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INSPECTORATE

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Foreword by the Director



Dear Readers,

I am pleased to present to you the Annual Report of the Czech Environmental Inspectorate, which provides a summary of the key activities and results of the inspectorate over the past year. It has been a year full of challenges but also opportunities. I believe we have managed to seize many of these opportunities.

As of 1 January 2024, the Inspectorate underwent a challenging reorganisation, resulting in the reduction of 33 positions, equivalent to approximately 8% decrease in staff. As part of this change, the Inspectorate lost its legislative competence concerning non-entrepreneurial natural persons under Act No. 114/1992 Coll., on Nature and Landscape Protection, and its role as an involved authority in the EIA and SEA processes under Act No. 100/2001 Coll., on Environmental Impact Assessment. These changes aim to shift the Inspectorate's focus from less significant cases and administrative burdens to addressing more substantial issues. The reduction in positions also enabled the reallocation of savings towards salary increases for some inspectors. Nevertheless, I recognise that the current conditions still do not enable inspectors to be compensated at a level corresponding to the demands of their work.

Among the significant achievements of the past year is our role in drafting an amendment to Act No. 167/2008 Coll., on Environmental Damage. This amendment, currently in the legislative process, will facilitate the application of the law and, in particular, simplify the entire environmental damage procedure. The draft amendment also includes a provision allowing the Inspectorate, in specified cases, to implement remedial measures itself, thus eliminating environmental burdens through a contractor.

Our work also involved investigating numerous serious cases of environmental damage, often in cooperation with the Police of the Czech Republic. Some of these cases attracted media attention, highlighting our commitment to maximum transparency and public awareness, despite the significant limitations imposed by applicable legal regulations on the provision of information.

The Inspectorate will continue to prioritise addressing extensive cases and serious environmental offences in its current and future plans. One of the key focus areas remains the transboundary shipment and illegal disposal of waste within the Czech Republic. In the CITES agenda, there is ongoing progress, often in collaboration with the Customs Administration of the Czech Republic and the Police of the Czech Republic. Given that the Czech Republic continues to be one of the leading breeding countries, our activities in this area are and will remain highly intensive. Despite the legal prohibition on breeding large felines outside zoological gardens, such cases still occur in practice. It is essential to work collectively with all involved authorities to put an end to this undesirable phenomenon.

The modernisation of the Inspectorate's activities is currently underway through the use of drones, GPS, and satellite data. These technologies enable us to monitor environmental issues more effectively and gather evidence even in hard-to-reach areas. For example, drones are used to monitor illegal waste dumps, while satellite data provide long-term insights into the condition of selected sites. These innovative solutions enhance our ability to respond to environmental threats and simultaneously improve the efficiency of our inspectors' work.

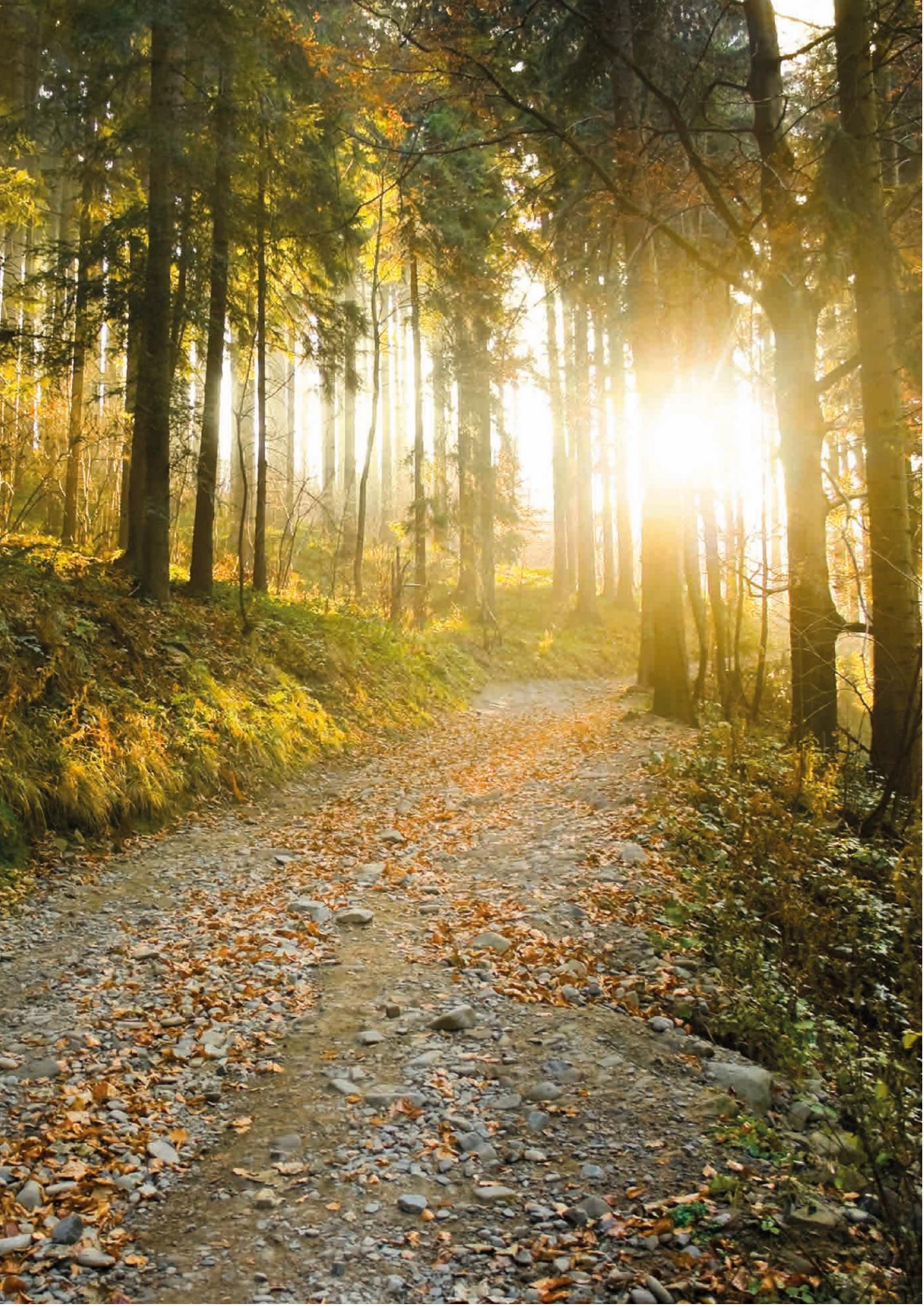
In the future, I would like to change the Inspectorate's approach to imposing sanctions, so that we move closer to the established Western models, which emphasise prevention and cooperation. This approach includes, for example, addressing minor infractions with a warning for the first offence and a significant fine for repeated violations. We are also considering alternative methods for determining maximum fines, such as based on a company's total revenue. The profits of some companies often exceed even high multi-million fines, which means that it is still worthwhile for them to continue illegal activities regardless of the potential risk of sanctions. According to European standards, with which I agree, harmful activities must not be profitable, and therefore, in my view, this situation must be changed.

In conclusion, I would like to express my sincere gratitude to all my colleagues for their tireless work and commitment that they demonstrate every day. Without their expertise, dedication, and commitment to protecting the environment, none of the stated goals would have been achievable.

Petr Bejček, Director of the Czech Environmental Inspectorate

Overview of activities in the years 2019–2023

| | 2019 | 2020 | 2021 | 2022 | 2023 |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Number of inspectors (final to Dec 31) | 409 | 408 | 396 | 389 | 394 |
| Number of checks | 16,896 | 11,784 | 11,231 | 12,622 | 12,583 |
| All decisions (penalty and other decisions incl. on fees) in legal power: | 8,607 | 2,444 | 1,690 | 2,511 | 2,518 |
| All fines, which have become legally binding | 2,532 | 2,041 | 1,673 | 2,160 | 2,138 |
| Number of other final decisions (other decisions incl. fees) | 6,075 | 403 | 17 | 351 | 380 |
| Total amount of fines in legal power in CZK | 112,329,717 | 87,604 415 | 79,387,735 | 109,624,411 | 96,508,188 |
| Other final decisions: | 412 | 309 | 244 | 318 | 341 |
| Instances of halting or restriction to operations, a facility of part of it, in force | 71 | 75 | 55 | 65 | 66 |
| Number of removals / seizures in legal power | 119 | 104 | 101 | 132 | 147 |
| Number of measures to remedy in legal power | 222 | 130 | 88 | 121 | 128 |
| EIA statement (Act No. 100/2001 Coll.) | 657 | 667 | 742 | 878 | 749 |
| Other issued expert opinions | 5,538 | 4,378 | 5,179 | 3,860 | 4,015 |
| Number of suggestions and petitions received | 3,493 | 2,972 | 2,853 | 2,489 | 2,773 |
| Number of suggestions submitted to public authorities from own inspection work | 309 | 293 | 250 | 274 | 253 |
| Number of submitted crime reports | 18 | 11 | 14 | 15 | 5 |
| Number of accidents and emergencies | 369 | 315 | 457 | 385 | 368 |
| Number of received requests for information (Act No. 106/1999 Coll. and Act No. 123/1998 Coll.) | 362 | 382 | 316 | 311 | 278 |
| Number of received suggestions about the activities of the Czech Environmental Inspectorate or inspectors - Section 175 of the Code of Administrative Procedure | 57 | 54 | 50 | 30 | 41 |
| Number of relevant notifications of unlawful conduct | 0 | 0 | 0 | 0 | 0 |
| Total number of employees as of 31 Dec | 557 | 546 | 564 | 533 | 536 |
| Educational structure (% of employees with higher education of all employees) | 81.50 | 82.00 | 78.90 | 82.00 | 82.00 |
| Occupational safety/accidents (accident frequency per 100 employees) | 0.00 | 0.18 | 0.00 | 0.00 | 0.00 |
| Rate of unplanned employee absenteeism (illness, accidents), (% of the planned time fund) | 3,84 | 3,45 | 3,53 | 4,30 | 4,20 |
| % of voluntary turnover (excluding forced departures, including those due to organisational changes, retirements) | 6,00 | 5,70 | 4,40 | 5,60 | 6,52 |
| Total budgetary funds of the CEI in CZK | 509,237,482.82 | 509,493,637.56 | 511,907,997.05 | 555,655,482.39 | 488,701,029.27 |



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1 Characteristic of the activity

1.1 Role of the CEI

CEI Organization

The Czech Environmental Inspectorate (CEI) was established in 1991 by Act No. 282/1991 Coll., on the Czech Environmental Inspectorate and its Role in Forest Protection, as amended. The CEI is a state organisational unit directly subordinated to the Ministry of the Environment of the Czech Republic. According to the Act on the CEI, it consists of the headquarters (referred to as the Directorate since 1993) and ten territorial inspectorates (TI), which have existed since 1995. These are TI Prague, TI České Budějovice, TI Plzeň, TI Ústí nad Labem, TI Hradec Králové, TI Havlíčkův Brod, TI Brno, TI Olomouc, TI Ostrava, and TI Liberec.

The Directorate is responsible for management, organisation, and methodology within the CEI. The methodological activities at the CEI Directorate are carried out by specialised departments, which are divided into two sections. One of these is the Department of Technical Environmental Protection and Integrated Prevention, which includes the Air Protection Department, Water Protection Department, Waste Management Department, and Integrated Agenda Department. The second section is the Department of Nature, Forest, and CITES Protection, consisting of the Nature Protection Department, International Biodiversity Protection and CITES Department, and Forest Protection Department.

The inspection activities are then carried out by the inspectors of the CEI at the individual territorial inspectorates. Generally, 40–45% of an inspector's time allocated for supervisory and control activities is planned in advance. The remaining capacity for control activities is reserved for tasks that arise during the year and which the Inspectorate is obligated to address (such as unplanned inspections, including checks on authorised emissions measurements, public reports of environmental damage or threats, ad-hoc thematic tasks assigned by the Ministry of the Environment, etc.). Investigating accidents, for example, is often very demanding.

Legal framework of the CEI's activities

The legal framework of environmental protection, within which the CEI operates, is based on the principle of separate regulation for individual environmental components according to the so-called departmental laws (see the introductions to each section in the Activity Plan for 2023 at www.cizp.cz/Plany-cinnosti). Additionally, it is necessary to mention the general legal regulations that apply to the activities of the CEI as a whole. As a specialised administrative authority carrying out preventive, supervisory, and sanctioning activities in the field of environmental protection, the CEI is required to act in accordance with these general legal regulations.

Among the general legal regulations is Act No. 500/2004 Coll., the Code of Administrative Procedure, as amended, which establishes the general framework for administrative proceedings and is the primary legal regulation in the field of administrative law. Another general legal regulation for the activities of the CEI is Act No. 255/2012 Coll., on Inspections (Inspection Procedure), as amended, which governs the process of conducting inspections. Another equally significant legal regulation is Act No. 250/2016 Coll., on Liability for Offences and the Proceedings Thereon, as amended, which governs the handling of administrative offences. The right to information, including information about the environment, is exercised by the public primarily through the so-called information laws, which are Act No. 123/1998 Coll., on the Right to Environmental Information, as amended, and Act No. 106/1999 Coll., on Free Access to Information, as amended. Given the CEI's role as a body for prevention in environmental

protection, it is necessary to also mention the following general legal regulations: Act No. 224/2015 Coll., on the prevention of major accidents involving selected hazardous chemicals or chemical mixtures and on the amendment of Act No. 634/2004 Coll., on administrative fees, as amended (the Major Accident Prevention Act), as amended, and Act No. 167/2008 Coll., on the Prevention and Remediation of Environmental Damage and on Amendments to Certain Acts.

Preventive and enforcement activities of the CEI

The activities of the CEI in the field of environmental protection consist of preventive activities and supervisory and sanctioning activities.

Preventive activities, in a broader sense, lie in the very existence of the CEI. The possibility of conducting inspections and subsequently sanctioning entities for violations of environmental protection regulations serves as an expected and intended means of ensuring compliance with these regulations. Furthermore, the preventive activities of the CEI are carried out through communication with the public, whether it concerns inquiries, providing information, or receiving reports that alert to environmental damage or threats.

The dividing line between preventive and enforcement activities is the imposition of corrective measures. From the perspective of administrative law, corrective measures are not a form of punishment, but they are always linked to unlawful actions or conditions and to the restriction of the entity's rights to act or the imposition of obligations on the entity to refrain from certain actions. By imposing these measures, the CEI seeks to prevent more extensive environmental damage or to rectify a situation where environmental damage has already occurred but can be remedied.

The second aspect of the CEI's activities is its supervisory and sanctioning activities. These activities are primarily carried out at the CEI's territorial inspectorates. The supervisory activities are conducted by CEI inspectors based on the powers specified in the individual departmental laws and are derived from both planned activities and those based on public reports, which are a very significant group of cases. Inspections are conducted in accordance with the Inspection Code. If a CEI inspector discovers during an inspection that the inspected entity has violated legal regulations and the CEI has the authority to address this unlawful conduct, it will initiate proceedings for an administrative offence.

If the CEI does not have jurisdiction over the unlawful conduct, it will report the findings to the relevant administrative authority or transfer the matter to the appropriate administrative authority. These authorities may include, depending on the powers set out in the departmental laws, municipal authorities, municipal authorities with extended competence (MEC), regional authorities, the State Navigation Authority, the Ministry of the Environment of the Czech Republic (MoE), regional public health authority, the Nature Conservation Agency of the Czech Republic, national park administrations, and others. If multiple administrative authorities are competent to handle the matter, typically the CEI and a municipality with extended competence (MEC) or the CEI and another nature protection authority, the determining factor is which of these bodies first initiated the administrative offence proceedings. The administrative proceedings are conducted in accordance with the Law on Liability for Offences and the Proceedings Thereon and the Code of Administrative Procedure.

Appeals can be filed against the decisions of the CEI, as the authority making the first-instance decision. The appellate authority is typically the Ministry of the Environment (MoE), which will usually decide on the appeal. The appeal process is primarily managed by the specialised departments of state administration (DSA) at the MoE. There are five such departments, each with a clearly defined territorial jurisdiction, where the area of each region falls under the responsibility of only one department of state administration.

In the appeal process, the first-instance decision issued by the CEI can be confirmed (always partially), revoked and returned for further proceedings, or revoked with the proceedings being discontinued, or changed, but never to the detriment of the accused. In exceptional cases, the CEI itself may decide on the appeal if the appeal is fully upheld and no party to the proceedings would suffer harm from the decision.

If someone feels that the decision of the appellate body has infringed on their rights, they cannot file another appeal against this decision. However, such a person may seek the annulment of the decision or a declaration of its nullity before an administrative court. The proceedings before administrative courts are governed by Act No. 150/2002 Coll., the Code of Administrative Justice, as amended.

[[1] Activities of the CEI arising from the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES - Convention on International Trade in Endangered Species).



1.2 Organizational structure

The CEI consists of 10 territorial inspectorates, two branches, and the Directorate. As of December 31, 2023, it employed 536 people, including 417 specialist employees.

Territorial Inspectorates:

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

The head of the service office with service duties at the Czech Environmental Inspectorate is appointed by the State Secretary.



Overview of the competences of the specialized departments of environmental protection



Specialized departments of environmental protection

| | Competences of the CEI | Air | Water | Waste | Integrated Prevention | Nature | Forest |
|----------------------------|--|-----|-------|-------|-----------------------|--------|--------|
| Supervision | Inspections, reviews, audits, investigations, etc. | • | • | • | • | • | • |
| Sanctions | Fines for legal entities | • | • | • | • | • | • |
| | Fines for individuals | • | | • | | • | • |
| | Restriction or cessation of activity, operation | • | • | | • | • | • |
| Measures | Measures for rectifying identified - deficiencies and also serious conditions according to the Water Act | • | • | • | • | • | • |
| | Seizure and confiscation of illegal specimens of endangered species of animals or plants | | | | | • | |
| | Seizure of unlawfully held individuals, confiscation of products | • | | | • | • | |
| Record of accidents | And cooperation in their resolution | • | • | | | | |
| Opinions | Opinions, statements, approvals for other authorities | • | • | • | • | • | • |
| Suggestions | Resolution of suggestions | • | • | • | • | • | • |





1.3 Intensity of inspection activity

In 2023, the CEI conducted a total of 12,583 inspections and issued 2,518 final decisions, of which 2,138 were decisions imposing fines.

Compared to 2022, there was no significant increase or decrease in the total number of inspections and the number of final decisions on fines issued.

The total number of inspectors at the CEI in 2023 was 394. On average, each inspector carried out around 32 inspections. In 2023, the CEI issued a total of 4,015 opinions and statements, of which 749 were related to the EIA process.

The number of inspections by territorial inspectorates – an overview of the past 5 years

| | 2019 | 2020 | 2021 | 2022 | 2023 |
|---------------------|-------|-------|-------|-------|-------|
| TI Prague | 2,221 | 1,353 | 1,532 | 1,766 | 1,736 |
| TI České Budějovice | 1,293 | 907 | 853 | 910 | 915 |
| TI Plzeň | 1,635 | 1,137 | 1,150 | 1,338 | 1,384 |
| TI Ústí nad Labem | 1,564 | 1,055 | 967 | 1,279 | 1,261 |
| TI Hradec Králové | 1,782 | 1,610 | 1,272 | 1,657 | 1,616 |
| TI Havlíčkův Brod | 1,405 | 1,012 | 1,089 | 1,212 | 1,181 |
| TI Brno | 2,064 | 1,454 | 1,248 | 1,313 | 1,488 |
| TI Olomouc | 1,227 | 977 | 810 | 902 | 836 |
| TI Ostrava | 1,705 | 1,226 | 1,212 | 1,452 | 1,314 |
| TI Liberec | 900 | 590 | 634 | 698 | 804 |
| Directorate | 669 | 463 | 417 | 95 | 48 |

Note: Listed for 5 years, in descending order

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

| | Number of fines imposed | Number of fines in legal force | Total amount of fines in legal force (CZK) |
|------|-------------------------|--------------------------------|--|
| 2023 | 2,209 | 2,138 | 96,508,188 |
| 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: Listed for 5 years, in descending order

2 Overview of work of territorial inspectorates

| | | | Statements | | Fines | | | Other decisions | | | | | | |
|--------------------------|-------------------|-----------------|---|------------------|------------------------------------|--|--|---|---|---|--|----------------------------|---|----------------------|
| Territorial inspectorate | No. of inspectors | No. of controls | 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 removal/confiscations in legal force | No. of remedial measures in legal force | 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 |
| Prague | 51 | 1,736 | 164 | 1,035 | 197 | 202 | 19,837,360 | 0 | 5 | 20 | 39 | 676 | 32 | 0 |
| České Budějovice | 31 | 915 | 38 | 175 | 163 | 154 | 6,547,720 | 39 | 4 | 19 | 19 | 237 | 20 | 0 |
| Plzeň | 35 | 1,384 | 37 | 269 | 214 | 204 | 6,186,330 | 0 | 2 | 10 | 4 | 188 | 13 | 1 |
| Ústí nad Labem | 42 | 1,261 | 46 | 389 | 220 | 198 | 14,128,000 | 11 | 0 | 15 | 29 | 308 | 14 | 0 |
| Hradec Králové | 35 | 1,616 | 92 | 158 | 261 | 251 | 9,624,380 | 6 | 6 | 8 | 75 | 318 | 31 | 0 |
| Havlíčkův Brod | 29 | 1,181 | 83 | 268 | 261 | 256 | 8,794,340 | 0 | 3 | 8 | 13 | 252 | 35 | 0 |
| Brno | 44 | 1,488 | 126 | 795 | 220 | 211 | 9,123,698 | 2 | 0 | 22 | 59 | 443 | 30 | 0 |
| Olomouc | 26 | 836 | 43 | 203 | 151 | 155 | 5,762,700 | 1 | 1 | 6 | 34 | 207 | 14 | 0 |
| Ostrava | 39 | 1,314 | 65 | 516 | 300 | 288 | 10,545,530 | 2 | 4 | 9 | 86 | 306 | 25 | 2 |
| Liberec | 25 | 804 | 53 | 170 | 110 | 107 | 4,675,830 | 5 | 0 | 9 | 10 | 179 | 36 | 0 |
| CEI TI Total | 357 | 12,535 | 747 | 3,978 | 2,097 | 2,026 | 95,225,888 | 66 | 25 | 126 | 368 | 3,114 | 250 | 3 |



3 Engagement with stakeholders

3.1 Cooperation with the public

A significant part of the CEI's activities involve addressing reports of environmental damage or threats to the environment, investigating complaints, and handling information requests and petitions. These tasks are an integral part of the CEI's operations across all departments of the territorial inspectorates of the CEI as well as the CEI Directorate.

3.1.1 Suggestions

The Czech Environmental Inspectorate investigates suggestions indicating environmental damage or threats within the applicable legal framework:

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

Suggestions are an important element of communication between the CEI and the public. The public often draws attention to violations of the law that would otherwise remain hidden. Suggestions serve as the starting point for further action by the CEI (for external inspection activities). If, following an investigation, the CEI finds grounds to initiate proceedings ex officio, a penalty procedure is typically initiated, followed by an administrative procedure for imposing corrective measures. Suggestions for which the CEI does not have the legal competence to investigate are forwarded to other relevant public authorities for investigation. The CEI also submits suggestions to other state administration bodies on its own initiative when, during its inspection activities, it discovers facts suggesting violations of legal regulations in areas that do not fall within its remit.

A suggestion for investigation can be submitted to the CEI by any individual, individual entrepreneur, or legal entity. Information on how to submit suggestions is published on the CEI's website under the "Contact Us" section (<https://www.cizp.cz/obratte-se-na-nas>). In 2023, a new option for submitting suggestions was introduced, allowing submissions via an **electronic form** (<https://www.cizp.cz/form/podnet>) available on the CEI's website. This is an easily accessible, quick, and effective tool for reporting potential violations of environmental protection laws.

The number of received suggestions

In 2023, the CEI received a total of 2,778 suggestions. There were situations where the CEI received suggestions that fell outside its legal competencies for investigation. These suggestions were forwarded to the relevant state administration authority. In 2023, this involved 401 suggestions. The number of suggestions received and forwarded by the individual territorial inspectorates and the CEI Directorate in 2023 is shown in the table below. As in previous years, the highest number of suggestions in 2023 was handled by the CEI Territorial Inspectorate of Prague.



Numbers of suggestions received by TIs and Directorate in 2023

| Territorial inspectorate | Suggestions received | Suggestions redirected as not within competence |
|--------------------------|----------------------|---|
| Prague | 581 | 63 |
| České Budějovice | 237 | 36 |
| Plzeň | 188 | 20 |
| Ústí nad Labem | 286 | 35 |
| Hradec Králové | 273 | 49 |
| Havlíčkův Brod | 204 | 15 |
| Brno | 365 | 62 |
| Olomouc | 156 | 31 |
| Ostrava | 295 | 33 |
| Liberec | 147 | 27 |
| Directorate | 46 | 30 |
| Total | 2,778 | 401 |

A single suggestion may indicate threats or damage to multiple environmental components, and as a result, it is addressed by several specialised departments. The data on how individual departments contributed to the resolution of suggestions received in 2023 is presented in the following table.

The individual departments of the TI and the Directorate contributed to the resolution of suggestions received in 2023 as follows

| Territorial inspectorate | Air protection | Water protection | Waste management | Nature protection | Forest protection | Integrated agendas |
|--------------------------|----------------|------------------|------------------|-------------------|-------------------|--------------------|
| Prague | 87 | 108 | 156 | 280 | 41 | 4 |
| České Budějovice | 22 | 37 | 50 | 111 | 15 | 2 |
| Plzeň | 26 | 30 | 60 | 67 | 5 | 0 |
| Ústí nad Labem | 35 | 46 | 73 | 130 | 24 | 0 |
| Hradec Králové | 40 | 65 | 102 | 92 | 18 | 1 |
| Havlíčkův Brod | 55 | 42 | 28 | 116 | 10 | 1 |
| Brno | 103 | 79 | 106 | 134 | 19 | 2 |
| Olomouc | 23 | 39 | 51 | 81 | 11 | 2 |
| Ostrava | 44 | 44 | 63 | 132 | 20 | 3 |
| Liberec | 14 | 44 | 42 | 66 | 10 | 3 |
| Directorate | 9 | 10 | 18 | 6 | 1 | 2 |
| Total | 458 | 544 | 749 | 1,215 | 174 | 20 |



The main topics of the suggestions investigated in 2023

In the **Air Protection Department**, the CEI most frequently addressed suggestions related to nuisance emissions of odorous substances that pollute the air and dust from industrial complexes. It also dealt with the smoke opacity from waste burning and the unauthorized operation of stationary sources.

In the **Water Protection Department**, the CEI most frequently investigated suggestions regarding water pollution caused by wastewater discharge, both into surface waters and groundwater. Additionally, suggestions were addressed regarding the compliance with minimum residual flows during the operation of small hydroelectric plants and the unsecured storage of harmful substances.

In the **Waste Management Department**, the CEI investigated suggestions from citizens related to the handling of waste, packaging, chemicals, and chemical mixtures (including biocidal products). These primarily concerned illegal waste dumping, unauthorized land alterations using waste materials, unauthorised handling of end-of-life vehicles without permission, and failure to comply with take-back obligations for electronic equipment and tires. In the area of chemical legislation oversight, significant topics included the sale of solder containing lead and the case involving 1,3-butadiene in liquefied petroleum gas.

In the **Nature Protection Department**, the CEI most frequently addressed suggestions related to the investigation of tree felling outside of forests, pruning, interference with the root systems, including above-ground parts of trees during earthworks, and other forms of environmental damage. The CEI also dealt with interference with the natural development of specially protected animal and plant species.

The **Forest Protection Department** primarily addressed suggestions for verifying logging activities in forests, often in connection with damage to forest soil. It also dealt with waste dumping and terrain modifications on forest land, as well as the unauthorized use of land designated for forest functions for other purposes.

In the competencies of **Integrated Agendas**, the CEI addressed suggestions regarding the failure to report the release or transfer of pollutants to the Integrated Pollution Register, as well as suggestions concerning potential environmental damage caused by the loss of groundwater through the creation of wells for heat pumps and groundwater extraction.

Trends in the number of suggestions from 2019 to 2023 by individual TI and the CEI Directorate

The declining trend in the number of suggestions received over the last three years was reversed last year, nearly reaching the level of 2021. Trends in the number of suggestions received over the 5-year period is shown in the following table. Public interest in environmental protection is a generally positive phenomenon, however, from the CEI's perspective, it places significant demands on personnel resources.



The development of the number of suggestions received in the years 2019–2023 according to individual TI and the CEI Directorate

| Territorial Inspectorate | 2019 | 2020 | 2021 | 2022 | 2023 |
|--------------------------|--------------|--------------|--------------|--------------|--------------|
| Prague | 943 | 656 | 563 | 498 | 581 |
| České Budějovice | 216 | 204 | 213 | 214 | 237 |
| Plzeň | 232 | 260 | 226 | 165 | 188 |
| Ústí nad Labem | 337 | 276 | 270 | 229 | 286 |
| Hradec Králové | 328 | 336 | 284 | 262 | 273 |
| Havlíčkův Brod | 279 | 224 | 256 | 215 | 204 |
| Brno | 381 | 374 | 359 | 305 | 365 |
| Olomouc | 167 | 144 | 150 | 158 | 156 |
| Ostrava | 325 | 281 | 284 | 264 | 295 |
| Liberec | 162 | 163 | 196 | 125 | 147 |
| Directorate | 123 | 54 | 52 | 54 | 43 |
| Total | 3,493 | 2,972 | 2,853 | 2,489 | 2,775 |

Note: presented for 5 years, in descending order



Green Line

Since September 1, 2008, the CEI has operated the so-called green line (800 011 011). This is a direct and free telephone connection between the CEI and the public. The line primarily serves for receiving suggestions from citizens. It is also used to respond to public inquiries about environmental issues and to inform them about the legal competences of the CEI. The line operates every weekday from 8 AM to 4 PM.

3.1.2 Provision of information

In 2023, the Czech Environmental Inspectorate processed a total of 278 information requests, of which 16 requests were handled under Act No. 106/1999 Coll., on Free Access to Information, as amended, and 262 requests under Act No. 123/1998 Coll., on the Right to Environmental Information, as amended. In addition to the information provided under these information laws, the CEI communicates with the public through press releases, annual reports, brochures, leaflets, and the operation of the free "Green Line" telephone service, among other means.

The provision of information contributes to creating stronger feedback between the CEI and the public. The main objectives are to maintain contact with both the professional and general public, as well as with the media, to ensure that, within its capabilities, questions regarding the CEI's supervisory and inspection powers are answered, and to provide objective information about the results of the CEI's inspection activities.

Providing information under Act No. 106/1999 Coll., on Free Access to Information, as amended

In accordance with Section 18(1) of the cited Act, the CEI hereby publishes the 2023 Annual Report on its activities in the area of providing information in accordance with Act No. 106/1999 Coll., as amended.

The required data pursuant to Act No. 106/1999 Coll. for 2023

| | |
|---|---|
| Number of information requests submitted | 16 |
| Number of decisions issued to refuse a request | Three and two partial refusals. |
| Number of appeals submitted against decisions | / |
| Summary of the essential parts of each judgment regarding the review of the legality of the obligated entity's decision to refuse an information request and overview of all expenses incurred by the obligated entity in connection with court proceedings concerning rights and obligations under this Act, including costs for its own employees and legal representation costs. | / |
| List of exclusive licences granted, including justification for the necessity of granting exclusive licences | / |
| Number of complaints submitted under Section 16a, reasons for their submission, and a brief description of how they were resolved | 2 Both complaints were submitted due to the alleged partial provision of the requested information. One complaint was fully upheld under Section 16a (5) / paragraph 5 of the Act, and the information was provided. The second complaint was decided by the MoE, which confirmed the CEI's procedure under Section 16a(6)(a) of the Act. |
| Additional information related to the application of this Act | 1 information request was withdrawn. |



Providing information under Act No. 123/1998 Coll., on the Right to Environmental Information, as amended

Under this Act, 262 requests were received in 2023. The highest number of requests was handled by the CEI Territorial Inspectorate in Hradec Králové and the CEI Directorate, while the lowest number was handled by the CEI Territorial Inspectorate in Liberec.

