishermen for analysis, the Inspectorate initiated an inspection at Mondi Štětí a.s. under Act No. 255/2012 Coll., On Inspection. The subject of the inspection was to determine the cause of the accident that occurred on January 15, 2022. During the inspection, representatives of Mondi Štětí a.s. stated, among other things, that on January 15, 2022, in the morning, there was a transfer of the contents of operational tanks containing sodium hydroxide. As a result of the pipe's leakage, approximately 3 m<sup>3</sup> or 50% of these substances leaked into the stormwater sewer and subsequently into the Elbe. By the time of the inspection on January 17, 2022, according to the information provided, approximately 200 kg of fish had died (about 25 individuals + 100 fry). Measures of a technical and organizational nature were subsequently taken by the originator of the incident to prevent a similar occurrence in the future.
- After agreeing with the Water Management Authority, the CEI investigated the causes and circumstances of the accident, which subsequently led to an administrative offense proceeding (after the case was dismissed by the Police of the Czech Republic). On June 29, 2022, the CEI's decision on a fine of CZK 400,000 became legally effective (without an appeal). The Inspectorate considered the originator's active approach to mitigating the harmful consequences of the accident and their overall cooperation in clarifying and managing the case.



**Ostrava TI** - An interesting case is the subsequent inspection activity and ongoing administrative proceedings after an accident at the facility "SPV RECYCLING CZ a.s." for waste collection, recycling, and utilization in the Vítkovice cadastral area. A fire occurred during the processing of toners (waste category 16 02 16) into soot in 2021. This was followed by investigations by the fire department, the police, and an inspection by the CEI (WMD).



Fire of a mill - soot at SPVRECYCLING CZ a.s.

Subsequently, another multi-component inspection took place in 2022 based on a complaint, and an order was issued by the WMD for a violation of the law before obtaining an IP. Furthermore, an order was issued by the IAD for a violation of IP conditions. However, objections were raised against both orders, leading to the initiation of proceedings by the WMD in Ostrava TI for IP condition violations (both the IAD and WMD proceedings were combined).

Fire of a mill - soot at SPVRECYCLING CZ a.s.



Summary data for the Inspectorate, with particular emphasis on accidents, can be found in section "4.6 The participation of the CEI in addressing accidents in 2022".

## Suggestions

Summary data for the Inspectorate, particularly with regard to suggestions and petitions, can be found in section "3.1. Cooperation with the public" (3.1.1 Suggestions) of this Annual Report.

Coordinators of integrated agendas also actively participate in addressing suggestions and petitions, especially in cases involving the jurisdiction of multiple departmental divisions. Their main task was to ensure a coordinated approach in handling these cases.

## Reports on inspection

According to Section 20b, paragraph 9 of the Act on Integrated Prevention, the Inspectorate is obliged to prepare, in connection with every **on-site inspection**, a report alongside the inspection protocol. This report should contain a description of the inspection findings and conclusions regarding any further measures, in other words, an **inspection report**. Furthermore, as per Section 20b, paragraph 11 of this law, it is also necessary to publish this report through the Integrated Prevention Information System (IPPC IS) managed by the Ministry of the Environment within four months from the execution of the on-site inspection. However, the report may only be prepared after the expiration of the deadline for objections to the inspection findings stated in the protocol, according to Section 13 of Act No. 255/2012 Coll., on Inspection.

The individual Territorial Inspectorates (especially CIA), post these inspection reports on the Integrated Prevention Information System (IPPC IS) within the respective deadlines.

In 2022, a total of 602 inspection reports from the CEI (both interim and final) were uploaded to the IPPC IS, of which **591 were final inspection reports from the CEI**.

As of December 31, 2022, according to the IPPC IS, a total of **4,802** final versions of inspection reports from the CEI have been identified since 2014.

### 4.7.3 Unsupervised activities of the CEI in the field of Integrated Agendas

**This activity primarily involves the creation of expert opinions:**

- 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 environmental audits,
- within the framework of requests for information pursuant to Act No. 123/1998 Coll. and Act No. 106/1999 Coll. etc.

### EIA/SEA – summary data for the Inspectorate

In 2022, the Inspectorate processed a total of 893 opinions on intentions, documentation, assessments, concept notifications, and concept proposals within the EIA/SEA process. This represents an increase of approximately 20% compared to the previous year, with 742 opinions issued.



The trend of more frequent use of Section 15 of Act No. 100/2001 Coll., on Prior Discussion with the Inspectorate, is confirmed. In general, the subjects of intentions predominantly include commercial storage complexes, transportation infrastructure, residential complex construction, and farm expansions and modernizations. The most significant issue with constructions anticipated on agricultural land is the appropriation of the most fertile soil.

Another issue arises with intentions where the specific use of halls is not specified, and therefore, the presented dispersion studies do not comprehensively evaluate the actual situation that will occur after the implementation of the intention during its operation. Dispersion studies only assess the traffic-related impact of the intention. If it is not clearly defined for what purpose the halls will serve, or what specific activities will take place in them, it is not possible to adequately assess the impacts of the intention on various environmental components. In practice, the actual use of the halls may be, and often is, entirely different.

According to the Inspectorate, the intentions of commercial companies (notifiers) to build production facilities (especially without specific designation) and storage facilities on arable land should not outweigh the public interest in protecting agricultural land fund. Given that there are unused industrial and agricultural areas throughout the entire Czech Republic (as seen in the national brownfield database), it is in the interest of environmental protection to primarily utilize these locations.

### Significant cases EIA

**Plzeň TI** - The intention notification for the "Recycling Centre Zbůch - Týnec (PLK1983)" follows up on the intention notification for the "Recycling Facility Týnec (PLK1980)" from October 2021 and expands upon it.

Among other things, a study on the impact on human health has been added, as well as a study on potential odour influence and a dispersion study on the impact on the emission situation. However, the dispersion study only assesses the impact of pollutants such as PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC (volatile organic compounds) and does not address emissions of ammonia and sulphur compounds, or dimethylsulfide from the composting process.

The odour study is burdened with significant uncertainty, as noted by its author. Under unfavourable meteorological conditions, the occurrence of odours near inhabited houses, even at distances of less than 200 meters from the intention, cannot be ruled out. Substances such as sulphur compounds and dimethylsulfide have a very unpleasant odour. In the past, the CEI addressed justified complaints from residents of the village of Zbůch regarding the nuisance of odours from composting in another location in the village, which was carried out by the company ELRON CZ s.r.o. For these reasons, the CEI requested further assessment of the intention under Act No. 100/2001 Coll.

**Ostrava TI** – The intention code is MSK2105. "Ecologization of Public Transport in Ostrava-Poruba". The Inspectorate's requirement was for the entire process, including the continuation of public discussion from 2020 in accordance with Section 17 of Act No 100/2001 Coll. Subsequently, there was a change in the assessor, followed by another turbulent public discussion, and then the assessment was halted before the issuance of an opinion after several years.

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

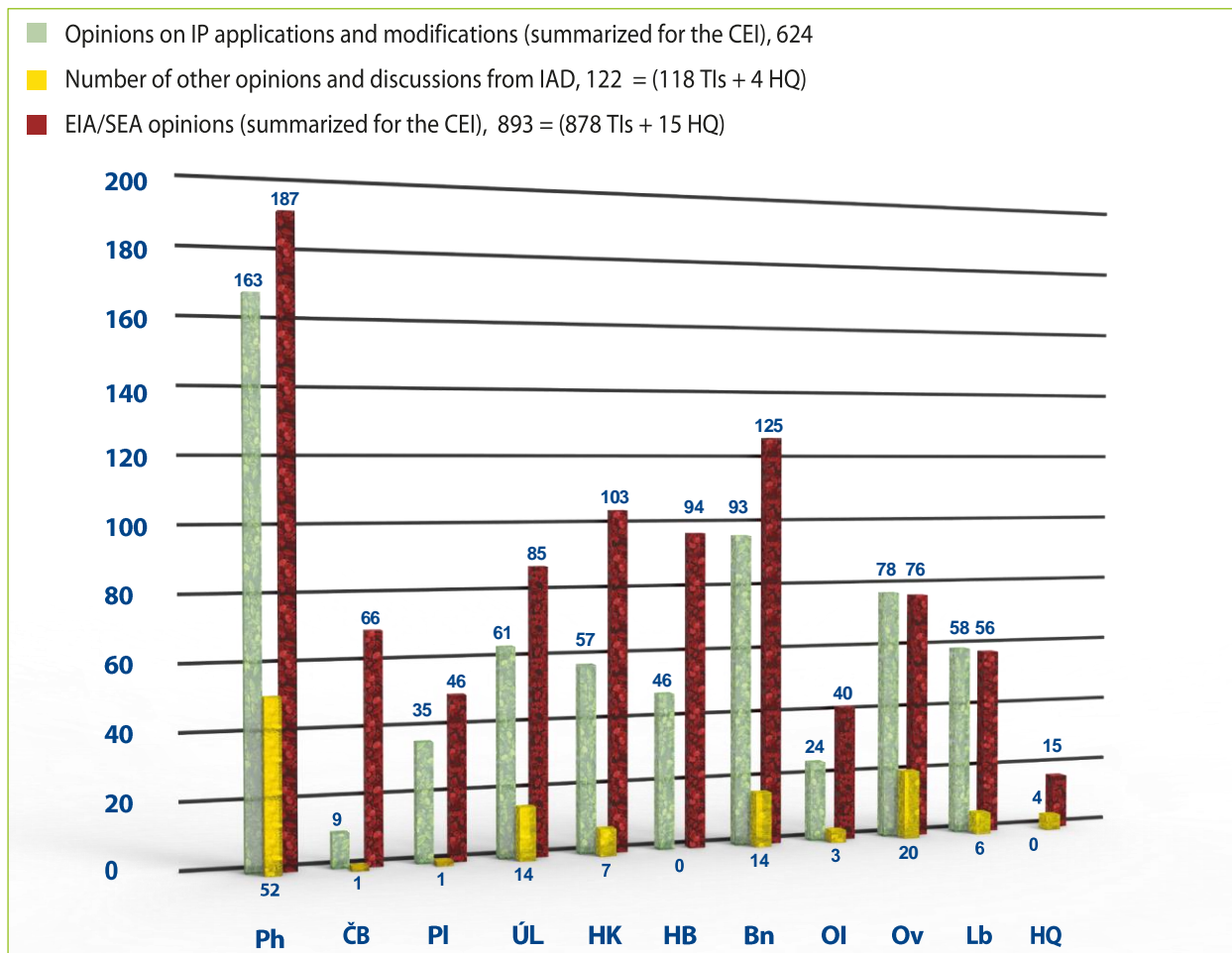
The Inspectorate actively collaborates with regional authorities in the field of integrated prevention. This collaboration includes providing comments on integrated permits, on significant changes to integrated permits (much more frequently), as well as reviews of integrated permits. In 2022, the Inspectorate processed a total of **624** comments on applications for integrated permit issuance or modifications. This represents a slight decrease compared to the previous year (641). In several cases, representatives of the CEI also participated in oral discussions regarding the applications for permit issuance or modification.

In the comments on changes to IPs, particularly those related to expanding landfill capacity, the Inspectorate has maintained a consistent opinion and continues to emphasize the changes in waste management legislation and the ban on depositing mixed municipal waste in landfills from 2030, with a significant reduction in the amount of waste being deposited (60% recycling). For these reasons, it is rigorously examined why operators are seeking to expand landfills since, in the interest of environmental protection, the operation of these facilities should gradually be phased out.