Overview of the number of information requests for 2023 by individual TIs

| | Total number of requests | Number of requests under Act No. 106/1999 Coll. | Number of requests under Act No. 123/1998 Coll. |
|------------------|--------------------------|---|---|
| Prague | 25 | 0 | 25 |
| České Budějovice | 19 | 0 | 19 |
| Plzeň | 18 | 0 | 18 |
| Ústí nad Labem | 29 | 0 | 29 |
| Hradec Králové | 62 | 0 | 62 |
| Havlíčkův Brod | 15 | 0 | 15 |
| Brno | 16 | 0 | 16 |
| Olomouc | 16 | 0 | 16 |
| Ostrava | 19 | 0 | 19 |
| Liberec | 12 | 0 | 12 |
| Directorate | 47 | 16 | 31 |
| Total | 278 | 16 | 262 |



Trend in the number of information requests from 2019 to 2023

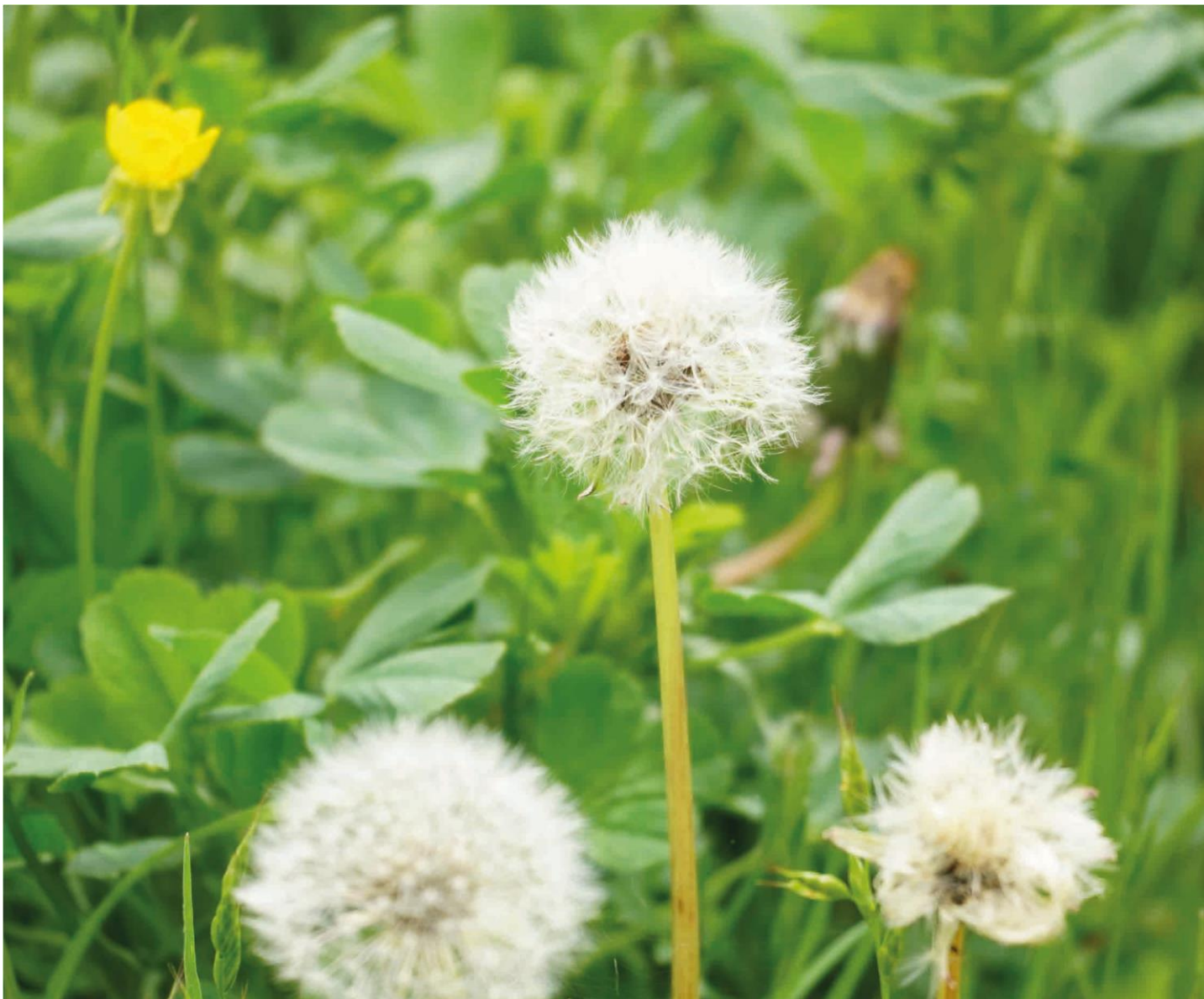
The total number of information requests has decreased year-on-year. Compared to 2022, the CEI received 29 fewer requests under Act No. 123/1998 Coll. and 4 fewer requests under Act No. 106/1999 Coll. Despite the decline in requests, public interest in the provision of information is still relatively high.



Trend in the number of information requests from 2019 to 2023

| Year | Total number of requests received | Number of requests under Act No. 106/1999 Coll. | Number of request under Act No. 123/1998 Coll. |
|------|-----------------------------------|---|--|
| 2023 | 278 | 16 | 262 |
| 2022 | 311 | 20 | 291 |
| 2021 | 329 | 23 | 306 |
| 2020 | 382 | 15 | 367 |
| 2019 | 362 | 13 | 349 |

Note: Listed for 5 years, in descending order



3.2 Cooperation with state institutions, professional and interest organisations



The Czech Environmental Inspectorate collaborates with a range of organisations in fulfilling its tasks, consults with professional institutions, and cooperates on joint educational projects with non-governmental 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

The year 2023 was the first year completely free of restrictions after two "COVID" years. In 2023, CEI employees **undertook a total of 35 foreign trips** to several traditional as well as some new destinations. These trips included visits to our closest neighbours Slovakia, Germany, and Poland, as well as Belgium, Italy, France, Spain, Sweden, and Finland, and within wider Europe, to Croatia, North Macedonia, and Bosnia and Herzegovina. Employees of the CEI Directorate (DIR) and territorial inspectorates were also active throughout the year in the online space.

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

In 2023, IMPEL organised two General Assembly (GA) meetings. The 25th meeting was held in a hybrid format on June 8-9 in Stockholm, and the 26th meeting took place as a virtual conference from Madrid on November 28–30.

CEI employees participate in IMPEL's project work in expert teams such as Industry & Air, Waste & TFS (Transfrontier Waste Shipments), Water & Land, Nature Protection, and Cross Cutting Tools & Approaches. They are also involved in the external project – SWEAP.

Throughout 2023, the Inspectorate, through its employees, participated in **8 projects, working in 15 working groups**. This allowed them to contribute to activities and gain valuable information in areas such as Air Quality Improvement, Lessons from Industrial Accidents, WEEE Article 17 Free-riders project (implementation of Article 17 of the WEEE Directive (2012/19/EU)), Plastic Waste Shipments, Enforcement Measures, National Contact Points Meetings, W&TFS Annual Conference, Strategic Networking Cooperation, Water and Soil Remediation, Combating



Illegal Activities Related to Hunting Tourism, Testing and Improving the Proposed Planning Tool for Natura 2000 Site Inspections (NIRAM), Invasive Alien Species Project Series Plan, EU Action Plan Against Wildlife Trafficking, Implementation of the Habitats and Birds Directives at European Airports, Where Have the Wolves Gone? and Geospatial Intelligence for Environmental Damage Assessment (GIEDA).

In addition to cooperation with IMPEL, an inspector from the Air Protection Department of the CEI Territorial Inspectorate in Ústí nad Labem attended the 37th meeting of the German-Czech working group for air protection in Regensburg, Germany, in June. The meeting focused on the exchange of information on transboundary air pollution and the revision of the Air Quality Directive.

In the field of waste management (WMD), the head of WMD at the CEI Directorate actively participates in international cooperation within the IMPEL ET Waste and Transboundary Waste Shipments group. As the deputy head of the expert team and head of the National Contact Points (NCP) Working Group, as well as the deputy head of the Steering Group of the expert team, he represented the CEI in several working meetings and conferences throughout the year. These meetings were also co-organised by him, and he actively participated in them. Examples include the "Waste & TFS National Contact Points (NCPs) Best Practice Meeting & Steering Group Meeting" and the "Waste & TFS Conference 2023 and the Steering Committee Meeting & National Contact Point (NCP) Meeting," which he attended together with an inspector from his department.

The Inspectorate is traditionally also involved in **LIFE SWEAP**, an external project coordinated by IMPEL. The head of the WMD at the CEI Directorate and a colleague from the department actively monitor the testing process of GPS trackers for monitoring the domestic movement of waste within the country and prepare the annual inspection data report for the Czech Republic, intended for the SWEAP database. The Czech Republic is one of the countries where the newly developed application "SWEAP APP," designed for reporting inspection data related to waste movement monitoring, is being tested in practice.

In addition to cooperation with IMPEL, the head of WMD at the CEI Directorate personally attended the Visegrád Group environmental crime expert meeting "Envispecialists V4" in March in Smolenice, Slovakia. The meeting focused on investigating illegal waste trafficking and was organised by the Department for the Detection of Hazardous Substances and Environmental Crime of the National Centre for Specialised Crime of the Presidium of the Police Force of the Ministry of the Interior of the Slovak Republic. In September, the head of WMD at the TI CEI Liberec, along with a team of employees, attended the regular "19th Cross-border Workshop on Circular Economy and Landfilling" in Zittau, Germany.

In the area of water protection (WPD), the CEI continued its cooperation in the Water and Land Remediation expert team, where the director of the TI CEI Ostrava participated in the November conference, the "IMPEL Water & Land Remediation Conference," in Skopje, North Macedonia. Within the expert team, he contributed to the development of methodologies for the use of two additional remediation methods – "Thermal Desorption" and "Phytoremediation." Within the Industry and Air ET, the inspector of the Water Protection Department (WPD) of the TI CEI Brno participated in the 15th annual seminar "Lessons Learnt from Industrial Accidents – LLFA," which took place in May in Marseille, France. The cooperation in the area of industrial accidents is linked to the waste management, water protection, and air protection sectors. The seminar focused on industrial accidents in facilities storing waste.

In addition to the cooperation with IMPEL, an inspector from the Water Protection Department (WPD) of the TI CEI Ostrava participated in the March meeting of the G3 Working Group on Emergency Pollution of **the International Commission for the Protection of the Oder against Pollution**, held in Wrocław, Poland, to update the International Warning and Alarm Plan for the Oder. In August, an inspector from the WPD of the CEI Directorate attended the 65th meeting of the Water Emergency Pollution Working Group (H) of **the International Commission for the Protection of the Elbe River**, in Dresden, Germany, where discussions focused on national-level water emergency pollution and the International Warning and Alarm Plan for the Elbe. In September, inspectors from the WPD of the TI CEI Ostrava also participated in **the "Future of the Oder"** conference in Schwedt-Criewen, Germany. In October, they attended the 31st meeting of the G3 Working Group on Emergency Pollution of **the International Commission for the Protection of the Oder against Pollution** in Oybin, Germany, where the Oder Emergency Plan was discussed, along with warnings related to the mass proliferation of golden algae *Prymnesium parvum*. The November meeting of the Water Protection Working Group **of the Slovak-Czech Commission for Boundary Waters** in Liptovský Ján, Slovakia, focused on the recap of activities for 2023, monitoring results, and harmonizing outputs from joint measurements. The head of the WPD of the TI CEI Brno participated in this meeting.

In the area of nature protection, CEI employees were active both within IMPEL projects and outside this network. In the ET Nature Protection, inspectors from the Department of International Biodiversity Protection and CITES of the CEI Directorate and Nature Protection Department TI CEI Prague traditionally participate very actively. In 2023, they attended a total of **10 in-person working group meetings and several selected online meetings**. The ET Nature Protection meetings, including project meetings of the working groups, were held in May in Rome and later in November in The Hague, Netherlands. Inspectors from the CITES CEI Directorate attended the meeting of the group Fighting Illegal Activities Associated with Trophy Hunting and the EU Action Plan Against Wildlife Trafficking. Two inspectors from the Nature Protection Department TI CEI Prague attended the working group meeting on Testing and Improving the Proposed Planning Tool for Natura 2000 Site Inspections (NIRAM) and the Plan for a Series of Projects on Invasive Alien Species, as well as the working group on Implementing the Habitats Directive and the Birds Directive at European Airports. An inspector from the Nature Protection Department of the TI CEI Prague attended the meeting of the working group "Where Have the Wolves Gone?". In June, an inspector from the Nature Protection Department TI CEI Prague participated in a workshop in Santiago de Compostela, Spain, organised by the working group on Testing and Improving the Proposed Planning Tool for Natura 2000 Site Inspections (NIRAM) and the Plan for a Series of Projects on Invasive Alien Species. In December, under the framework of the EU Action Plan Against Wildlife Trafficking working group, **a joint inspection of a reptile fair in Hamm, Germany**, took place, attended by an inspector from CITES CEI Directorate.

In addition to collaboration with IMPEL, in April, an inspector from CITES CEI Directorate, as a member of the CITES Czech Republic Control and Sanctioning Authority, attended **the 44th meeting of the Wildlife Trade Enforcement Group (WTEG) organised by Europol** in The Hague, Netherlands. In December, the General Secretariat of Interpol **hosted the 34th meeting of the Interpol Working Group on Wildlife Crime, which deals with criminal activities affecting wild and naturally growing species**, in Lyon, France. The inspector from CITES CEI Directorate once again participated in this event. In June, the Lesy města Chebu s.r.o. (Forests of the City of Cheb) organised a traditional meeting at the hunting lodge of the city of Cheb in Bavaria, at the Alten Egerer Wald location. During this event, a group of 11 inspectors from the Forest Protection Department (FPD) of the TI and CEI Directorate was introduced to methods of forest protection and cultivation with regard to biodiversity in the forests of the city of Cheb in Germany.

The ET Cross-cutting Approaches and Tools IMPEL, with the support of the European Commission and in cooperation with its partner networks EUFJE, EnviCrimeNet, EPA Network, and ENPE, organised **the 4 Networks Conference**. The international meeting on the topic of Cooperation in Strengthening Environmental Law Enforcement was attended by organisations from over 44 countries, with 230 delegates participating in person and 189 delegates joining virtually. The conference took place in September in Rome, and the CEI was represented by the Head of the WMD CEI and the Director of Internal Services of the CEI Directorate. Two CEI inspectors began collaborating on the new project of the Working Group on Geospatial Intelligence for Environmental Damage Assessment (GIEDA). The Director of the Department of Environmental Technical Protection and Integrated Prevention (DETIPI) of the CEI DIR and the Head of the Department of Inspection Support and Chemical Safety (DISCS) of the CEI DIR, who is actively engaged in the use of drones in inspection activities and the processing of data obtained from observations, attended the hybrid meeting of the working group in September in Rome online.

Inspection activities in the field of chemical safety, particularly within the framework of **the European Chemicals Agency (ECHA)**, is another area in which CEI staff regularly and significantly participate at the international level. The Head of the Department of Inspection Support and Chemical Safety (DISCS) of the CEI DIR and the inspector of the Waste Management Department (WMD) of the TI CEI Brno participated in the 44th meeting of members of the **Forum for Exchange of Information on Enforcement within ECHA** in June. In November, the Director of the Department of Environmental Technical Protection and Integrated Prevention (DETIPI) of the CEI DIR, along with the inspector of the WMD of the TI CEI Brno, attended training for national coordinators for the REF-12 project on import control and training for trainers on enforcement of import control regulations. All meetings were held in Helsinki, Finland, at the ECHA headquarters. The Head of the DISCS of the CEI DIR and the inspector of the WMD of the TI CEI Brno also participated virtually in **the 45th plenary session of the Forum for Exchange of Information on Enforcement organized by ECHA in November**. In October, the Director of the DETIPI of the CEI DIR attended **the European Enforcement Summit 2023** online, which was held in Brussels.

In the area of integrated agendas (DIA), experts from the CEI participated in the conference IPPC Process in Slovakia and the Czech Republic. The so-called **Slovak-Czech BAT FORUM 2023**, held in September at Štrbské Pleso in Slovakia, focused on the exchange of practical and legislative experiences between both countries in the field of integrated prevention, best available techniques, and environmental areas related to integrated prevention. The event, organised as an international workshop, actively involved **8 inspectors from the Directorate and the territorial inspectorates of Ostrava, Brno, Hradec Králové, Havlíčkův Brod, and Plzeň**.

In April 2023, the Ministry of the Environment hosted **representatives from a Ukrainian non-governmental organisation**, and inspectors from the Department of Integrated Agendas (DIA) of the CEI DIR also gave a presentation on the IPPC process.

In June, the CEI Directorate hosted **representatives from the Ethiopian Ministry of Water Resources and Energy**. The Ethiopian delegates were particularly interested in drinking water sources, their treatment, distribution, and the methods by which we protect them from industrial pollution in the Czech Republic. The Director of the CEI, together with the Head of the Water Protection Department (WPD) of the CEI TI Prague, presented Czech legislation on water management and the Inspectorate's activities in the field of water protection, including one of the topics on the technical and financial challenges of remediation following groundwater and soil contamination.

In September, the CEI hosted a working meeting with representatives from the Jinju City Hall of the Republic of Korea, during which the CEI management, together with experts from the DETPIP, WPD, and CITES of the CEI DIR, presented the Inspectorate's activities in the Czech Republic.

Foreign trips are generally undertaken to fulfil the Czech Republic's contractual obligations within international organisations, conventions, and protocols on the one hand, and activities directly related to EU membership on the other. In total, the CEI spent CZK 220,088.48 on foreign trips in 2023.



3.4 Communication with the public and the media

In 2023, the Inspectorate issued 42 press releases and responded to 290 media inquiries.

According to the company Toxin, the CEI was mentioned in 2,757 media posts. Of these, 187 posts were broadcast on the radio, 203 on television, 218 on social media, 376 articles were published in print newspapers and regional publications, and 1,774 in online publications.



In 2023, the media were most interested in the following topics: illegal waste management, illegal import of waste into the Czech Republic, surface water pollution, fish die-offs, nuisance odours, illegal logging, moldavite, and illegal trade in endangered species of animals and plants.



Open Day at the CEI Directorate in Prague.

In September 2023, the CEI organised an "Open Day" at the CEI Directorate in Prague and the TI CEI in České Budějovice for pupils and students, allowing them to gain a better understanding of the inspectors' work. Throughout the year, the Inspectorate participated in several public events to raise awareness about environmental protection and the activities of the office. For awareness purposes, the Inspectorate also began communicating with the public via social media platforms Instagram, LinkedIn, and X in 2023.



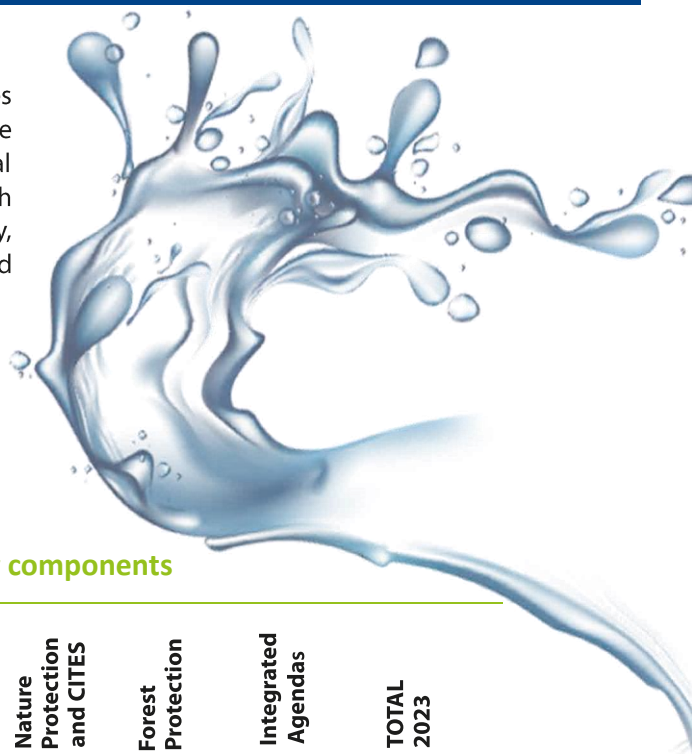
Open Day at the TI CEI in České Budějovice



Presentation of the activities of the CEI at the Země živitelka exhibition in České Budějovice with the participation of the Director CEI Director Petr Bejček and Minister Petr Hladík

4 The activities of the CEI in 2023 by professional departments

The examples of the highest fines imposed by the CEI Inspectorates on legal and natural persons, as well as decisions where operations/activities were restricted or halted, are selected from final decisions in Chapter 4. These decisions are listed for each environmental protection component (air, water, waste, forestry, nature) and for each CEI Inspectorate. Examples of decisions related to integrated agendas are provided for the CEI.



Overview of the activities of the CEI for the year 2023 by components

| | | Air Protection | Water Protection | Waste Management | Nature Protection and CITES | Forest Protection | Integrated Agendas | TOTAL 2023 |
|--|--|-----------------|------------------|------------------|-----------------------------|-------------------|--------------------|------------|
| Number of inspectors (department heads + inspectors; final status as of 31 December)* | | 75 | 83 | 89 | 83 | 45 | 17 | 392 |
| Number of inspections | | 3,196 | 2,501 | 2,947 | 2,359 | 955 | 625 | 12,583 |
| EIA Statement (Act No. 100/2001 Coll.). | | Reported by DIA | Reported by DIA | Reported by DIA | Reported by DIA | Reported by DIA | 749 | 749 |
| Other Statements | | 2,097 | 722 | 147 | 120 | 64 | 865 | 4,015 |
| Fines | All issued fines | 337 | 435 | 661 | 652 | 65 | 59 | 2,209 |
| | All fines that have become legally binding | 326 | 417 | 654 | 624 | 61 | 56 | 2,138 |
| | Total amount of legally binding fines (CZK) | 12,012,500 | 16,690,368 | 42,305,000 | 12,668,700 | 10,033,000 | 2,798,620 | 96,508,188 |
| Other Decisions | Number of suspensions or restrictions of activity, operation, or part of it in legal force | 1 | 0 | / | 30 | 35 | 0 | 66 |
| | Number of withdrawals / confiscations in legal force | 0 | / | / | 147 | / | / | 147 |
| | Number of corrective measures in legal force | 3 | 26 | 3 | 29 | 67 | 0 | 128 |
| Number of exceptional events (in terms of air quality laws) and accidents (under the Water Act) | | 131 | 237 | / | / | / | / | 368 |

*Note: The number of inspectors does not include positions of civil service and local government officers, territorial inspectorate directors, and department.

/ - The department does not have the competence to perform this activity

4.1 Air Protection, Earth's Climate System Protection, and the Ozone Layer Protection

4.1.1 Overview of inspection activities in 2023

The inspection activities in 2023 carried out by the Air Protection Department in the areas of air protection, ozone layer protection, and the Earth's climate system protection were conducted in full compliance with the applicable legal regulations governing these areas of environmental protection. The inspections focused on compliance with obligations set by directly applicable national regulations as well as EU regulations, and also on the fulfillment of obligations specified in the permits for the operation of stationary air pollution sources. A total of 3,196 inspections were carried out, of which 1,323 (41.4%) were planned and 1,873 (58.6%) were unplanned.

The number and distribution of inspections conducted in 2023 across the various areas of responsibility reflected the severity of the activities being operated and their impact on the environment. The highest number of inspections was conducted on stationary sources listed in Appendix No. 2 of the Air Protection Act (1,734 inspections), followed by the performance of activities by individuals authorized to measure emissions and prepare expert assessments (62 inspections), and individuals authorized to prepare dispersion studies (1 inspection). In 2023, stationary sources not listed in Appendix No. 2 of Act No. 201/2012 Coll. were also inspected (534 inspections). The Air Protection Department inspectors inspected 237 facilities with integrated permits under the Integrated Pollution Prevention and Control Act, and in 216 cases, the inspection also focused on obligations set forth in Act No. 201/2012 Coll. Inspections of compliance with the conditions of the protection of the Earth's climate system were carried out to a lesser extent (365 inspections, of which 79 concerned facilities in the greenhouse gas emissions trading system, and 286 inspections involved individuals handling fluorinated greenhouse gases). Furthermore, 25 inspections were conducted concerning the protection of the ozone layer – stratospheric ozone. As part of inspections on compliance with obligations related to the handling of regulated substances and fluorinated greenhouse gases, 4 individuals engaged in activities requiring certification by the Ministry of the Environment were inspected. Additionally, 18 inspections were conducted that did not fall into any of the above categories. The Air Protection Department inspectors also participated in 427 integrated inspections with other technical departments (Waste Management Department, Water Protection Department).

As a result of inspections carried out in 2023 and those conducted in the previous period with a carryover into 2023, 326 final penalty decisions were issued for violations of obligations in the protection of the air, the ozone layer, and the climate system.

In 2023, a total of 506 administrative offences were concluded, amounting to CZK 12,012,500. In 2023, 312 final decisions were initiated, with total fines amounting to CZK 10,307,500. In 2022, 13 final decisions were initiated, amounting to CZK 1,555,000, and before 2022, 1 final decision was initiated, amounting to CZK 150,000.

The total amount of fines imposed by inspectors for violating the conditions set out in Act No. 201/2012 Coll. reached CZK 8,283,500, for violating the conditions set out in Act No. 76/2002 Coll. the amount of fines reached CZK 2,183,000, for violating the conditions set out in Act No. 73/2012 Coll. the amount of fines was CZK 1,513,000, and for violating the conditions set out in Act No. 383/2012 Coll. one fine of CZK 10,000 was imposed. Furthermore, in 2023 two fines entered into force, one for violating the conditions set out in Act No. 255/2012 Coll. in the amount of CZK 20,000 and the other for violating the conditions set out in Act No. 500/2004 Coll. in the amount of CZK 3,000.

4.1.2 Overview of Departmental Task Performance

4.1.2.1 Air protection

In the field of air protection, the departmental tasks for 2023 were carried out as part of five groups of tasks, namely: (1) the control of the operation of sources based on the permits issued by the air protection authority and in compliance with these permits, (2) compliance with the established level of pollution (emission limits and emission caps) and technical conditions that replace or supplement these emission limits and ceilings, (3) determining the level of air pollution, (4) record-keeping and reporting obligations, and (5) other obligations of operators of stationary sources of air pollution and prohibitions of selected activities.

1. Control of the operation of stationary sources of air pollution

During inspections, it was found in 57 cases that operators of stationary sources of air pollution listed in Annex 2 of the Air Protection Act, for which an operating permit from the air protection authority is required, **operated sources without a permit**. Fines totalling CZK 2,768,000 were imposed for the proven violations.

In 65 cases, it was found that operators of stationary sources of air pollution listed in Annex 2 of the Air Protection Act, for which an operating permit from the air protection authority is required, **operated sources in violation of the permit**. Fines totalling CZK 2,992,000 were imposed for the proven violations.

In 36 cases, it was found that operators of stationary sources of pollution with an integrated permit **operated sources in violation of the air protection conditions specified in the integrated permit**. Fines totalling CZK 2,193,000 were imposed for the proven violations.

In 2023, a smog situation was declared for the agglomerations listed in the table below, but no regulation was implemented.

| Area | | Smog situation duration h | Regulation duration h |
|-----------------------------------|--|------------------------------|--------------------------|
| Agglomeration PM ₁₀ | O/K/F-M 7 th Dec. 2023 | 6 | 0 |
| Agglomeration PM ₁₀ | Třinec Area 7 th Dec. 2023 | 3.5 | 0 |
| Zone PM ₁₀ | Moravian-Silesian 7 th Dec. 2023 | 25 | 0 |
| O ₃ | Ústí nad Labem Region 12 th Sept. 2023 | 16 | 0 |

One final decision was issued to suspend the operation of a source.

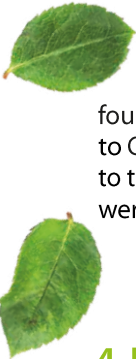
2. Inspections of compliance with the specified pollution levels and technical conditions

In 21 cases, non-compliance with the emission limit was identified. Fines were imposed for proven violations, totalling CZK 560,000. In four cases, non-compliance with the technical operating conditions was found, and fines totalling CZK 85,000 were imposed.

The control of compliance with the prescribed pollution levels (specific emission limits) and the impact of sources on air quality was also carried out through measurements conducted by the staff of the Air Protection Department of the CEI Directorate. Direct measurements determined the concentrations of nine pollutants (eight gaseous substances and one particulate matter), and laboratory analysis was performed on fifteen samples of odour-causing substances. To determine the impact of sources emitting odour-causing substances on air quality, inspectors from the Air Protection Department of the CEI Directorate collected and analysed fifteen air samples using dynamic olfactometry. These samples were from a source without specific emission limits for odour-causing substances. The results of these measurements were used to objectify the pollution level when addressing suggestions.

3. Inspections to determine the level of air pollution

In 2023, the Czech Environmental Inspectorate (CEI) inspected **the compliance with the obligation to determine and assess the level of air pollution** through direct measurements conducted by authorised persons, either through one-off measurements or continuous measurements provided by the operator. Source operators were required to submit measurement reports to the Inspectorate within the specified deadline. In 50 cases, it was



found that the obligation to perform one-off emission measurements had not been fulfilled. Penalties amounting to CZK 755,000 were imposed for this violation. In 46 cases, the operator failed to submit the measurement report to the Inspectorate, and a fine of CZK 265,000 was imposed for this violation. Three cases of late report submission were resolved with a warning.

4. Inspections of record-keeping and reporting obligations

Non-compliance with the obligation to **maintain / store operational records or to report data from the summary operational records** was identified in 146 cases involving operators of stationary air pollution sources. Fines totalling CZK 736,000 were imposed, specifically for failure to report summary operational data through the ISPOP reporting system. In 14 cases, the failure to maintain and store operational records for the pollution source in full was addressed, and the fines imposed in all cases were absorbed as part of the penalties for the most serious violation when multiple violations occurred concurrently.

5. Inspections of other obligations of stationary air Pollution source Operators

During the inspection activity, violations of other obligations and prohibitions related to air protection were identified. In five cases, it was found that prohibited materials were being burned in an open fireplace. Fines for violating this ban amounted to CZK 67,500.

During inspections, it was found that in the operation of combustion sources not listed in Appendix 2 of the Air Protection Act, i.e., with a thermal input of up to 300 kW, seven violations had occurred. These included burning waste in a source where it is not permitted or burning fuels that did not meet quality requirements or specifications set by the manufacturer of the combustion source. Additionally, in one case, the technical condition and operation of the combustion source had not been inspected by a qualified person, one violation related to the operation of a combustion source that did not meet the minimum requirements set by Appendix 11 of the Air Protection Act, and finally, the operator of the combustion source had not provided requested operational information. The total amount for these violations was CZK 45,000.

Based on the Inspection Procedure, a fine of CZK 20,000 was imposed for failing to provide the necessary cooperation for the inspection.



4.1.2.2 Protection of the Earth's climate system

Measures for **protecting the Earth's climate system** – prevention of greenhouse gas emissions, gases that absorb radiation in the infrared range – include monitoring compliance with conditions for handling fluorinated greenhouse gases and adherence to conditions set for equipment included in the greenhouse gas emissions trading system.

A total of 38 fines amounting to CZK 898,000 were imposed for non-compliance with obligations related to the handling of fluorinated greenhouse gases. Most violations involved failure to conduct leak checks on equipment containing F-gases within the required timeframe. Additional fines were imposed for violations related to the import of equipment containing F-gases from non-EU countries. A fine of CZK 10,000 was imposed on one certified person for using F-gas with a high global warming potential during the servicing of refrigeration equipment.

A fine of CZK 10,000 was imposed for violating the reporting obligation under the law on the trading of greenhouse gas emission allowances.

4.1.2.3 Protection of the ozone layer

The ozone layer protection (stratospheric ozone) from the effects of substances that damage it ("regulated substances") involves the prevention of leakage of these substances from equipment that contains them, particularly as refrigerants and fire extinguishing agents. Regulated substances are gradually being replaced by substances with a lower ozone depletion potential ("ODP"), and the number of operating devices containing them is decreasing. However, one type of regulated substance, "halons," is still used for critical applications, such as fire extinguishing. Given the general restriction on their use, relatively fewer inspections have been carried out in this area compared to equipment containing fluorinated greenhouse gases.

Three fines were imposed for non-compliance with the obligations related to handling regulated substances, with a total amount of CZK 605,000. One case involved a violation of the obligation to possess an export licence for the export of halon 1301, the second case was for failing to ensure the transfer of halon 1301 for disposal to a person authorised to carry out this activity. The third case involved failure to meet deadlines for regular leak checks on equipment containing ozone-depleting substances.

The Czech Environmental Inspectorate, as the administrator of the fee for the import and production of regulated substances, monitored compliance with the fee obligation of individuals placing regulated substances on the market. In four cases, the obligation to pay fees amounting to CZK 10,752 for imported halons for critical uses was established.



4.1.3 Overview of the fulfillment of specific tasks

Given the broad scope of 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 the year 2023.

4.1.4 Significant cases based on fine amounts imposed and decisions to halt operations

TI Prague

The CEI imposed a fine of CZK 270,000 on the company Nemocnice Rudolfa a Stefanie Benešov, a.s., a hospital of the Central Bohemian Region, for exceeding the emission limits of heavy metals.