### Other expert opinions

Coordinators of integrated agendas at individual TIs and at the CEI HQ further prepared or collaborated on an additional **122** opinions (EMAS, as part of the Safe Company program, for environmental audits, etc.), as indicated in the chart on the following page.

## Opinions issued by TIs and the HQ CEI in 2022



## Provision of information

Summary data for the Inspectorate, particularly in relation to the provision of information, can be found in section "3.1. Cooperation with the Public" (**3.1.2 Provision of Information**) of this Annual Report.

**České Budějovice TI** - among several **information requests** addressed by the IAD, it's possible to mention a recurring type of information request, for example, in the case of VAFO Production s.r.o. in Číčenice. The request was submitted under Act No. 123/1998 Coll. and was processed according to the content of Act No. 106/1999 Coll. The request was related to an unannounced inspection by the Inspectorate at the facility "Extruded Animal Feed Production for Animals Kept in Hobby Breeding - Číčenice Plant," specifically regarding: providing an inspection plan, stating the reason for the inspection, and whether and how the inspection is coordinated with the regional authority.

## 4.7.4 Significant cases from inspection activities

### The highest fines imposed by CIA

**Praha TI** – On October 24, 2022, the decision of the Inspectorate dated December 21, 2021, on an offense committed by the company OPIMO TRADE s.r.o. became legally effective. This offense, based on Section 37 paragraph 5 of the Act on Integrated prevention, was related to **a breach of the obligation to implement corrective measures within the specified deadline**, as mandated by the Inspectorate's decision dated January 27, 2020. This requirement for the operator to remove all waste from the land in the cadastral area of Dubí near Kladno by June 30, 2020, including the obligation to inform the Inspectorate about the waste removal, was imposed based on the binding condition of operation D.3.1 of the valid integrated permit issued by the Regional Authority of the Central Bohemian Region for the facility "New Press Plant – Forge 5 (Nová lisovna – Kovárna 5)," located in Dubí near Kladno. Within 14 days after the removal of the relevant waste, the operator was required to inform the Inspectorate by providing documentation of the transfer of the cleared waste. For non-compliance with this obligation, a fine of **CZK 3,000,000** was imposed on the appellant according to Section 37, paragraph 6, letter b) of the Act on Integrated Prevention.



**Liberec TI** – On March 8, 2022, the decision of the Inspectorate dated February 18, 2022, regarding an offense committed by the company EKO Volfartice, a.s., became legally effective. The fine imposed in this case amounted to **CZK 1,000,000**. The offense was related to a breach of the obligation defined in Section 16, paragraph 1, letter a) of the Integrated Prevention Act. This paragraph specifies that the operator of a facility is required to operate the facility in accordance with the integrated permit issued under this Act, including the conditions of facility operation stipulated in the operational regulations and other documents approved as part of the integrated permit. The operator committed an offense under Section 37, paragraph 4 of this Act, as they operated in contravention of the integrated permit issued by the Regional Authority of the Liberec Region and in violation of the conditions of the integrated permit

- the degassing wells were not hermetically sealed,
- no capacity reserve was provided in the leachate pits, leading to the filling of the landfill area with leachate and subsequent overflow of wastewater outside the sealed part of the landfill body, resulting in groundwater pollution,
- operational records were not adequately maintained, making it impossible to determine the amount of water pumped into the landfill body. Records of leachate removal to the wastewater treatment plant were added to operational records retroactively, no records were kept regarding the rupture of sealing membranes in the gas wells,
- the requirement for an alternative water analysis with an extended range of parameters was not followed when groundwater was polluted by leachate from the landfill in 2020 and 2021,
- the water level in pit JPV-1 was not measured at all, and there were no records of monitoring, etc.

**Olomouc TI** – On May 11, 2022, the decision of the Inspectorate dated July 15, 2020, regarding an offense committed by the company MEGAWASTE-EKOTERM, s.r.o., Prostějov, became legally effective. The fine imposed in this case amounted to **CZK 800,000**. The offense was related to the operation of the facility "Waste Incinerator Prostějov – MEGAWASTE-EKOTERM" in violation of the integrated permit issued by the decision of the Regional Authority of the Olomouc Region and in violation of the Air Protection Act.

#### 1. Non-compliance of facility operation with the integrated permit:

- failure to comply with the emission limit of "50 mg/m<sup>3</sup> (when determining the average daily value)" for the pollutant carbon monoxide, and others,
- handling of hazardous substances (liquid waste) on the outdoor handling area without proper containment measures, resulting in a risk to groundwater quality.

#### 2. As the operator of a stationary source listed in Annex No. 2 to the Air Protection Act,

under code 2.1 - Thermal Waste Treatment in Incinerators, which constitutes a facility, the operator failed to comply with the operational technical conditions in the following way:

- the waste gas was not properly heated in a controlled manner to a temperature of at least 850 °C for a minimum of two seconds in all locations along the waste gas flow profile following the last combustion air inlet,
- during the start-up and shutdown of the incinerator, it was not ensured that the specified temperature in the area where waste is thermally treated would be maintained throughout the entire duration while unburned waste is present,
- during the commissioning of the incinerator, in the event of a decrease in temperature below the specified minimum threshold, there was no automatic prevention of waste being introduced into the area where waste is thermally treated by direct oxidation.

## 4.7.5 CONCLUSION

During inspections, discrepancies in equipment descriptions are often identified, thus after the inspection, the Inspectorate provides feedback to the regional authority, which subsequently rectifies these discrepancies during the review process. The same process occurs in the case of outdated or no longer relevant conditions, where, for instance, integrated permits still refer to obsolete legislation, especially in the field of waste management (referencing Law No. 185/2001 Coll. instead of Law No. 541/2020 Coll.) and water protection.

It can be noted that in most cases, specific violations are not repeated in subsequent inspections. The overall decrease in identified infringements is due to both the greater discipline of operators and the thoroughness of facilities with issued integrated permits. The Inspectorate has conducted inspections at each facility at least three times (often more), leading to a lower number of identified violations. The majority of "chronic deficiencies" in facilities have already been discovered, corrected by operators, and potentially sanctioned by the Inspectorate. Therefore, the identified violations tend to be more sporadic or less significant in nature.

### Legislative insufficiency

The legislative insufficiency remains problematic, especially in the case of addressing suggestions regarding odour.

Furthermore, there appears to be a certain legislative ambiguity regarding wastewater (according to Act No. 254/2001 Coll.) and water-based liquid waste (wastewater according to Act No. 541/2020 Coll.). This issue also became apparent during the discussion and resolution of input limits for a waste facility that is simultaneously a water body, a biological wastewater treatment plant. Waste generators can cleverly bypass the Operational Rules and classify waste as wastewater, which falls outside all quality records, with only the quantity being recorded.

### Organizational issues

Note on the administrative burden of the CIA during some inspections. If all the requested documents are available during an on-site inspection, there are only a few documents in the case file (in the electronic case management system). However, if the operator is unable to provide everything on-site and subsequently sends documents gradually, or if the Inspectorate must repeatedly request missing documents, the number of documents in the case file can increase to dozens. The process of uploading a large number of subsequently provided documents increases the workload on the CIA and potentially on other members of the inspection team.

The inspection of the "Bory Prison - Facility for the Employment of Convicts in Metalworking" was interesting and organizationally demanding. The collaboration with the prison service is highly commendable, as they created conditions for the inspection and set rules for future planned and unplanned inspections in this facility. During the inspection, an employee of the Prison Service took the necessary photographic documentation as required by the inspectors. However, this documentation could only be provided to the Inspectorate after approval by the Director of Bory Prison.

### International and domestic cooperation, prevention

In 2022, an important activity of the inspectors from the IAD was also **cross-border cooperation** with Slovakia (MoE SR and the Slovak Environmental Inspectorate) within the BAT forum and ENVIRO.

Furthermore, in 2022, the coordinators of integrated agendas, as is traditional, actively participated in the **activities within technical working groups**, especially at MoE ("Regions and Integrated Prevention") and at the Ministry of Industry and Trade (MIT) ("Forum for the Exchange of Information on BAT"), to the extent possible.

The Inspectorate actively and effectively collaborates with other state authorities, especially with **regional offices** responsible for permitting the operation of individual facilities in accordance with the Act on Integrated Prevention. The goal of this mutual cooperation is to strive for enhancing the quality of IP, ensuring IP compliance with the current state of facilities, formulating specific binding operating conditions with regard to their enforceability, and thus ensuring a high level of environmental protection. The gradual increase in the number of IP changes, however, results in increased demands on the conducted inspections. Inspections in the field of integrated prevention, therefore, require precise preparation and an adequate time frame.

Within its activities, the Inspectorate does not strictly focus solely on imposing fines but places emphasis on **prevention and also employs so-called "soft methods"**.



## 5 Ethics and integrity, anti-corruption activities, complaint resolution, and data protection



### 5.1 Ethics and integrity

#### Rules of ethics

Ethics is one of the pillars of the corporate culture of the CEI, whose values and principles have been successfully upheld in the long term. The purpose of the ethical rules applicable at the CEI is for all employees to consciously and actively adhere to ethical principles when performing their designated tasks. Employees are regularly trained in the area of ethical rules, and they are continuously informed about all documents related to anti-corruption policies. Within each organizational unit of the CEI, the representative of ethical leadership is its head, who creates a suitable environment within the managed unit.

The rules of ethics for state employees and employees in an employment relationship performing activities according to Section 5 of Act No. 234/2014 Coll., on the State Service, as amended, are primarily defined by this regulation in Section 77, paragraphs 1 and 2, and Section 81. Additionally, they are specified in the service regulation of the Deputy Minister of the Interior for State Service No. 13/2015, dated December 14, 2015 (available here: [www.mvcr.cz/sluzba/clanek/sluzebni-predpisy.aspx?q=Y2hudW09OA%3d%3d](http://www.mvcr.cz/sluzba/clanek/sluzebni-predpisy.aspx?q=Y2hudW09OA%3d%3d)), article 9 of the mentioned regulation is dedicated to preventing the risks of corruption, fraud, and unwanted external influences that could jeopardize the proper performance of service. The obligations of employees in employment relationships that extend to the principles and rules of ethics are defined by the Labour Code No. 262/2006 Coll., as amended, especially in Sections 301, 302, 303, and 304.

Among other documents that employees of the CEI also follow in the area of ethical conduct are the Rules of Ethics and Principles of Behaviour and Conduct for the employees of the Ministry of the Environment. These can be found on the CEI website in the "Anti-Corruption Program" section at ([www.cizp.cz/cizp/protikorupcni-program](http://www.cizp.cz/cizp/protikorupcni-program)).

#### Reporting suspicion of illegal or corrupt activities

In accordance with Government Regulation No. 145/2015 Coll., on measures related to reporting suspicions of committing unlawful acts in a government office (Government Regulation), the CEI has adopted a service regulation issued by the director of CEI which establishes the procedures for reporting suspicions of committing unlawful acts, including corrupt activities, and addresses the protection of whistle-blowers. Additionally, this service regulation designates two state employees (investigators) responsible for receiving reports and investigating the suspicions contained therein.

Reports of suspicions of corrupt or unlawful activities can be submitted by employees of CEI or by anyone from the public. Reported information is treated confidentially, and the option for submission is available continuously (in writing or via email). The process for reviewing reported suspicions is defined by Government Regulation, the methodological directive of the Deputy Minister of the Interior for State Service No. 8/2015, and the service regulation issued by the director of CEI. These methodological documents, among other things, establish that whistle-blowers among the employees should not face retaliation, disadvantages, or pressure related to their reporting.

Within the CEI, there are the following options for reporting suspicions of unlawful or corrupt activities:

- Written reports can be placed in the designated box located in an unmonitored area to the right of the main entrance to the headquarters of CEI (Na Břehu 267, 190 00 Praha 9). This method allows for anonymous reporting.
- Reports can also be sent via email to the address [prosetrovatel@cizp.cz](mailto:prosetrovatel@cizp.cz).

Information about the CEI investigators is published on the CEI website in the section „Practical guide“ ([www.cizp.cz/prakticky-radce/podavani-oznameni-o-podezreni-ze-spachani-protipravniho-jednani-vcetne-korupcniho](http://www.cizp.cz/prakticky-radce/podavani-oznameni-o-podezreni-ze-spachani-protipravniho-jednani-vcetne-korupcniho))

In addition to the above-mentioned options, every citizen or organization has an independent means to report suspicions of corrupt conduct by the CEI employees through the Ministry of the Environment's [Contact Centre Against Corruption](http://www.mzp.cz/cz/kontaktnei_centrum_proti_korupci) ([www.mzp.cz/cz/kontaktnei\\_centrum\\_proti\\_korupci](http://www.mzp.cz/cz/kontaktnei_centrum_proti_korupci)) and also through the [External Reporting System \(EOS\)](http://www.oznamovatel.justice.cz) ([www.oznamovatel.justice.cz](http://www.oznamovatel.justice.cz)) of the Ministry of Justice. Reporting unlawful activities is also possible through the standard criminal law process.

## 5.2 Anti-corruption program

The Internal Anti-Corruption Program of the Czech Environmental Inspectorate (IAP CEI) is a set of procedures and measures for managing corruption risks that employees are obligated to adhere to. Its goal is to minimize the conditions for the occurrence of corrupt activities within CEI and protect the assets and interests of the state to the maximum extent. The IAP CEI consists of five main parts: Creating and strengthening an anti-corruption climate; Transparency; Managing corruption risks and monitoring controls; Procedures in cases of suspected corruption; Evaluating the internal anti-corruption program. The current IAP CEI is available on the CEI website in the section „[Anti-Corruption Program](http://www.cizp.cz/cizp/protikorupcni-program)” ([www.cizp.cz/cizp/protikorupcni-program](http://www.cizp.cz/cizp/protikorupcni-program)).

The IAP CEI is based on the strategy of the Czech government, which is formulated in government resolutions and adopted concepts. The current foundational document that outlines a coordinated and systematic approach to combating all forms of corruption at all levels of state management is the Government Concept for Combating Corruption for the years 2018 to 2022. The IAP CEI is also in line with the Ministry of the Environment's internal anti-corruption program.

The implementation of the IAP CEI is regularly evaluated and brought into compliance with the anti-corruption policies of the Czech government and the Ministry of the Environment. Within the CEI, corruption risks are identified at the level of individual departments, and rules for their management are established through the elaboration of a Corruption Risk Map, which is re-evaluated annually.

As part of its transparency efforts, the CEI publishes all contracts and invoices through the Contract Registry and [Open Data of the MoE](http://www.mzp.cz/cz/otevrena_data) ([www.mzp.cz/cz/otevrena\\_data](http://www.mzp.cz/cz/otevrena_data)). The CEI also twice a year releases a list of advisors and advisory bodies in the Anti-Corruption Program section on its website.

In the past five years (2018-2022), no cases of corruption have been identified at the CEI. Furthermore, no contractual relationships were terminated due to violations of regulations related to corruption.

## 5.3 Complaint resolution

Complaints against inappropriate behaviour or procedures by the CEI.

As part of its activities, the CEI also investigates complaints filed under Section 175, paragraph 4 of the Administrative Procedure, both complaints against the conduct of administrative authorities and complaints against inappropriate behaviour by public officials. Information on how to file complaints is available on the CEI website in the "[Practical Guide](#)" section.

Complaints against the inappropriate behaviour of employees or against the procedures of individual units within territorial inspectorates or CEI headquarters provide valuable feedback that helps the organization improve its work. To ensure that a complaint can be properly investigated, it is essential that it contains clear and comprehensible information regarding what specific procedure it concerns and what inappropriate behaviour or action the complainant perceives. After a thorough and objective assessment, the CEI will determine whether the complaint is justified, partially justified, or unjustified. In cases where the complaint is found to be justified or partially justified, measures are taken to remedy the situation, prevent the recurrence of inappropriate actions, and improve the performance of public administration.

In 2022, the CEI received a total of 30 complaints, out of which 24 were found to be unjustified. Five complaints were partially justified, and one complaint was justified. The overall summary of complaints divided by individual territorial inspectorates and the headquarters is provided in the following table. Compared to previous years, there has been a significant decrease in the frequency of complaint submissions.



## The number of complaints against inappropriate behaviour of inspectors or the procedures of TIs CEI in 2022

Territorial Inspectorate	Number of received complaints	among which		
		justified	partially justified	unjustified
Praha	5	0	0	5
České Budějovice	2	0	0	2
Plzeň	5	1	0	4
Ústí nad Labem	1	0	0	1
Hradec Králové	2	0	0	2
Havlíčkův Brod	2	0	0	2
Brno	1	0	0	1
Olomouc	3	0	2	1
Ostrava	0	0	0	0
Liberec	0	0	0	0
Headquarters	9	0	3	6
<b>Total</b>	<b>30</b>	<b>1</b>	<b>5</b>	<b>24</b>

## 5.4 Data protection and compliance with legislation

In 2022, the Czech Environmental Inspectorate received an inquiry from the Office for Personal Data Protection, to which an employee of the Czech Environmental Inspectorate had turned. The complaint pertained to the leakage of the employee's personal phone number and personal data. The Czech Environmental Inspectorate promptly responded to all the queries it received from the Office for Personal Data Protection and concurrently concluded that it did not violate any laws. The Office for Personal Data Protection determined that, based on the actions taken before the inspection according to Section 3 of Act No. 255/2012 Coll., on Inspection (Inspection Procedure), there was no apparent breach of legal regulations on personal data protection. Therefore, the Office did not find any reason to initiate an inspection or administrative proceedings, and there is no further action to be taken.

In 2022, the CEI paid fines for traffic violations in a total amount of CZK 17,600.

### The evaluation of safety at the Czech Environmental Inspectorate for the year 2022

#### 1. Security incidents

##### ● Physical and technical security area

In 2022, the Czech Environmental Inspectorate repeatedly received envelopes of a uniform appearance through Czech Post, s.p., at the headquarters post office, along with other mail. These envelopes appeared suspicious to an employee due to their uniform appearance and the same postal routing number (222 00), which revealed that it was mail from SPU PH that does not deliver postal items to any address, street, or village. Subsequently, discussions were held with Czech Post, s.p., where an agreement was reached that such delivered documents would be returned as "Unsolicited Mail" to the storage facility of Czech Post, s.p.

All of these incidents were reported to the Police of the Czech Republic. The Police of the Czech Republic took custody of the suspicious envelopes and, in the presence of the security director of CEI, expertly opened them. None of the suspicious envelopes contained dangerous substances; they only contained promotional leaflets.

##### ● Personnel security and information security area

In 2022, no exceptional events occurred in the area of personnel security.



In April 2022, the Office for Personal Data Protection received a complaint from a complainant concerning suspected violations of personal data protection regulations by the CEI. This related to an alleged leak of personal data from the complainant's personal file maintained by the CEI and the creation of an audio recording by the CEI during a personal meeting without the complainant's knowledge. On January 6, 2023, the Office for Personal Data Protection sent information about the status of the complaint under reference number UOOU-01480/22-13. The Office for Personal Data Protection concluded that, based on the actions taken before the inspection according to Section 3 of Act No. 255/2012 Coll., on Inspection (Inspection Procedure), there was no apparent breach of legal regulations on personal data protection. Therefore, the Office did not find any reason to initiate an inspection or administrative proceedings, and there is no further action to be taken.

#### ● **IT security area**

No security incident in the ICT area was recorded.

#### ● **Cybersecurity area**

No security incident in the field of cybersecurity for reporting to the National Cyber and Information Security Agency was recorded.

### **2. Safety status inspection activities**

#### ● **Physical and technical security area**

Directors of TIs and the Operations Department of the CEI monitor compliance with operational rules of facilities, work safety guidelines, workplace health and safety, vehicle security, and other assets. Twice a year, an external company, TST SAQIA s.r.o., conducts inspections of facilities to ensure compliance with workplace health and safety, operational rules, and security prevention. The results of these reports do not reveal significant mistakes by CEI employees, and recommendations are implemented within 1-3 months after their completion.

#### ● **IT security area**

An audit of the cybersecurity management system was conducted by DATASYS s.r.o. Within the CEI, rules and procedures for evaluating cybersecurity events and managing cybersecurity incidents, as well as recording and analyzing cybersecurity events and incidents to prevent further occurrences, have been established. However, it is also necessary to incorporate these technical procedures into the security policy.



## 6 Tender procedures and supply chain in 2022

The CEI is one of the departmental organizations of the Ministry of the Environment, which complies with the rules for central government procurement (the system of centralized public procurement) and, at the same time, is a public contracting authority that adheres to a variety of legal and internal regulations when awarding public contracts (for details, see the website: [www.cizp.cz/cizp/verejne-zakazky](http://www.cizp.cz/cizp/verejne-zakazky)).

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### Supply chain

The supply chain primarily represents continuous outsourcing of:

- building management and maintenance,
- cleaning and reception services,
- provision of personal protective equipment,
- printer services,
- service of official vehicles,
- service and repair of specialized equipment,
- IT contracts, service, and system support.



The Public Procurement Department at the CEI also manages public contracts related to currently required specialized training and the purchase of technical equipment for inspectors, contributing to the improvement of inspection activities.

In the first quarter of 2022, the CEI was in a budgetary provisional period. During this time, contracts for public procurement were not concluded. After the budgetary provisional period had elapsed, the Public Procurement Department entered into 28 contracts with a total financial value exceeding CZK 9 million, excluding VAT. Among the most significant public contracts were contracts for the "Supply of GNSS devices for the CEI," "TI HK - VIS Spectrophotometer for Cuvette Tests with Accessories," and "Supply and Operation of a System for Efficient Data Distribution and Encrypted Data Exchange within the IS CEI environment".

Other public contracts administered by the Public Procurement Department include routine maintenance work in the buildings of territorial inspectorates, such as facade cleaning, painting, and door replacement, as well as the purchase of mobile phones for inspectors.

In 2022, the CEI implemented a Dynamic Purchasing System (referred to as "DPS"). DPS serves to provide laboratory services and geological surveys for the CEI, and it is divided into four categories, namely waste management, water protection - wastewater and surface water, water protection - groundwater and geological environment, and chemical substances in products. Laboratory services entail qualified collection of gas, solid, and liquid samples according to the DPS categories, followed by their qualified analysis.

### Verification of environmental impacts, labour-law procedures, and societal effects at suppliers.

G4-EN32 - The percentage of new suppliers who underwent screening using environmental criteria.

G4-SO9 - The percentage of new suppliers who underwent screening according to criteria for societal impacts.