TI České Budějovice

The CEI imposed a fine of CZK 650,000 on Gienanth Czechia s.r.o., Zdíky facility, for exceeding the annual projected consumption capacity of organic solvents from 2019 to 2021 during the operation of an air pollution source involved in the application of paints. Additionally, the operator failed to submit the protocol from a one-time emission measurement to the inspectorate within the specified deadline.

TI Plzeň

The CEI imposed a fine of CZK 600,000 on Plzeňská teplárenská a.s., Plzeň Heating Plant operation, for operating the facility in violation of the integrated permit conditions. The violations included the unauthorized use of fault codes, exceeding the allowed downtime for fault repair, and non-compliance with emission limits. The case involved complex evidence gathering and time-consuming evaluation of the supporting documents.

TI Ústí nad Labem

The CEI imposed a fine of CZK 260,000 on FIBRAN s.r.o., Havraň plant, for operating a source engaged in the production of extruded polystyrene without a permit and for failing to report the data of the overall operational record through the Integrated System for Reporting Obligations.

TI Liberec

The CEI imposed a fine of CZK 70,000 on RAVY CZ a.s., Liberec Růžodol I facility, for operating without a permit, failing to determine pollution levels, failing to submit operational records, and failing to report data from the comprehensive operational records via the Integrated System for Fulfilling Reporting Obligations for combustion sources with a total rated thermal input from more than 0.3 MW to 5 MW.

TI Hradec Králové

The CEI imposed a fine of CZK 150,000 on ARGO-HYTOS s.r.o., Vrchlabí plant, for the unauthorized operation of multiple sources, exceeding the emission limit for fugitive emissions of volatile organic compounds, and for failing to assess the level of pollution during the operation of sandblasting and degreasing technology.



The sandblasting and degreasing technology at the Vrchlabí plant.

TI Havlíčkův Brod

The CEI imposed a fine of CZK 85,000 on STERIS AST CZ s.r.o., Košíkov plant, for offences committed during the operation of technology emitting volatile organic compounds, combustion sources, and direct process heating sources. The violations included operating without a permit, failure to ensure one-time emission measurements, and deficiencies in operational and summary operational records.

TI Brno

The CEI imposed a fine of CZK 150,000 on Ernst Leopold s.r.o., Blansko plant, for operating a grey cast iron foundry in violation of integrated permit conditions. The violation involved the inadequate technical condition of the equipment for limiting emissions of solid pollutants.

TI Olomouc

The CEI imposed a fine of CZK 90,000 on RESALTA Czech Republic s.r.o., Hlubočky plant, for operating combustion sources of air pollution in violation of the operating permit, failing to submit the required document during the inspection, and not reporting the summary operational data through the Integrated Reporting Obligation Fulfilment System.

TI Ostrava

The CEI imposed a fine of CZK 240,000 on KOMTERM Technology, s.r.o., "Energetika Kopřivnice" plant, for operating the facility with the integrated permit "Energetika Kopřivnice" during a certain period without the integrated permit and in violation of the integrated permit conditions, including failing to meet emission limits and not ensuring immediate corrective action.

Air Protection Department – Directorate

The CEI imposed a fine of CZK 500,000 on ČEZ, a.s. for an offence in the area of ozone layer and climate system protection, as the company failed to ensure the transfer of a regulated substance intended for disposal to an authorised person within the prescribed timeframe.

Suspension of operations

In 2023, one decision on the suspension of operations became legally binding. Specifically, the company Slezské kamenolomy a.s., Mikulovice facility, was ordered to cease operation of the surface treatment source until the decision on the operating permit issued by the regional office became legally binding.

4.1.5 Conclusions of the inspection activities

The inspections carried out by the CEI covered the full scope of its responsibilities in the areas of air protection, the ozone layer, and the Earth's climate system, as defined both in directly applicable national binding regulations and in EU legislation.

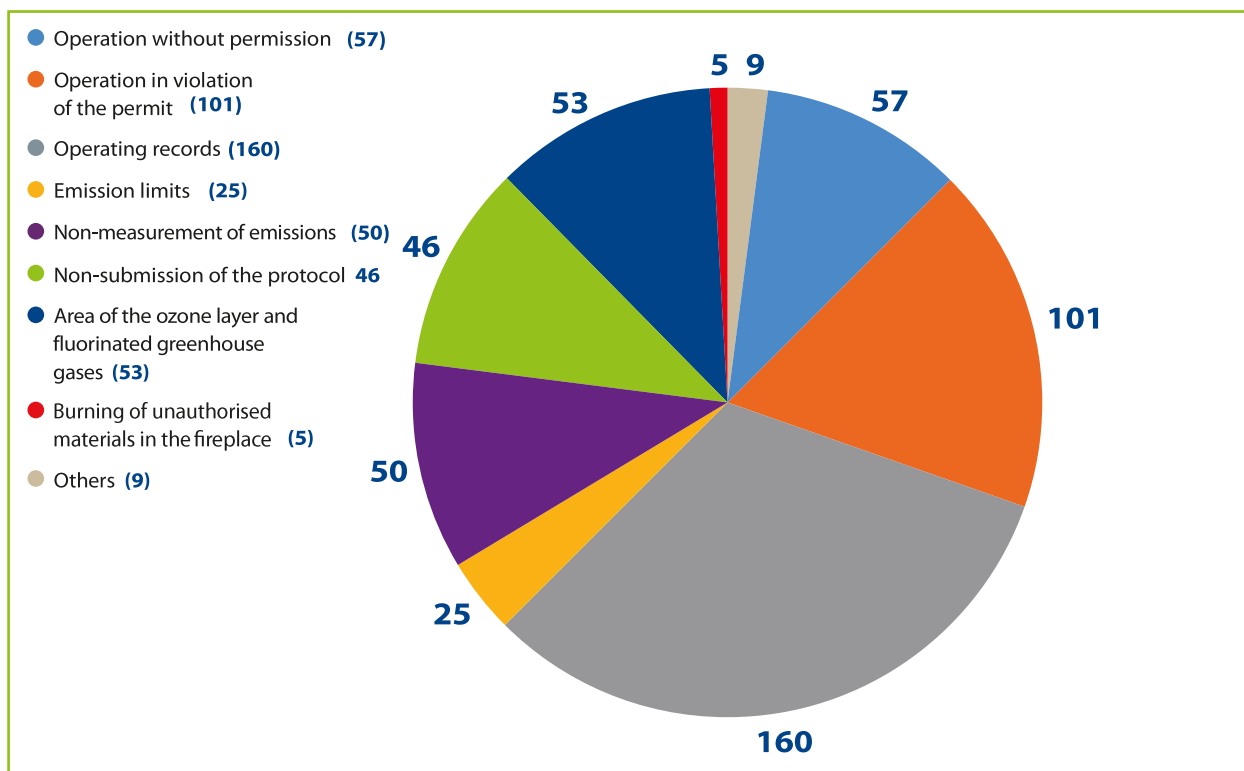
Compared to 2022, there is a noticeable slight increase in inspection activity. Specifically, in 2022, a total of 2,946 inspections were carried out, and 465 offences were resolved through legally binding fines. In 2023, there were 3,196 inspections, and 506 offences became legally binding, with a total fine amounting to CZK 12,012,500.

The number of cases of air pollution sources operating without permits remains at a similar level compared to 2022. A slight increase is noticeable in cases of operations in violation of permits, as well as in reporting and notification obligations (failure to submit summary operational records on time, failure to maintain full operational records).

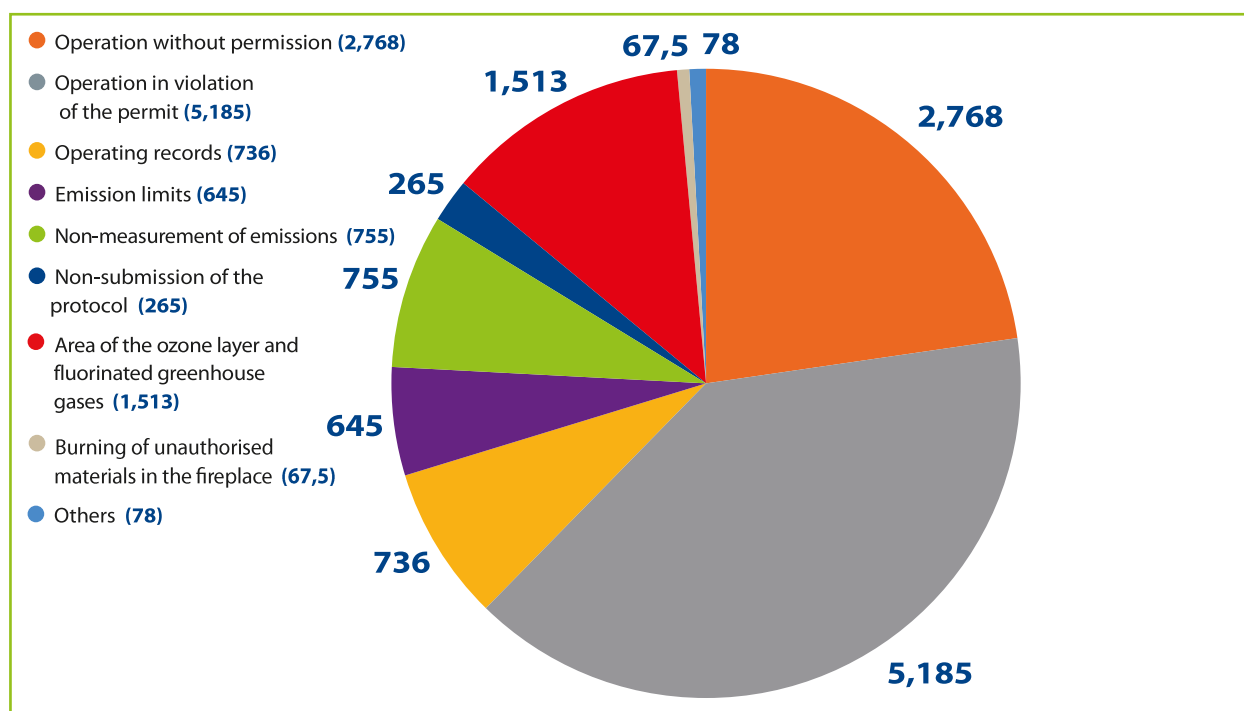
The inspection focused on the Earth's climate system protection, both in terms of preventing the release of fluorinated greenhouse gases and ensuring compliance with the conditions for operators of facilities included in the emissions trading scheme. Although the use of regulated substances that damage the ozone layer is decreasing, three violations of the conditions for handling these substances were addressed in 2023, resulting in fines totalling CZK 605,000.



The number of violations in the areas of air protection, the ozone layer, and the Earth's climate system, addressed in 2023 in penalty proceedings



Fines imposed for violations of air, ozone layer and Earth's climate system protection conditions by offenses in 2023 (in thousands of CZK)



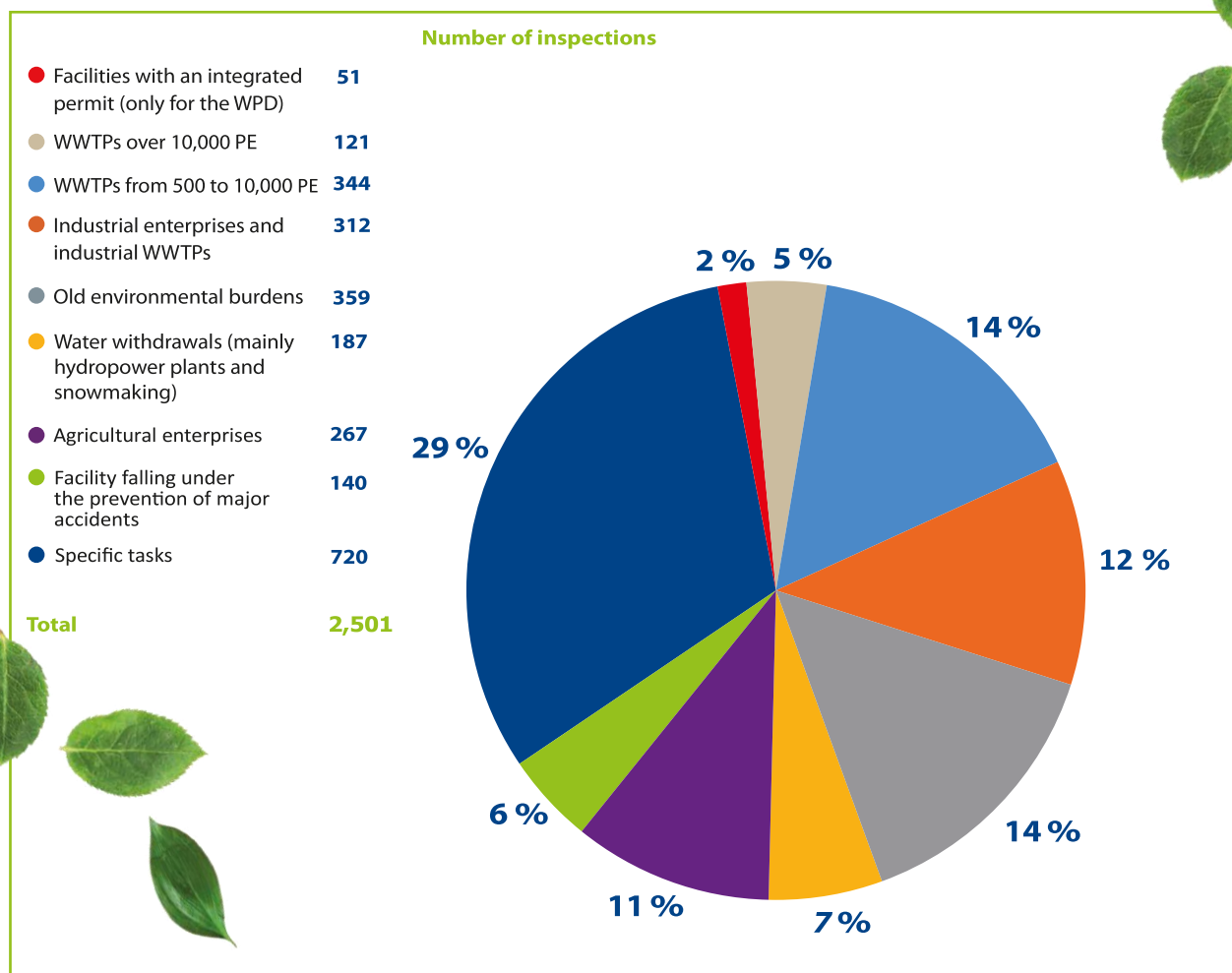
4.2 Protection of water and prevention of major industrial accidents

4.2.1 Overview of the inspection activities in 2023

In the Water Protection Department (WPD), 77 inspectors were involved in overseeing compliance with the provisions of Act No. 254/2001 Coll., on Water, and Act No. 224/2015 Coll., on the Prevention of Major Accidents, in 2023. During the inspection activities, inspectors primarily focused on the most significant issues in water protection across the Czech Republic, both as part of planned main and departmental tasks, as well as specific tasks addressing issues in individual regions. In 2023, a total of 2,501 inspections were carried out, of which 1,172 were planned. Additionally, WPD inspectors, in cooperation with other professional departments of the CEI, participated in 441 inspections under Act No. 76/2002 Coll., on Integrated Prevention.

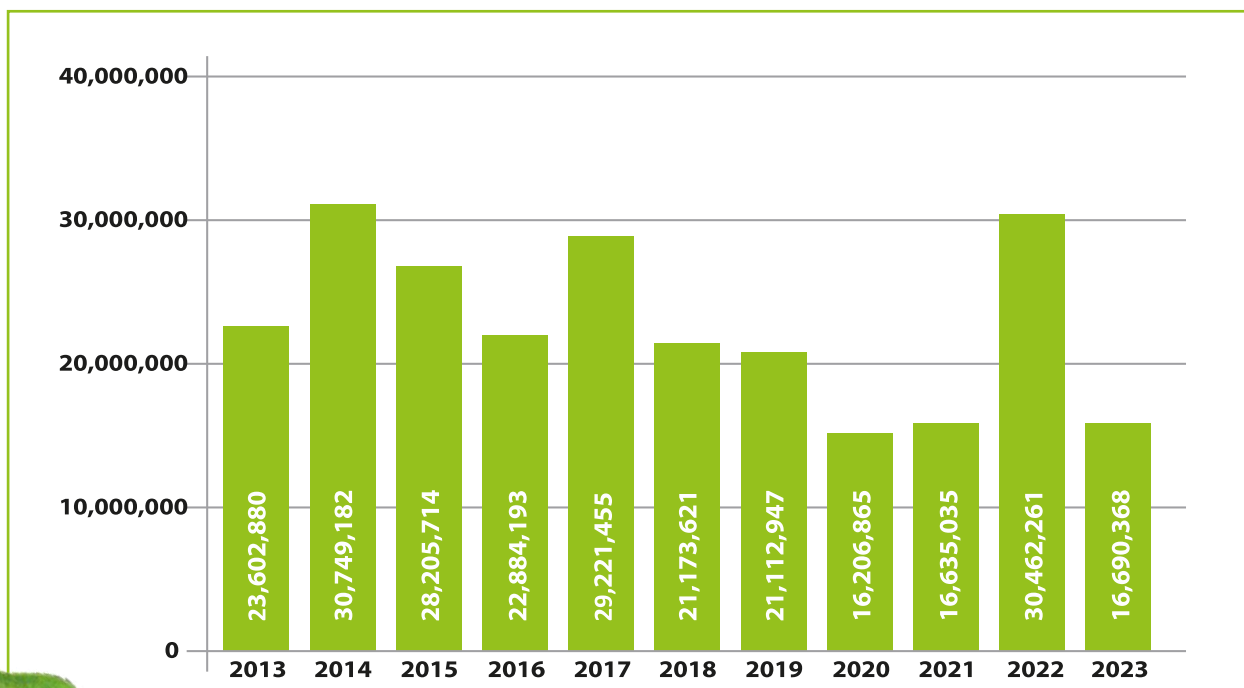
The number and distribution of inspections corresponded to the severity of operations and their impact on the environment. The most inspections were conducted at wastewater treatment plants, industrial operations, including those under the provisions of the Act on the Prevention of Major Accidents, water extraction sites, agricultural operations, and locations with the presence of historical environmental burdens.

Distribution of inspections carried out in 2023



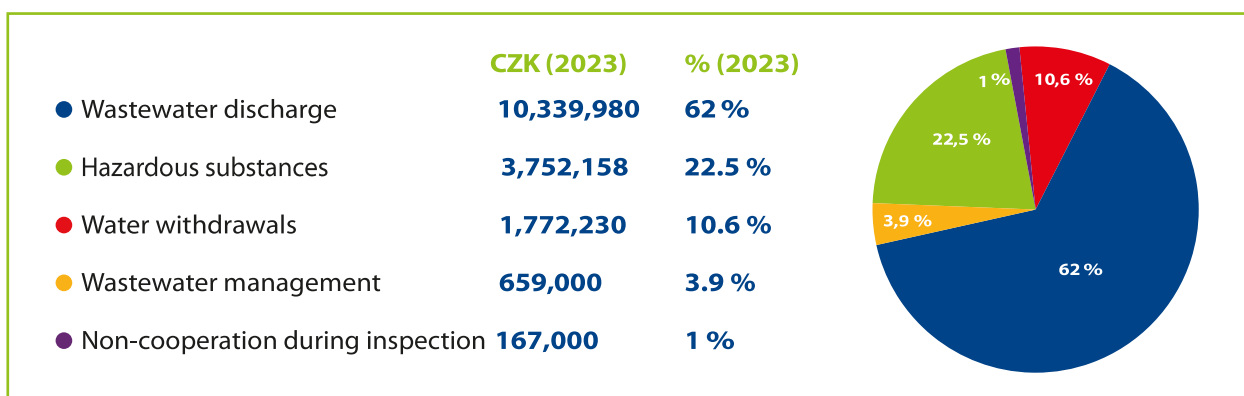
As a result of inspection, 446 proceedings for misdemeanours were initiated, and 417 final penalty decisions were issued, amounting to a total of CZK 16,690,368 in sanctions. The inspectors of the WPD also collaborated in the issuance of 10 decisions within the inspections of facilities with an integrated permit (IP), which are recorded in Chapter 4.7. Most fines imposed by the WPD were based on the results of unplanned inspections. To address the identified deficiencies and hazardous conditions, 29 decisions with a deadline for corrective measures were issued in 2023, of which 26 decisions became final in 2023.

Amount of fines in legal force (in CZK)



In terms of committed misdemeanours, the amount of fines in legal force can be divided into five main categories, as follows: water withdrawals (withdrawals of surface and/or groundwater in violation of the permit and/or without a permit), wastewater discharge (discharge of wastewater from WWTPs, septic tanks, and/or open sewer outlets in violation of the permit and/or without a permit), wastewater management (disposal of wastewater from impermeable pits without proof of disposal method, disposal of wastewater in violation of the Water Act, such as disposal on agricultural land), hazardous substances (handling of hazardous substances such as failure to conduct tightness tests of storage facilities, failure to prepare an emergency plan, failure to take appropriate measures to prevent hazardous substances from entering surface or groundwater), and non-cooperation during inspection (violation of Section 10(2) of Act No. 255/2012 Coll.).

Proportional distribution of fines in legal force into five main categories based on committed misdemeanours



An essential part of the inspectors' activities within the Water Protection Department (WPD) involves addressing suggestions, which in most cases have only a local and minor impact on the environment. However, their resolution is often time-consuming and administratively demanding. More details are provided in Chapter 3.

In 2023, inspectors from the WPD processed a total of 1,962 statements, both independently for the WPD (722) and as part of consolidated statements (1,240). These included opinions on the termination of ecological contracts, remediation projects, reports on remediation interventions, planned projects under subsidy programmes, EIA/SEA documentation, applications for the issuance or modification of integrated permits, etc.

The WPD inspectors collaborate with other state authorities and institutions (e.g., water management authorities at all levels, the State Environmental Office of the Czech Republic, the Ministry of Finance of the Czech Republic (MoF), the Ministry of the Environment (MoE), River Basin Enterprises, the Fire Rescue Service, the Police of the Czech Republic, the T. G. Masaryk Water Research Institute, regional authorities, regional mining offices, etc.).

In 2023, the Inspectorate, in cooperation with the river department of the Police of the Czech Republic, conducted checks under the initiative "MACO CLEAN WATERS – Safe by the Water," focusing on the prevention of water pollution by vessels.

As part of international cooperation, inspectors from the Water Protection Department (WPD) meet with environmental protection authorities from neighbouring states and participate in meetings of international water protection commissions. In May 2023, representatives from the WPD of the Brno Territorial Inspectorate (TI) attended a seminar in Marseille organised under the framework of the "Marseille 15th LLFA's 2023 IMPEL." The seminar focused on industrial accidents and lessons learned from their occurrences. The seminar addressed industrial accidents at waste management facilities, accidents caused by malfunctioning control systems, and incidents linked to non-standard operations such as start-ups, shutdowns, repairs, etc. Further details on other international participations are provided in Chapter 3.3.

4.2.2 Overview of Departmental Task Performance

Inspections of pollution sources in environmental sectors with valid integrated permits

Under the Act on Integrated Prevention, the most significant sources of pollution from the perspective of water protection fall within its scope. The focus of inspections was determined based on the specific conditions of the facilities and the requirements of the Territorial Inspectorates. Inspections carried out by the inspectors of the Water Protection Department (WPD) targeted compliance with the water management conditions of the integrated permit (IP), particularly adherence to permits for groundwater and surface water abstraction, wastewater discharge, handling of hazardous substances, verification of the validity of the IP, inspection of operational rules, the relevance and preparation of emergency plans in accordance with Decree No. 450/2005 Coll.

As part of this task, 492 inspection investigations were conducted. Inspectors of the Water Protection Department (WPD), in collaboration with other expert departments, carried out 441 integrated inspections, with an additional 51 inspections conducted independently. A total of 40 sanction decisions issued by the WPD became legally binding, resulting in a total amount of fines imposed of CZK 1,860,000. The most commonly identified offence was exceeding emission limits in wastewater discharged into public sewer systems. Detailed information regarding inspections carried out under the Act on Integrated Prevention is provided in Section 4.7. In 2023, the WPD issued two warnings and one remedial measure.

Inspection of the largest municipal wastewater treatment plants with a capacity of over 10,000 PE

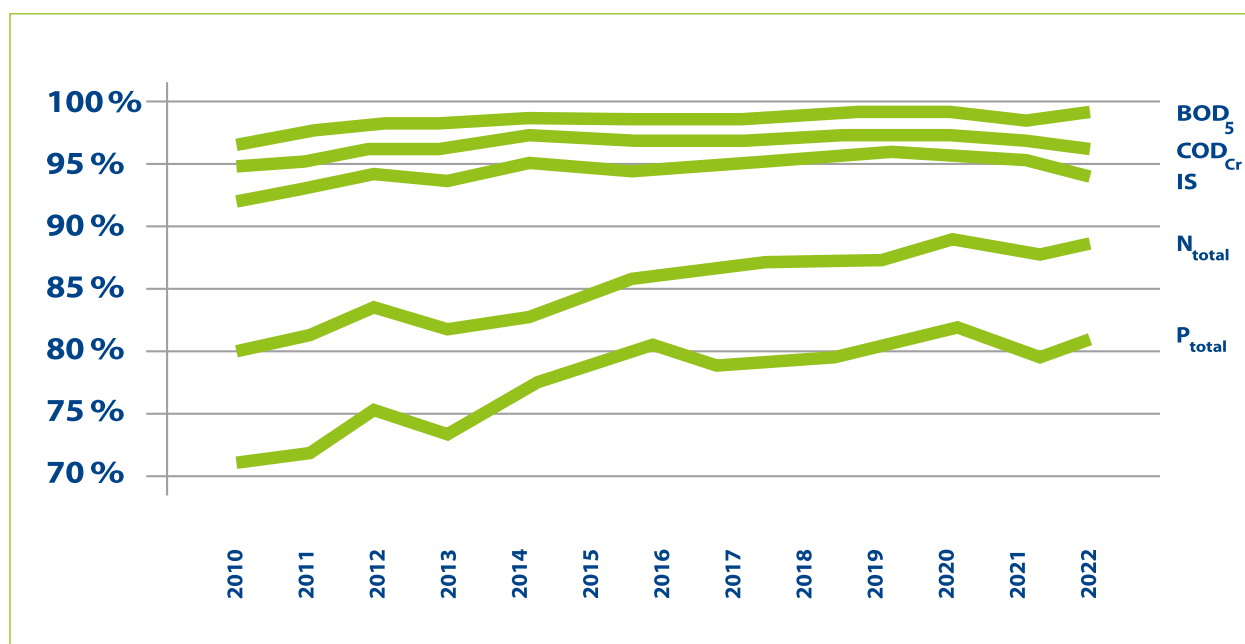
The aim of inspections focused on the largest municipal wastewater treatment plants (WWTPs) is to physically verify the water law status of the WWTPs, compliance with Council Directive 91/271/EEC on urban wastewater treatment, and Government Regulation No. 401/2015 Coll., with an emphasis on determining the actual operating conditions of these WWTPs in terms of produced and discharged pollution from individual sources, as well as any other factors that may influence the operation of the WWTP and, consequently, the amount of pollution discharged.

In 2023, 121 inspections were carried out at municipal wastewater treatment plants (WWTPs) with over 10,000 population equivalents (PE), five of which were unplanned. Based on the inspections, four final penalties were

imposed, totalling CZK 165,000. The violations concerned exceeding the permitted emission limits for pollution indicators set in the respective water permits, discharging wastewater without the appropriate permit from the water authority, or the absence of an emergency plan. Considering the ratio of penalties to inspections, it can be stated that significant and frequent violations of the water law are not common at sources of this category. In the monitored year 2023, no warnings or corrective measures were issued.

At WWTPs with a capacity over 10,000 population equivalents (PE), inspections are carried out at regular intervals. The results clearly indicate that due to the reconstruction of both the structural and technological units of the WWTPs, there has been a gradual improvement in the quality of the treated wastewater discharged from the WWTP, leading to a significant reduction in the pollution discharged into surface waters. This is also reflected in the observable trend of increasing treatment efficiency, particularly in the widely discussed indicator of total phosphorus (see the schematic graph of the average efficiency of pollutant removal). The need for higher efficiency in the removal of dissolved phosphorus and nitrogen remains an important topic in the field of wastewater treatment.

Efficiency balance 2010 to 2022



The efficiency of municipal wastewater treatment at these WWTPs was 98.5% for the BOD₅ indicator, 95.4% for the COD_{Cr} indicator, 97.8% for the IS indicator, 81.9% for the total nitrogen (N_{total}) indicator, and 87.4% for the total phosphorus (P_{total}) indicator.

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

The physical inspection of the water law status of wastewater treatment plants in the category of 500 to 10,000 PE was primarily focused on compliance with the conditions of the water authority's permit for the construction of these water facilities, adherence to the conditions of the permit for discharging wastewater from them in relation to their operation method, and monitoring their operation and all other factors that may affect the function of the wastewater treatment plant and, consequently, the amount of discharged pollution.

In 2023, a total of 344 inspections were carried out as part of this task, of which 117 were unplanned. Inspections were primarily focused on previously unchecked wastewater treatment plants, plants that had not been inspected for an extended period, inspections based on received suggestions, and plants where legal violations had been identified in the past. Based on the inspections, a total of 73 final penalty decisions were issued, amounting to a total of CZK 3,400,000, including one decision for non-cooperation during an inspection with a penalty of CZK 7,000. In 2023, the WPD issued two warnings and no corrective measures.

As part of the ongoing trend, the most common violations include exceeding the specified emission limits, exceeding the discharged volume of wastewater, failing to comply with the monitoring requirements for discharged wastewater, both in terms of sampling frequency and the determination of individual pollution

indicators, or sampling by an unauthorized person. Another common violation is the discharge of wastewater without the appropriate permit from the water management authority.

The overall overview shows that more significant operational shortcomings persist regularly in those wastewater treatment plants (WWTPs) operated by municipalities, towns, or voluntary associations of municipalities. Water supply companies, based on long-term experience, expertise of employees, as well as the scale and availability of technical resources, more often operate treatment plants without significant deficiencies and without technological fluctuations that affect the quality of discharged wastewater.

Insufficient removal of biogenic elements (P_{total} , N_{total} , and $N\text{-NH}_4^+$) remains a constant and persistent issue in wastewater treatment. For smaller WWTPs included in the task "WWTPs from 500 to 10,000 PE," the Government Regulation No. 401/2015 Coll. does not set maximum or permissible concentrations of phosphorus. Many smaller WWTPs do not have phosphorus removal technologies, and the amount of phosphorus discharged is not monitored. This unsatisfactory situation could be addressed by revising 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.

Due to the increasing interest in the environment, the number of suggestions received from citizens concerning surface and groundwater conditions has been rising in recent years. In response, the CEI conducts unplanned inspections.



A view of the poorly maintained interior of the technology

Inspection of industrial entities handling hazardous substances

The inspections were primarily focused on significant industrial sites where hazardous substances are stored or handled on a larger scale. The task also involved inspections of industrial wastewater treatment plants (neutralisation or de-emulsification stations). These inspections mainly focused on compliance with the conditions for discharging wastewater into surface waters or sewer systems. An integral part of the inspections were checks of industrial entities operating ammonia-based systems (such as winter stadiums or refrigeration facilities).



The unsecured IBC containers near rainwater drains

As part of this task, 312 inspections were carried out. During these inspections, 16 entities with ammonia-based operations and 27 entities with neutralisation stations were checked. The most common deficiencies included the absence of an emergency plan for accidents, exceeding emission limits in discharged wastewater, unauthorised discharge of wastewater without permission, and failure to comply with obligations when handling hazardous substances (such as water protection measures for tanks against leaks, leak tests for tanks, etc.). In 2023, 58 decisions were issued, totalling CZK 2,480,000. In 2023, four corrective measures and two decisions regarding non-cooperation during inspections were imposed, amounting to CZK 100,000 in total.

Inspection of the implementation of remediation of old environmental burdens and long-term accidents on groundwater

The CEI is responsible, in cooperation with the Ministries of Environment and Finance, for overseeing the process of eliminating hazardous conditions at old environmental burden sites (OEB). The state committed to financing the OEB during the privatisation of state-owned enterprises and, for this purpose, concluded an environmental agreement with them. In addition to these sites, the CEI also focuses on sites of so-called long-term accidents, the remediation of which is successfully addressed through the grant schemes of the State Environmental Fund (SEF) and EU Operational Programmes for the Environment. Furthermore, the CEI participates in the supervision of sites, where hazardous conditions resulted from the Soviet Army activities in the last century.