The CEI strives to apply the principles of socially and environmentally responsible procurement to the widest extent possible when awarding public contracts. They divide public contracts into parts to enable the participation of smaller suppliers, reserve public contracts for suppliers employing individuals with disabilities, and include environmental requirements in public contracts.

The CEI routinely applies environmental requirements in individual public contracts. This principle has been particularly utilized in public contracts for the provision of cleaning services, interior painting, facade cleaning, and others. The public contract titled "Provision of Hygiene Supplies for the CEI" included a requirement for an "environmentally friendly product".

In the public contract titled "Provision of Cleaning Services and Maintenance of the České Budějovice TI Area," the public contract was exclusively reserved for suppliers who employ individuals with disabilities - these are referred to as reserved contracts, where the supplier must provide confirmation from the labour office in their bid to meet this criterion.

During the screening of suppliers in the social sector of public contracts, selected suppliers underwent an additional check, in addition to the regular control, which includes compliance with legal requirements and the contracting authority's criteria. This additional check aimed to ensure that the supplier employed at least 50% of individuals with disabilities from their total workforce on sheltered workplaces, as required for reserved contracts.



## 7 Employee environment and human resources

The CEI considers the care of its employees as a fundamental value and the basis of its expertise. The core approach involves direct communication between management and employees in all territorial inspectorates, a focus on continuous employee training, and workplace safety. The human resources management strategy primarily emphasizes controlling and reporting human resources management, as well as professional growth and development of employees.

A key change in 2022 was the incorporation of the Personnel Department into the new Personnel and Legal Department. The CEI's Personnel Department continued to optimize the process of recruiting new employees. In conjunction with the approved amendment to the State Service Act effective from January 1, 2023, it was necessary to prepare for significant changes in the implementation of selection procedures for civil service positions, including the transition at the turn of the year. Given the average age of CEI employees, there was a noticeable turnover in staff in 2022 due to the retirement of experienced employees. Furthermore, the electrification of personnel processes continued.

In 2022, there were also changes that increased the demands on the payroll budget. As of September 1, 2022, employee tariffs in both the civil service and employment relationships were increased by 10%. However, this increase was only partially budgetarily compensated, and additional budgetary resources will need to be sought in 2023.

As of December 31, 2022, the CEI had 533 employees, including 303 women and 230 men. The CEI employees work at the headquarters, territorial inspectorates in 10 regions, and two branches. The majority of employees work in specialized inspector roles (74.7%) and hold a university degree (82.2%). Employees with over 10 years of experience at the CEI make up 60.2% of the workforce.

CEI has civil servants whose employment law is regulated by the State Service Act and employees in an employment relationship, whose rights and obligations are governed by the Labour Code. This necessitates two agreements: a collective agreement for civil service and a collective agreement for employment relationships





### The number of employees/actual numbers/ by region (inspectorate)

Year	2018	2019	2020	2021	2022
<b>The absolute number of employees as of December 31<sup>st</sup></b>	<b>550</b>	<b>557</b>	<b>546</b>	<b>540</b>	<b>533</b>
Praha and Central Bohemia	62	62	62	63	59
České Budějovice	36	39	36	37	34
Plzeň	44	43	43	40	43
Ústí nad Labem	49	50	52	50	50
Hradec Králové	44	44	44	43	41
Havlíčkův Brod	37	38	36	36	35
Brno	54	55	51	50	50
Olomouc	34	36	34	30	32
Ostrava	47	46	48	47	47
Liberec	32	33	30	31	29
Headquarters (in Prague)	111	111	110	113	113



## The number of employees, broken down by type of employment relationship and employment contracts

Year	2018	2019	2020	2021	2022
<b>Total number of employees as of December 31<sup>st</sup></b>	<b>550</b>	<b>557</b>	<b>546</b>	<b>540</b>	<b>533</b>
Percentage of employees covered by the collective agreement	100	100	100	100	100
Employees in top management management + heads of departments /state employees	15	17	17	16	16
within that, women	2	2	2	2	3
within that, men	13	15	15	14	13
Professional employees/state employees/	437	446	421	439	412
within that, women	217	229	213	216	214
within that, men	220	217	208	223	198
Supporting employees /employees in an employment relationship/	98	94	108	101	105
within that, women	86	86	92	85	86
within that, men	12	8	16	16	19
Employment relationship for an indefinite period	492	504	505	528	486
within that, full-time	484	490	496	519	477
within that, part-time	8	14	9	9	9
Employment relationship for a definite period *	58	53	41	12	47
within that, full-time	53	52	40	12	47
within that, part-time	5	1	1	0	0
Number of women as of December 31 <sup>st</sup>	305	317	307	301	303
Employment relationship for an indefinite period (women)	269	278	278	294	277
within that, full-time	262	266	269	286	268
within that, part-time	7	12	9	8	9
Employment relationship for a definite period (women)	36	39	29	7	26
within that, full-time	33	38	29	7	26
within that, part-time	3	1	0	0	0
Number of men as of December 31 <sup>st</sup>	245	240	239	239	230
Employment relationship for an indefinite period (men)	223	226	227	234	209
within that, full-time	222	224	226	233	209
within that, part-time	1	2	1	1	0
Employment relationship for a definite period (men)	22	14	12	5	21
within that, full-time	20	14	11	5	21
within that, part-time	2	0	1	0	0

\*Definite period employment - according to § 21 of the State Service Act, state employees who have not yet successfully completed the civil service examination are hired for a definite period.

Once state employees pass the civil service examination, their definite period employment is changed to an indefinite period.



## Classification of employees by education and gender - as of December 31, 2022

Achieved education	men	women	total	%
Primary	1	0	1	0.2%
Secondary professional	0	5	5	0.9%
Complete secondary	2	10	12	2.3%
Complete secondary professional	9	62	71	13.3%
Higher vocational	1	5	6	1.1%
University	217	221	438	82.2%
<b>Total</b>	<b>230</b>	<b>303</b>	<b>533</b>	<b>100.0%</b>

## Duration of employees' employment relationships – as of December 31, 2022

Length	Number	%
Up to 5 years	133	25.0%
Up to 10 years	79	14.8%
Up to 15 years	68	12.8%
Up to 20 years	79	14.8%
Over 20 years	174	32.6%
<b>Total</b>	<b>533</b>	<b>100.0%</b>





## 7.1 Human resources management

Approach to the CEI employees is governed by the Labour Code and the State Service Act and is further regulated by internal regulations. Key internal directives include, in particular:

- Collective Agreement and Collective Contract,
- Work Regulations of the Czech Environmental Inspectorate (effective from May 1, 2012),
- Salary Regulations (effective from June 1, 2012),
- Directive 14/2012 on Employee Education at the CEI (effective from April 20, 2022),
- 3/2015 Service Regulation for the Implementation of the Work Regulations of the Czech Environmental Inspectorate in the Employment Relationships of State Employees According to the State Service Act (effective from August 10, 2015),
- 8/2015 Service Regulation Governing the Taking of Oaths by State Employees in the Czech Environmental Inspectorate (effective from November 26, 2015),
- 10/2015 Service Regulation Governing the Implementation of the State Service Act in the Czech Environmental Inspectorate (effective from December 4, 2015),
- 8/2017 Directive for the Application of Section 81 of the State Service Act in the Czech Environmental Inspectorate (other profit-making activities, effective from June 15, 2017),
- 11/2018 Directive on the Provision of Occupational Health Services in the Czech Environmental Inspectorate (effective from July 1, 2018),
- 1/2019 Directive on the Remuneration of State Employees (effective from February 7, 2019),
- 10/2019 Service Regulation that specifies the procedure for conducting performance appraisals of state employees assigned to the Czech Environmental Inspectorate (effective from October 8, 2019),
- 35/2021 Service Regulation, which issues the internal organization of the Czech Environmental Inspectorate (effective from January 1, 2022) as amended by Annex No. 1 SP 19/2022 and Annex No. 2 SP 22/2022,
- 24/2022 Methodological Instruction - Employee Satisfaction Surveys (effective from November 1, 2022),
- 25/2022 Service Regulation - Adaptation Process (effective from November 1, 2022),
- 26/2022 Methodological Instruction - Management of Employee Innovation Proposals (effective from November 1, 2022),
- 27/2022 Human Resources Policy (effective from November 1, 2022).

In 2022, the COVID-19 pandemic was winding down, and the activities of the personnel department were returning to ensuring the normal operation of the CEI. There was no longer a need for remote work (home office), and employees returned to their offices. However, readiness to implement required measures remained in place if necessary. The ongoing process of digitalization continues with the aim of reducing unnecessary paperwork.

### Employment

Given the nature of its activities, the CEI primarily offers qualified job positions. Key to its success is retaining employees, which is measured by the voluntary turnover rate.

At the end of the year, the CEI had 39 vacant systematized positions. The current task of the CEI's leadership remains the stabilization and development of key professions. The average voluntary turnover rate at the CEI is still relatively low at 5.6%. However, compared to the previous period, it is on the rise again.

Changes in the employee count are regularly monitored through internal reporting and evaluated by the management. Job positions are filled through public selection procedures. To stabilize employees, benefits are offered, and both civil servants and employees in employment relationships are entitled to them equally. The salary levels, especially for inexperienced graduates, are determined by salary scales and are relatively low. As of September 1, 2022, government directives led to a 10% increase in salary tariffs. However, the only partial budget coverage necessitates cost-saving efforts, even in non-entitled salary components.

According to the State Service Act, it is not possible to plan the career progression of employees, and selection procedures must be carried out for each systematized position.

## Total number and ratio of new employees and employee turnover rate 2018-2022

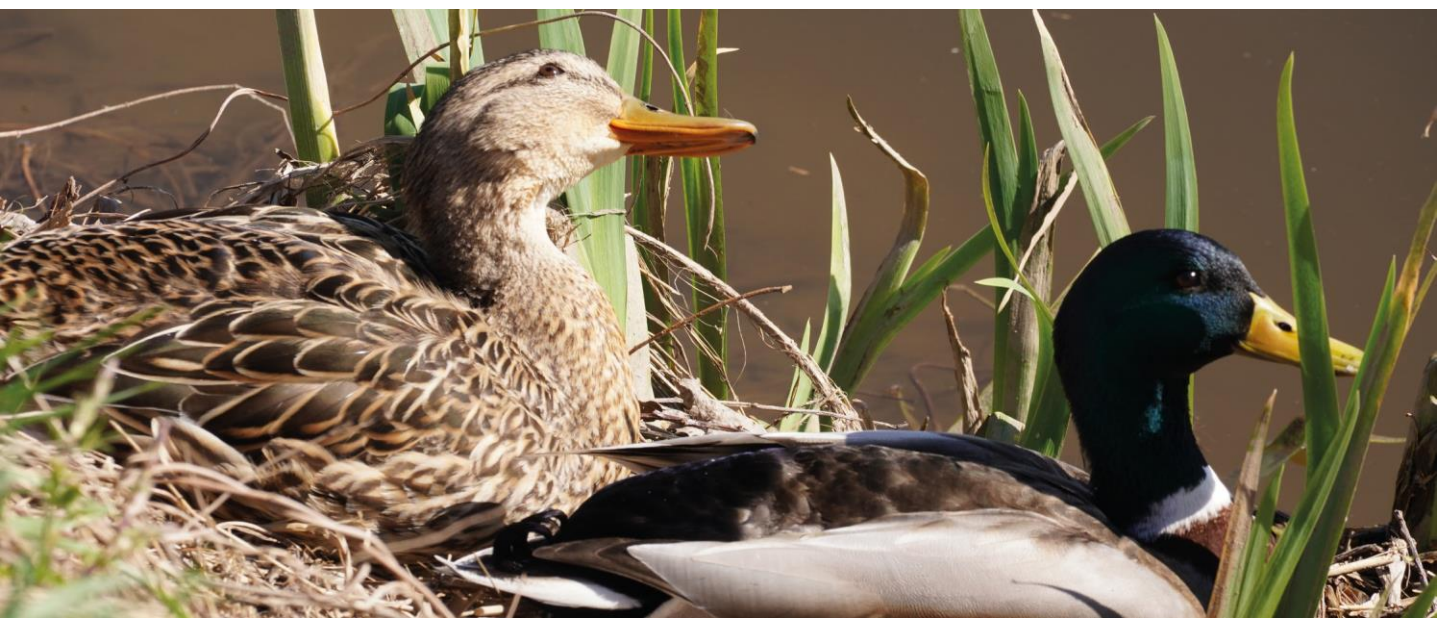
	2018	2019	2020	2021	2022
<b>Employees hired during the year, total within</b>	<b>59</b>	<b>54</b>	<b>43</b>	<b>33</b>	<b>46</b>
<b>that, women</b>	<b>33</b>	<b>39</b>	<b>28</b>	<b>21</b>	<b>24</b>
up to 30 years	16	9	5	6	8
aged 30-50 years	13	22	16	12	12
aged over 50 years	4	8	7	3	4
<b>within that, men</b>	<b>26</b>	<b>15</b>	<b>15</b>	12	22
up to 30 years	7	3	5	2	6
aged 30-50 years	10	6	6	6	14
aged over 50 years	9	6	4	4	2
<b>Total employees as of December 31st</b>	<b>550</b>	<b>557</b>	<b>546</b>	<b>540</b>	<b>533</b>
<b>Total number of employees who left employment in a given year</b>	<b>51</b>	<b>50</b>	<b>55</b>	<b>46</b>	<b>51</b>
<b>within that, men</b>	<b>25</b>	<b>19</b>	<b>16</b>	<b>18</b>	<b>26</b>
up to 30 years	1	2	1	1	3
aged 30-50 years	15	6	7	4	7
aged over 50 years	9	11	8	13	16
<b>within that, women</b>	<b>26</b>	<b>31</b>	<b>39</b>	<b>28</b>	<b>25</b>
up to 30 years	4	5	4	5	4
aged 30-50 years	13	16	16	13	13
aged over 50 years	9	10	19	10	8
<b>% voluntary fluctuation*</b>	<b>4,8</b>	<b>6</b>	<b>6,4</b>	<b>4,4</b>	<b>5,6</b>
(excludes forced departures, including due to organisational changes, retirements, departures due to injury or death)		<b>6</b>		<b>4,4</b>	<b>5,6</b>
<b>% total fluctuation of employees</b>	<b>9,5</b>	<b>9</b>	<b>10,1</b>	<b>8,5</b>	<b>9,6</b>
Total number of terminated employments in the period (year) x 100 / average registered number of employees in the year.		<b>9</b>		<b>8,5</b>	<b>9,6</b>

\*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 of economic, health, and social benefits for employees (excluding retirement benefits) that apply to employees on an indefinite full-time employment contract in 2022**

	<b>Top management employees</b> (management + heads of departments)  (state employees)	<b>Professional employees</b>  (state employees)	<b>Supporting employees</b>  (employees in an employment relationship)
Average monthly number of employees in the year	16	412	105
Collective agreement	YES	YES	YES
Percentage of employees covered by the collective agreement	100%	100%	100%
Life insurance for employees	NO	NO	NO
Healthcare contribution	YES	YES	YES
Disability insurance, insurance against permanent injuries from accidents	NO	NO	NO
Parental leave	as per LC	as per LC	as per LC
Financial support for pension insurance	YES	YES	YES
Increased severance pay for termination of employment due to organizational changes specified in the Collective Agreement	NO	NO	NO
Life insurance for managers, insurance for work disability	NO	NO	NO
Sick leave (5 days per year)	YES	YES	YES
13th salary	NO	NO	NO
Meal allowance	YES	YES	YES
Services related to corporate dining	NO	NO	NO
Protective beverages and vitamin supplements	NO	NO	NO
Contribution to children's recreation	YES	YES	YES
Contribution to family recreation	YES	YES	YES
Work with seniors	NO	NO	NO
Anniversary bonuses	YES	YES	YES
Tuition for university education of employees	NO	NO	NO
Contribution to cultural and sports activities	YES	YES	YES
Bonuses and cash gifts	YES	YES	YES
Standby pay (by law), not a benefit	NO	NO	NO
Social assistance	YES	YES	YES
Extension of the annual leave entitlement by 1 week in a calendar year beyond the basic allowance	NO	NO	NO
Interest-free loans	YES	YES	YES



## Diversity and equal opportunities

The Czech Environmental Inspectorate is an organization that respects equal opportunities for men and women. Employee selection primarily considers the expertise of applicants. Salary transparency is ensured through salary tariffs. Pay equality is based on the system of employee performance evaluation.

The various departments within the organization are very diverse in terms of gender, age, and acquired experience. The organizational culture does not tolerate any form of direct or indirect discrimination that supports gender stereotypes. The limiting factor is the somewhat specific structure of candidates for open positions, where the centrally determined salary structure may not be very appealing to middle-aged candidates with experience. The work regulations specify the requirement of work discipline and adherence to rules of politeness and courtesy.

The CEI supports equal opportunities within the organization through flexible working hours and, if needed, reduced working hours, making it easier for all employees, regardless of gender, to balance their private and professional lives.

As part of the onboarding process, a separate presentation on equal opportunities is provided. In 2022, all new employees were required to complete an e-learning course on equal opportunities.

## Relationships between employees and management of the CEI

State employees and employees in service/employment relationships must have separate collective agreements/contracts, and the collective agreement/contract applies to all CEI employees. The collective agreement, or agreement in the case of state employees, primarily regulates: employee privacy protection, the provision of work leave, workplace safety and health protection, wage policies, workplace dining, employee education while working, information sharing between management and union representatives, negotiation procedures, and the creation and use of the cultural and social needs fund. Minimum notice periods related to organizational changes are governed by labour law. Organizational changes for state employees in service relationships are regulated by the State Service Act.

Equal pay for men and women is ensured by the fact that the wage class is systemized for each service or employment position.

Normally, the management of CEI communicates with employees primarily through the system of consultations, supplemented by other communication platforms that facilitate the availability of information, such as email or the intranet, where employees can find, for example, all of CEI's internal regulations and information about organizational and personnel changes.



## Composition of management bodies and composition of categories of employees in 2022

	men	women	total
Employees in top management (management + heads of departments) /state employees/	13	3	16
Employees – professional employees /state employees/	198	214	412
Supporting employees /employees in employment relationship/	19	86	105
<b>Total</b>	<b>230</b>	<b>303</b>	<b>533</b>



## 7.2 Education

**In 2022, the following mandatory training took place:**

- Entry education introductory (number of participants 33)
- Ongoing entry education (number of participants 8)
- Examinations of professional competence according to Act No. 250/2019 Coll., on Offenses (number of participants 17)
- Specialized training for inspectors (number of participants 9)
- Civil service examinations (number of participants 13)

**The specified number does not include the mandatory training required by law, which a total of 1,829 employees participated in over the past year. These trainings are categorized as follows:**

- Occupational Safety and Health Training for Manager (number of participants 52)
- Occupational Safety and Health Training for Employees (number of participants 337)
- Fire Protection for Managers (number of participants 52)
- Fire Protection for Employees (number of participants 354)
- First Aid (number of participants 57)
- Drivers (number of participants 495)
- Working at Heights (number of participants 448)
- Classified Information Protection (number of participants 34)

**During the period 1-12/2022, a total of 1,678 mandatory e-learning training sessions were conducted (according to the service regulations). This number includes the following training sessions:**

- Combating Corruption in Public Administration (number of participants 544)
- Personal Data Protection according to GDPR and other legal regulations (number of participants 537)
- Cybersecurity (number of participants 549)
- Equal Opportunities for Women and Men in the Czech Republic and the EU (number of participants 48)

**In 2022, a total of 822 employees were trained through 138 in-person courses and conferences. This number includes educational events categorized as follows:**

- Internal courses: Group training at the CEI (number of events 23, number of participants 469)
- External courses: Individual training (number of events: 83 number of participants: 177)
- Conferences (number of events 32, number of participants 176)



Employees of the CEI also have access to the online educational platform Rentel, which offers a wide range of optional courses in addition to mandatory ones. Among the most popular courses were those related to communication and soft skills.

Due to its volume, a portion of the Athena file service training was separated from the Entry Training in 2021. This portion is mandatory for all new employees but is also available to existing employees. In 2022, 79 employees participated in this training.

Due to the current security situation, cybersecurity remains a priority for 2022. Throughout the year, all employees of the CEI received training in several waves. E-learning focused on current cyber threats and the defence against potential attacks on computer systems.

In 2022, compared to 2021, there was a resurgence of in-person training due to the waning COVID-19 pandemic. However, we are prepared to switch back to online training if necessary.

## 7.3 Occupational safety and health protection

### Principles ensuring occupational safety

Occupational safety and health protection are among the top priorities of the CEI. The Directive on the Organization and Management of Occupational Safety and Health Protection primarily regulates the activities of the CEI's professional employees who work in a diverse and challenging environment within various companies and locations. These employees inspect operations with pollution sources or investigate environmental damage and threats.

The status of occupational safety and health protection is verified through an annual comprehensive audit conducted by an external company, followed by inspections of compliance with occupational safety and health protection guidelines by CEI employees.

The CEI conducts regular safety training for its employees, and all employees are familiarized with current general and internal occupational safety and health protection regulations. All CEI employees are provided with personal protective equipment that meets the maximum safety standards for their work activities. In case of any signs of damage, these protective equipment items are replaced with new ones.

Questions related to occupational safety are part of collective agreements and contracts. Part V of the collective agreement and contract addresses topics related to workplace care, safety, and health protection, as well as issues concerning environmental control, fire safety, and occupational health. Occupational safety, as stipulated in the collective agreement or contract, is overseen by the CEI trade union committee, which represents all CEI employees and deals with occupational safety and health matters with the CEI management. The committee regularly participates in annual comprehensive inspections of the state of occupational safety and health protection, reviews records, and reports on work-related accidents.

### Injury rates, missed days, and absences

The high effectiveness of the Occupational Safety and Health Protection management and employee discipline is demonstrated by the very low accident rate. In 2022, there were no work-related accidents resulting in disability. The main causes of work-related accidents are unforeseeable job hazards or human errors. From 2014 to 2022, there were no fatal accidents or occupational diseases reported. All workplaces diligently record all accidents, including investigations into their causes.