The goal of this task is to maintain an up-to-date overview of the remediation work at old environmental burden sites where the CEI has issued decisions for corrective measures. Subsequent supervision is carried out through regular quarterly inspection days combined with a physical inspection of the site. Although 207 out of 327 concluded environmental agreements were terminated, by the end of 2023, 120 environmental contractual obligations were still recorded, under which remediation work is ongoing at various stages of development. Sites where the financial guarantee for remediation has been depleted and remediation has been interrupted are particularly problematic. The continuation of remediation can only be ensured if additional financial resources are secured. The interruption or cessation of remediation poses a risk of re-contamination of already remediated areas. The completion of remediation at some sites is being delayed due to newly discovered facts or other reasons. The timely implementation of corrective measures is difficult to achieve, and deadlines are being pushed back to as late as 2035. The Ministry of Finance of the Czech Republic, in cooperation with the Ministry of the Environment (MoE), sets priorities for environmental public procurement each year, along with a medium-term outlook for 2025+ and a project pipeline for 5 to 10 years.

In 2023, within the framework of this task, 359 inspections were carried out, and 7 decisions were issued for remediation or extension of the deadline for corrective measures. Based on the protocol for the completion of remediation work, the Ministry of Finance of the Czech Republic terminated two environmental agreements: Synthomer, a. s., and Iveco Czech Republic, a. s.

The remediation work at the following sites was formally concluded by the CEI: OZ Chemie Horní Počernice, KOVOŠROT GROUP CZ, s. r. o. – Chomutov and Děčín facilities, HARTMANN – RICO, a.s., Most site, Innomatics, s. r. o. and UNIPETROL RPA, s. r.o. - ČS PHM Ostrava – Muglinovská.

The priority sites included, among others, the styrene drum landfill in Nelahozeves owned by ORLEN Unipetrol, a. s. (remediation paused, with interim monitoring in progress), SPOLANA, a. s. (preparation of remediation intervention in the Petrochemicals area, Old Plant, newly identified hotspot at the PVC plant, maintenance project underway in the former buildings contaminated with dioxins), ORLEN Unipetrol, a. s., Litvínov site, DIAMO Lagoons (waste landfill from a former refinery, repeated requests from the CEI for the sealing of known leaks in the underground sealing wall and privileged paths and leaks at the base of the collector), and SAP Mimoň, spol. s r. o. (guaranteed amount depleted, increase in guarantee not approved, legal dispute continues between the purchaser and the Ministry of Finance of the Czech Republic).



Sampling work

Inspection of water abstractions (especially surface waters)

This task focused on the issue of water abstractions, specifically on compliance with the conditions set out in water permits (adhering to minimum residual flow requirements) and the approved amount of water withdrawn, whether surface or groundwater. In the summer months, inspections primarily targeted water abstraction for the operation of small hydroelectric power plants. In the winter, inspections targeted water abstraction at ski resorts for artificial snowmaking on slopes.

A total of 187 inspections were conducted as part of this task, including 97 unplanned inspections. Thirty-three penalty decisions were issued, amounting to a total of CZK 1,126,540, with one decision imposing a CZK 20,000 fine for non-cooperation during an inspection. Two corrective measures were imposed. The most frequent violations included exceeding permitted water abstraction limits or abstracting water without a valid permit for drinking or utility purposes. At small hydropower plants, violations of operational conditions resulted in failure to meet minimum residual flow requirements in streams.



Non-compliance with the minimum residual flow in watercourses

Inspection of agricultural enterprises for Compliance with the Water Act Requirements

The task was focused on compliance with the requirements of the Water Act, primarily on ensuring the safe handling of specific hazardous substances produced or handled in the agricultural sector. This task involved inspections of agricultural operations for compliance with the Water Act. Inspections at selected facilities primarily focused on water management measures for the storage of mineral and organic fertilisers, digestate, fugate, fermentation sludges, bulk feed, storage of petroleum substances, including operations of fuel depots, storage of plant protection products, field dumps, livestock housing,

manure endpoints, etc. was also checked. Attention was also given to water management, verifying the existence, validity, and completeness of water law and operational documentation. In 2023, the task was expanded to include inspections of entities involved in fish farming. The focus of these inspections was on compliance with operating procedures, water management, and the discharge of hazardous substances into surface waters.

In 2023, a total of 267 inspections were carried out. 71 final decisions were issued, amounting to a total of CZK 2,599,948. Additionally, four corrective measures and one warning were issued.

The main identified deficiencies were illegal handling of hazardous substances (storage, manipulation), operation of waterworks in violation of the Water Act, outdated documentation (emergency plans, tank tightness tests), or unauthorized abstraction of groundwater.

At agricultural enterprises, conditionality checks are also conducted by the Central Institute for Supervising and Testing in Agriculture, which are also related to the handling of hazardous substances according to the Water Act. The CEI aims to coordinate the selection of enterprises to prevent the inspection of the same entity by different authorities on the same date.

The WPD inspectors also focused on raising awareness during inspections. The inspected entities were informed about the key obligations under the Water Act and its implementing regulations. As a result, agricultural entrepreneurs are becoming increasingly knowledgeable about water protection laws.



Unsecured manure storage

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

The CEI carried out inspections in cooperation with integrated inspection authorities (State Labour Inspectorate and regional labour inspectorates, Czech Mining Authority and district mining authorities, regional public health authority, and fire rescue services of the regions) and regional authorities.

Inspections were carried out 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.

The inspection plan for 2023 was approved by the MoE of the Czech Republic. According to this plan, 133 inspections were scheduled to be conducted at the listed entities. The aim was to verify operators falling into groups A and B. A total of 140 inspections were carried out, including unplanned ones.

The inspections in 2023 were primarily focused on:

- Inspection of emergency plans and related operating regulations and procedures in the context of the current situation (whether they are up to date, whether employees are able to follow them in the event of an emergency, when they were last tested, etc.);
- Inspection of the setup of the non-standard operation management system (necessary to address individual steps, shutdown, restriction, outage, and startup of operations, as these are high-risk processes in terms of safety);
- Inspection of planning and implementation of maintenance and safety investments, as adverse economic conditions may lead to their postponement;
- Changes in the quantity and logistics of dangerous substances;
- Ensuring that the safety documentation includes instructions for procedures and safeguards applicable during an emergency situation, particularly for non-standard operational scenarios;
- Ensuring that the operator also pays attention to the recording of accidents, injuries, drills, and emergency preparedness, particularly the implementation of measures to prevent major accidents;
- On-site inspection of the facility.

In 2023, five major accidents occurred, involving explosions, fires, hazardous substance leaks, and personal injuries. One reported incident was classified by the operator as a technical equipment failure, and the report on the occurrence and impact of the major accident was submitted to the regional office, which will determine whether it qualifies as a major accident according to Act No. 224/2015 Coll. In some cases, CEI inspection revealed violations of the obligations under the Major Accident Prevention Act, and a suggestion was forwarded to the relevant regional office. In other cases, administrative proceedings will be conducted by the CEI. Less serious deficiencies were addressed during inspections. During the inspections, it was confirmed that the inspection activities within this task have a positive impact on preventing accidents and emergency situations.

In 2023, coordination meetings were also held to prepare the inspection plan for the following calendar year at the territorial inspectorates of the CEI. During the inspection activities and the overall implementation of this agenda according to the Major Accident Prevention Act, the CEI maintained effective cooperation with all involved state authorities, arising from the activity of the departments and their coordination.

4.2.3 Overview of specific tasks performance – summary

A significant part of the inspection activities, both planned and unplanned, is attributed to checks within specific tasks, which the territorial inspectorates plan themselves based on many years of experience with recurring deficiencies of the inspected entities under the relevant provisions of the Water Act. In 2023, within this task, 720 inspections were carried out, of which 155 were planned based on findings of repeated violations from previous years.

As in previous years, the inspectors of the Water Protection Department (WPD) focused on recreational facilities and catering establishments (TI České Budějovice and TI Liberec), public fuel stations (TI Plzeň), discharge of wastewater from stormwater drains (TI Plzeň, TI Liberec, TI Ostrava), car repair shops (TI Plzeň), municipal wastewater treatment plants with up to 500 PE (TI Ústí nad Labem, TI Plzeň, TI Havlíčkův Brod, TI Brno, TI Ostrava),

mining areas (TI Plzeň, TI Ústí nad Labem, TI Olomouc), biogas plants (TI Havlíčkův Brod), and small hydropower plants (TI Liberec).

The most common violations identified were related to wastewater discharge during the operation of wastewater treatment plants (WWTP) in smaller municipalities and in the area of recreational facilities inspections. These violations included discharging wastewater without permit, failing to comply with the balancing and concentration limits set in the permit, not measuring the level of pollution in discharged wastewater, failing to adhere to sampling intervals, illegal abstraction of groundwater, failure to provide documentation on the disposal of wastewater from cesspools, discharging sewage into groundwater or surface waters, and not conducting tests for the tightness of cesspools and tanks for storing hazardous substances.

An example of a violation can be seen with the operator of the mountain hotel KODREA in Nové Hutě, in the TI České Budějovice region. The inspection was carried out based on a submission. The operator managed water without a water permit from May 1, 2022 to March 9, 2023. As a result of these offences, untreated wastewater was repeatedly discharged into an open drainage ditch, flowing into Vydří Stream, which is located in a specially protected area of the Šumava Protected Landscape Area, on the borders of Šumava National Park and the Písecká slat' Nature Reserve. The Nové Hutě area falls within the Protected Area of Natural Water Accumulation. This led to repeated environmental risks. For this violation, under Section 125a(1)(b) of the Water Act, a fine of CZK 560,000 was imposed, which became final on November 24, 2023.

In 2023, 138 decisions became final. The total amount of fines reached CZK 5,058,880, including two decisions for non-cooperation during inspections, each imposing a fine of CZK 30,000. Additionally, three warnings were issued, and eight decisions required corrective actions. The results of the inspection activities show that these inspections are still necessary in the regions, as operators of smaller facilities continue to insufficiently familiarise themselves with the relevant provisions of the Water Act in the course of their business activities.

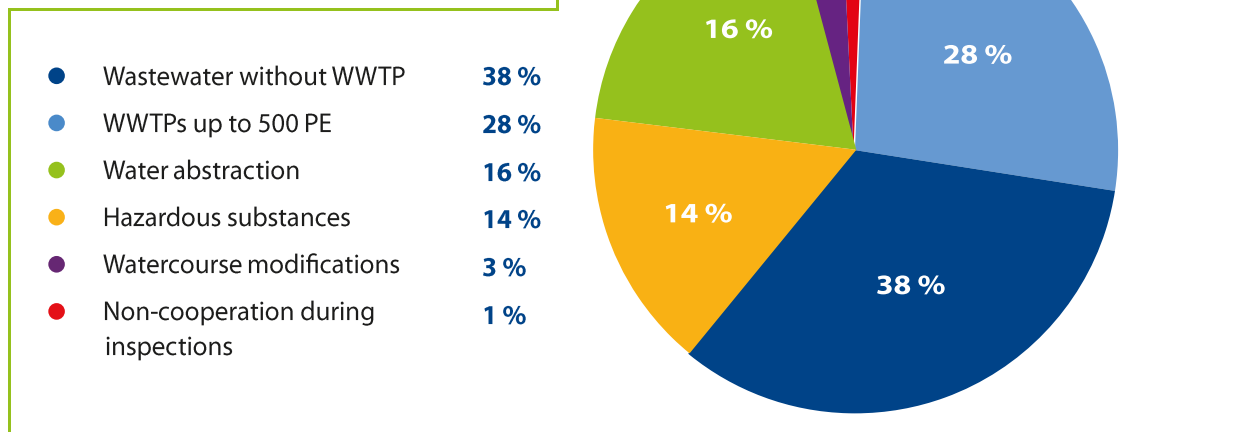


Leak of palm oil and sampling

From the perspective of offences committed within specific tasks, the amount of fines in legal force can be proportionally divided into six main categories, which include: **WWTPs up to 500 PE** (discharge of wastewater from WWTPs in violation of the permit and/or without a permit), **wastewater without WWTP** (discharge of wastewater from septic tanks and/or open sewer outlets in violation of the permit and/or without a permit, or disposal of wastewater from sealed pits without proof of disposal method), **hazardous substances** (handling

of hazardous substances, such as failure to perform leak-tightness tests for storage facilities, failure to prepare an emergency plan, failure to implement measures to prevent contamination of surface or groundwater), **water abstraction** (abstraction of groundwater or surface water without a permit or in violation of the permit), **watercourse modifications** (modification of watercourses without a permit), and **non-cooperation during inspections** (violation of Section 10(2) of Act No. 255/2012 Coll.).

Proportional distribution of fines in legal force into five main categories according to committed offences



4.2.4 Significant cases

Highest final fines in the Water Protection Department by individual TIs

| Name of territorial inspectorate | Subject | Imposed amount in legal force | Effective date |
|----------------------------------|--|-------------------------------|----------------------------|
| TI Liberec | Městská sportovní Turnov, s.r.o. | CZK 721,150.00 | 16 th June 2023 |
| TI Prague | 1. vodohospodářská společnost, s.r.o. | CZK 600,000.00 | 19 th Jan. 2023 |
| TI České Budějovice | KODREA s.r.o. | CZK 560,000.00 | 24 th Nov. 2023 |
| TI Brno | Metaldyne Oslavany, spol. s r.o. | CZK 490,000.00 | 21 th Apr. 2023 |
| TI Plzeň | KLAUS Timber a.s. | CZK 200,000.00 | 1 st July 2023 |
| TI Ostrava | HAVÍŘOVSKÁ STAVEBNÍ s.r.o. | CZK 160,000.00 | 18 th Sep. 2023 |
| TI Hradec Králové | Vamberecká voda s.r.o. | CZK 150,000.00 | 27 th Dec. 2023 |
| TI Ústí nad Labem | Sedlecký kaolin a.s. | CZK 100,000.00 | 4 th oct. 2023 |
| TI Olomouc | provozovatel autoservisu a pneuservisu | CZK 80,000.00 | 4 th Jan. 2023 |
| TI Havlíčkův Brod | Agentura7.cz s.r.o. | CZK 80,000.00 | 26 th Jan. 2023 |

The highest sanctions imposed for individual TIs (listed in descending order of fine amount):

TI Liberec: Městská sportovní Turnov, s.r.o.

During the inspection of the sports and recreational area operated by the company Městská sportovní Turnov, s. r. o., the Inspectorate found that the company was abstracting groundwater without a permit (a total of 14,423 m³ of groundwater was extracted), handling hazardous substances without an approved emergency plan, and operating an oil separator in violation of the terms of the valid permit, i.e. failure to monitor the quality of discharged water (failure to ensure sampling and subsequent analysis). The company was fined CZK 721,150 for the above-mentioned violations. The company appealed the Inspectorate's decision, but the Department of State Administration (DSA) of the Ministry of the Environment confirmed the fine in full and it became final on June 16, 2023. In this case, the Inspectorate assessed not only the seriousness of the violations committed, but also the fact that the company had taken the necessary measures to remedy the identified illegal situation,

i.e. submitted an approved emergency plan, a groundwater abstraction permit and contractual arrangements for monitoring wastewater discharged from the oil separator.

TI Prague: 1. Vodohospodářská společnost, s.r.o.

For discharging wastewater from the Chýně WWTP in violation of the valid decision, 1. Vodohospodářská společnost, s.r.o. was fined CZK 600,000. The inspection proved that the company exceeded the set limits 13 times in 2021, even many times over. This involved exceeding the "m" limits for the indicators COD_{Cr} , BOD_5 , IS, $N-NH_4^+$ and P_{total} . The accused company was aggravated by the fact that the outflow from the Chýně WWTP flows into the Strahovský pond, through which the Litovický stream flows, which is classified by Government Regulation No. 71/2003 Coll. among carp waters, and the fact that the Litovický stream flows through the Hostivické ponds natural monument. The company appealed against the decision of the CEI, however, the DSA of the Ministry of the Environment confirmed the Inspectorate's decision and this decision entered into force on January 19, 2023.

TI České Budějovice: KODREA s.r.o.

The Inspectorate imposed a fine of CZK 560,000 on KODREA s.r.o. for discharging wastewater without a permit from the recreational facility "Mountain Hotel Kodrea" in Nové Hutě. The company discharged approximately 201 m³ of wastewater without a permit from the water authority into a drainage ditch with a drain into the Vydří stream without prior pre-treatment. The wastewater contains concentrations of unspecified organic substances, as well as biogenic elements, bacteria and, for example, pharmaceuticals. These substances have a negative impact on fauna and flora. The Inspectorate considered the fact that the violation occurred in the specially protected area of the Šumava Protected Landscape Area, on the borders of the Šumava NP and the Písecká slat' PP. According to the provisions of Government Regulation No. 71/2003 Coll., the Vydří stream is classified as salmonid waters, and this classification is carried out according to the regulation in question in order to increase the protection of these waters. Furthermore, it was taken into account, among other things, that the company committed the offense repeatedly. The company appealed against the Inspectorate's decision and the DSA of the Ministry of the Environment confirmed the Inspectorate's decision and the fine entered into force on November 24, 2023.

TI Brno: Metaldyne Oslavany, spol. s r.o.

The company operating the surface treatment facility in Oslavany violated the conditions of the integrated permit pursuant to Act No. 76/2002 Coll. by exceeding the established emission limits and at the same time failing to collect and analyze a sample of wastewater discharged from the neutralization station into the Oslava stream. The "m" value was exceeded in the pollution indicators DS, IS, COD_{Cr} , Mo, Zn, Mn, and even several times. Furthermore, the "p" value was exceeded in the pollution indicator Mo. The Inspectorate considered that the Oslava stream is classified as a significant watercourse according to Decree No. 178/2012 Coll. and that the discharged wastewater contained heavy metals, which are mostly highly toxic to the aquatic environment and which accumulate in river sediments and organisms. The company has already been sanctioned for a similar offense in the past. Fine pursuant to Act No. 76/2002 Coll. in the amount of CZK 490,000 entered into legal force on April 21, 2023.

TI Plzeň: KLAUS Timber a.s.

The company operates a sawmill in Dražkov, where the Inspectorate found a violation of legal obligations in the section of the Water Act. Specifically, the company committed an offense by handling groundwater without the appropriate permit from the water authority, when it withdrew a total of 432.4 m³ of this groundwater. Furthermore, it failed to comply with the conditions and obligations set out in the decision, i.e. to monitor the quality of pre-treated sewage wastewater, did not have an approved emergency plan and handled a mixture of harmful substances on the sawmill premises on a handling area that was not water-safe. At the same time, it did not have the appropriate permit to discharge pre-treated sewage wastewater from the WWTP and, as the owner of the water facility, did not comply with the conditions and obligations under which the water facility (well) was permitted. The Inspectorate imposed a fine of CZK 200,000 on KLAUS Timber a.s., which became legally binding on July 1, 2023.

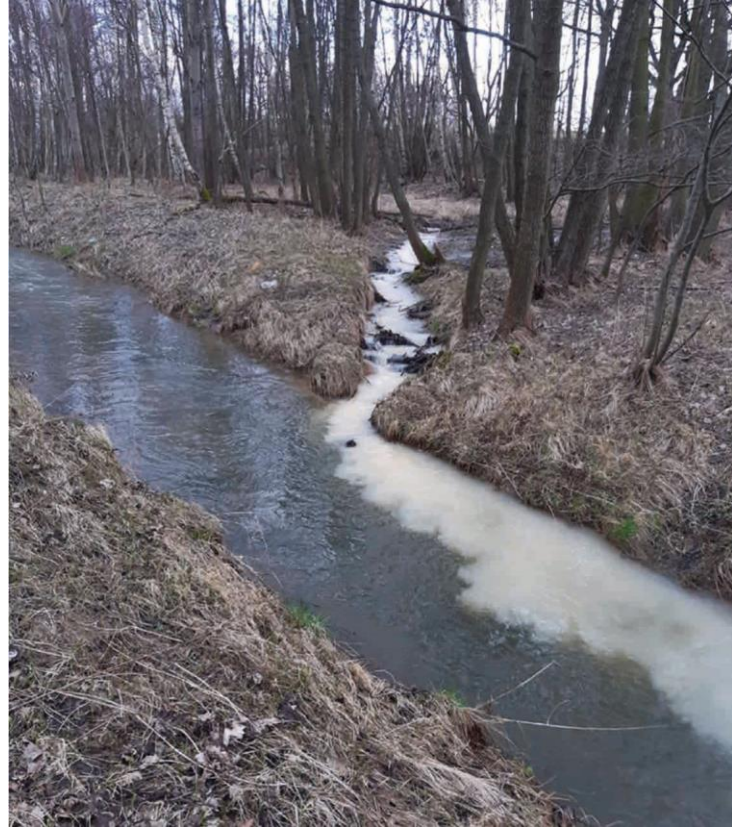
TI Ostrava: HAVÍŘOVSKÁ STAVEBNÍ s.r.o.

The Inspectorate found that the company filled in a small watercourse of the left tributary of the Osinský stream in a length of 50 m and modified the left bank of the watercourse with fills (e.g. soil, construction and demolition fills), thereby changing the cross-sectional profile of the watercourse bed and placing objects in the watercourse that threatened the smooth flow of water. The Inspectorate assessed the fact that the company did not contact

the relevant watercourse administrator and the water authority and intervened in the watercourse without proper discussion and without appropriate technical documentation. Due to the absence of the above, there may always be a threat to or damage to a legally protected interest, i.e. the protection of watercourses and beds. The fine imposed by the Inspectorate in the amount of CZK 160,000 was confirmed by the DSA of the Ministry of the Environment and entered into legal force on September 18, 2023.

TI Hradec Králové: Vamberecká voda s.r.o.

For exceeding the emission limits set in the water permit for discharged wastewater, the company Vamberecká voda s.r.o. was fined CZK 150,000 by the Inspectorate, which came into legal force on December 27, 2023. For the wastewater discharged from the Vamberk WWTP into the Zdobnice stream, the value "m" for the pollution indicator P_{total} was exceeded several times and the annual balance for this indicator was also exceeded. According to Government Regulation No. 71/2003 Coll., the Zdobnice stream is classified as a surface water suitable for the life and reproduction of native species of fish and other aquatic animals. The company has been repeatedly sanctioned for exceeding the emission limits at this WWTP.



Discharge of mine water associated with kaolin mining

TI Ústí nad Labem: Sedlecký kaolin a.s.

The company Sedlecký kaolin a.s. committed an offense by discharging mine water into surface waters at three locations in violation of the valid permit. Specifically, this includes the Osmoza-Jih location, where the condition set out in the pH indicator was not met and the emission limit for the "m" value for the Fe pollution indicator was exceeded. Furthermore, it includes the Jimlíkov IV-VI location, where the emission limits for the DS, IS and pH pollution indicators were exceeded. At the Jimlíkov-Sever location, the emission limit for the IS pollution indicator was exceeded. This is a relatively long-term and extensive problem associated with kaolin mining in the Karlovy Vary region. The discharge of mine water during periods of intense rainfall appears to be very problematic, when, due to the small capacity of some retentions, water with extremely high values of suspended solids ("white water") leaks out and the quality of local watercourses (Jimlíkovský or Vlčí stream) deteriorates dramatically. For the above, the company was fined CZK 100,000, which was paid on October 4, 2023.

TI Olomouc: A self-employed individual running a car repair and tire service business

The CEI found a self-employed individual doing business guilty because they failed to take appropriate measures when handling hazardous substances, when by placing an unsecured wreck of a commercial vehicle from which operating fluids (oil substances) were dripping, they polluted the well's groundwater, and by storing other oil substances without proper water management security, they failed to prevent their potential leakage into the soil. Furthermore, they handled hazardous substances in this establishment without an approved emergency plan. For the above and other violations of the Waste Act, this person was fined CZK 80,000, which came into legal force on January 4, 2023.



Wastewater discharged from a recreation center into a watercourse – the Oslava River

TI Havlíčkův Brod: Agentura7.cz s.r.o.

The company operating the children's summer camp area in the JISKRA recreation center discharged wastewater

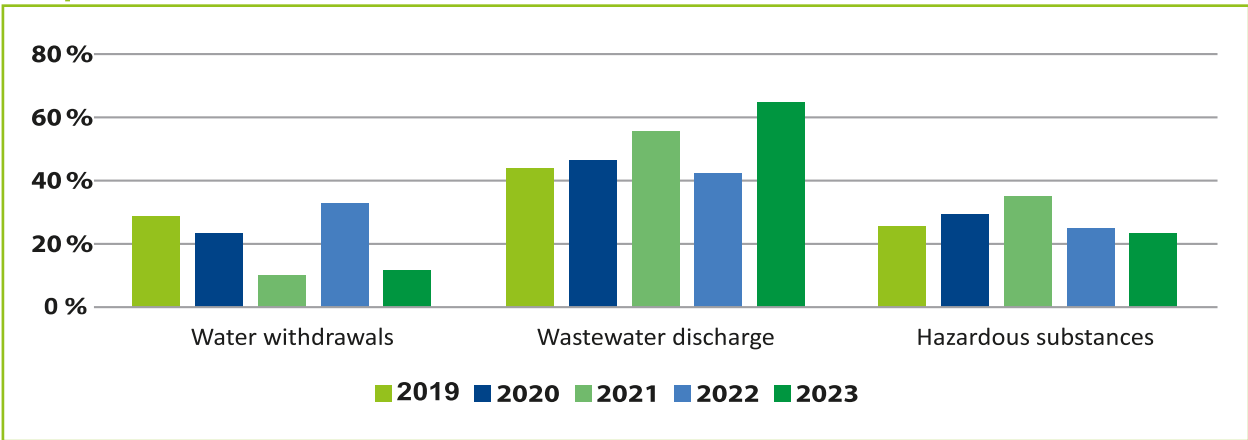
(sewage) from the site under its own non-functional wastewater treatment plant into surface waters, an oxbow of the Oslava River, and subsequently into the Oslava River, without the appropriate permit for discharging wastewater into surface waters. According to Government Regulation No. 71/2003 Coll., the Oslava River is classified as a watercourse requiring increased protection of water quality to support the life of fish and other aquatic animals. For the above, the company was fined CZK 80,000, which entered into legal force on January 26, 2023.

4.2.5 Conclusions of the inspection activity

The focus and volume of inspections in 2023 remained consisted with previous years. When planning inspection activities, emphasis was placed on inspections of major polluters discharging wastewater and on significant industrial and agricultural enterprises. The inspection findings showed that these significant sources do not have major problems with compliance with legislation on a permanent basis. This is due to the more responsible approach of these entities to environmental protection and the systematic activity of the Inspectorate focused on this area. Most problematic cases arise from unplanned inspections carried out on the basis of submissions and accidents. In these cases, the investigation, identification of evidence and other documents are much more time-consuming and administratively demanding. In the case of resolving submissions, these are cases with a less significant impact on the environment.

The overall results of the WPD's inspection activities during 2023 showed that the most violations were resolved for the illegal discharge of wastewater into surface waters from the operations of smaller WWTPs, often operated by municipalities, and for groundwater withdrawals. The results of the inspections show that it will be necessary to supervise the proper management of wastewater even in relatively small WWTPs (over 500 PE), to which the contents of sealed sumps from their "catchment" area are often imported, or which have more or less historically also partially processed wastewater from local establishments (recreational facilities, hotels, small-scale industrial and agricultural production, services, etc.). Long-term problems can still include insufficient sewerage in municipalities or the method of wastewater disposal, especially at recreational centers.

Proportional distribution of fines according to the most common violations in comparison between 2019, 2020, 2021, 2022 and 2023



The most common shortcomings in the area of handling hazardous substances include failure to take appropriate measures during their storage and handling, the absence of an approved emergency plan, and failure to perform leak-tightness tests on tanks designed for storing hazardous substances.

During 2023, the current status of the remediation of old environmental burdens continued to be monitored and evaluated. A relatively fundamental fact for 2023, similar to the previous year, can be described as the stagnation of the solution of old environmental burdens, mainly due to the limited funding for new activities. In some significant locations, remediation was suspended or was carried out to a limited extent.

Although five accidents were recorded in 2023 among entities included in the Act on the Prevention of Major Accidents, the benefit of inspection supervision carried out under the Act on the Prevention of Major Accidents can be assessed as effective for preventing accidents and emergencies.

Despite these findings, the CEI continues to systematically monitor significant sources of pollution and systematically "searches for" new sources of pollution during field investigations.

In the coming years, the inspectors of the WPD will cooperate with other environmental protection authorities and, as part of preventive efforts, instruct and inform business entities and the general public about the obligations arising from the legislation so that the inspected entities are given the opportunity to actively protect the environment themselves. Inspections in the field of water protection are still a significant preventive tool leading to the social protection of groundwater and surface water supplies.

4.3 Waste management, chemical substances and biocidal products

4.3.1 Overview of inspection and administrative activities in 2023

The inspection activities of the Waste Management Department (WMD) were also planned as standard in 2023 and divided into a total of eight thematic component tasks, which include the relevant laws under supervision. Planned inspections are selectively targeted at selected priority areas or specific entities. The criteria for selecting and focusing inspection activities are generally legislative requirements for mandatory inspections of selected entities (IPPC) or areas (waste transport), specific problematic or new areas of supervision (e.g. requirements of the Ministry of the Environment), experience with selected areas from previous periods or the history of the entity. Primarily, these are targeted selections for planned inspections, based on available analytical data or cooperation with other authorities. Furthermore, territorial inspectorates can select specific tasks at their own justified discretion. Approximately 80 inspectors are engaged in field inspection activities throughout the Czech Republic.

Inspectors in the waste management section carried out a total of 2,947 inspections. A total of 40% of inspections were planned inspection activities, the rest mainly consisted of suggestions and other unplanned inspections related to, for example, other investigations. These included inspections of compliance with legislation in the field of waste management, end-of-life products, packaging and chemical substances. Last year, the waste management and chemical safety section dealt with a total of 746 suggestions, i.e. 20% more than in the previous year. In 366 cases, WMD inspectors participated in inspections pursuant to Act No. 76/2002 Coll., on Integrated Prevention. The Inspectorate also submitted 130 suggestions to other state administration bodies.

In 2023, 658 proceedings were initiated and 661 decisions on the imposition of sanctions were issued. The most proceedings were typically related to the Waste Act (412 proceedings), the Environmental Protection Act and the Packaging Act (99 proceedings). 83 misdemeanour proceedings were initiated in the area of chemical legislation. A total of 654 decisions on fines became legally binding in 2023, i.e. more than in the previous year. In three cases, corrective measures were imposed.

Fines totalling CZK 42,305,000 became legally binding in the monitored period. The total amount of fines was essentially the same when compared to 2022. The highest legally binding fine imposed was CZK 6,000,000 for violating the Waste Transport Regulation in conjunction with the Waste Act.

4.3.2 Overview of Departmental Tasks Performance Waste disposal facilities

In 2023, a total of 142 inspections were carried out at facilities designed for waste disposal. These primarily concerned landfills, waste incinerators, and various types of permitted waste treatment methods before final disposal. For violations found at facilities where final waste disposal takes place, misdemeanour proceedings were conducted to impose fines, with the total amount of fines imposed by 31 decisions at the end of the year reaching CZK 4,575,000.

Most waste disposal facilities operate under an integrated permit pursuant to the Integrated Prevention Act, and the deficiencies and defects identified generally indicate a violation of the conditions of the integrated permit in the waste management sector. As part of landfill inspections, inspections of associated facilities on the landfill site are often carried out, most commonly involving waste management such as mechanical-biological/physical waste treatment, biodegradation, solidification, composting.

Waste disposal by landfill

A total of 93 inspections of waste landfills were carried out, including actively operated, reclaimed and post-treatment landfills. Inspections were carried out at all hazardous waste landfills. By the end of the year, 20 decisions on fines totalling CZK 2,818,000 had become legally binding.

The deficiencies identified by landfill inspections mainly included the following issues: exceeding the size of the active area, depositing biodegradable waste in landfills, not covering landfilled waste with inert material/waste, insufficient spreading and compaction of the deposited waste, failure to maintain the gas tightness of the landfill body, failure to secure gas wells so as to prevent leakage of landfill gas, sending false waste reports. The so-called basic description of the removed waste was insufficiently processed, analyses were not documented and critical indicators were not determined.

Other serious findings in violation of legal requirements were unauthorized retention of seepage water within the landfill body, failure to cover waste asbestos, or the discovery of waste that released a liquid phase (8% of dry matter) due to sedimentation. It was even discovered that waste was being accepted and deposited at the landfill, despite the landfill operation being interrupted.

In 2023, cooperation continued with the National Center for Organized Crime and the High Public Prosecutor's Office in criminal proceedings related to the waste landfill in Litvínov and the implemented state contract for the removal of the OEB.

In the case of the unreclaimed Slavičín Landfill, regular arrangements are being made with the Office for Government Representation in Property Affairs to ensure the regular transfer of landfill water from the seepage water tank to the WWTP, and gradual steps are being taken to implement the overall reclamation of the landfill.

In 2023, several landfill fires occurred, in most cases due to spontaneous combustion of stored mixed municipal waste (insufficient coverage of waste in the active area of the landfill).