## Injuries, diseases, missed days and absences of the CEI employees

	unit	2018 men	2018 women	2018 total	2019 men	2019 women	2019 total	2020 men	2020 women	2020 total	2021 men	2021 women	2021 total	2022 men	2022 women	2022 total
Average monthly number of employees in year	absolute no.	245	294	539	243	310	553	237	309	546	239	301	540	230	303	533
Number of all occupational injuries	absolute no.	0	0	0	0	0	0	0	1	1	0	0	0	2	1	3
Number of registered occupational injuries leading to incapacity for work at least 3 day (GRI Injury)	absolute no.	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0
Total number of serious occupation injuries leading to hospitalization longer than 5 days	absolute no.	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0
Total number of absence days due to injury or occupational disease (GRI lost day)	days/shifts	0	0	0	0	0	0	0	86	86	0	0	0	0	0	0

## Injuries, diseases, missed days and absences of the CEI employees

	unit	2018	2019	2020	2021	2022
Injury frequency (number of registered occupational injuries per 100 employees) (CZ standard)	relativní číslo	0.00	0.00	0.18	0.00	0.00
Average number of lost calendar days per registered occupational injury	absolutne no.	0.00	0.00	88.00	0.00	0.00
Absence due to disease, occupational and other injuries (% of total time worked) (CZ standard)	%	3.65	4.63	6.19	4.32	5.00
Unscheduled absence rate Absence due to unscheduled absence: disease, occupational and other injuries (GRI Absentee rate)	%	3.07	3.84	5.67	3.77	4.3
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)	%	0.00	0.00	4.84	3.52	3.1
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.	absolutne no.	0.00	0.00	0.00	0.00	0.00

## 8 The energy and material intensity of CEI's activities

The CEI purchases all of its consumed energy from suppliers, whose selection is conducted within the framework of a centralized public procurement system. The supplier of electric energy was Centropol a.s., and the supplier of natural gas was Pražská plynárenská a.s.

The goal of CEI is to reduce the consumption of individual energy sources, the consumption of which is influenced by climatic conditions, and the consumption of gasoline and diesel is influenced by the number of inspections and the distances to the inspected objects.

For all properties where the CEI has the right to manage state assets, energy audits and energy performance certificates for the buildings have been prepared. Based on the data, measures have been identified to reduce energy consumption. In 2022, the installation of LED bulbs and fluorescent lights took place in several territorial inspectorates.

In 2022, the CEI replaced 12 gasoline-powered vehicles with hybrid vehicles.

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.

### The weight of CEI waste (kg) and method of disposal – overview for 5 years\*

	2018		2019		2020		2021		2022	
	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste
<b>Total production</b>	27	43,960	37	85,510	25	50,551	3511	36,824	425	35,547

\*The waste product was handed over to authorised persons in accordance with the Waste Act.

### The energy, fuel, and water consumption by the CEI - overview for 5 years

	Fuel or energy type	Unit	2018	2019	2020	2021	2022
<b>Purchased and consumed sources of energy</b>	Petrol	l	63,165	61,791	37,465	39,092	49,910
	Diesel	l	51,243	50,120	36,425	34,245	38,414
	Electricity*	kWh	462,409	592,471	437,085	511,851	461,062
	Natural gas	m <sup>3</sup>	93,397	80,866	82,249	98,712	81,339
	Thermal energy	GJ	1,681	2,032	1,517	2,430	1,041
<b>Water consumption from municipal supply or other utility</b>		m <sup>3</sup>	6,769	6,840	3,934	3,803	4,041

\* The origin of electricity supplied to the CEI as the end customer from CENTROPOL ENERGY, a.s. in 2022 was as follows: from coal 50.88%, from nuclear facilities 30.36%, from natural gas 8.40%, from sources utilizing renewable resources, including guarantees of origin, 10.11%, from sources utilizing secondary energy sources 0.25%, from oil and oil products 0.00%, from other sources 0.00%.

Note: presented for 5 years, in descending order



## 9 Economy

In 2022, the CEI managed a final budget of expenditures in the amount of CZK 555,655.49 thousand. This included a final budget of wage expenses and the Fund of Cultural and Social Needs in the amount of CZK 382,691.76 thousand, a final budget of operating expenses in the amount of CZK 86,723.80 thousand, and a final budget of capital expenditures of CZK 86,239.936 thousand.

### Utilization of non-investment expenditures for the year 2022

#### Expenditure on salaries and related expenses

For the Czech Environmental Inspectorate, funds for salaries and other payments for work in 2022 were approved in the amount of CZK 265,237.73 thousand, of which CZK 220,864.61 thousand was allocated for salaries of employees under the Civil Service Act, and CZK 41,337.15 thousand was designated for salaries of employees in an employment relationship. Other payments for work were approved in the amount of CZK 3,035.95 thousand. The approved budget for salaries of employees in an employment relationship was increased by a non-negotiable component (NNC) of CZK 13,278.16 thousand, and for other payments for work, it was increased by CZK 3,839.85 thousand. As indicated by the further presented analysis of employment and expenditure on salaries for the year 2022, the approved limits for salaries and other payments for work were not exceeded.

Indicator	Final budget	Spending	In thousands CZK
			Balance-NNC as of December 31, 2022
Salaries of employees in the employment relationship	41,667,224.00	35,710,894.00	5,956,330.00
Salaries of state employees	232,288,978.00	220,144,145.00	12,144,833.00
WPD	6,875,811.00	2,403,210.00	4,472,601.00
Social insurance	70,981,429.00	64,048,404.00	6,933,025.00
Health insurance	25,664,755.00	23,243,484.00	2,421,271.00
<b>Total wage expenditures</b>	<b>377,478,197.00</b>	<b>345,550,137.00</b>	<b>31,928,060.00</b>

#### Utilization of other current operating expenditures

Indicator	Final budget	Spending	In thousands CZK
			Balance-NNC as of December 31, 2022
Other current non-investment expenditures	86,723,800.36	63,229,509.24	23,494,291.12

#### Utilization of project expenditures

Indicator	Final budget	Spending	In thousands CZK
			Balance-NNC as of December 31, 2022
Capital expenditures	86,239,923.03	34,153,419.15	52,086,503.88

#### Utilization of project expenditures

Activity name	Adjusted budget	Spending	Balance
Access management – network security	800,000.00	0	800,000.00
Multi-factor authentication of users	4,906.40	0	4,906.40
Mobile phone refurbishment	989,175.00	989,175.00	0
Renewal of personal computing equipment	3,714,874.18	0	3,714,874.18
<b>Total non-investment project expenditures</b>	<b>5,508,955.58</b>	<b>989,175.00</b>	<b>4,519,780.58</b>

The underspending of allocated funds for project activities was due to lengthy procurement processes that the CEI often had to repeat. This was also influenced by the lingering impact of epidemiological measures related to COVID-19 and an unusually high inflation rate. Completion and consolidation of these actions are expected to occur in 2023.



#### Utilization of investment expenditures for the year 2022

Activity name	Adjusted budget	Spending	Balance
Creation of new websites	600,000.00	0	600,000.00
Access management and network security	400,000.00	0	400,000.00
Multi-factor authentication for users	1,426,798.00	0	1,426,798.00
Identity and Role Management (IDM)	1,455,147.00	1,343,826.00	111,321.00
Print security and management	700,000.00		
Mobile phone recovery			
Reconstruction of LAN network at the TI	1,940,077.17	0	1,940,077.17
Central Agenda Information System	35,000,000.00	12,249,737.50	22,750,262.50
Infrastructure	1,603,250.00	1,603,250.00	0
Replacement of telephone exchanges with VoIP system	1,800,000.00	0	1,800,000.00
Renewal of personal computing equipment			
Renewal of server infrastructure at the TI	1,600,000.00	147,808.76	1,452,191.24
Data encryption transmission	1,210,000.00		1,210,000.00
IP address space management system	2,500,000.00	2,335,818.85	164,181.15
Windows Server licenses	1,130,000.00	466,232.00	663,768.00
Acquisition of MS SQL Server licenses	172,508.00	172,507.98	0.02
Brno TI- reconstruction of air conditioning equipment	420,000.00	0	420,000.00
Costs for the commissioning of the Lázně Kynžvart facility	88,790.00	0	88,790.00
Reconstruction of sewage system in Lázně Kynžvart	407,000.00	0	407,000.00
Purchase of personal vehicles in 2019	2,137,170.85	2,137,170.84	0.01
Purchase of transportation vehicles in 2019 (3 pcs)	1,416,565.52	944,216.51	472,349.01
Elevation of security level for Brno TI, ČB, HB a OST	1,500,000.00	0	1,500,000.00
Lázně Kynžvart - installation of the final EZS Trade Fides equipment	91,000.00	0	91,000.00
Acquisition of alternative fuel vehicles	9,433,434.48	9,433,434.48	0
Reconstruction of the gas boiler room at Plzeň TI	1,500,000.00	0	1,500,000.00
HQ - Trimble devices	435,116.00	435,116.00	0
TIs - Trimble Geo 7x devices	1,599,983.00	1,599,983.00	0
Spectrometer for cuvette tests	209,667.83	209,667.83	0
Thermal cameras	85,474.40	85,474.40	0
Off-road vehicles (11 pcs)	8,250,000.00	0	8,250,000.00
CEI - Purchase of wallboxes	1,355,000.00	0	1,355,000.00
CEI - Aggregated actions	263,985.20		263,985.20
<b>Total investment project expenditures</b>	<b>80,730,967.45</b>	<b>33,164,244.15</b>	<b>47,566,723.30</b>



## 9.1 Overview of transfers of budget savings to the statement of unspent expenditure claims

The underspending of allocated funds for project activities was due to lengthy procurement procedures, which the CEI often had to repeat, taking into account the lingering impact of COVID-19-related epidemiological measures and unusually high inflation. The completion or consolidation of these actions will occur in 2023.

## 9.2 Use of the reserve fund and other non-budgetary resources

In 2022, the CEI's approved budget was increased by off-budget sources from insurance claims, totalling CZK 199,839, of which the Inspectorate used CZK 120,032. The CEI did not create a reserve fund in 2022.

## 9.3 Total income assessment

budget for income in 2022 was CZK 850,000. Actual income exceeded this by CZK 1,214,643.98, reaching a total value of CZK 2,064,643.98. The highest income was generated from procedural costs, executions, and fines, amounting to CZK 1,110,943.67, and the sale of long-term tangible assets amounting to CZK 385,000.

### Overview of income by budget items

Item type	Adjusted budget	Reality
2132	350,000	291,913.31
2133	3,600	0
2310	0	2,919
2322	0	255,077
2324	496,400	1,110,943.67
3113	0	385,000
4132	0	18,791
<b>Total</b>	<b>850,000</b>	<b>2,064,643.98</b>

### Analysis of income from the sale of real estate, off-budget funds, etc.:

2132 – On this budget item, income is generated from the rental of office spaces at the Havlíčkův Brod and Liberec Territorial Inspectorates.

2133 – On this budget item, income is generated from the rental of movable assets at the Havlíčkův Brod Territorial Inspectorate

2310 – On this budget item, income is generated from the purchase of personal protective equipment.

2322 – On this budget item, income come from insurance claims - reimbursements from insurance companies.

2324 – On this budget item, income is generated from procedural costs, executions, and fines.

3113 – On this budget item, income is accounted for from the sale of long-term tangible assets.

4132 – On this budget item, income is generated from unspent payroll funds from December 2021.















# 10 Financial statement as of December 31, 2022

## Balance sheet

Item number	Item name	Synthetic account	1	2	3	4
			ACCOUNTING PERIOD			
			CURRENT			PREVIOUS
			GROSS	CORRECTION	NET	
TOTAL ASSETS			944,707,137.60	374,583,122.44	570,124,015.16	551,597,683.0
A.	Fixed assets		838,383,818.80	374,583,122.44	463,800,696.36	444,159,008.2
I.	Long-term intangible assets		62,865,702.81	36,927,645.01	25,938,057.80	10,869,963.3
1.	Intangible research and development results	012	0.00	0.00	0.00	0.0
2.	Software	013	30,666,469.14	19,695,017.84	10,971,451.30	8,751,222.3
3.	Valuable rights	014	183,000.00	181,613.00	1,387.00	1,483.0
4.	Emission permits and preference limits	015	0.00	0.00	0.00	0.0
5.	Low-value long-term intangible assets	018	17,051,014.17	17,051,014.17	0.00	0.0
6.	Other long-term intangible assets	019	0.00	0.00	0.00	0.0
7.	Unfinished long-term intangible assets	041	14,965,219.50	0.00	14,965,219.50	2,117,258.0
8.	Advances granted for long-term intangible assets	051	0.00	0.00	0.00	0.0
9.	Long term intangible assets scheduled for sale	035	0.00	0.00	0.00	0.0
II.	Long-term tangible assets		775,518,115.99	337,655,477.43	437,862,638.56	433,289,044.8
1.	Land	031	12,527,113.00	0.00	12,527,113.00	12,527,113.0
2.	Cultural items	032	11,491.00	0.00	11,491.00	11,491.0
3.	Buildings	021	516,860,088.73	162,684,414.82	354,175,673.91	361,873,562.6
4.	Individual tangible moveable assets and sets of tangible moveable assets	022	139,083,409.94	69,898,672.14	69,184,737.80	57,560,123.9
5.	Cultivation units of permanent crops	025	0.00	0.00	0.00	0.0
6.	Low-value long-term tangible assets	028	105,072,390.47	105,072,390.47	0.00	0.0
7.	Other long-term tangible assets	029	0.00	0.00	0.00	0.0
8.	Unfinished long-term tangible assets	042	1,963,622.85	0.00	1,963,622.85	1,266,754.2
9.	Advances granted for long-term tangible assets	052	0.00	0.00	0.00	0.0
10.	Long-term tangible assets scheduled for sale	036	0.00	0.00	0.00	50,000.0
III.	Long-term financial assets		0.00	0.00	0.00	0.0
1.	Property interest in entities with decisive influence	061	0.00	0.00	0.00	0.0
2.	Property interest in entities with substantial influence	062	0.00	0.00	0.00	0.0
3.	Debt securities held until payable	063	0.00	0.00	0.00	0.0
4.	Long-term loans	067	0.00	0.00	0.00	0.0
5.	Long-term time deposits	068	0.00	0.00	0.00	0.0
6.	Other long-term financial assets	069	0.00	0.00	0.00	0.0
7.	Acquired long-term financial assets	043	0.00	0.00	0.00	0.0
8.	Advances granted for long-term financial assets	053	0.00	0.00	0.00	0.0
IV.	Long-term receivables		0.00	0.00	0.00	0.0
1.	Long-term returnable financial aids granted	462	0.00	0.00	0.00	0.0
2.	Long-term receivables from ceded credits	464	0.00	0.00	0.00	0.0
3.	Long-term advances granted	465	0.00	0.00	0.00	0.0
4.	Long-term receivables from guarantees	466	0.00	0.00	0.00	0.0
5.	Other long-term receivables	469	0.00	0.00	0.00	0.0
6.	Long-term advances granted for transfers	471	0.00	0.00	0.00	0.0
7.	Long-term mediation of transfers	475	0.00	0.00	0.00	0.0

Item number	Item name	Synthetic account	1	2	3	4
			ACCOUNTING PERIOD			
			CURRENT			PREVIOUS
			GROSS	CORRECTION	NETTO	
B.	Current assets		106,323,318.80	0.00	106,323,318.80	107,438,674.8
I.	Inventory		0.00	0.00	0.00	0.00
1.	Acquisition of materials	111	0.00	0.00	0.00	0.0
2.	Materials in stock	112	0.00	0.00	0.00	0.0
3.	Materials on the way	119	0.00	0.00	0.00	0.0
4.	Unfinished production	121	0.00	0.00	0.00	0.0
5.	Semi-finished products of own production	122	0.00	0.00	0.00	0.0
6.	Products	123	0.00	0.00	0.00	0.0
7.	Acquisition of goods	131	0.00	0.00	0.00	0.0
8.	Goods in stock	132	0.00	0.00	0.00	0.0
9.	Goods on the way	138	0.00	0.00	0.00	0.0
10.	Other inventory	139	0.00	0.00	0.00	0.0
II.	Short-term receivables		70,164,953.44	0.00	70,164,953.44	68,034,907.0
1.	Customers	311	0.00	0.00	0.00	4,089.0
2.	Bills for cashing	312	0.00	0.00	0.00	0.0
3.	Receivables from discounted securities	313	0.00	0.00	0.00	0.0
4.	Short-term advances granted	314	2,805,888.27	0.00	2,805,888.27	3,097,583.4
5.	Other receivables from main activities	315	66,450,472.53	0.00	66,450,472.53	64,090,701.6
6.	Short-term financial aid granted	316	0.00	0.00	0.00	0.0
7.	Short-term receivables from ceded loans	317	0.00	0.00	0.00	0.0
9.	Employee receivables	335	62,117.50	0.00	62,117.50	1,188.0
10.	Social security	336	0.00	0.00	0.00	0.0
11.	Health insurance	337	0.00	0.00	0.00	0.0
12.	Pension plans	338	0.00	0.00	0.00	0.0
13.	Income tax	341	0.00	0.00	0.00	0.0
14.	Other taxes, fees, and similar pecuniary payments	342	0.00	0.00	0.00	0.0
15.	Value-added tax	343	0.00	0.00	0.00	0.0
16.	Receivables from entities outside selected government institutions	344	0.00	0.00	0.00	0.0
17.	Receivables from selected central government institutions	346	0.00	0.00	0.00	0.0
18.	Receivables from selected local government institutions	348	0.00	0.00	0.00	0.0
19.	Tax administration receivables	352	0.00	0.00	0.00	0.0
20.	Tax redistribution settlements	355	0.00	0.00	0.00	0.0
21.	Receivables from executions and other handling of foreign assets	356	0.00	0.00	0.00	0.0
22.	Other tax administration receivables	358	0.00	0.00	0.00	0.0
23.	Short-term receivables from guarantees	361	0.00	0.00	0.00	0.0
24.	Fixed-term operations and options	363	0.00	0.00	0.00	0.0
25.	Receivables from unfinished financial operations	369	0.00	0.00	0.00	0.0
26.	Receivables from financial security	365	0.00	0.00	0.00	0.0
27.	Receivables from issued bonds	367	0.00	0.00	0.00	0.0
28.	Short-term advances for transfers	373	0.00	0.00	0.00	0.0
29.	Short-term intermediation of transfers	375	0.00	0.00	0.00	0.0
30.	Costs of future periods	381	762,201.98	0.00	762,201.98	731,660.9



Item number	Item name	Synthetic account	1	2	3	4
			ACCOUNTING PERIOD			
			CURRENT			PREVIOUS
			GROSS	CORRECTION	NETTO	
B.	Current assets		106,323,318.80	0.00	106,323,318.80	107,438,674.8
31.	Income of future periods	385	90.00	0.00	90.00	0.0
32.	Accrued active accounts	388	0.00	0.00	0.00	0.0
33.	Other short-term receivables	377	84,183.16	0.00	84,183.16	109,684.0
III.	Short-term financial assets		36,158,365.36	0.00	36,158,365.36	39,403,767.8
1.	Tradable equity securities	251	0.00	0.00	0.00	0.0
2.	Tradable debt securities	253	0.00	0.00	0.00	0.0
3.	Other securities	256	0.00	0.00	0.00	0.0
4.	Short-term fixed deposits	244	0.00	0.00	0.00	0.0
5.	Other current accounts	245	34,506,463.29	0.00	34,506,463.29	38,119,875.2
6.	State financial asset accounts	247	0.00	0.00	0.00	0.0
7.	Liquidity control accounts of the state treasury and state debt	248	0.00	0.00	0.00	0.0
8.	Tax-sharing and co-management accounts	249	0.00	0.00	0.00	0.0
9.	Current account	241	0.00	0.00	0.00	0.0
10.	Current account CSNF	243	1,650,874.07	0.00	1,650,874.07	1,282,806.6
14.	Current accounts of state organizational units	225	0.00	0.00	0.00	0.0
15.	Securities	263	1,028.00	0.00	1,028.00	1,086.0
16.	Cash on the way	262	0.00	0.00	0.00	0.0
17.	Checkout	261	0.00	0.00	0.00	0.0

Item number	Item name	Synthetic account	1	2
			ACCOUNTING PERIOD	
			CURRENT	PREVIOUS
TOTAL LIABILITIES			570,124,015.16	551,597,683.04
C.	Equity capital		469,034,528.18	449,272,818.06
I.	Accounting entity's property and adjusting items		488,994,891.33	488,915,507.33
	1. Accounting entity's equity	401	727,357,406.25	727,357,406.25
	2. Privatization fund	402	0.00	0.00
	4. Exchange rate differences	405	0.00	0.00
	5. Pricing differences upon initial application of the method	406	-238,435,713.18	-238,435,713.18
	6. Other pricing differences	407	-28,185.74	-28,185.74
	7. Correction of previous accounting periods	408	101,384.00	22,000.00
II.	Accounting entity's funds		1,623,395.07	1,282,806.61
	2. Cultural and Social Needs Fund	412	1,623 395.07	1,282 806.61
	4. Reserve Fund from Other means	414	0.00	0.00
III.	Economic result		-4,777,562,154.69	-4,350,821,908.94
	1. Economic result for the current accounting period		- 426,740,245.75	- 420,465,278.40
	2. Economic result in the approval process	431	0.00	0.00
	3. Economic result of previous accounting periods	432	-4,350,821,908.94	-3,930,356,630.54
IV.	Income and expenditure account of budgetary activity		4,755,978 396.47	4 309 896 413.06
	1. Income account of state organizational units	222	-2,064,643.98	-2,618,372.73
	2. Special expenditure account	223	448,146,627.39	420,924,051.66
	3. State budget activity account	227	0.00	0.00
	4. Aggregated revenues and expenses of previous accounting periods	404	4,309,896,413.06	3,891,590,734.13
D.	External resources		101,089,486.98	102,324,864.98
I.	Reserves		0.00	0.00
	1. Reserves	441	0.00	0.00
II.	Long-term payables		0.00	0.00
	1. Long-term credits	451	0.00	0.00
	2. Received non-refundable financial aid - long-term			
	Long-term liabilities from issued bonds	452	0.00	0.00
	3. Long-term loans	453	0.00	0.00
	4. Long-term advances received	455	0.00	0.00
	5. Long-term liabilities from guarantees	456	0.00	0.00
	6. Long-term promissory notes for payment	457	0.00	0.00
	7. Other long-term liabilities	459	0.00	0.00
	8. Long-term advances for transfers	472	0.00	0.00
	9. Long-term intermediation of transfers	475	0.00	0.00