Certain legislative ambiguities regarding the landfilling of sorting residues appear to be problematic, as the input to the sorting facility is industrial waste, municipal waste and imported waste, and waste for which the producers are exempt from sorting requirements. As a result, it is then very difficult in practice to determine and verify what proportion of sorting residues can be legally landfilled.

Compared to other waste management methods, landfilling represents relatively low disposal costs, it remains the most economical method of waste management in the long term and, among other things, the existing facility capacities are quickly filled.

Thermal waste disposal

As part of inspections of waste disposal facilities, eight inspections of hazardous waste incinerators (industrial and medical) were carried out. Three final sanctions of CZK 1,350,000 and one warning were imposed for operating the facility in violation of the IP or in violation of the operating rules. The inspections revealed, for example, the accumulation of hazardous waste cat. no. 180103* in a place and in a manner that was in violation of the operating rules.

Waste treatment before disposal

In 2023, 42 inspections of facilities performing physical and chemical waste treatment (decontamination, neutralization, demulsification, vacuum waste parks, etc.) were carried out. At the end of the year, seven decisions with a total fine of CZK 407,000 were in force. The CEI cooperates with the relevant customs authorities in inspections focused on liquid waste management.

In the operation of the demulsification station and decontamination area, it was found, for example, that the area/location designated for handling hazardous waste cat. no. 130208* was not equipped with a currently valid identification sheet for the relevant hazardous waste according to Annex No. 21 of Decree No. 273/2021 Coll. and the containers designated for concentrating hazardous waste cat. no.: 150202 N and 130208 N were not labelled according to Annex No. 20 of Decree No. 273/2021 Coll.

During the inspection of obligations under Act No. 25/2008 Coll. on the Integrated Pollution Register (IPR Act), it was found that the entity did not keep records for reporting transfers of pollutants in waste in 2021 and 2022 and did not report the release or transfer of a pollutant (Ni) for 2022 in wastewater intended for off-site treatment.



Waste recovery facilities

A total of 266 inspections were carried out within the framework of inspections focused on waste recovery, of which 83 inspections were carried out based on received suggestions. The inspections covered facilities for processing biodegradable waste (composting plants, biogas plants, application of sludge to the soil), the use of construction waste and excavated waste soil for land reclamation, landscaping or backfilling, facilities for the treatment and recycling of construction waste (recycling facilities), plastic recycling, waste sorting and production of alternative fuels, and last but not least, mobile waste utilization facilities.

112 misdemeanour proceedings were conducted for the identified deficiencies. In 2023, a total of 94 fines entered into force, totalling CZK 15,024,000.

The inspection findings show that, as in previous years, the inspected entities most often violate the Waste Act by handling waste in locations not designated for this purpose (e.g. unauthorized landscaping). Other violations include transferring waste to an unauthorized person, or taking over waste by an unauthorized person, recordkeeping errors (failure to submit ongoing waste records, failure to send an annual waste report or reporting incorrect data, etc.). For approved facilities pursuant to Section 21(2) of the Waste Act, the CEI most often identifies violations of the operating rules, e.g. by exceeding the specified annual or immediate capacity, storing waste outside the areas specified in the operating rules, failing to determine the quality of received waste, failing to assess the quality of outputs from the facility, or failing to process a risk assessment for a given location.

Use of biodegradable waste

Inspections of facilities intended for utilization of biodegradable waste focused on the proper processing in composting plants (including small facilities and community composting plants), in biogas plants or on compliance with obligations for the management of sludge from wastewater treatment plants intended for application to soil. A total of 53 inspections were carried out. 34 composting plants were inspected, as well as one community and five small facilities, eight biogas plants and in five cases the use of sludge on agricultural land was addressed. Of the misdemeanour proceedings conducted, a total of 21 decisions entered into force in 2023 in the total amount of CZK 1,242,000.

Composting plants

The amount of sanctions imposed by 17 final decisions on compost plant operators reached CZK 1,022,000 in 2023. The inspections focused on compliance of compost plant operations with the conditions of the valid consent and with the approved operating rules. During composting, violations of the operating rules or conditions of consent were most frequently identified. Specifically, deficiencies were found, especially in the construction of foundations, in the excessive delay from the receipt or delivery of waste to the compost plant, even after more than 13 months.

Non-compliance with the operating rules includes, for example, exceeding the maximum capacity of the production hall, exceeding the percentage of sludge and gastro-waste for compost production, handling waste in the facility that could not be handled in the facility, storing finished compost in containers in an unapproved location, the lack of documentation for each delivery of sludge proving that it does not exhibit the dangerous property of infectivity, failure to keep a mass balance of operational contaminated wastewater from composting, failure to keep a mass balance of rainwater from the composting area collected in the rainwater tank, failure to keep ongoing records of waste and waste management methods, and failure to ensure appropriate technical measures for the sanitation box.

Biogas stations

During the inspection of biogas station operations (BSO), a minimum of shortcomings in the management of biowaste, mainly gastro-waste, were found. By the end of 2023, 2 decisions on fines totalling CZK 50,000 entered into force.

Terrain modification and waste backfilling

The issue of terrain modification is mainly related to large-scale construction projects in the Czech Republic, i.e. the construction of linear infrastructure, expressways, utility networks and motorways. This issue is the most frequently addressed by the submissions handled by the Waste Management Department (approx. 50%). Most submissions in this area are justified, as they involve illegal dumping of waste on land and unauthorized terrain

modification or backfilling on a large scale, resulting in the massive illegal placement of up to thousands of tons of construction waste. At the same time, this issue is associated with the most administrative proceedings and some of the highest sanctions are imposed. Illegal waste utilization in the form of terrain modification or reclamation was the subject of 46 misdemeanor proceedings, and 41 sanctions totalling CZK 9,542,000 became legally binding last year.

Significant shortcomings have long been identified, especially in the area of construction and demolition waste management, in their illegal dumping on the terrain, involving large volumes of waste materials (amounting to several thousand tons of construction and demolition waste). The reasons for the illegal dumping are mainly of a financial nature (reducing the costs of disposal and transport), but often only a reluctance to complete the administrative procedure for permitting terrain modification at the relevant building authority or approving a backfilling facility according to the Waste Act.

In many cases, the Inspectorate often and repeatedly encounters insufficient activity of the relevant building authorities (absence of building permits for landscaping, problematic demolition dimensions). The CEI also often has to solve problems through inspection activities that should primarily be solved at the local level by the building authority (or by the municipal authority or municipality with extended powers). These authorities have time and location availability, including inspection competences, and in many cases, problems with illegal actions could be prevented.

Waste recycling

In 2023, 83 inspections were conducted at facilities primarily processing construction waste. As in previous years, the utilization of construction waste has led to the development of recycling centers that process construction waste into recycled materials, resulting in the end-of-waste status (transition from waste to product). Facilities processing plastic waste were also inspected. Additionally, inspections were carried out at facilities processing wood waste, edible oils and fats, and those utilizing metal waste in metallurgy (e.g. recovered rhodium, residual silver). Issues and errors were identified in waste records, including their absence, in annual reports on waste production and management, in exceeding the immediate or annual capacity of facilities, and in the unsorted collection of generated waste. A total of 35 administrative proceedings were conducted, with sanctions in 29 cases becoming final. The total sum of fines imposed was CZK 3,850,000. Out of this amount, two administrative fines (for failing to submit documents within the specified deadline or failing to attend a notified inspection without a valid justification) amounted to CZK 740,000.

Energy recovery from waste

In 2022, waste-to-energy facilities and co-incineration plants producing alternative fuels were inspected. Three inspections were conducted in this sector.

Mobile waste recovery facilities

The issue of mobile waste recovery facilities is similar to that of mobile waste collection facilities, with the key difference being that these facilities often enable the end-of-waste status. This transition, under specific conditions, transforms waste into a product, representing an essential step toward sustainable waste management and the circular economy. However, operators of mobile facilities often classify only processed waste as products, even though the waste has merely undergone treatment in a mobile facility (most commonly involving only changes in physical properties) and does not meet the defined criteria for the given products. Additionally, mobile facilities are often improperly substituted for stationary facilities (tied to a specific address or location). Operators sometimes place mobile facility on a site they consider suitable and conduct operations there, rather than carrying out waste processing directly at the waste producer's location or within another stationary facility. In 2023, five mobile waste recovery facilities were inspected. Four administrative offence proceedings were initiated, with sanctions becoming legally binding in three cases, amounting to a total of CZK 390,000.

Waste Collection Facilities (Including Waste Storage)

In 2023, a total of 209 inspections were carried out (17 more than in 2022) on waste collection facilities (including mobile units), storage of other and hazardous waste, traders, or intermediaries. Of these, 23 inspections were conducted based on received suggestions, four of which highlighted possible illegal activities. A total of 79 sanction proceedings were initiated, and 74 decisions became legally binding, imposing fines totalling

CZK 7,478,000. Of this total amount, six fines were related to administrative breaches (failure to provide documents within the specified timeframe or non-participation in a scheduled inspection without proper excuse), amounting to CZK 995,000.

The Inspectorate focused its activities on potentially problematic facilities and waste storage sites. One of the most frequently identified and recurring violations in 2023 was the failure to comply with the approved operating rules of the facilities, particularly in relation to exceeding the instantaneous and maximum capacity of the facility. During inspections, insufficient labelling of hazardous waste, especially the lack of hazard symbols and the absence of identification sheets for hazardous waste at collection points, was still commonly found. Other repeated findings included insufficient information on the facility's waste acceptance board, such as the incomplete list of waste types accepted at the facility. In the area of waste collection from individuals, however, violations related to identifying waste handover persons were increasingly rare (only two violations identified in 2023), and there were also fewer instances of cash payments compared to previous years (only three violations identified in 2023).

During inspections, the inspectors also focused on compliance with new obligations arising from the current legislation for operators of metal waste collection facilities. These inspections revealed that facility operators were either not fulfilling or only partially fulfilling the requirements related to the mandatory installation of surveillance systems, which all metal waste collection facilities are required to have. In 2023, five violations of the Waste Act were identified.

Mobile waste collection facilities continue to present a significant issue, particularly in the management of hazardous waste. This system has largely enabled various forms of illegal handling of hazardous waste. Although the system for recording hazardous waste transport (SEPNO) attempts to track the movement of waste from its source to final use or disposal, this effort is often undermined by the transfer of waste between the operator of a mobile facility and a stationary facility, or between mobile facilities themselves (even though such transfers are prohibited by the new Waste Act), or when waste transport by the operator of the mobile facility to the stationary facility is not reported, making it difficult to trace the transportation. Problems also persist with the annual waste management reports, which are either incorrect or not submitted at all, complicating the oversight of waste transfers by the regulatory authorities. In the case of waste collection facilities and storage of other and hazardous waste, continuous inspection activities remain crucial to ensuring compliance with regulations in this area of waste management.

As part of this specific task, the highest legally binding fine was imposed in the amount of CZK 1,300,000 on the operator of a mobile facility. The fine was imposed for fictitious handling of large quantities (tens of thousands of tons) of various types of predominantly construction-related waste in the mobile facility (according to the inspectorate's findings, these were wastes taken into the facility). In reality, the company did not handle the waste through the mobile facility but instead concentrated, sorted, and processed it by crushing on land in the cadastral area of Libeň. The accumulation of construction waste on these plots in the Libeň cadastral area was not authorized for the appellant, meaning the waste was handled outside the authorized waste management facilities. The sanction was upheld by the appellate authority.

Illegal concentration of large amounts of construction waste in violation of the requirements of the applicable legislation in the cadastral area of Libeň



Facility for the collection and processing of end-of-life vehicles

In 2023, CEI inspectors carried out a total of 101 inspections in the area of end-of-life vehicles (an increase compared to 82 and 83 inspections in 2021 and 2022, respectively). Forty-two of these inspections were focused on investigating received suggestions. Most (36 suggestions) reported illegal handling of end-of-life vehicles. In 2023, 35 penalty proceedings were initiated in connection with end-of-life vehicle handling, and 29 decisions became legally binding, resulting in fines totalling CZK 2,030,000. In an additional eight cases, CEI imposed fines for obstructing inspections or failing to provide required documentation during inspections (totalling CZK 305,000). The highest fine of CZK 450,000 was imposed on the operator of an end-of-life vehicle collection and processing facility for violations related to the storage of a large number of end-of-life vehicles and for incorrect record-keeping.

More than half of the inspections conducted were focused on investigating illegal handling of end-of-life vehicles. In some cases, it was found that a natural person was responsible for the illegal handling of end-of-life vehicles. Since CEI does not have the authority to inspect individuals in this area, the findings are forwarded to the locally competent municipal authority of the municipality with extended powers.

In cases where illegal handling of end-of-life vehicles is detected among business entities, the Inspectorate conducts administrative proceedings and imposes sanctions. During inspections, inspectors have identified illegal vehicle dismantling, particularly of vehicles purchased abroad (often after accidents or in poor technical condition), vehicles stored in so-called depots (i.e., temporarily taken out of service), and vehicles accepted by authorized facilities. The primary purpose of the illegal dismantling is to obtain spare parts. For vehicles received by authorized facilities, the issue arises when these vehicles are dismantled at locations other than the authorized facility, and by individuals other than the operator. In such cases, CEI imposes sanctions both on the person conducting the illegal dismantling and on the operator of the authorized facility, as they provided end-of-life vehicles intended for environmentally responsible disposal to unauthorized individuals without the required operational permit. In the area of illegal handling, CEI imposed a fine of CZK 300,000 on a company that accepted, stored, and dismantled end-of-life vehicles (some of which contained hazardous substances or components) despite lacking the required permit from the competent regional authority. This involved at least 18 end-of-life vehicles that had originally been accepted by another authorized facility.

In 2023, the CEI also inspected facilities for the collection and processing of end-of-life vehicles authorized by the relevant regional authorities, conducting a total of 46 such inspections. During these inspections, inspectors, as in previous years, identified violations related to the storage and dismantling of end-of-life vehicles. These violations included, for example, the storage of more than two end-of-life vehicles stacked on top of each other, or the storage and dismantling of these vehicles on areas not specified in the facility's operational plan. Other issues included exceeding the set capacity, failure to adhere to the facility's operating hours, failure to decommission VIN codes on end-of-life vehicles, errors in record-keeping and reporting, incomplete data entry into the MAISOH system, and mistakes in the acquisition and submission of photographic documentation (e.g., failure to provide the required photographic documentation within the specified time frame or scope). In 2023, the CEI also identified cases of end-of-life vehicles being handed over to unauthorized persons from authorized facilities. For example, the CEI investigated a case involving an authorized facility where it was found that end-of-life vehicles were dismantled and stored outside the areas specified in the approved operational plan. More than two vehicles were stacked on top of each other, VIN codes were not decommissioned as required by the operational plan, hazardous waste was not properly labelled according to legislation, and errors were found in the annual report submitted. Additionally, not all required data was entered into the MAISOH system, and there were deficiencies in the acquisition of photographic documentation. For these violations, the facility operator was fined an enforceable fine of CZK 180,000.



Stacking more than two end-of-life vehicles on top of each other in violation of legal regulations

Take-back of products, including processors

As part of the issue of the take-back of selected products (electrical equipment, batteries and accumulators, and tires), the CEI primarily inspects entities placing individual products on the market (i.e. importers and cross-border carriers), the final retailers, operators of take-back points, and processors of these products, with a focus on compliance with the obligations under Act No. 542/2020 Coll., on products with end-of-life (the EOL Products Act). In 2023, inspectors conducted 131 inspections in this area, of which 19 were focused on investigating received suggestions. The suggestions most frequently pointed out potential "free riding" on selected products (mainly electrical equipment), illegal handling of selected products, and non-functional tire take-back points.

The table below shows the number of inspections for individual types of products subject to take-back, with some inspections possibly covering multiple products.

| Take-back of products | Number of inspections |
|----------------------------|-----------------------|
| Electrical equipment | 71 |
| Tires | 52 |
| Batteries and accumulators | 18 |
| Total | 131 |

In 2023, inspectors of the CEI initiated a total of 33 proceedings for the imposition of fines and imposed 35 final fines amounting to a total of CZK 957,000. Additionally, five fines were imposed for non-cooperation during inspections. The highest fine of CZK 150,000 was imposed on an electrical equipment processor who operated in violation of the operating regulations, specifically by storing electrical waste outside the storage and handling areas designated in the operating regulations. This operator had already been fined for the same violation in 2021.

Tires

In the area of tire take-back, inspectors inspected five importers or cross-border transporters of tires, 26 final retailer, 28 operators of take-back points, one processor of waste tires, and in four cases, investigated suspicions of illegal handling of tires. Often, the inspected entity is both the final retailer and the operator of the take-back point. The inspection received seven suggestions regarding tire take-back issues, three of which reported issues with non-functioning take-back points (refusal to accept tires or conditioning take-back on a fee or purchase of new tires).

At the take-back points, inspectors verify whether these locations are publicly accessible, functional, and if tire take-back is carried out free of charge. The CEI also checked importers and cross-border transporters of tires suspected of failing to fulfil their obligations (so-called "free riders"), as well as those fulfilling obligations in an individual system (particularly checking the provision of a minimum collection network, minimum levels of take-back, record-keeping duties, etc.). For the final retailers of tires, the main focus is on ensuring they meet the obligation to inform the end user about the provision of tire take-back.

In the area of tire take-back, the Inspectorate imposed fines totalling CZK 175,000 through six legally binding decisions. For example, a fine of CZK 70,000 was imposed on a tire retreading facility operator for failing to report the operation of the facility and for not proving that the waste it produced was handed over in the appropriate quantity and manner (this involved both other waste and hazardous waste). Furthermore, the CEI imposed a fine of CZK 50,000 on a tire manufacturer operating individually for failing to comply with the minimum take-back requirement.

Electrical equipment, batteries and accumulators

As part of the take-back of electrical equipment, the CEI conducted 71 inspections, of which 32 inspections focused on checking the obligations of manufacturers under the Waste Electrical and Electronic Equipment Act (i.e., mainly importers and cross-border carriers), 30 inspections on the obligations of final retailers, 14 inspections on the obligations of take-back site operators, and 11 inspections focused on the obligations of operators of facilities for processing electrical equipment and devices intended for preparation for reuse. Regarding batteries and accumulators, CEI inspectors inspected a total of 18 entities. The inspections were most

often focused on checking the obligations of manufacturers, i.e., suspicions of free riding of batteries and accumulators (10 inspections). The Inspectorate also encounters illegal handling of electrical equipment, batteries, and accumulators at metal collection points, where these end-of-life products or their components are illegally removed, dismantled, and not kept separate from other types of waste.

In the area of these commodities, the CEI initiated a total of 28 administrative offence proceedings in 2023, and 30 decisions became legally binding, imposing fines totalling CZK 817,000. The imposed fines most frequently, as in previous years, concerned so-called "free riding" of electrical equipment and batteries. For example, the CEI imposed a fine of CZK 50,000 on a battery importer for failing to meet obligations related to ensuring the take-back system. Inspectors also fined a final retailer who repeatedly violated the obligation to ensure a "one-for-one" take-back when selling new electrical equipment. The inspection revealed that the retailer charged CZK 199 for ensuring the take-back of a washing machine. However, take-back should be free of charge for the end user. The Inspectorate imposed a fine of CZK 80,000 on this retailer, which was fully upheld by the appellate body.

Inspections of industrial enterprises and other waste producers

Throughout 2023, 829 inspections of waste producers were conducted. The identified shortcomings were sanctioned through administrative offence proceedings by issuing decisions on fines or addressed in the form of warnings. By the end of the year, 184 sanctions had become legally binding, amounting to a total of CZK 5,742,000. This includes six warnings without a financial penalty.

In 2023, the largest share of inspections of waste producers was represented by large industrial enterprises with a broad range of production in various sectors (heavy, chemical, light industry, automotive industry, food industry, construction industry, car workshops, etc.), followed by agricultural businesses. Most of the producers hold integrated permits, meaning that serious violations are not commonly detected, and large producers often collaborate with specialized environmental experts. The CEI's planned inspections primarily target entities that generate larger quantities of waste, i.e., major producers. However, inspections also include entities with smaller production, such as workshops, services, and hospitality businesses.

The violations of the Waste Act found among waste producers were diverse, with the most common issues being improper waste collection, inadequate sorting of generated waste, incorrect classification of waste by type and category, and failure to manage waste according to its actual properties. Other violations involved failure to meet reporting and record-keeping obligations (e.g., failure to maintain ongoing records, incorrect record-keeping, incomplete or late reporting on the production and handling of waste), failure to submit reports on the amount of processed plant waste from garden and household maintenance within the set timeframe, failure to label hazardous waste, and the failure to process hazardous waste identification forms. Additionally, violations included failure to equip hazardous waste handling areas with identification forms, transferring waste to unauthorized facilities, failing to secure collected waste against theft, leakage, or degradation, not ensuring the transfer of regularly produced municipal waste with a written contract before its generation, and failure to secure written contracts for municipal and construction waste not processed by the producer. Furthermore, there was non-compliance with the requirement to sort five categories of municipal waste (paper, plastic, glass, biodegradable waste, and metals) for visitors of business establishments.

Demolition waste

Construction companies that produce significant amounts of demolition waste as part of their construction activities are considered waste producers. For deficiencies related to the production and subsequent handling of construction and demolition waste, including asbestos waste generated during the renovation of buildings, 44 final decisions imposing fines amounting to CZK 2,099,000 were issued. These findings essentially represent the most serious violations of the Waste Act concerning the unauthorised handling of construction and demolition waste outside facilities designated for the disposal of such types and categories of waste according to the Waste Act.

Azbest

For improper handling during demolition activities involving the removal of asbestos-containing waste, the producer (legal entity) was penalized. Specifically, when demolishing the Betonix panels, which contain asbestos, no measures were taken to prevent the release of asbestos fibres into the air, nor was it ensured that asbestos fibres or asbestos dust were not released into the atmosphere. Instead, the resulting asbestos-containing waste was handled mixed with construction waste as other types of waste. The Inspectorate does not oversee the activities of individuals handling asbestos in this area.

Medical waste

In connection with the production of medical waste, four decisions with a total fine of CZK 151,000 became legally binding.

Hazardous liquid waste

As part of its inspections on the handling of liquid hazardous waste, the CEI focused on electroplating plants and surface treatment facilities. The inspected entities had their own pre-treatment/neutralisation systems (pre-treatment of water before discharge into the sewer system and monitoring of effluent discharge limits). Rinsing waters, which were not classified as waste, were treated at their own neutralisation stations, where both baths and rinsing waters were processed, or additional rinsing waters were treated on ion-exchange units and returned to production. It can be stated that none of the inspected producers discharged rinsing waters or baths directly into the sewer system; rather, they performed pre-treatment at water treatment facilities. The operation of the water treatment facility for handling particularly hazardous substances is thus carried out based on operational and procedural regulations according to the Water Act, and discharge into the sewer system is authorised by the water authority. No violations of the Waste Act were identified in this area. However, in some cases, it was found that waste functional baths, or some initial rinsing waters, were handed over to external facilities as liquid hazardous waste. In such cases, the main issues arise when proving the transparent disposal of liquid waste at authorised facilities, misclassification of liquid waste as wastewater, and illegal discharge or dilution. The WMD addresses this area in its inspection activities.

Control of waste management within the framework of old environmental burdens (OEB)

Waste production is also monitored within the framework of the remediation of old environmental burdens (OEB), where in 2023, WMD inspectors inspected compliance with legal requirements for 30 OEB projects under the Waste Act, participating in a total of 40 inspection days.

The CEI regularly monitors the flows of individual types and categories of waste (primarily hazardous waste) generated during the implementation of the remediation of old environmental burdens (OEB). Inspections verify the management of remediation waste, such as backfill material after the removal of contaminated structures. Additionally, for selected OEB projects, the subsequent flow of remediation waste beyond the site of origin is also monitored.

Municipalities

Inspection activities are annually focused on the management of municipal waste and the establishment of municipal waste management systems. In 2023, 107 inspections of municipalities were conducted, and 17 decisions became legally binding, imposing fines totalling CZK 345,000.

Inspections were focused on ensuring locations for the separate collection of municipal waste components, i.e. hazardous waste, paper, plastics, glass, metals, biodegradable waste (BDW), and edible oils and fats. Most municipalities have designated waste collection points established in the municipal ordinances.

It was most commonly found that municipalities had established their municipal waste management systems through municipal ordinances, and simultaneously set the fee for the operation of the municipal waste management system through a separate municipal ordinance, applying it to both residents and recreational properties. Additionally, it was found that municipalities did not utilize the option to set a fee based on the amount of municipal waste produced, and they did not utilise the possibility of establishing ReUse centres. Biodegradable waste was predominantly transferred to facilities designated for waste management, while composters were distributed to households. It was also discovered that reports on waste production and management had not been submitted. Some municipalities ensured the handling of construction waste, utilised the option of sending mixed municipal waste and bulky waste to landfills at a reduced fee, and in some cases allowed the participation of legal entities and self-employed individuals in the municipal waste management system. Furthermore, municipalities did not track the percentage of separately collected recyclable components of municipal waste, but did fulfil their obligation to inform residents about the waste management system and its results once a year.

A sanction was imposed, among other cases, when a municipality, based on a purchase agreement with a self-employed individual, accepted excavated soil and handled it outside of a facility designated for managing

this type and category of waste. This waste was used for land reclamation on other properties, without the activity being in compliance with or authorised under the Building Act and the Waste Act.

Illegal waste management

The most common findings during inspections of waste management are activities carried out in violation of the Waste Act, which can generally be described as illegal methods of handling waste. Illegal practices can be uncovered through inspection activities even in authorised facilities that fail to comply with established rules and designated areas for waste management operations or deviate (either occasionally or systematically) from the procedures set out in the approved operational technology.

Primarily, inspections uncover activities involving the manipulation and handling of waste materials that are not authorised by the state authority, or that take place without any approval from a public administration body, notification, or reporting. Illegal waste management beyond legal possibilities is classified under the Waste Act as a violation of Section 13(1)(b) of Act No. 541/2020 Coll. In practice, this most commonly involves unauthorised terrain modifications, illegal land reclamation, unlawful collection and storage of waste, disposal of waste through unapproved burial, dumping of demolition waste and waste soils (without knowledge of their quality) onto unsecured natural terrain, or even onto land designated for agricultural purposes. The dumping of contaminated soils and mixed construction debris with polluting additives significantly negatively affects natural ecosystems and poses a threat to environmental components in the affected area, and potentially also to human health. The controlled entities mistakenly assume that if excavated soils or "recyclates" from construction and demolition waste are accompanied by compliant analyses under the implementing decree of the Waste Act, they are "automatically" classified as a by-product, whereas they remain waste, albeit processed. Moreover, chemical analyses are often provided only after the fact.

Unauthorised actions primarily involve the transfer of waste outside of facilities designated for waste management, such as disposing of waste by leaving it, abandoning it, crushing and spreading it, or discharging, concealing it through covering, burying, or disguising its purpose, or declaring waste as by-products, or even falsely declaring waste as products. The Waste Act strictly defines the conditions under which the concepts of "by-product" or "waste-derived product" can be applied, which may only be used for the lawful termination of waste status in a clearly documented and indisputably verifiable manner. Unfortunately, the financial profits or savings from illegal waste management practices are highly tempting. Waste producers often deal with large quantities (thousands to tens of thousands of tonnes), which leads them to seek ways to dispose of waste "cheaply" beyond the legal framework.

Other forms of illegal waste management include burning waste directly in open fires or in boilers for heating purposes. The illegal disposal of waste also involves the use of kitchen waste shredders or the use of discarded tires to be buried in the ground.

Illegal waste management was the primary and key subject of at least 285 inspections. In 2023, 113 final decisions were issued for proven illegal practices in waste management, resulting in fines totalling CZK 13,623,000.

Of the suggestions received by the Inspectorate, 80% highlight illegal waste occurrences that pose a threat to the environment and various unlawful methods of waste disposal outside the legal framework. A significant portion of the suggestions relates to construction activities, specifically the management of construction and demolition waste, excavated soil, waste asphalt, slags used for reclamation, and waste with elevated levels of harmful substances, particularly heavy metals or polycyclic aromatic hydrocarbons (PAHs).

Many submissions point to so-called illegal dumpsites. If the responsible party is not identified, the suggestion is forwarded to the relevant Municipality with Extended Powers in accordance with legal competences.

Chemical Law and Biocides

Part of the inspection activities of the CEI also includes the issue of chemical safety and market supervision. It covers EU laws and regulations governing the handling of chemicals, chemical mixtures, and products containing these substances. This primarily includes the Chemical Act No. 350/2011 Coll., the Biocides Act No. 324/2016 Coll., and related directly applicable European regulations – Regulation No. 1907/2006 on the registration, evaluation, authorisation, and restriction of substances (REACH Regulation), Regulation No. 1272/2008 on the classification, labelling, 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 662 inspections within the agenda of chemical substances and market supervision in the monitored year. This represents a 6% decrease compared to 2022. The REACH Regulation was involved in 43% of the inspections (substance registration, safety data sheets, restricted and authorised substances; a total of 288 inspections). 31% of the inspections concerned the CLP Regulation (classification, packaging, and labelling of substances, a total of 204 inspections). Biocidal products were inspected in 42 cases (64 products), and detergents in 45 cases.

The Inspectorate received 340 notifications about hazardous products from the Safety Gate system. Based on these, 65 inspections of hazardous non-food products were carried out from 95 notifications, in accordance with Act No. 102/2001 Coll. on General Product Safety.

In 2023, 90 fines (including two warnings) for violations of the Chemical Act, the Biocide Act, and the Inspection Procedure Act (No. 255/2012 Coll.) became legally binding, with a total amount of CZK 2,505,000 (a 15% decrease compared to 2022). In the reported year, 87 administrative proceedings were initiated. Of the finalised fines, 25% of the violations were related to incorrect labelling of chemical substances and mixtures (under the CLP regulation), 20% involved non-compliant safety data sheets in terms of REACH regulation requirements, and 18% were for failure to notify chemical mixtures to toxicological centres.

In 2023, the Inspectorate continued its cooperation with the European Chemicals Agency (ECHA), specifically with the Forum for Exchange of Information on Enforcement and the Subgroup for Biocides. The Inspectorate's staff actively participated in several working groups of the forum and also in regular meetings.

Inspection Projects

In 2023, the CEI participated in the pan-European project REACH-EN-FORCE 11 (REF-11) organised by the ECHA. The goal was to inspect the safety data sheets of chemical substances and mixtures placed on the market in the Czech Republic. The project focused primarily on changes in safety data sheets related to EU Regulation No. 2020/878. The inspections also covered exposure scenarios and updates to the safety data sheets.

During the observed period, CEI inspectors conducted 45 inspections as part of this project, and the RPHA conducted 1 inspection. Out of the 46 safety data sheets inspected, 11 were not in compliance with the requirements of the REACH Regulation (24% non-compliance).

The second significant project concerned POPs and restricted substances. Specifically, it focused on certain substance restrictions according to Annex XVII of the REACH Regulation (e.g., dichloromethane, lead, D4/D5, etc.) and also on the restriction of POPs content in products (perfluorinated substances, polybrominated diphenyls, chlorinated paraffins with a short chain). This project was divided into two separate inspection actions. In the first phase, nine entities (28 products) were inspected, and no products exceeded the limits from Annex XVII of the REACH Regulation. In the second phase, Christmas-themed items made of plastic materials were inspected (concerning the content of phthalates, brominated organic compounds, etc.), and the analysis of 22 products did not confirm the presence of restricted substances in this case either.

In addition to the pre-planned projects, thematic inspections were also carried out in 2023 regarding specific issues or types of products. For example, these included inspections of solders containing lead, the marketing of which is regulated by the REACH Regulation (sale only for professional use). During the monitored period, 48 inspections were conducted based on a suggestion (some were postponed to 2024), with 52% revealing violations of the REACH Regulation.

In terms of lead restrictions, the CEI, in cooperation with the Czech Police, carried out several inspections both on its own initiative and based on suggestions from the public regarding the use of lead shot as ammunition in wetlands or their immediate vicinity. The investigations focused primarily on bird hunting organisers and on shooting ranges located near wetlands. The reason for the restriction on the use of lead shot in wetlands was primarily the widespread poisoning of waterfowl. The new requirement of the European REACH Regulation came into effect on February 15, 2023. No violations of this restriction were identified during the inspections.

Packages

In 2023, CEI inspectors carried out inspections of 92 entities regarding compliance with the Packaging Act. Two of these inspections were carried out based on received suggestions alerting to so-called free riding of packaging. In 2023, the CEI initiated 51 administrative penalty proceedings for violations of the Packaging Act and imposed 48 fines totalling CZK 812,000, as well as four warnings. In five cases, fines were imposed for failure to cooperate during the inspection (i.e. failure to provide requested documents or information or obstructing the inspection).