Item number	Item name	Synthetic account	1	2
			ACCOUNTING PERIOD	
			CURRENT	PREVIOUS
III.	Short-term liabilities		101,089,486.98	102,324,864.98
1.	Short-term credits	281	0.00	0.00
2.	Discounted short-term bonds (bills)	282	0.00	0.00
3.	Short-term liabilities from issued bonds	283	0.00	0.00
4.	Other short-term credits	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	85,105.00	87,705.00
8.	Liabilities from co-management	325	691,240.00	699,160.00
9.	Received refundable financial aid – short-term	326	0.00	0.00
10.	Employees	331	0.00	0.00
11.	Other liabilities towards employees	333	17,679,671.00	19,052,380.00
12.	Social security	336	6,644,998.00	7,224,450.00
13.	Health insurance	337	2,867,063.00	3,134,327.00
14.	Pension plans	338	0.00	0.00
15.	Income tax	341	0.00	0.00
16.	Other taxes, fees, and similar pecuniary payments	342	1,474,113.00	1,940,394.00
17.	Value-added tax	343	0.00	0.00
18.	Liabilities to individuals outside selected government institutions	345	0.00	0.00
19.	Liabilities to selected central government institutions	347	39,970,352.60	40,368,677.60
20.	Liabilities to selected local government institutions	349	28,822,525.00	27,737,400.00
21.	Tax advances received	351	0.00	0.00
22.	Tax overpayments	353	0.00	0.00
23.	Liabilities from indirect tax refunds	354	0.00	0.00
24.	Tax redistribution settlements	355	0.00	0.00
25.	Liabilities from executions and other handling of foreign assets	357	0.00	0.00
26.	Other tax administration liabilities	359	0.00	0.00
27.	Short-term liabilities from guarantees	362	0.00	0.00
28.	Fixed-term operations and options	363	0.00	0.00
29.	Liabilities from unfinished financial operations	364	0.00	0.00
30.	Liabilities from financial guarantees	366	0.00	0.00
31.	Liabilities from subscribed but unpaid securities and shares	368	0.00	0.00
32.	Short-term advances received for transfers	374	0.00	0.00
33.	Short-term intermediation of transfers	375	0.00	0.00
34.	Liabilities from liquidity management of the state treasury and state debt	248	0.00	0.00
35.	Expenses of future periods	383	0.00	0.00
36.	Revenues of future periods	384	0.00	0.00
37.	Accrued passive accounts	389	0.00	0.00
38.	Other short-term liabilities	378	2,854,419.38	2,080,371.38

## Profit and loss statement

Item number	Item name	Synthetic account	1	2	3	4
			ACCOUNTING PERIOD			
			CURRENT		PREVIOUS	
			Main operation	Economic activity	Main operation	Economic activity
A.	TOTAL COSTS		429,585,854.37	0.0	423,754,622.38	0.00
I.	Costs of operation		429,241,760.65	0.0	423,754,866.30	0.00
1.	Material consumption	501	7,656,277.49	0.0	5,831,778.34	0.00
2.	Energy consumption	502	5,559,553.69	0.0	4,913,242.30	0.00
3.	Consumption of other non-storable supplies	503	0.00	0.0	0.00	0.00
4.	Goods sold	504	0.00	0.0	0.00	0.00
5.	Long-term asset activation	506	0.00	0.0	0.00	0.00
6.	Current asset activation	507	0.00	0.0	0.00	0.00
7.	Change in the state of self-produced inventories	508	0.00	0.0	0.00	0.00
8.	Repairs and maintenance	511	5,275,448.95	0.0	7,886,960.48	0.00
9.	Travel costs	512	3,807,071.63	0.0	1,563,800.96	0.00
10.	Entertainment costs	513	252,414.40	0.0	256,771.37	0.00
11.	Internal service activation	516	0.00	0.0	0.00	0.00
12.	Other services	518	29,319,877.17	0.0	29,683,615.32	0.00
13.	Wages and salaries	521	260,598,514.00	0.0	255,086,299.00	0.00
14.	Statutory social insurance	524	87,291,854.00	0.0	85,559,370.00	0.00
15.	Other social insurance	525	0.00	0.0	0.00	0.00
16.	Statutory social expenditures	527	8,039,763.00	0.0	7,112,602.90	0.00
17.	Other social expenditures	528	0.00	0.0	0.00	0.00
18.	Road tax	531	0.00	0.0	0.00	0.00
19.	Property tax	532	2,596.00	0.0	1,460.00	0.00
20.	Other taxes and fees	538	216,082.00	0.0	212,078.00	0.00
21.	Indirect tax refunds	539	0.00	0.0	0.00	0.00
22.	Contractual fines and late payment interest	541	351.40	0.0	0.00	0.00
23.	Other fines and penalties	542	18,100.00	0.0	168,624.00	0.00
24.	Gifts and other gratuitous transfers	543	0.00	0.0	0.00	0.00
25.	Material sold	544	0.00	0.0	0.00	0.00
26.	Shortages and damages	547	0.00	0.0	698.00	0.00
27.	Fund creation	548	5,213,562.00	0.0	5,128,102.00	0.00
28.	Depreciation of long-term assets	551	13,601,940.00	0.0	12,827,863.50	0.00
29.	Sale of long-term intangible assets	552	0.00	0.0	0.00	0.00
30.	Sale of long-term tangible assets	553	0.00	0.0	0.00	0.00
31.	Sale of land	554	0.00	0.0	0.00	0.00
32.	Creation and settlement of reserves	555	0.00	0.0	0.00	0.00
33.	Creation and settlement of provisions	556	0.00	0.0	0.00	0.00
34.	Costs from written-off receivables	557	0.00	0.0	0.00	0.00
35.	Costs of minor long-term assets	558	2,170,825.01	0.0	7,521,333.13	0.00
36.	Other operating costs	549	217,529.91	0.0	267.00	0.00
II.	Financial costs		344,093.72	0.0	-243.92	0.00
1.	Sold securities and shares	561	0.00	0.0	0.00	0.00
2.	Interest	562	338,936.42	0.0	0.00	0.00
3.	Exchange rate loss	563	5,157.30	0.0	-243.92	0.00
4.	Costs from revaluation	564	0.00	0.0	0.00	0.00
5.	Other financial costs	569	0.00	0.0	0.00	0.00

Item number	Item name	Synthetic account	1	2	3	4
			ACCOUNTING PERIOD			
			CURRENT		PREVIOUS	
			Main operation	Economic activity	Main operation	Economic activity
III.	Costs of transfers		0.00	0.0	0.00	0.00
1.	Costs of selected central government institutions for transfers	571	0.00	0.0	0.00	0.00
3.	Costs of selected central government institutions for pre-financing transfers	575	0.00	0.0	0.00	0.00
IV.	Costs from shared taxes and fees		0.00	0.0	0.00	0.00
1.	Costs from shared personal income tax	581	0.00	0.0	0.00	0.00
2.	Costs from shared corporate income tax	582	0.00	0.0	0.00	0.00
3.	Costs from shared value-added tax	584	0.00	0.0	0.00	0.00
4.	Costs from shared excise taxes	585	0.00	0.0	0.00	0.00
5.	Costs from other shared taxes and fees	586	0.00	0.0	0.00	0.00
V.	Income tax		0.00	0.0	0.00	0.00
1.	Income tax	591	0.00	0.0	0.00	0.00
2.	Additional income tax contributions	595	0.00	0.0	0.00	0.00
B.	TOTAL REVENUES		2,845,608.62	0.0	3,289,343.98	0.00
I.	Operating revenues		2,556,665.62	0.0	3,286,188.98	0.00
1.	Revenues from the sale of own products	601	0.00	0.0	0.00	0.0
2.	Revenues from the sale of services	602	892,633.43	0.0	948,626.86	0.0
3.	Revenues from rental	603	291,913.31	0.0	339,456.12	0.0
4.	Revenues from goods sold	604	0.00	0.0	0.00	0.0
5.	Revenues from administrative fees	605	0.00	0.0	0.00	0.0
7.	Revenues from court fees	607	0.00	0.0	0.00	0.0
8.	Other revenues from own operations	609	0.00	0.0	0.00	0.0
9.	Contractual fines and late payment interest	641	0.00	0.0	0.00	0.0
10.	Other fines and penalties	642	530,078.00	0.0	554,500.00	0.0
11.	Revenues from written-off receivables	643	0.00	0.0	0.00	0.0
12.	Revenues from the sale of materials	644	0.00	0.0	0.00	0.0
13.	Revenues from the sale of long-term intangible assets	645	0.00	0.0	0.00	0.0
14.	Revenues from the sale of long-term tangible assets (except land)	646	385,000.00	0.0	769,600.00	0.0
15.	Revenues from the sale of land	647	0.00	0.0	0.00	0.0
16.	Utilization of funds	648	0.00	0.0	0.00	0.0
17.	Other operating revenues	649	457,040.88	0.0	674,006.00	0.0
II.	Financial revenues		288,943.00	0.0	3,155.00	0.00
1.	Revenues from the sale of securities and shares	661	0.00	0.0	0.00	0.00
2.	Interest	662	0.00	0.0	0.00	0.00
3.	Exchange rate revenues	663	0.00	0.0	0.00	0.00
4.	Revenues from revaluation at fair value	664	0.00	0.0	0.00	0.00
5.	Revenues from long-term financial assets	665	0.00	0.0	0.00	0.00
6.	Other financial revenues	669	288,943.00	0.0	3,155.00	0.00
III.	Revenues from taxes and fees		288,943.00	0.0	3,155.00	0.00
1.	Revenues from personal income tax	631	0.00	0.0	0.00	0.00
2.	Revenues from corporate income tax	632	0.00	0.0	0.00	0.00
3.	Revenues from social insurance	633	0.00	0.0	0.00	0.00
4.	Revenues from value-added tax	634	0.00	0.0	0.00	0.00
5.	Revenues from excise taxes	635	0.00	0.0	0.00	0.00
6.	Revenues from property taxes	636	0.00	0.0	0.00	0.00
7.	Revenues from energy taxes	637	0.00	0.0	0.00	0.00
8.	Revenues from road tax	638	0.00	0.0	0.00	0.00
9.	Revenues from other taxes and fees	639	0.00	0.0	0.00	0.00



IV.	Revenues from transfers		0.00	0.0	0.00	0.00
1.	Revenues of selected central government institutions for transfers	671	0.00	0.0	0.00	0.00
3.	Revenues of selected central government institutions for pre-financing transfers	675	0.00	0.0	0.00	0.00
V.	Revenues from shared taxes and fees		0.00	0.0	0.00	0.00
1.	Revenues from shared personal income tax	681	0.00	0.0	0.00	0.00
2.	Revenues from shared corporate income tax	682	0.00	0.0	0.00	0.00
3.	Revenues from shared value-added tax	684	0.00	0.0	0.00	0.00
4.	Revenues from shared excise taxes	685	0.00	0.0	0.00	0.00
5.	Revenues from shared property taxes	686	0.00	0.0	0.00	0.00
6.	Revenues from other shared taxes and fees	688	0.00	0.0	0.00	0.00
C.	ECONOMIC RESULT					
1.	Economic result before taxation	631	-426,740,245.75	0.0	-420,465,278.40	0.00
2.	Economic result for current accounting period	639	-426,740,245.75	0.0	-420,465,278.40	0.00











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## 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
<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>MEP</b>	Municipality with extended powers
<b>MIT</b>	Ministry of Industry and Trade of the Czech Republic
<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>TLS</b>	Technical landfill security
<b>UEC</b>	Unspent expenditures claim
<b>WMD</b>	Waste Management Department

WPD

Water Protection Department

WWTP

Wastewater treatment plant











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