The inspections focused primarily on so-called free riding of packaging, i.e., inspecting entities suspected of not fulfilling their obligations for the packaging they place on the market in the Czech Republic. This mainly concerns obligations related to ensuring the take-back and recycling of packaging, as well as the recovery of packaging waste. In the area of free riding of packaging, in 2023, the CEI inspected importers of packaged goods (e.g., confectionery, cosmetics, textiles, electrical appliances, and kitchenware) and retailers of packaged goods (food, beverages, coffee, animal feed, fertilisers, etc.). The inspected entities can prove during inspections that they are exempt under Section 15a of the Packaging Act if they placed less than 300 kg of packaging on the market or into circulation in the Czech Republic per calendar year and their annual turnover, or total net turnover, did not exceed CZK 25,000,000. In these cases, these entities are not required to ensure the take-back and recovery of packaging waste and related obligations. A total of 12 entities claimed this exemption during inspections in 2023.

As part of this issue, individuals registered in the List of Persons under Section 14(1) of the Packaging Act, who are required to fulfil their obligations under the Packaging Act individually, are also inspected. In 2023, 13 such inspections were conducted. During these inspections, non-compliance with the obligation to ensure the required level of packaging waste recovery is often found, as well as failure to meet reporting obligations.

The highest fine imposed by inspectors in 2023 was on an importer of confectionery from North Macedonia and Turkey, who failed to ensure the take-back and recycling of packaging waste or meet other related obligations. The importer only started complying with these obligations after the CEI inspection. This case involved the import of a significant quantity of packaging (approximately tens of tonnes), including plastic and paper retail packaging. The Inspectorate imposed a fine of CZK 125,000. When imposing fines, the extent of advantage gained by the offender compared to other entities fulfilling their obligations is assessed, considering the quantity, types, and characteristics of packaging for which waste recovery had not been ensured. Inspectors also imposed fines on other importers of packaged goods (e.g., cosmetics, clothing, footwear, toys, wine) in 2023. The CEI also identified violations among online retailers and other vendors (particularly of food products).

Cross-border transport of waste

The Waste Management Department (WMD) carries out inspections within its scope focused on compliance with obligations related to the cross-border transport of waste, particularly with waste senders and receivers according to the EU Regulation on the Shipment of Waste No. 1013/2006 (hereinafter "the Regulation"). These inspections are conducted at waste producers or facilities that trade in waste (import and export). The CEI also conducted inspections based on information about intercepted illegal shipments within the Czech Republic and other countries. In such cases, the CEI cooperates with the MoE and the Customs Administration of the Czech Republic, with which it also works during roadside inspections. Based on cooperation with the Customs Administration of the Czech Republic, subsequent inspections of individuals involved, especially in illegal waste shipments, also take place upon their initiative. The purpose of the CEI inspections was primarily to verify compliance with the Regulation's rules (e.g., bans and restrictions, waste classification, etc.), including the required documentation for shipments. The focus is traditionally on cross-border shipments to the Czech Republic from other EU member states and on verifying the final use of waste. Ongoing cooperation continued between the CEI, customs authorities, and law enforcement agencies in cases of illegal waste shipments. The Inspectorate provides expert support in investigating environmental crime in this area.

In 2023, a total of 77 inspections focused on cross-border transport were carried out. Of these, 69 inspections concerned waste senders and receivers, primarily involving entities transporting waste under the so-called green list regime. Other inspections were aimed at checking transporters in cooperation with the Customs Administration of the Czech Republic and inspections related to identified illegal waste shipments.

A total of 29 administrative offence proceedings were initiated as part of this departmental task. 25 sanctions became legally binding, amounting to a total of CZK 7,318,000.

The majority of cases were related to illegal waste transportation carried out under the so-called "green list" regime, which was in violation of the transportation document, or involved waste shipments without notification and consent (waste that did not meet the criteria of the green list). These are typically cases of pretending to recycle waste, which is imported into the Czech Republic (usually residual waste) as waste for recycling. Permits for waste collection and treatment facilities are often misused, where the reception and treatment of waste at these facilities is fabricated. The waste is often only fictitiously documented as accepted at waste treatment facilities, then reclassified as a different type of waste with Czech origin, and handed over to other entities for further disposal (landfilling, energy recovery, reclamation, etc.). In reality, the waste is secretly disposed of and reported as recycled, or is simply imported and left without further processing at the waste treatment or storage facility.

Another common violation of the law identified in the context of waste transportation, even in cases within the Czech Republic, is the failure to label the vehicle transporting waste. However, vehicle labelling is not the only obligation for waste transporters; they are also responsible for ensuring that the driver is properly equipped with the relevant documents, which must be accurately and correctly completed. Similar to cases involving senders and receivers, inspectors encounter errors in documents related to shipments under the green list regime: the recipient is not correctly listed, waste declarations, weight, methods of waste recovery, sender signatures, etc., are missing or incorrect.

The highest fine was imposed in connection with a case where the CEI conducted an inspection on a part of the land in the cadastral area of Bochoř, Ústí nad Labem Region, at the company PROIN Stružná s.r.o. (see section 4.3.4).

4.3.3 Overview of Specific Tasks Performance – Summary

In addition to the nationwide departmental tasks, individual TI of the CEI set specific tasks that mainly address local needs, recurring problems in the region, or a specifically selected entity. In 2023, specific tasks included inspections of, for example, registration discrepancies between producers and facilities (or between two facilities), old environmental burdens, terrain modifications, cross-border waste transportation, waste from sorting being landfilled, municipalities, management of hazardous liquid waste, and specific waste producers. These actions, apart from the standard inspection activities that directly lead to the initiation of offence proceedings, also have the character of field monitoring or gathering further findings for additional inspection investigations, providing feedback from the field to the MoE, or for cooperation with other state administration bodies or law enforcement agencies.

4.3.4 Significant cases

The following chapter provides an overview of the highest fines imposed by the Waste Management Department of the individual territorial inspectorates of the CEI.

TI Prague

The company FCC Regios, a.s., was fined CZK 1,800,000 under Section 37(4) of Act No. 76/2002 Coll., on Integrated Prevention, for violating the obligations under Section 16(1)(a) of the same law. The company violated the binding conditions of the integrated permit while operating the Úholičky landfill, as during the inspection, sectors 2 and 3 in Phase IV of the landfill were not closed, and the landfill body was still being compacted and covered with deposited waste, despite exceeding the maximum height quota for the construction of the landfill, and the relevant sectors were supposed to be closed. Additionally, a waste disposal area larger than permitted was identified. The CEI also found insufficient coverage of waste with inert waste outside the active area of the landfill.

The company WEST1 Construction s.r.o. was fined CZK 1,500,000 for the disposal of untreated construction and demolition waste at locations (in the Koleč cadastral area) not designated for waste management. Various types of construction and demolition waste (wood, soil, stone, concrete, bricks, mixtures or separate fractions of concrete, bricks, tiles, and ceramic products, etc.) were handled in quantities of waste in the lower tens of thousands of tons. The management of these wastes involved activities such as concentrating, sorting, and controlled disposal (spreading and shaping the landfill body), etc. The company appealed the fine, but the Ministry of the Environment subsequently upheld the sanction.



The disposal of construction and demolition waste at locations not designated for this purpose

TI České Budějovice

The company Růžov a.s. was fined CZK 150,000 for retaining an excessive amount of leachate within the landfill body. The landfill was thus operated in violation of the established technical conditions of CSN 83 8033, which stipulate that retaining leachate within the landfill body is impermissible.



Leachate tank from the landfill

TI Plzeň

The company Písky – Skviřín, s.r.o., was fined CZK 780,000 for the unauthorised use of 13,000 tonnes of steel slag to reinforce roads during the reclamation of a sandpit. Analyses commissioned by the CEI confirmed excessive levels of chromium and vanadium. This penalty was preceded by a CZK 390,000 fine in 2021 for the unauthorised acceptance of the same slag. Although the entity was aware of the slag's properties, it did not hand it over to an authorised person but instead distributed it across the site, arguing, among other things, that analyses it had commissioned did not reveal any limit exceedances. However, the Inspectorate successfully challenged these analyses due to poor sampling quality. The fine was upheld by the appellate authority.

TI Ústí nad Labem

The CEI, during an inspection of the company PROIN Stružná s.r.o. on part of a plot of land in the cadastral area of Bochoř, Ústí Region, found several hundred to thousands of tonnes of various types of waste of unknown origin on the premises. Examples included crushed multi-coloured electrical waste cables, mixtures of crushed waste paper, plastic, textiles, foam, polystyrene, and other materials. The facility was primarily designed for recycling, including cable waste via wet separation of copper and aluminium particles from plastic. The most serious finding of the inspection was that the company had accepted a mixture of waste transported across borders from Germany without the necessary notification and approval of all the relevant authorities. This waste (mixtures of halogenated and non-halogenated plastics from cable crushing with additional admixtures) was improperly imported under the so-called green list regime. Furthermore, the imported waste was stored at the facility



Waste from illegal shipments requiring notification from the MoE transport to the Czech Republic and approval

for a long period without any proven subsequent use. The company also violated additional obligations under the Waste Act, including failing to maintain the operational logbook of the facility to the required extent, facility's permitted annual capacity, accumulating plastic waste at the facility contrary to its permit, and submitting inaccurate and incomplete reports on waste production and management. The CEI imposed a penalty of CZK 6,000,000 on the company for these violations.

TI Hradec Králové

The company Technistone, s.r.o., is engaged in the production of conglomerate (artificial) stone and, for this purpose, received and used waste (glass/mirror shards) in production. The company did not request consent in accordance with the transitional provisions of Section 153(2) of the Waste Act, as stipulated in Section 21(2) of the Waste Act, and therefore was not authorised to accept waste from 2022 onwards, yet it continued to accept it. The supply of waste glass/mirror shards was also subject to cross-border transportation, which was carried out in violation of the regulations on waste transport. The CEI identified additional violations: transferring produced waste to a person not authorised to accept it, failing to secure solid and liquid waste, misclassifying produced waste in accordance with the Waste Catalogue, and providing false information in waste reports. A fine of CZK 350,000 was imposed on the company for the identified unlawful actions.

TI Havlíčkův Brod

The company AGROSPOL ÚTĚCHOVICE spol. s r.o., as a waste producer, was fined CZK 70,000 for failing to meet basic obligations in waste management at three of its facilities. This included the failure to separately collect produced waste by type and category, failure to ensure a designated area for the separate collection of municipal waste (biodegradable waste and waste metals) generated at the facility. Additionally, violations were identified in the continuous record-keeping and reporting of data from it, as well as the incorrect classification of metal waste under an inappropriate catalogue number.

TI Brno

In 2023, after an appeal, the fine of CZK 350,000 imposed on the company JOGA LUHAČOVICE s.r.o., the operator of the composting plant, became legally binding. The company operated a facility named "Regional Composting Plant Slavičín" in violation of the conditions set by the relevant regional authority, such as:

- exceeded the maximum capacity of the production hall,
- exceeded the percentage share of sludge and food waste for compost production,
- handled waste in the facility that was not authorised for disposal in the facility,
- did not have the required documentation for each delivery of waste sludge,
- did not maintain a balance of operational wastewater and a balance of rainwater,
- did not maintain continuous records of waste and methods of waste management for the facility.

In 2023, a fine of CZK 250,000 was imposed on Franver, s.r.o., for operating a mobile demolition waste crushing plant without the appropriate permit for its operation. The fine was also imposed for handling demolition waste in the cadastral area of Veselí nad Moravou in 2021, 2022, and 2023 without the required permit for operating a facility for the collection and utilization of demolition waste.

Unpermitted facility for construction and demolition waste



TI Olomouc

During inspections carried out in 2020 and 2021, it was found that EKOTERMEX, a. s. unlawfully managed hazardous waste from the healthcare sector, amounting to approximately 160 m³ (four tarpaulin-covered containers) on land in the cadastral area of Pustiměř, without this land being registered as a facility under the Waste Act. Additionally, the company violated the Waste Act by failing to maintain continuous records of waste and methods of waste management at the facility named "EKOTERMEX Industrial Waste Incinerator," in accordance with the ordinance to the Waste Act. At the facility named "Liquid Waste Sorting and Mixing Plant," the company also failed to equip waste handling (concentration) areas for six types of hazardous waste with hazardous waste identification sheets and operated the facility "Liquid Waste Sorting and Mixing Plant" in violation of the approved operating rules (the facility's basic and maximum instantaneous capacity was significantly exceeded). A penalty was also imposed for violating the Inspection Procedure, as the company did not cooperate with the Inspectorate and failed to provide the required documents within the prescribed deadline for a complete inspection finding under the Waste Act. The operator of the facility was fined CZK 750,000, against which the company appealed. The appellate body upheld the fine imposed by the CEI.

The company Purum s.r.o. was imposed a final fine of CZK 120,000 for operating the facility "Hazardous Waste Storage at COLORLAK, a.s. site" in violation of its approved operating rules. The company also submitted a false report regarding the production and management of waste at the facility. This case dates back to 2020. The issue was that the company merely pretended to receive hazardous waste from EKOTERMEX, a. s. at the facility, although it did not physically accept the waste at the stated facility. Furthermore, the waste was not the hazardous waste category 11 01 09* Sludges and filter cakes containing hazardous substances (as stated in the waste documentation), but rather hazardous waste category 16 07 09* Waste containing other hazardous substances (waste containing white phosphorus). Purum s.r.o. transferred this hazardous waste via ordered transportation directly to SUEZ CZ a.s. at the "Logistics Centre Olomouc" facility. On April 15, 2020, an accident occurred at this facility due to the self-ignition of the waste, which had been incorrectly declared as sludges, but the actual cause of the fire was the phosphorus content in the waste.



An explosion followed by a fire occurred at the facility

TI Ostrava

On May 10, 2021, an explosion followed by a fire occurred at the facility of SPV RECYCLING CZ a.s.

The explosion and subsequent fire were caused by the processing of waste containing toner powder. The incident involved an explosion and fire of electrical waste and car wrecks on the waste processing line, which quickly spread to other unprocessed waste outside the facility. The fire brigade's intervention ended in the early hours of May 11, 2021.

A subsequent inspection revealed that the inspected entity was not operating the facility in accordance with the integrated permit. In violation of the permit for crushing electrical waste, waste containing substances that could cause ignition during processing (waste toners) had been accepted. The company had failed to properly inspect the waste upon its arrival at the facility. The inspection imposed a fine of CZK 1,000,000, which the company appealed. The appellate authority modified the inspection's decision and subsequently reduced the fine to CZK 850,000.

TI Liberec

A fine of CZK 490,000 was imposed for failure to cooperate during an inspection as part of the investigation of a suggestion. As revealed in the investigation, the company Zdemolujeme s.r.o., as the waste producer, transported at least 5,000 tons of construction waste from the demolition of the Hubertus Hotel in Harrachov to land in the cadastral area of Plavý, which was not authorised for this activity.



Illegal handling of demolition waste originating from the demolition on land in the cadastral area of Plavý

4.3.5 Conclusions from inspection activities

In 2023, the CEI carried out standard inspection activities associated with field investigations at business establishments or specific locations. In terms of the most serious and common violations of the Waste Act, the Inspectorate most frequently encountered cases of waste management, particularly with construction and demolition waste, at locations not designated for this purpose. Most often, this involved the illegal accumulation of waste, processing outside approved sites for waste management, simple dumping of waste on properties, illegal terrain modifications, exceeding capacity limits, or the disposal of non-compliant waste. Waste producers continued to be found lacking in sorting waste at the source. Further specific findings and issues are described in the chapters addressing the departmental tasks.

During inspection activities, there continue to be issues not only with the fulfilment of obligations but also with the interpretation of the obligations under the "new Waste Act" and the Act on Products with End of Life, as well as the implementing legal regulations and their transitional provisions. In practice, some interpretative issues persist, such as the classification of waste/non-waste (e.g., in the area of construction and demolition waste) or by-products (especially in the case of excavation soils). For these waste streams, it would be appropriate to establish rules through implementing regulations, similarly for some potentially recyclable industrial wastes (slag, ash, etc.). Practical problems also arise in relation to the compliance with and interpretation of rules for landfill disposal and recycling for construction use, the issue of mobile waste processing equipment, and the operation of such equipment outside the places of waste origin, as well as the issue of their cross-border transportation. It is evident that the new record-keeping obligations, which are set to take effect from January 1, 2025, will need further clarification and legislative simplification. This is a challenge not only for companies themselves but also for the permitting authorities and ultimately the CEI.

The capacities of the Inspectorate for selective control activities are still significantly burdened by the enormous volume of suggestions (in many cases trivial) and the obligation to carry out integrated inspections. Often, unresolved problems or suggestions from other authorities are unnecessarily forwarded to the Inspectorate, and in some cases, there is a lack of clarity between authorities regarding the interpretation of regulations and competences. This significantly limits the selective control activities of the Inspectorate, leading to the deferral of some inspections to future periods. Like other authorities, the CEI also faces insufficient human resources, i.e., a limited number of inspectors and mandatory inspections. Unfortunately, the volume of environmental and procedural regulations is constantly increasing, the time for implementing them into practice is shortening (new regulations replace the previous ones), and new, increasingly complex regulations are being issued. There is also an increase in unfounded complaints about the activities and bias of inspectors, the "aggressiveness" of the complainants and inspected individuals, intimidation of inspectors, etc. As a result, enforcing the law overall has become much more complicated, more difficult to enforce, and procedurally longer, especially in cases where the Inspectorate is targeting complex and serious cases in waste management, both in terms of substance, methodology, and procedure. In some serious cases, the attempt to resolve matters successfully and quickly within the framework of civil services for enforcement of regulations may, in fact, be objectively threatened.

A positive aspect is the fact that in the area of law enforcement, specifically in the fight against criminal activities related to waste, customs authorities and the Czech Police are also actively involved, thanks to continued

awareness-raising efforts in cooperation with the High Public Prosecutor's Office in Prague. This enables successful collaboration on serious cases, where operational and investigative tools, including financial investigations, help gradually uncover cases in which the Inspectorate lacks sufficient resources and capabilities to detect systematic illegal activities, or where administrative sanctions are not sufficient for the offenders. It will, therefore, be necessary to not only maintain but also develop this cooperation, setting long-term objectives in the form of education, awareness, organisational structures, focusing of forces and resources, and changes in legal regulations during the transposition of the Directive on criminal law protection of the environment, etc., to ensure that this collaboration and activity remain effective in the long term and contribute positively to internal security in the area of shared environmental protection and human health in the Czech Republic.

V In 2023, the issue of chemical substance supervision was also influenced by the large number of suggestions submitted by the public and public administration authorities. These primarily concerned the inspection of restricted substances in mixtures and articles (especially the issue of lead), as well as inspections related to the content of 1,3-butadiene in liquefied petroleum gases for consumer use. Due to a decrease in human resources in this area and the increasing number of complex cases, it has become problematic to maintain the number of inspections at the levels seen in previous years. Additionally, the volume of suggestions from both the public and market supervision (Safety Gate) is growing.

Within the Department of Inspection Support and Chemical Safety (DISCS), the use of unmanned aerial systems for the collection and subsequent analysis of spatial data has proven effective, including volume changes in waste, soil, and other materials over time. The data obtained serves as a basis primarily for inspection purposes, and in some cases, can be used in emergency situations. In 2023, the department also participated in public outreach events (open days, events for primary, secondary, and higher education schools), where modern technologies (unmanned aerial systems, spectrometers for screening analyses, etc.) used in support of the CEI's inspection activities were presented.

In the development and use of modern technologies, the Department of Chemical Safety will continue over the next three years, for example, as an application guarantor in projects of the Technology Agency of the Czech Republic, both in the field of chemistry and in the use of spatial data (e.g. satellite data, images, laser scanning, etc.).



4.4 Nature protection and CITES

4.4.1 Overview of inspection activity in 2023

Inspectors from the Nature Protection and CITES Department in 2023 focused their activities on examining situations, activities, and entities that may pose a threat to the interests protected under departmental laws, including those on nature and landscape protection, the Agricultural Land Fund, the protection of species of wild fauna and flora through trade regulation, the handling of genetically modified organisms, zoological gardens, and the conditions for the use of genetic resources under the Nagoya Protocol. Inspection activities consisted of approximately 40% planned inspections, which followed up on previous findings and reflected the current state. Inspections conducted based on suggestions from the public also accounted for approximately 40% of inspection capacities, with the remaining 20% involving investigations carried out proactively based on the Inspectorate's own findings.

Nature Protection and CITES inspectors conducted a total of 2,359 inspections and investigations in 2023 (slightly fewer than in the previous year) under the relevant departmental laws. With 76 inspectors, this corresponds to an average of more than 31 investigations per inspector annually. Additionally, within their area of competence, they participated in 87 further inspections in cooperation with other specialised departments. In 2023, a total of 849 decisions became legally binding (only slightly fewer than the previous year), including 624 decisions imposing fines (257 for offences by legal entities and self-employed individuals, and 367 for offences by private individuals), 19 warnings, 30 decisions to restrict or cease activities, 147 decisions on seizure or removal, 29 decisions on remedial measures, and 17 interim measures imposed.

The total amount of fines legally imposed in 2023 reached CZK 12,668,700, representing an increase of nearly 20% compared to the previous year. Of this amount, CZK 10,702,000 were fines imposed on legal entities and self-employed individuals, while CZK 1,966,700 were fines for non-business private individuals. Additionally, in 2023, the Nature Protection and CITES Department submitted four reports to law enforcement authorities, mainly in the area of CITES, and 82 suggestions to other state administration bodies at various levels. The results of inspection and administrative activities in most monitored indicators are approximately comparable to the previous year. However, a significant increase (nearly one-fifth) was observed in the total amount of fines imposed.

A significant portion of the Inspectorate's supervisory activities involves investigating suggestions from citizens and associations, which serve as a valuable source of information, particularly regarding the protection of trees growing outside forests and the agricultural land fund. In 2023, inspectors handled a total of 1,215 suggestions within the scope of nature protection, a number comparable to the previous year. On average, this equates to nearly 16 investigated suggestions per inspector for the year.

The most significant aspect of the Nature Protection Department's work involves inspection and administrative activities related to compliance with the provisions of **Act No. 114/1992 Coll., on Nature and Landscape Protection**. Traditionally, the area of nature protection accounted for the largest share of inspections (2,034 out of a total of 2,359 investigations and inspections) and administrative actions (fines totalling CZK 11,557,200 out of a total of CZK 12,668,700). It also encompassed all issued preliminary measures and decisions on activity restrictions or cessation, nearly two-thirds of corrective measures issued, and a significant portion of suggestions submitted to other state administration bodies. The scope of inspection, administrative, and offence-related activities in nature protection is exceptionally broad. This area is further detailed in sections concerning specific tasks performed and significant cases addressed during the year.

An essential part of the Nature Protection Department's activities is the control of compliance with the provisions of **Act No. 334/1992 Coll., on the Protection of the Agricultural Land Fund**. In 2023, a total of 59 inspections or investigations were carried out under this Act, of which 26 were carried out in cooperation with other professional departments of the CEI, in particular the Waste Management Department and the Water Protection Department. In the reporting period, the Inspectorate also investigated 30 suggestions pointing to possible violations of legislation in this area. A total of 16 suggestions were referred to other state administration bodies if the Inspectorate concluded that a violation of the Agricultural Land Fund Act had occurred but was outside its competence. Traditionally, most of the received suggestions referred to soil piling, waste disposal or the application of sewage sludge on land registered as agricultural land. In 2023, three entities were fined a total of CZK 43,000 for violating the provisions of Act No. 334/1992 Coll.

As part of its inspection activities, the Inspectorate cooperates closely with the Central Institute for Supervising and Testing in Agriculture and investigates its suggestions. The Central Institute for Supervising and Testing in Agriculture carries out agrochemical testing of agricultural soils for the content of hazardous elements and substances in agricultural soil. In the event of detection of above-limit content of these elements and substances in the soil, it submits a suggestion to the CEI to investigate the contamination of agricultural soil. In 2023, a total of 12 inspections were carried out at various locations in the country on the basis of information from the Central Institute for Supervising and Testing in Agriculture. Most of these inspections (10) were carried out in the Pilsen Region. The CEI always carried out an inspection of the agricultural entity at the given location and informed the relevant state administration authorities about the detection of exceedances of risk elements or substances according to the applicable legislation.

In the field of **CITES**, the Czech Republic as a breeding, growing and collecting power with a large hunting community, plays a significant role as a country of origin, destination, and transit in the area of wildlife crime. In 2023, the CEI carried out 225 inspections (130 inspections in 2021 and 263 inspections in 2022) and more than 1,200 additional inspections and investigations, mainly during border control activities (airports, customs post). The Inspectorate also dealt with a total of 121 CITES suggestions (39 in 2021, 98 in 2022). Compared to 2022, inspection activity in the area of offences and administrative proceedings has been further intensified. In 2023, the Inspectorate imposed a total of 240 fines (of which 231 on natural persons and nine on legal persons and self-employed individuals), totalling CZK 1,003,500 (of which CZK 646,500 on natural persons and CZK 357,000 on legal persons and self-employed individuals), three warnings and ten corrective measures (in 2022, a total of 213 fines totalling CZK 1,282,000 were imposed). A total of 137 confiscation decisions became legally binding in 2023 (129 in 2022).

In 2023, as in 2022, the Inspectorate received more than 1,000 import and export notifications, which it examined individually and provided the necessary assistance at border controls as requested by customs authorities.

At **Ruzyne Airport**, the CEI recorded a total of 367 active interactions with customs authorities in 2023, which represents a steady slight decrease compared to previous years (506 interactions in 2021 and 453 interactions in 2022). The majority of illegal trade was represented by **individual imports of traditional Asian medicine products** by members of Asian communities. In 2023, 107 cases of such imports were detected, about half as many as in 2022 and about three times as many as in 2021. The share of so-called tourist imports (corals, shellfish shells, animal products and parts of their bodies-feathers of birds, crocodile skin products, skeletal remains, etc.) was limited to a few cases. The steady trend of reduction of this component of the offence can be attributed to the Inspectorate's long-standing emphasis on media coverage of CITES issues. The Inspectorate also provides operational advice to citizens enquiring about the possibility of importing various items from abroad. In 2023, the Inspectorate continued to inspect all exported and imported raptors for falconry purposes. For example, of the live specimens protected by CITES, a total of 16 primate specimens and 18 reptile specimens were seized during the interaction between Customs and the CEI during export controls. The ratio of inspection activities to detected cases of illegal activities illustrates the increasing effectiveness of cooperation between border control authorities.

In 2023, the Inspectorate carried out a total of 616 inspections of **international mail**, which is almost double the number of inspections carried out in 2022 (336 inspection activities). CITES violations were identified in 20 cases (mostly leather and shell products, but bear bile, dried insects and traditional Asian medicine products were also seized).

The Inspectorate cooperated intensively with **law enforcement authorities**. Several cases have developed from filed reports and shared findings from inspection activities and are currently under criminal investigation. The Inspectorate provided assistance to customs and police authorities, in particular in taking over specimens for further action, taking seized specimens into custody, providing expert consultations during house searches and drawing up expert opinions. Within the framework of activities organised by Europol and Interpol, the Inspectorate, in cooperation with the Customs Administration of the Czech Republic, continued to monitor trade in eel in the country. After analysing the results of the previous years, the Inspectorate has defined further priorities for 2023 in the field of inspection activities, namely inspections of breeding, import and export of primates and large parrots.

During the inland inspection activities, more than 35 live reptile specimens, almost 30 live bird specimens and 10 live mammal specimens (including one tiger and one lion) were confiscated by the CEI during its own activities, in cooperation with the Police of the Czech Republic or the Customs Administration of the Czech Republic, or during control actions coordinated by Interpol when illegal activities were detected.

In 2023, the Inspectorate also actively participated in **international programmes** to combat wildlife crime. Inspectors were involved in meetings of European commissions and working groups as well as Interpol committees.

Inspections on compliance with the provisions of Act No. **78/2004 Coll., on the Handling of Genetically Modified Organisms and Genetic Products**, Act No. **162/2003 Coll., on the Conditions for the Operation of Zoos**, and Act No. **93/2018 Coll., on the Conditions for the Use of Genetic Resources under the Nagoya Protocol** are the subject of thematic department tasks, the evaluation of which is included in the following section. So far, these areas concern a limited number (in the order of tens) of subjects.



4.4.2 Overview of Departmental Tasks Performance

The so-called departmental tasks within the scope of all territorial inspectorates include inspections resulting from inter-departmental obligations (Cross Compliance) and inspections within comprehensive agendas resulting from existing knowledge, experience or requirements of the Ministry of the Environment (inspection of the implementation of imposed corrective measures, handling of genetically modified organisms, inspection of zoos).

Cross Compliance (CC) inspections on agricultural operators

In connection with the allocation of agricultural subsidies, the Inspectorate carried out inspections of agricultural entities to the planned extent, specifically in the past year it carried out the so-called cross-compliance check on a total of 312 applicants for agricultural subsidies. Compliance with the mandatory farming requirements (MFR) arising from Council Directive 79/409/EEC on the Conservation of Wild Birds (MFR 3) was assessed by the Inspectorate in a total of 199 cases, and 112 subjects were inspected for compliance with the requirement arising from Council Directive 92/43/EEC on the Conservation of Natural Habitats (MFR 4).

Inspections focused on compliance with the requirements arising from the above-mentioned European directives and compliance with the relevant provisions of Act No. 114/1992 Coll. are directed to areas where there is a greater risk of conflict between agricultural management and protected interests. In the case of MFR 3, this concerns land where there may be unauthorised interference with trees growing outside the forest, significant landscape features such as watercourses and valley floodplains or bird nesting sites, or land with the occurrence of selected specially protected species associated with grassland (blues, corncrakes). Requirement MFR 4 is inspected in relation to the existence of a site of European importance within the managed area or its immediate surroundings.

The majority of cross-compliance checks were carried out on the basis of a centrally drawn up control plan covering at least 1% of the total number of applicants for agricultural subsidies. Three inspections on compliance with the requirements of the Wild Birds Directive were added during the period under review on the basis of own findings or on the basis of received suggestions. In two cases, an already planned inspection was extended to include the relevant requirements, and one entity was included in the plan completely beyond the original plan.

A total of three times in the past year, serious deficiencies were found during cross-compliance checks, which were the basis for a proposal to reduce the subsidy. In each case, the inspections were supplemented by exceptional controls, of which twice the originally planned inspections within the scope of the TI Ostrava were extended by additional control requirements based on the findings of during the on-site control. The detected infringements concerned the unauthorised felling of trees growing outside the forest, in one case five individual mature trees, in the other case more than 1 000 m² of involved stands of smaller trees. As a result of the detected infringements, a proposal was made to reduce the subsidy by 1% and to impose a fine of CZK 10,000 in the injunction procedure.

The inspection of the third entity within the scope of the TI České Budějovice was carried out based on a suggestion. The violation concerned non-compliance with the protection of a significant landscape feature, a watercourse and a valley floodplain, in connection with cattle grazing. Damage to the channel and adjacent floodplain caused by grazing cattle was found on several sections of the Močeradský stream and its tributaries, with the cumulative length of damage amounting to several hundred metres of watercourse. At the same time, there was damage to pools recently constructed in the vicinity of one of the tributaries, specifically to their bank

edges and parts of the exposed bed. Based on this infringement, a proposal has been made for a 1% reduction in the subsidy and a corrective measure and a fine for the infringement will be imposed.

The inspected entities usually cooperate with the Inspectorate and respect its instructions to implement preventive measures to avoid possible conflicts between management and the public interest in the form of nature and landscape protection.

During inspections, the Inspectorate continuously draws attention to selected protected interests and to possible risk aspects of agricultural activity, including possible consequences in terms of reduction of agricultural subsidies. This can be attributed to the relatively low number of infringements detected, especially in recent years.

Inspections on the handling of genetically modified organisms

Inspections on the handling of genetically modified organisms (GMOs) are carried out according to a pre-prepared plan, which, given the limited number of entities handling GMOs, allows to control each GMO user at regular intervals. However, as the number of entities authorised to handle GMOs is increasing every year, it is necessary to adapt the planning of inspections to this fact. Especially in the case of entities handling only in the first risk category or those that only store GMOs on their sites for a long time, the inspection intervals of these entities can be extended and, on the contrary, priority can be given to inspections of entities handling in higher risk categories or newly authorised to handle GMOs.

In 2023, a total of 26 inspections were carried out in this area. In 24 cases these were inspections of contained GMO handling in risk categories 1-2. One of the planned inspections was not carried out because the site where it was planned duly notified the Ministry of the Environment of the termination of its activities in the field of GMO management. During the inspections, violations of Act No. 78/2004 Coll., on the Handling of Genetically Modified Organisms, were identified only in one case. It concerned the handling of GM mouse strains for which neither a risk assessment nor a notification on handling of new GMOs was prepared and submitted to the Ministry of the Environment by the inspected person. The inspected person immediately corrected this error, however, the matter will be subject to infringement proceedings.

Based on the results of the inspection carried out at the end of 2022, the Inspectorate imposed a warning to one subject in 2023 for administrative misconduct consisting in failure to send the final report on the termination of GMO handling to the Ministry of the Environment within the statutory deadline and related false information in the annual reports on closed handling.

In 2023, two inspections were carried out on the introduction of transgenic plants into the environment, so-called field trials. As already mentioned in previous reports, the establishment of field trials was significantly reduced by the authorised entities, so only the long-term trial with GM plum trees and the trial with GM barley, started in 2019, continued in 2023.

Another type of introduction of GMOs into the environment are clinical trials of medicinal products using genetically modified cells. In 2023, compliance with Act No. 78/2004 Coll. was inspected in the case of this type of GMO introduction into the environment as well, within the framework of the inspection of two entities authorised both for contained disposal and for conducting clinical trials.

No violation of the Act on the Management of Genetically Modified Organisms was identified during the inspections of the introduction of GMOs into the environment.

Inspections of zoos

During the year 2023, a total of 12 inspections of zoos operating under a licence granted by the Ministry of the Environment (MoE) were carried out. An essential part of the inspections of such facilities consists not only of verifying compliance with the obligations arising from Act No. 162/2003 Coll., on Zoos, but also the handling of specimens protected by the CITES Convention in the diction of Act No. 100/2004 Coll., as these are mostly inspections of establishments keeping a significant number of specimens and require the processing of a large number of documents, including verification of facts with other state administration bodies, not all the inspections carried out have been completed. Of the inspections initiated in 2023, the inspection of one entity was not completed in the same year. On the other hand, one inspection of a zoo started in 2022 was completed. In the case of zoos operating under a valid licence, the inspections in 2023 did not reveal any violations of Act No. 100/2004 Coll., Act No. 114/1992 Coll. or Act No. 162/2003 Coll.

The Inspectorate also cooperated with the Ministry of the Environment, which provided information and documents necessary for conducting its inspection activities, mainly in the form of comments on regular inspections of the Ministry of the Environment or on licence applications. In 2023, the Inspectorate prepared a total of 14 statements on regular inspections by the MoE and four statements on applications for a licence

to operate a zoo. In one case, this was a statement on the application of an entity that already has a licence but plans changes in the operation of the facility that require a new decision on the zoo licence.

An integral part of the inspection activities aimed at ensuring compliance with Act No. 162/2003 Coll. was the inspection of breeding facilities that could fulfil the characteristics of a zoo. Inspections of facilities of this type were carried out on the basis of the inspectorate's own initiative or findings. A total of two such facilities were inspected in 2023.

During the inspection of these facilities, it was found that in one case the facility met the definition of a zoo within the meaning of Section 2(1)(a) of Act No.162/2003 Coll. The Inspectorate imposed a fine on the operator of this facility for the offence of operating a zoo without a licence. At the same time, the operator of the establishment was also fined for offences under the Act on Trade in Endangered Species. Since the operator immediately modified the operation of the facility so that it continued to correspond to the type of facility that is not considered a zoo, the CEI did not proceed with administrative proceedings to close the facility to the public. The inspection of the second establishment revealed that it is a facility which is not considered a zoo under Act No. 162/2003 Coll.

In 2023, the CEI also imposed a fine for the offence of operating a zoo without a licence on an entity whose inspection had already been initiated in 2021. The appeal authority subsequently upheld the Inspectorate's decision in this case and the decision on the fine thus became legally binding at the beginning of 2024. Administrative proceedings were also initiated against this entity in 2023 to close the zoo to the public for operating without a licence. The decision in this case also became legally binding only in 2024.

During 2023, an inspection was also carried out on a facility that was previously operated under a zoo licence that expired at the end of 2022. However, a new zoo licence was not issued to this entity by the MoE. Nevertheless, the facility's operator continues operating a zoo without a licence and therefore the Inspectorate proceeded to close the facility to the public. The decision of the Inspectorate in this case was subsequently confirmed by the appeal authority, and the decision to close the zoo to the public became legally binding only in 2024. No infringement proceedings have been initiated yet due to further inspection of the facility.

Inspections on the implementation of measures imposed by the CEI pursuant to Sections 66 and 86 of Act No. 114/1992 Coll.

The Inspectorate's core competences include imposing restrictions or conditions on the performance of activities, setting conditions for measures to remedy harmful activities and imposing alternative remedial measures. The essence of the task is to monitor the fulfilment of the obligations imposed and any further steps leading to their enforcement. The selection of the obligations imposed for the purpose of monitoring their fulfilment is carried out in cooperation between the individual territorial inspectorates and the Directorate of the CEI, the purpose being to continuously examine all decisions of this type issued. Related to this topic is the inspection of the implementation of measures imposed by other state administration bodies, typically replacement planting imposed within the framework of decisions on felling permits.

In total, 64 inspections were carried out by the Inspectorate, almost half of which took place within the scope of the TI Ústí nad Labem and another approximately one fifth within the scope of the TI Ostrava. Some of the corrective measures inspected concerned the implementation of replacement planting of trees, while other measures were aimed at ensuring a favourable state in relation to the protective conditions of specially protected species, significant landscape features, specially protected areas or the subject of protection of a Site of European Importance, usually in connection with landscape management or construction activities. The restrictions or bans imposed were usually aimed at ensuring the protection of the habitats of specially protected species of plants and animals.

The measures and conditions imposed were generally respected by the obliged entities and most of the inspections did not reveal any violations of the law. Problems were identified in a total of 11 inspections in the six territorial inspectorates. On the basis of the findings, fines are gradually being imposed for non-compliance with the decision issued, and in one case an amended decision to impose a measure was issued for objective reasons.

The Liberec Territorial Inspectorate addressed non-compliance with the corrective measure of filling in the drainage ditch and removing the spring pit. The company LIGRANIT a.s. was the originator of the ditch and the sump and was found guilty in the subsequent proceedings of an offence for unauthorised interference with the habitat of a specially protected plant species, harmful interference with a significant landscape feature

of a watercourse and unauthorised felling of trees growing outside the forest. In addition to the fine for the offence, the company was also ordered to remove the constructed sump and ditch in 2021. A final fine of CZK 40,000 was imposed on the company for failure to comply with this measure within the time limit, and a further inspection of compliance with the imposed measure will be carried out in 2024.

Two unfulfilled corrective measures were identified within the scope of the TI Brno, namely the failure to plant 21 trees, imposed as compensation for the harmful interference with a significant landscape feature and altering the landscape character due to tree felling along the riverbed, or the failure to instal a replacement nesting platform and thunderstick measures against injury to white storks, imposed on the basis of previous unauthorized interference with the natural development of this specially protected species. In both cases, offence proceedings will be initiated with the obliged entities.

Serious cases of this type were handled by the TI Ústí nad Labem. A final fine of CZK 80,000 was imposed on Arbo PRO s.r.o. for repeatedly failing to comply with the imposed corrective measure. In 2024, proceedings for the enforcement of non-monetary performance will be initiated with this company. A final fine of CZK 20,000 was imposed on a natural person for failing to comply with the deadline for mowing set by the decision with regard to the protection of the population of specially protected species - the large blue butterfly and the dusky large blue butterfly.

One natural person and one legal entity were fined CZK 15,000 and CZK 7,000 respectively for failure to carry out the imposed replacement planting. Two other individuals were subjected to a non-monetary enforcement procedure for the non-compliance of the replacement planting, the purpose of which is to officially ensure the implementation of the replacement planting and the reimbursement of the costs incurred by the obliged person. So far, one of the initiated enforcement actions has been successful.

Last but not least, a violation of the terms of the decision was detected during an inspection within the scope of the TI Hradec Králové. This consisted in non-compliance with the prohibition of activities in the Site of European Importance of Orlice a Labe, which also resulted in the imposition of a fine.

Inspectorate-wide check

An Inspectorate-wide check was carried out in the past year in the territory of the Bohemian Paradise Protected Landscape Area, specifically on May 15 - 18, 2023. It focused on compliance with the provisions of legal regulations and decisions concerning nature and landscape protection in the exercise of state administration by the substantively and locally competent municipal authorities in the territory of the Protected Landscape Area. The inspected subjects were 11 municipal authorities in the districts of Jičín, Mladá Boleslav and Semily, as well as the Sobotka Municipality, which is a municipal authority with extended powers. The subject of the inspection was mainly the issuance of decisions on felling permits, keeping an overview of land suitable for replacement planting and an overview of publicly accessible roads, paths and footpaths, or documentation relating to memorial trees, registered significant landscape features and issuing binding opinions on interventions in these significant landscape features (in the case of the Sobotka municipality).

During the inspection, a total of 250 administrative decisions issued by municipal authorities with jurisdiction in the PLA territory between 2019 and 2023 were recorded, or 76 administrative decisions issued by the Sobotka Municipality in the same period. The Inspectorate focused in detail on selected decisions. The majority of the deficiencies concerned the most frequently inspected decisions on felling permits, the deficiencies identified were usually insufficient specification of the trees to be felled, insufficient justification of the decision, including evaluation of the importance of the tree species and reasons for felling, insufficient specification of replacement planting or other formal (official) deficiencies of the municipal authority's decision-making.

All inspected municipal authorities were informed on the spot about the identified shortcomings, received the inspection report and contacts to their superior methodological body, or references to the methodological instructions of the Ministry of the Environment. The aim of the departmental task was to improve and unify the procedure of the municipal authorities in the PLA territory and to ensure legal certainty in their performance of state administration. The topic of inspection of the state administration is an integral part of the preventive (methodological) activities of the Nature Protection Department of the CEI. A higher level of deficiencies was found in the decision-making of some municipal authorities, which will be the subject of further inspections.

Nagoya protocol

In 2023, two inspections of users of genetic resources under the Nagoya Protocol were initiated. One of the inspections had not been completed by the end of 2023, as further documentation had to be requested from the inspected entity as part of the fact-finding process. An inspection of a user of genetic resources under the Nagoya Proto-

col, which was initiated at the end of 2022, was also completed in 2023. No violations of Act No. 93/2018 Coll. and the related European Regulations were found during the inspections. The annual plan for user inspections is drawn up by the Inspectorate in cooperation with the MoE using a risk-based approach. The CEI also cooperates closely with the MoE in inspections of users of genetic resources.

CITES - potentially problematic entities

In 2023, the Inspectorate focused mainly on inspections of breeders of large parrots, primates, reptiles and large felines. The most frequent deficiencies detected during the inspections were violations of the law consisting in non-compliance with the legal deadlines for reporting changes concerning the specimens concerned. Based on their findings, the relevant territorial inspectorates then coordinated with the registration authorities and the inspected entities to rectify any identified deficiencies.

Inspections of entities possessing a larger number of specimens are usually still ongoing, especially due to the large number of specimens inspected and the amount of supporting documentation. The processing of all the findings and the drawing of conclusions therefore requires a time-consuming process of more than one year.

The most publicly followed case was undoubtedly the seizure of the tigresses "Charlotte" and "Antonia Ramba", whose owners failed to prove the legal origin of the animals. Both were seized and then temporarily placed in the Tierart Wild Animal Sanctuary, a specialised facility for big cats in Germany run by the international animal protection NGO Four Paws.



4. 4.3 Overview of Specific Tasks Performance

The specific tasks reflect activities and subjects that represent actual and potential serious threats to the interests of nature protection in the territorial scope of individual territorial inspectorates. Targeted inspection activities are thus based on local knowledge of individual regions and focused on activities and subjects that can be assumed to pose a potential serious threat to nature conservation interests protected by laws within the Inspectorate's competence. Although the range of specific tasks is much broader, we list here only those tasks to which we attach the greatest importance, or those which, by their focus, illustrate the wide range of the NPD's activities.

Inspections on compliance with the basic and specific protection conditions of small-scale and large-scale specially protected areas and Sites of European Importance

The Inspectorate has long considered inspections of compliance with the protective conditions of specially protected areas (SPAs) to be one of its priorities in the field of nature and landscape protection. Among other things, SPAs contribute to the habitat diversity of the landscape and provide refugia for endangered, rare and specially protected species of animals and plants. In 2023, all territorial inspectorates of the CEI carried out 142 inspections of small SPAs, 33 partial inspections on the territory of several PLAs and a total of 34 inspections of Sites of European Importance (SEI). The inspections focused, among others, on the demarcation of boundaries, assessment of the status, compliance with basic and specific protection conditions of the SPA during management and by visitors, preliminary or basic protection of the SEI, as well as control of activities or interventions that can be carried out only with prior approval of the nature protection authority. With a few exceptions, these were planned inspections, only some of them were carried out on the basis of a received suggestions. A number of inspections focus simultaneously on territorial, species and general nature protection. Some of the findings of the Inspectorate are set out below.

In the scope of the TI Brno, two violations of the protective conditions of protected areas were detected, resulting in fines being imposed. A fine of CZK 30,000 was imposed on a natural person for establishing over 51 fireplaces on the territory of the Miroslavské kopce National Nature Monument. Fires and brushwood were burnt on these fireplaces. Furthermore, a block fine of CZK 2,000 was imposed on an individual who was carrying out soil piling on the territory of the Cínová hora Nature Reserve.

A total of seven cases of legal violations were identified during inspections by TI Ostrava. So far, four inspection findings have resulted in fines, including two fines in the amount of CZK 10,000 for legal entities for farming without an exemption in the Hořina NR, or for the use of heavy agricultural machinery when farming in the Heraltický potok Nature Monument (NM) and the subsequent damage to the protected area. The remaining cases have not yet been resolved. The TI Plzeň addressed the storage of straw bales on the edge of the Chodská Úhlava NM, the placement of hunting equipment in the Luňáky NR or the soil in the protection zone

of the U Hřbitova NM during construction activities in the vicinity of the protected area. In the first two cases, the operators were asked to remedy the situation, and an inspection of the landowner will be initiated in connection with the soil deposition. Two other violations of the law were detected in the protected areas under the jurisdiction of the TI České Budějovice; the subsequent proceedings have not yet been completed.

Initially, in relation to ensuring the protection of the habitats of the SPA, the inspectors of the TI Brno carried out an inspection of compliance with the legal provisions in connection with the planned motocross training and races in the 3rd zone of the White Carpathians Protected Landscape Area. The Inspectorate revealed that the Administration of the White Carpathians Protected Landscape Area did not issue an exemption from the prohibitions for the motorcycle competition. The Inspectorate therefore proceeded to issue a preliminary measure and subsequently a decision on the restriction and prohibition of activities pursuant to Section 66 of Act No. 114/1992 Coll., until the legal situation is ensured.

In a number of small-area SPAs, the inspection identified insufficient or missing signboards or stripe markings, which are supposed to alert visitors to the existence of the SPA and the specific protection regime and thus the rules of behaviour. Findings of this type are forwarded to the managers of the area (competent nature conservation authorities). Within the large-scale, specially protected areas, mainly the entrances and staying of vehicles or other basic protection conditions in zone 1 or 2 of the protected area were inspected. In this case, the inspections had mainly a preventive effect; two violations were dealt with within the scope of the Hradec Králové TI and one within the scope of the Havlíčkův Brod TI. No violations of the law were found in any of the SEI inspections carried out.

Inspections to ensure legal protection of selected commemorative trees

Commemorative trees (CT) represent dominant features of landscape and cultural-historical importance. Very often, due to their age, they are also of inestimable ecological importance. It is therefore necessary to increase their protection and ensure their identification in the landscape, which can prevent their possible damage by human activity. The protection of CTs is ensured by a decision prohibiting interference with them and their protection zone. Any interference can only be carried out with the consent of and subject to conditions imposed by the competent nature conservation authority. Identification of the CT in the landscape is ensured by a plaque with the inscription 'commemorative tree' and a small national emblem. These identifiers are a legal obligation, which is provided by the competent administrative authority.

In 2023, most of the territorial inspectorates were involved in CT inspections to varying degrees, and the status and protection of a total of 144 commemorative trees, groups of trees or tree plantations were gradually inspected. The majority of the inspections carried out did not find any legal violations or major deficiencies. Most of the inspected commemorative trees are properly cared for, and the manner of their designation and marking in the field also complies with the requirements of the law. However, in a few cases, substantive or formal deficiencies were identified, typically insufficient or outdated signage, insufficient care or non-updated status (non-existence) of the CT, which were addressed through discussions with the relevant nature conservation authorities.

Inspections of investment projects and construction activities focused on possible violations of legal provisions and inspections of compliance with the conditions of issued exemptions from the prohibitions for SPA and SPS, decisions on the establishment of a derogation procedure for wild birds and other decisions of locally competent state administration authorities

In the scope of most territorial inspectorates, inspections were carried out in various forms to ensure compliance with legal regulations in connection with the implementation of construction projects, modifications or reconstruction. Typically, they were linked to verifying compliance with the conditions of decisions or binding opinions issued by other public authorities. In total, there were dozens of inspections carried out which can be classified in this area, and repeated misconduct by those responsible has been recorded.

The inspectors of the TI Plzeň focused on verifying compliance with the conditions of the issued exceptions to the prohibitions for specially protected species of amphibians and reptiles, issued decisions on the felling permits or binding opinion on the intervention of the significant landscape feature on several construction sites. The inspection of a company that, during the construction of a production hall, filled in part of a wetland which is a habitat of specially protected species and thus failed to comply with one of the conditions of the issued exemption decision has not yet been completed. The subsequent initiation of infringement proceedings is expected. Another legal entity has already been fined on the spot for damaging the root systems of four mature trees during construction activities. In several other cases, no violations were identified. Inspectors from several other TIs were involved in verifying compliance with the terms of the amphibian exemption decision, but usually no violations were identified.

The Inspectorate has long considered control of the conditions specified in the exceptions to the prohibitions for SPAs to be one of the priorities in the field of nature and landscape protection. The existence of protected areas contributes to the habitat diversity of the landscape and provides refugia for endangered, rare and specially protected animals; therefore, compliance with the conditions set by the relevant nature protection authorities is necessary for activities carried out in them. For the same reasons, great attention is paid to species of plants and animals that are endangered or rare, scientifically or culturally very important on the territory of the Czech Republic and which are classified as specially protected species for these reasons. One of the tools is the legally established regulation of interference with their populations and biotopes.

Inspections on compliance with the protection of habitats and populations of specially protected species of plants and animals

As in previous years, the Inspectorate carried out a number of planned and unplanned inspections focused on species protection, often in combination with other protected interests (SPAs, SEIs, SLFs). Many inspections are carried out on the basis of received suggestions that point to possible violations of the protection conditions of specially protected species.

The Inspectorate has repeatedly encountered unauthorised interference with 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 inspections carried out to protect specially protected species were related to construction activities, typically excavations or reconstruction of existing buildings and other structures. Multiple instances of misconduct were detected in the scope of several TIs, leading to offence proceedings and the imposition of fines.

Among the specific cases, we can mention the damage of a locality with the occurrence of snowdrops by excavation works carried out for the installation of water pipes in jurisdiction of the TI Havlíčkův Brod. In the subsequent proceedings, a fine of CZK 30,000 was imposed on the legal entity KLAS a.s. Čihošť' for the offence. The inspectors of the Olomouc TI addressed, among other things, with interference with the natural development of specially protected species in connection with the illegal application of rodenticide. The agricultural cooperative Těšetice was found guilty and fined CZK 50,000 for the offence.

A significant part of the inspections is focused on **compliance with the protection conditions of specially protected species that use human buildings, especially bats, swifts, storks and other birds**. The use of human buildings by specially protected species thriving in urbanised environments is a chronic problem. This is particularly the case when a building as a habitat for a specially protected species collides with its external reconstruction, usually the building shell and roof. Specially protected animal species are endangered or rare, scientifically or culturally very important on the territory of the Czech Republic, therefore legal regulation is needed to ensure the protection of their habitats in the form of human buildings, which are mostly used by them only seasonally. The main reason for the use of human settlements is the lack of natural habitats for these species in the cultural landscape, such as old trees with hollows.

A specific case are **inspections of caves, mine workings and other sites with the occurrence of bats**, which belong to specially protected species and which use these areas as wintering grounds or as summer colonies. The availability and favourable conditions prevailing in these areas are therefore crucial for the survival of populations of this group of mammals. Traditionally, in 2023, the inspection focused on caves and mines in the territory of the Bohemian Switzerland National Park, the Labské pískovce Protected Landscape Area and the České středohoří Protected Landscape Area; in addition to the wintering sites, the TI Hradec Králové inspected compliance with the protective conditions for summer colonies of bats in buildings (21 inspections in total). In the inspected cases, no unauthorised entries into these premises, disturbance or killing of hibernating bats, or damage or other interference with the security of these premises were identified. Based on the results of the monitoring, it can be stated, among other things, that the recent barring of access to a number of mine workings (installation of grilles) has had a positive effect on the population of bats.

Inspections on the keeping and handling of CITES specimens, specimens of SPSs or wild birds

Inspections focused on compliance with legal regulations in the possession, breeding and other handling of CITES specimens, specimens of specially protected species and wild birds are carried out regularly by the CEI. The selection of the inspected entities is based on various criteria, often in cooperation with the relevant regional authorities or the Ministry of the Environment. Often, it is based on irregularities detected in the CITES Register, on a higher number of recorded cases of illegal handling of specific species or on the suggestions of other authorities in the Czech Republic and abroad. In particular, breeding of birds of prey and owls, parrots or songbirds, and breeders of turtles or other groups of reptiles are systematically inspected within the scope of several TIs.

Collectively, this set can include control activities aimed at compliance with a wide range of legal requirements in the field of CITES, species and general nature protection, i.e. in particular proof of origin, compliance with the registration obligation, the obligation of unmistakable marking, reporting of acquisitions or changes, or compliance with the conditions set out in the regulations, the decision on the exemption from the protection conditions of the SPSs or the decision on the establishment of a derogation procedure for wild birds.

Dozens of cases of non-compliance with the legislation were recorded during the inspections carried out in 2023, most commonly the non-reporting or late reporting of acquisitions or changes, or the absence of an unmistakable marking. Less serious deficiencies are identified in the scope of all the territorial inspectorates. The standard procedure is to impose corrective measures in terms of compliance with the legal requirements and to impose an appropriate sanction, typically in the form of a block fine or an on-the-spot penalty. Occasionally, cases with a combination of several offences in the area of proof of origin, compliance with the registration obligation or unmistakable marking are dealt with, resulting in the imposition of fines of tens of thousands of CZK; in justified cases, the Inspectorate will proceed to the removal or seizure of illegally held individuals or specimens.

Inspectors from the TI Hradec Králové and the TI Brno were mainly involved in the inspection of holders of birds of prey, owls and corvids. In the majority of inspections, no violations of legal regulations were found. An exception was the failure to prove the origin of one individual of the Eurasian eagle-owl, placed in the premises of the rescue station of the KRNAP Administration. Apparently, it was a captive and falconry-reared individual, but without unmistakable markings. The Inspectorate formally removed this individual from the care of an unknown person and left it in the care of the rescue station.

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

Since 2019, the TI Plzeň has been carrying out targeted inspections of operating shooting ranges, with a focus on verifying compliance with the prohibition of introducing substances and preparations other than those permitted by specific regulations into the ALF. Specifically, the subject of the inspection is to verify whether the soil in the impact areas meets the limits for lead content, for which a preventive value of 60 mg per kilogram of dry weight of the sample and an indication value of 300 mg per kilogram of dry weight of the sample are set. Inspections of three shooting ranges were conducted in 2023. Based on the analyses of the soil samples collected, one shooting range was found to have exceeded the preventive value for lead in soil. Based on these findings, the competent authority for the protection of the agricultural soil and the Central Institute for Supervising and Testing in Agriculture were informed of this fact. Another shooting range was found to exceed the lead in soil indicative value and the Central Institute for Supervising and Testing in Agriculture will be contacted with a request to carry out official soil sampling and analysis.

At the last shooting range, soil samples were collected by the CEI inspectors and subsequently sent to the CEI laboratory at the Directorate for analysis of lead content in the soil, but these analyses have not yet been performed. In addition, TI Prague, in cooperation with colleagues from the Waste Management Department, addressed a shooting range located in a wetland area.

After a two-year transitional period, the legislation set out in Commission Regulation (EU) 2021/57 concerning the ban on the use of lead shot in and near wetlands in connection with the amendment of the REACH Regulation entered into force on February 15, 2023. According to this regulation, it is prohibited to shoot or carry lead shot in wetlands or within 100 m of wetlands. As part of the inspection, the inspectorate again collected soil samples in the impact area, which were subsequently submitted for analysis. The results of these analyses are pending.

In this issue, the Inspectorate addressed the disposal of sludge from sewage treatment plants on land that is part of the ALF. Close cooperation with colleagues from the waste management department is needed here, but first it is necessary to determine whether the sludge meets the applicable limits under Act No. 541/2020 Coll., on Waste. Soil samples are then collected for analysis to determine whether the sludge could possibly have contaminated agricultural land.

In addition, the Inspectorate also dealt with other specific tasks such as:

- inspections of registered significant landscape features and significant landscape features watercourse and valley floodplain (TI Prague, Ústí nad Labem);
- inspections of compliance with the ban on commercial use of inaccessible caves (TI Brno - no violations);
- inspections of water retention in the landscape with relation to the protection of nesting sites of wild birds and specially protected species associated with water and wetland biotopes (TI Brno);
- inspections of the implementation of imposed replacement plantings (TI Prague, Ústí nad Labem – several violations);

- inspection of the notification obligation for felling under power lines (TI Plzeň - no violation);
- inspection of compliance with the protection of trees in connection with the maintenance of public greenery and other areas (TI České Budějovice - no violations);
- inspections of municipal authorities and municipalities with extended powers in relation to felling permits and imposed replacement plantings (TI Prague, České Budějovice, Hradec Králové - frequent mistakes of locally competent nature protection authorities);
- inspection of small hydropower plants, with a focus on compliance with minimum residual flows (TI Olomouc - in a total of 11 inspections, one violation was detected (under Significant Cases).

4.4.4 Significant cases

In 2023, the Inspectorate encountered a wide range of unlawful behaviour in the monitored area. Some of the investigated cases stand out due to their scale, broader impact, or because they may indicate emerging trends in the violation of nature protection regulations. Externally, serious violations are reflected primarily in the imposition of fines at the upper end of the legally prescribed range. The Inspectorate addressed severe cases of illegal conduct related to terrain modifications and construction activities in specially protected areas (SPAs) or sites hosting specially protected species. However, the category traditionally includes extensive unauthorised felling of trees outside forests or damage caused by improper pruning. It is no coincidence that certain decisions to restrict or prohibit activities, typically in connection with the implementation of investment projects, are also classified as significant.

TI Prague

The company Vlašimské městské lesy, during the sanitation of municipal forests (trees infested by bark beetles), damaged the root systems of a significant group of memorial lime trees. Within the protective zone of these trees, the company established a trajectory for timber extraction and a temporary depot without the necessary authorisation from the nature protection authority. For this conduct, the company was fined CZK 40,000. The highest fine, amounting to CZK 200,000, was imposed on the company Real Eco Technik for the destruction of 4,093 m² of dense growths of trees outside forests without the required authorisation from the nature protection authority in the cadastral areas of Buštěhrad and Stehelčevy.

TI České Budějovice

For the unauthorised felling of 1,806 m² of dense growths and 13 trees outside forests, the company Adolissare was fined CZK 130,000.

TI Plzeň

As part of the reconstruction of the road and bridge over the Chýlava watercourse, the Plzeň Region Road Administration and Maintenance Authority, through a contracted entity, carried out construction work in the riverbed. This included the movement of machinery in the stream below and around the bridge, resulting in water turbidity, riverbed stress during concrete transport to the construction site, potential leaks of operating fluids from vehicles, construction activities directly conducted from the watercourse leading to contamination with concrete, and the filling of riverbanks with quarried stone. The watercourse at this location serves as a habitat for the specially protected species, the stone crayfish. The company was aware of this, as the Regional Authority of the Plzeň Region issued a statement for the project, stipulating that the aquatic ecosystem and the stone crayfish habitat must not be affected during construction. For harmful interference with the habitat of the specially protected species stone crayfish, the Plzeň Region Road Administration and Maintenance Authority was fined CZK 150,000.



Construction work in the Chýlava riverbed, which serves as a habitat for the critically endangered stone crayfish



Construction work in the Chýlava riverbed, which serves as a habitat for the critically endangered stone crayfish.

TI Ústí nad Labem

A fine was imposed for the repeated failure to fulfil a remedial measure to rectify unlawful conduct pursuant to Section 86(2) of Act No. 114/1992 Coll. The remedial measure was intended to restore the functions of a pond in the cadastral area of Ludvíkovice. A fine of CZK 2,000,000 was imposed on CZ GOLF INVESTMENT, a.s., which the MoE upheld in the appeal proceedings. This highly problematic case has persisted for several years. As early as 2015, the Inspectorate imposed a fine of CZK 2,000,000 on the accused company for the same unlawful conduct, which was also upheld by the MoE. Even these substantial fines failed to compel CZ GOLF INVESTMENT, a.s., to implement the remedial measure.

TI Hradec Králové

The company Jeřábek & Vodrážka, výkrm drůbeže, spol. s r.o., was fined CZK 250,000 for clearing woodland without the permission of the nature protection authority in preparation for the construction of a new hen house. The company removed trees growing outside the forest over an area of 3,500 m², thereby impacting the natural habitat of specially protected species, including the common nightingale, the red-backed shrike, the grass snake, and the slow worm. Along with the fine, the Inspectorate imposed a requirement for the offender to carry out remedial action, which involves planting 85 new trees of geographically native species on land adjacent to the area where the trees were felled. The Inspectorate also set the obligation to care for these trees for a period of five years after planting.

TI Havlíčkův Brod

The subject of the proceedings was the damage to the nature monument Ptáčovské rybníky, where sediments were removed from one pond and deposited on a neighbouring meadow with the presence of specially protected plant species. The intervention was carried out without the knowledge of the relevant nature protection authority, and no permit was issued for the works. The legal entity Rybí líheň, spol. s r.o., acted as the instigator in this case. An appeal was filed against the Inspectorate's decision to impose a fine of CZK 90,000, but it was rejected by the appellate authority, and the Inspectorate's decision was upheld. A final fine of CZK 60,000 was also imposed on the company that carried out the construction works, namely Agrostav, a.s.



Unauthorized intervention in the bottom of Ptáčovský pond, removal of part of the pond sediments



Depositing sediments on an area with the presence of specially protected plant species (Western march orchid)

Tl Brno

The Inspectorate investigated significant damage to the root systems of trees growing as a row of trees on Zemkova Street and Zemědělská Street in Brno. The road manager, during the reconstruction of the structural layers of the roads and the replacement of curbstones, damaged a total of 27 mature trees, causing substantial and permanent reduction in the ecological and social functions of these trees. For the damage to the trees growing outside of forests, the company Brněnské komunikace a.s. was fined CZK 70,000.

TI Olomouc

A self-employed individual was fined CZK 80,000 for causing harm by disproportionately extracting water from the Březná watercourse into the intake canal for a small hydropower plant, without the consent of the environmental protection authority. This extraction weakened the ecological-stabilizing function of the significant landscape feature, the watercourse, over a stretch of 930 metres in the Drozdov cadastral area. The decision was made using the absorption principle in cooperation with the water protection department. The appellate authority reduced the fine to CZK 65,000.

TI Ostrava

The company Kolářova chata Slavíč, s.r.o., without any administrative acts under the building law, demolished the original so-called Kolářova chata and began constructing a new one. It unlawfully used land designated for forest functions for purposes other than forest functions, deposited at least 1,200 tons of construction and demolition materials over an area of 1,660 m² in the 2nd zone of the Beskydy Protected Landscape Area (PLA), thereby damaging and destroying part of the natural environment in the PLA. It also unlawfully entered the PLA without exceptions, beyond the roads. It was found that the building authority and the state forestry authority had already imposed fines on the company for violating building and forestry laws. The CEI imposed a fine of CZK 200,000 on Kolářova chata Slavíč, s.r.o. for offences under Section 88(1)(a), (2)(c) and (n) of Act No. 114/1992 Coll. The company did not appeal the fine decision, but after the deadline expired, it submitted a suggestion for a review of the decision. The Ministry of the Environment rejected this review request.

TI Liberec

The company FVE Pěkná s.r.o., as the client, felled a continuous tree stand covering 955 m² and 178 trees growing outside forests in November 2022 through a self-employed individual, without the permission of the nature protection authority. This occurred on land parcels nos. 476, 520, 481, and 478/1 in the Kuřivody cadastral area. By this action, the company violated Section 8(1) of Act No. 114/1992 Coll., which stipulates that felling trees growing outside the forest requires the permission of the nature protection authority unless otherwise specified. The company thus unlawfully destroyed the planted stand and a group of trees growing outside the forest, committing an offence under Section 88(1)(c) of Act No. 114/1992 Coll. A fine of CZK 220,000 was imposed on the company. FVE Pěkná appealed the decision, but the Ministry of the Environment upheld the fine imposed by the CEI.



4.4.5 Conclusion of inspection

The agenda of the Nature Protection Department and CITES, which the Inspectorate carries out, is exceptionally diverse and includes six departmental laws: No. 114/1992 Coll., on Nature and Landscape Protection; No. 100/2004 Coll., on the Protection of Species of Wild Animals and Wild-growing Plants by Regulating Trade in Them; No. 78/2004 Coll., on the Handling of Genetically Modified Organisms and Genetic Products; No. 162/2003 Coll., on the Conditions for the Operation of Zoos; No. 334/1992 Coll., on the Protection of Agricultural Land Fund, and No. 93/2018 Coll., on the Conditions for the Use of Genetic Resources under the Nagoya Protocol.

The focus of the activities of the nature and landscape protection department of the Czech Environmental Inspectorate traditionally lies in monitoring compliance with the provisions of Act No. 114/1992 Coll. In this area, the Inspectorate encountered hundreds of cases of unlawful conduct in 2023. Both individuals and legal entities, including businesses, most frequently **committed illegal felling or damage to trees growing outside of forests**. Extensive felling or damage to trees, typically related to construction activities or in combination with other types of legal violations, prominently appear on the list of highest imposed sanctions. Several final fines for these offences exceeded CZK 250,000.

Similar to previous years, serious cases involving **unlawful interventions in significant landscape features, habitats, or the natural development of specially protected species** were prevalent, primarily in connection

with construction activities, terrain modifications, or alterations to watercourse beds. Fines exceeding CZK 100,000 were also imposed for illegal building modifications of structures with the presence of specially protected species of birds or bats. Repeatedly, substantial sanctions were imposed for unlawful activities consisting of damaging the preserved state of specially protected areas through terrain modifications.

A specific part of the activities of the Nature Protection Department involves administrative procedures concerning **the prohibition of harmful activities or the establishment of conditions for the conduct of activities** according 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 2023, a total of 30 decisions of this type became legally binding, with legal entities slightly outnumbering natural persons among the obligated entities.

A similar activity involves **the imposition of remedial or compensatory measures** and subsequent **monitoring of their implementation**. The Inspectorate has been systematically focusing on monitoring the fulfillment of imposed measures, especially in recent years. Failure to comply with the measures set out in decisions within the prescribed time limit is regularly sanctioned, and in some cases, repeatedly, if the unlawful situation is not rectified. This is the case with the highest fine imposed in the past year, which reached the upper limit of the statutory range (CZK 2,000,000) and followed a previously imposed fine of the same amount. The reason for this is the long-term failure to implement a compensatory measure for remediation, which had been imposed more than ten years ago in connection with very serious illegal environmental interventions during the construction of a golf course.

In terms of the number of offence and administrative proceedings, as well as the total amount of fines imposed, the second most extensive area of supervisory activity is the issue of CITES, which intersects with the protection of specially protected species of plants and animals or generally protected bird species. Serious violations of legal regulations are found primarily in connection with the illegal import or trade of endangered species, but the vast majority of the offences dealt with concern non-compliance with the law regarding registration requirements or the reporting of changes concerning specimens in human care.

Other regulated legal provisions contribute rather marginally to the overall volume of inspection and administrative activities. Supervisory competencies in the area of protection of Agricultural Land Fund (ALF) are increasingly being applied, and in justified cases, the Inspectorate also participates in remedying undesirable situations related to the operation of zoos and other facilities that could potentially be zoological gardens. The Inspectorate frequently encounters insufficient cooperation from the controlled entities during inspections, typically in the form of failure to provide requested documents, statements, or information. In this regard, a total of seven fines were imposed on both legal and natural persons, amounting to CZK 65,000.





4.5 Forest protection

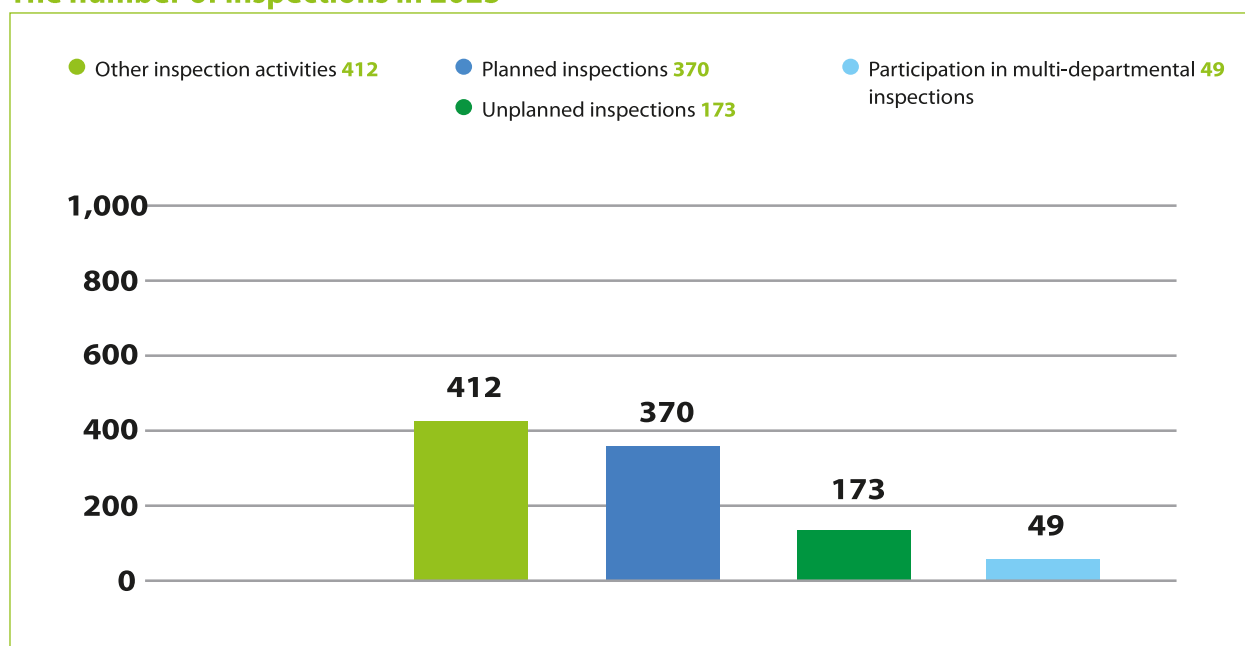
4.5.1 Overview of the inspection activity in 2023

As of December 31, 2023, there were a total of 42 inspectors in the Forest Protection Department of the territorial inspectorates. This meant that each inspector was responsible for approximately 64,000 hectares of supervised forests, based on the area of forest land reported in the State of Forests and Forestry in the Czech Republic Report for 2022.

Inspection activities in forests were carried out based on a legal framework similar to previous years. This framework primarily included Act No. 282/1991 Coll., on the Czech Environmental Inspectorate and its Role in Forest Protection, Act No. 289/1995 Coll., on Forests and on Amendments to Certain Acts (Forest Act), Act No. 149/2003 Coll., on the Circulation of Reproductive Material of Forest Trees of Forestly Significant Species and Artificial Hybrids Intended for Forest Regeneration and Reforestation, and Amendments to Certain Related Acts (Forest Reproductive Material Trade Act), Act No. 114/1992 Coll., on the Protection of Nature and Landscape, Act No. 255/2012 Coll., on Inspection (Inspection Procedure), Act No. 500/2004 Coll., Code of Administrative Procedure, Act No. 250/2016 Coll., on Liability for Offences and the Proceedings Thereon, and internal management acts within the CEI.

Inspectors of the Forest Protection Department (FPD) carried out a total of 955 inspection activities during the monitored period. Of the total, 370 were planned inspections, 173 were unplanned inspections, and 412 were other types of inspection activities. As in previous years, field activities were conducted in the form of the inspections themselves or actions preceding the inspections, including various investigations based on received suggestions and information, and collaboration with other state administration bodies, the Forest Management Institute (FMI), and, where applicable, the Czech Police, etc. In addition, FPD inspectors participated in 49 multi-departmental inspections organised by other departments of the CEI. During the evaluated period, 174 suggestions were addressed.

The number of inspections in 2023



Inspections were carried out on forest properties of all ownership types, focusing primarily on the current state of stands and existing issues within them – damage to forest stands by wildlife, damage to land designated for the fulfilment of forest functions, and the restoration and securing of stands.

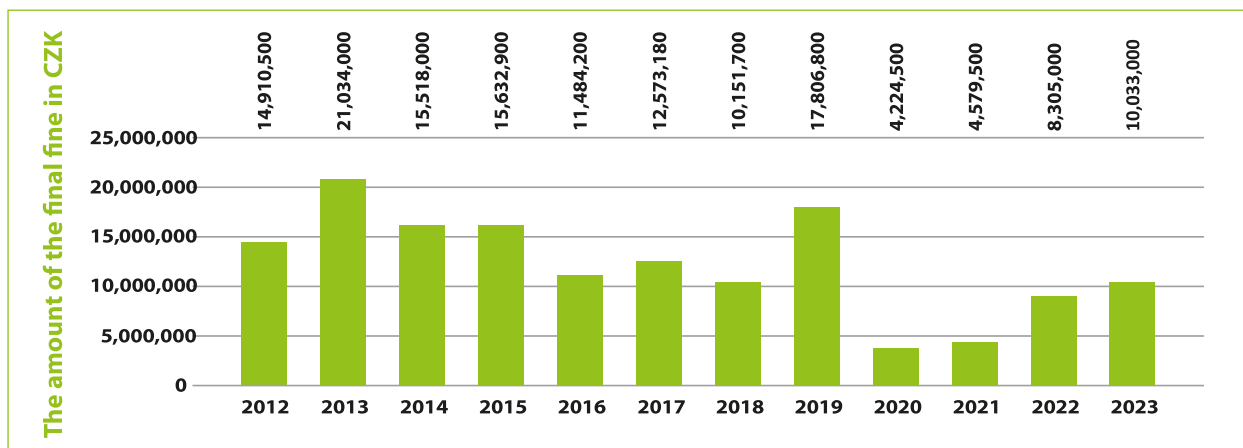
The system of fines and the imposition of corrective measures was again applied in the assessed year in cases of repeated or gross violations of the law.

As part of other inspection activities, 379 background opinions were prepared for EIA assessments and 64 other opinions and statements were issued, both for individuals and legal entities, as well as for state administration bodies, the Police of the Czech Republic, and others.

In 2023, a total of 65 fines were imposed under the misdemeanour proceedings, with 61 fines becoming legally binding within the observed period. Of these, 53 final fines were issued in 2023, and 8 fines were issued in the previous period. The total amount of final fines was CZK 10,033,000. The individual Forest Protection Departments contributed to the fines as follows: Prague CZK 4,045,000, České Budějovice CZK 621,000, Plzeň CZK 30,000, Ústí nad Labem CZK 135,000, Hradec Králové CZK 496,000, Havlíčkův Brod CZK 3,143,000, Brno CZK 475,000, Olomouc CZK 93,000, Ostrava CZK 915,000, and Liberec CZK 80,000.

The total number of fines imposed by the department is 19 fines lower compared to 2022. The reason for this is the handling of more serious and time-consuming proceedings regarding damage to forest assets caused by negligence on the part of forest owners or by external factors.

The development of final fines in the years 2012–2023



The offences for which the aforementioned fines were imposed primarily include violations of regulations during forest renewal, damage to land designated for the performance of forest functions by forest transport, unauthorised occupation of land designated for the performance of forest functions, and failure to comply with imposed measures to remedy the illegal state of forest property, etc.

For the entire Forest Protection Department (FPD), the highest final fines imposed in 2023 were those issued by the TI Prague to the company POPELÍKY s.r.o. in the amount of CZK 3,580,000 for the illegal occupation of forest land and management of the LDPFF, the fine issued by the TI Havlíčkův Brod to the company the Forests of the Czech Republic, s.p., in the amount of CZK 3,053,000 for long-term failure to process and carry out bark beetle wood sanitation, and the fine issued by the TI Ostrava to the company Capital Group SERVICE s.r.o. in the amount of CZK 800,000 for failing to properly renew the forest, prevent soil erosion, and remove unauthorised technologies for slope snowmaking.

During the monitored period, administrative proceedings were also conducted to impose corrective measures, resulting in the issuance of 64 administrative decisions. A total of 67 corrective measures became legally binding, 4 of which were issued in the previous period and became legally binding in 2023.

In the assessed year, 3 warnings became legally binding.

Suggestions submitted to the state administration authorities amounted to 4.

In the assessed year, 1 criminal complaint was submitted, which was filed by the TI Havlíčkův Brod regarding the creation of a clearcut for the violation of Section 295 of Act No. 40/2009 Coll.

Inspection activity according to territorial inspectorates

TI Prague

In 2023, a total of 72 inspection actions were carried out, of which 19 were planned inspections, 41 were unplan-

ned, and 12 were other inspection activities. The FPD also participated in the resolution of 9 planned multi-departmental inspections. The planned inspections were mainly focused on municipal and private forests and aimed at ensuring compliance with environmental protection regulations in forests. The most common inspections were comprehensive, followed by those targeting illegal use (encroachments) of forest land, use of forest land for recreational activities, failure to reforest within the statutory period, and the implementation of remedial measures. Due to the large number of unplanned inspections, suggestions, and the resolution of complex cases, it was not possible to carry out nearly half of the planned actions. Another factor was the extensive personnel changes in the second half of 2023. Some of the uncompleted planned actions were rescheduled for 2024, and some were replaced with more current ones.

In 2023, 41 unplanned inspections were carried out, of which 31 were based on suggestions. Additionally, FPD inspectors from the TI Prague participated in ten multi-departmental inspections, mostly within the framework of resolving suggestions. The unplanned inspections were carried out in state, municipal, and private forests and primarily focused on logging, the protection of land designated for forest functions (unauthorised encroachments, dumps, terrain modifications), reforestation of clearings, etc.

TI České Budějovice

Throughout 2023, 157 inspection actions were carried out, of which 64 were planned inspections, 36 unplanned inspections, and 57 inspections were related to other inspection activities. The planned inspections resulted in multiple proceedings concerning corrective measures and fines, which primarily involved issues such as failure to reforest clearings, restoration of forest stands, protection of forests from bark beetles, use of the LDPPF, and waste on forest land.

As part of the unplanned inspections, several proceedings were initiated, which have been or will be concluded with a decision imposing fines for damage to forest land caused by timber harvesting and forest transport, insufficient protection of forests from bark beetles, failure to carry out restoration, and illegal use of the LDPPF. Corrective measures mainly focused on the restoration of clearings. Additionally, the TI issued requests for the removal of minor deficiencies related to the restoration of small clearings, damage caused by game, and forest protection against bark beetles.

TI Plzeň

In the assessed period, 80 inspections were carried out. There were 34 planned inspections, 11 unplanned inspections, and 35 related to other inspection activities. The planned inspections primarily focused on comprehensive inspections, protection of the forest land fund (encroachments on forest land, waste in the forest), protection against bark beetles, and the restoration of forest stands. The unplanned inspections were mainly conducted based on submitted suggestions and predominantly concerned the protection of the forest land fund (encroachments on forest land, waste in the forest), but also the presence of bark beetles and the restoration of forest stands.

TI Ústí nad Labem

In the assessed year 2023, a total of 92 inspections were carried out. There were 61 planned inspections, 11 unplanned inspections, and 20 related to other inspection activities. As part of the inspections conducted, 24 suggestions within the competence of the FPD were received. Four inspections were carried out as participation in suggestions recorded by other departments, primarily with the NPD.

TI Hradec Králové

In 2023, inspectors carried out 110 inspections in forests of all types of ownership, with the most common focus on comprehensive inspections, protection of the forest land fund, damage to forests from logging, and the implementation of corrective measures. There were 61 planned inspections, 21 unplanned inspections, and 28 actions related to other inspection activities.

TI Havlíčkův Brod

In 2023, 137 inspection actions were carried out. Nine inspections were planned, seven were unplanned, and 121 inspections were related to other inspection activities.

TI Brno

In 2023, the TI Brno conducted a total of 115 supervisory actions, including 72 planned, 16 unplanned, and 27 actions related to other inspection activities. Compared to the previous year, the TI recorded a decrease in inspections. The planned activities primarily focused on comprehensive inspections and investigations, as the FPD inspectors base their inspection activities on a multifunctional approach, considering the interconnections of the various societal functions of forests and the inseparable link between forest stands and forest soil. Therefore, they place emphasis on the comprehensiveness of the supervision.

Of the total number of reported supervisory actions, the majority were carried out based on citizens' suggestions, from FPD's own findings during supervisory activities, and in one case, an investigation was conducted based on materials passed on from the NPD TI Ostrava. The FPD also participated in addressing eight other suggestions, for which other departments of the CEI TI Brno were responsible.

TI Olomouc

In 2023, a total of 93 inspections were conducted, including 24 planned, 3 unplanned, and 66 other inspection activities. More extensive comprehensive inspections were carried out (Forests of the City of Štítý, Mornstein-Zierotin Forests, Municipality of Moravský Beroun), requiring a larger time allocation.

The majority of the unplanned inspections focused on logging, forest protection, and the protection of forest and agricultural land, whether in connection with ongoing incidental logging or forest transportation. The issue of afforestation on areas previously used as landfills or pastures was also addressed.

TI Ostrava

In the reviewed period, 30 inspections were conducted. There were 5 planned inspections due to the prioritisation of more time-consuming cases, mostly initiated by suggestions and carried over from the previous period. A total of 25 unplanned inspections were carried out, most of which were initiated based on suggestions. Legal violations were identified in 7 cases, 4 of which were addressed in administrative proceedings, and 2 are still under investigation. The unplanned inspections primarily focused on the protection of the LDPFF, forest damage caused by logging, and forest regeneration.

TI Liberec

In the reviewed period, 69 inspections were conducted. 21 of these were planned inspections, 2 were unplanned, and 46 actions were related to other inspection activities.

Two unplanned inspections were carried out, and 12 inspections were conducted as part of other inspection activities in the form of actions preceding the inspection. Both unplanned inspections were based on suggestions and focused primarily on the delayed processing of incidental bark beetle felling and excessive damage to the soil surface after felling and timber transport.



4.5.2 Overview of Departmental Tasks Performance

The departmental tasks for 2023 included damage to forest stands by wildlife (for calamity areas, measures to minimise damage during forest regeneration) and monitoring of damage to the LDPFF on areas after logging and timber transport. These tasks were addressed within all types of inspection actions (comprehensive inspections, specific inspections, investigation of suggestions, inspections of corrective measures, actions prior to inspection, etc.), in accordance with the Inspection Procedure and the internal regulations of the CEI, especially the Methodological Instruction FPD No. 3/2014. Forest properties of all ownership types were inspected.

Findings from the inspections carried out by the territorial inspectorates

TI Prague

FPD TI Prague stated that the identified damage to forest stands by wildlife was of a rather local character and did not pose a threat to the environment in the forests. As part of the inspection activity, the issue of game damage is continuously monitored even outside of departmental tasks, and it cannot be concluded that the situation is worsening; rather, it is considered a stable condition. The departmental task of monitoring of damage to the LDPFF in areas affected by logging and timber transport was not assessed by FPD TI Prague, as no such damage was recorded on any of the inspected properties, whether in planned or unplanned inspections.

TI České Budějovice

Within the South Bohemian Region, FPD TI České Budějovice addressed the issue of damage to forest stands by wildlife in all comprehensive inspections. During these inspections, the occurrence of game damage was monitored, and protective measures were implemented. In the case of 9 inspections of various types of owners, a detailed survey was conducted on calamity clearings according to the methodological instruction FPD no. 1/2023, to determine the procedure and evaluate the departmental task of damage to forest stands by wildlife. For the calamity areas, measures were taken to minimise the damage during forest restoration.

In the case of forest estates managed by the Forests of the Czech Republic, s.p., municipalities, and large forest owners with their own Forest Management Plans (FMPs), inspections revealed that clearings after calamities are reforested continuously within the usual two-year timeframes. Meliorative and stabilising trees are protected by fencing, while the rest of the reforestation is carried out using repellent treatments. The number of seedlings is close to the minimum numbers set out in Decree No. 456/2021 Coll. The restoration mainly used a mix of natural regeneration and preparatory species. On the surveyed areas, lateral browsing was observed, averaging between 10 to 40%, with partial stripping up to a maximum of 5%. All the inspected estates were inhabited by roe deer and fallow deer. Bark stripping was not observed. Damage on these areas was not addressed by the forest owners with users. The cultures were protected across 100% of the area.

Significant damage from browsing was found only in the case of the municipality of Krašovice and two private forest owners who had not implemented protection measures against wildlife damage, and the situation was not addressed with the hunting ground users. These estates also had a higher wildlife population. In these specific cases, corrective measures were imposed, or a request for action was issued, starting with protecting young stands and ending with cooperation with the hunting ground users. Scraping of saplings in newly restored areas was not significant. On all inspected estates, there was a noticeable increase in the wildlife population; without protection of young stands, timely securing of young stands would not have been possible. No pressure was applied to the hunting ground users to address the damage in the respective hunting grounds. Furthermore, the state administration of hunting did not address the issue.

TI Plzeň

The monitored area of the TI Plzeň has generally and for a long time been dealing with damage caused by overpopulated wildlife, specifically sika deer, mouflon, and European fallow deer. Damage caused by red deer has gradually decreased over a 20-year period due to intensive population reduction. Secondly, damage is also caused by wild boar and roe deer. Small game does not cause damage due to its minimal natural occurrence.

On properties where the cloven hoof game population is not significantly overabundant, the damage caused by browsing is generally up to 10% – primarily terminal shoots damage, fraying up to 5%, and bark stripping or peeling 5–10%. In this case, standard protection of young forest stands with repellents or fencing for "more sensitive" tree species is sufficient. In the case of significantly overabundant cloven hoof game population, protection through fencing alone is not effective. Furthermore, fencing would need to be maintained for more than 20 years, which is neither operationally nor economically feasible. A realistic solution is a significant reduction in the overabundant wildlife population.

The biggest problems in forest stands are caused by the sika deer, which, due to inadequate game management (insufficient population control), is spreading intensively into areas where it was previously absent and is successfully filling in the foothill and higher altitudes of the region. A significant expansion is evident in the areas of the Czech Forest, Šumava, and Slavkov Forest, where the red deer previously dominated, but which was difficult to control. The sika deer is either supplementing or displacing the red deer in these areas. The hybridisation of the red deer and the sika deer can be seen as a major problem, which was already highlighted during the previous regime by the Ministry of Forestry and Water Management. This issue should be addressed at the ministerial level, with the sika deer being treated as an invasive species. Its population should be reduced, and the two species should be separated to prevent hybridisation.

The worst situation is in the northern part of the Plzeň region, where there are areas with the presence of sika deer, mouflon, and the newly spreading fallow deer. In these areas, the forest owner, together with the state forestry administration, the state game management administration, and possibly the hunting ground users, is unable to reduce the game population. The forest owner often protects young forest stands for up to 20 years with fencing. However, after fencing, the game causes damage through bark stripping or browsing, which is crucial for the future forest stand, leading to destructive damage to the regenerated or regenerating forest. Hunting ground users who do not manage forests are generally unwilling to reduce the game population, so the damage could be perceived as tolerable.

The management of hunting rights within the so-called "management hunting areas" is considered effective or partially effective, when forestry and hunting management are handled by the same entity. However, the policy of the Forests of the Czech Republic, s. p. to increase the number of management hunting areas faces challenges due to a lack of hunting capacity, i.e., the already extreme time burden on forestry personnel.

Game damage in the TI Plzeň has been steadily increasing or changing over time. The area of significant damage to forest stands by wildlife continues to grow, worsening the condition of the forest stands. The upcoming amendment to the hunting law was inspired primarily by the Saxon forestry and hunting laws, where it has been possible to address potential damages relatively quickly and effectively. If this amendment is not passed or is improperly altered, there will continue to be areas in the Plzeň region where forestry management will not be feasible.

In the case of disproportionate damage to the LDPFF, no harm to forest property was found.

TI Ústí nad Labem

An investigation of departmental tasks was conducted at five entities in the forests of the Karlovy Vary and Ústí nad Labem regions. In the case of damage to the LDPFF in areas affected by logging and timber transportation, there was recorded strain on the road network due to the transport of processed bark beetle wood in the shortest possible time. The visible damage is particularly noticeable on the crowns of trees and ruts in the road network. On the approach tracks in the stands, damage caused by the displacement of tracks is always evident, which is subsequently remedied as part of post-logging adjustments.

The state of damage to forest stands by wildlife has been normalised in some areas due to the presence of predators, in this case, the grey wolf, as well as increased culling of deer in the hunting grounds of the Forests of the Czech Republic, s.p., and the increase in the number of enclosures around young stands. The Forest Protection Department (FPD) identifies issues related to game damage in communal hunting grounds, where the Forests of the Czech Republic, s.p., does not hold a majority ownership share.

TI Hradec Králové

In the Hradec Králové and Pardubice regions, damage to forest stands by wildlife was monitored as part of comprehensive inspections and during three inspections focused solely on damage to forest trees by game. Damage to forests by game occurs throughout the territory under the jurisdiction of the TI Hradec Králové. It is primarily caused by cloved hooved game, with a significantly smaller contribution from hare game. Although there is damage to forest trees by game, the regeneration of forest stands is not prevented. Forest owners select tree species compositions and ensure the protection of forest trees in a way that allows for forest regeneration. Larger landowners fence off part of the regenerating forest, while for the remaining areas, they plant only the most widespread tree species in the locality (often spruce or pine).

Small forest owners generally do not use fencing at all during regeneration. As a result of these practices, the potential species diversity of forest stands is reduced. Game significantly damages primarily deciduous trees and fir. Regeneration areas with these species throughout the supervised territory must be protected by fencing to ensure the successful growth of the trees. The construction of fences is more costly and time-consuming compared to protecting seedlings with a repellent treatment. Additionally, regular inspections and maintenance of the fences are necessary. For operational reasons, forest owners therefore prefer to regenerate the forest with spruce or pine seedlings, using only a protective repellent treatment.

Similarly, in the case of natural forest regeneration, the damage caused by game significantly reduces the proportion of fir and deciduous trees. An exception is beech in certain areas with a higher proportion in older stands where its share in natural regeneration is no longer decreasing. As a result of game damage to forest trees, the potential number of forest tree species in regenerating stands is limited. Species sensitive to game damage are often concentrated in areas that were fenced during forest regeneration and are therefore not naturally dispersed throughout the forest.

During inspections of forest damage caused by forestry traffic after logging, it was found that bark beetle wood was being transported in increased volumes on forest land. In 2023, many properties exceeded their annual

quotas, which led to increased movement of heavy machinery in the forests, primarily due to the felling of bark beetle-infested trees and their subsequent removal. Due to the increased need for transporting wood on forest land, environmental hazards were identified when forest owners created transport routes. These transport routes (roads) were established without any consultation with state administration authorities. New routes, turning areas, and the expansion of existing roads were found to have been constructed. No technical documentation was maintained for the construction, and in one case, waste excavated soil was used for widening the road. Based on these findings, three administrative violation proceedings were initiated. Fines of CZK 2,000 and CZK 70,000 were imposed, and in another case, the participant appealed against a fine of CZK 200,000.

TI Havlíčkův Brod

In the Vysočina Region, the TI Havlíčkův Brod directed the investigation of the component task "Monitoring of damage to the LDPFF" on areas affected by logging and timber transport, primarily focusing on existing logging furrows from harvesting and transport activities. Although intensive processing of incidental, particularly bark beetle, logging has been taking place in most of the investigated cadastral areas in recent years, no significant damage to the LDPFF was found in connection with logging and transport activities. The forest road network mostly showed only typical operational wear. In some sections of the forest roads, post-production modifications were noticeable. In the case of unpaved roads, these involved levelling, while paved roads were also repaired, for example, with the use of aggregates. The occurrence of drainage channels in sloped sections of the forest roads was rather rare.

However, the Inspectorate's approach to these matters cannot be applied uniformly, and they cannot always be considered as environmental threats. It is necessary to individually assess the potential impacts on the forest environment. Therefore, this damage to the road network must be taken into account, particularly in relation to the threat to the stability of stands (disruption of the root system, fungal pathogen attacks, and subsequent reduced vitality and stability, especially of younger stands) and also the risk of erosion in sloped terrain.

From this perspective, no significant negative impacts as mentioned above were identified during the inspection. All these undesirable effects of forest transportation are addressed directly on-site with appropriate measures (e.g. placing branchwood into clearing lines) or as part of post-production modifications. Any shortcomings are addressed either by setting a deadline for corrective action in the protocol or through targeted warnings. The owners' approach to this issue thus does not differ from the standard situation, and they make efforts to minimise these damages in their own interest.

The task "Damage to forest stands by wildlife" primarily covered larger estates, typically those managed according to the Forest Management Plan (FMP), where this task can be carried out in a way that provides meaningful results. For estates of around 1 hectare, the objectivity of the evaluation is debatable due to the absence or, conversely, the dominance of the relevant age class of the stands, the drastically differing approaches of the owners to the protection of plantations, or the one-sidedly prevailing species composition of the established stands.

The assessment covered damage caused by terminal or lateral browsing, bark stripping, gnawing, fraying, and rooting. In summary, it can be said that in the case of winter terminal browsing, manageable damage can only be maintained by consistently applying repellent treatments (though the success rate significantly depends on the quality of application, the specific repellent used, and local wildlife pressure) for individual protection. Repellent applications for summer browsing are practically not carried out. For group protection, success again depends on the owner's approach (regular checks of the functionality and repair of fences). Lateral browsing is present in a larger portion of coniferous plantations, but its extent was not found to be fatal. Deciduous plantations are mostly protected in groups, and success is again dependent on the aforementioned factors. Summer bark stripping and winter gnawing caused by large game, particularly sika deer or mouflon, in the extent set by the methodological guidelines, were not observed.

Damage caused by fraying by antlered game was only observed exceptionally. The level of interest from this wildlife depends on the tree species, the type of protection (in the case of a still functional group protection system, this damage is eliminated), and the presence of other so-called pioneer trees, such as aspen, rowan, or birch, in the area. On the other hand, damage caused by rooting by wild boar was not observed at all.

The results of the task can be assessed as follows: while damage to forest stands does not cause significant harm, this is only achieved at the cost of high operational costs dedicated to forest protection.

TI Brno

In the South Moravian and Zlín regions, a significant percentage of dead, predominantly spruce stands had to be harvested due to the most extensive bark beetle calamity in history that forests in the Czech Republic have faced in recent years. This was carried out with the maximum utilisation of all available logging machinery. As a result, excessive pressure was exerted on forest soil and the remaining stands during logging operations. Similarly,

increased damage by wildlife following reforestation could be anticipated (e.g., due to excessive game populations or the reduction of their hiding opportunities, resulting in heightened stress, etc.). It can therefore be stated that, in addition to the continuous implementation of intensive protection of surviving forest stands against bark beetles, issues focusing on the protection of forest soil, including its restoration after logging, and on the regeneration of forest stands are gaining prominence. Above all, the regeneration and subsequent protection of young stands from harmful factors (including wildlife) represent a task unprecedented in its scale in our history.

It is widely recognised that high populations of cloven hoofed game have long caused, and in some areas of the Czech Republic still cause, significant difficulties in reforestation efforts. Consequently, in recent years, several measures have been adopted to reduce the cloven hoofed game populations and thereby mitigate damage to forest stands. These measures are primarily legislative, including amendments to Decree No. 245/2002 Coll., which extended hunting seasons for all species of cloven hoofed game, and an amendment to Decree No. 289/2007 Coll., which allowed hunting grounds users to sell larger quantities of game meat directly to consumers. The Hunting Act has also been amended. Despite these efforts, the issue of objectively overabundant game remains highly relevant.

Based on the experience and findings of the FPD Tl Brno obtained during inspections (with forest owners or managers), a clear proportional relationship can be observed: the larger the property and the greater the resources invested in reforestation, the greater the subsequent care for emerging stands (including natural regeneration). This is primarily due to the economic interest of owners in minimising damage. Conversely, with smaller holdings and the decreasing economic importance of forest land to individual owners, proper care of the land is often neglected. In a significant percentage of cases, there is reliance solely on natural regeneration, which does not meet the reforestation parameters stipulated by Decree No. 456/2021 Coll. In many instances, the legal obligation for reforestation within the statutory period (Section 31(6) of the Forest Act) is fulfilled, but without any subsequent care, including protection against damage caused by game. Many smaller owners, particularly individuals, often have only a vague or no understanding of the role and work of a professional forestry manager (PFM). Some owners disregard the recommendations of their locally assigned PFM, engaging with them only when the CEI initiates an inspection.

At this point, it is necessary to highlight Section 32(5) of the Forest Act: "Forest owners, hunting grounds users, and forest state administration authorities are required to ensure that forest stands are not excessively damaged by game." Thus, it is the duty of the owner, the hunting grounds user, and equally the Forest State Administration Department (FSAD) to implement measures that demonstrably reduce the negative impact of game. The CEI generally considers browsing damage to be excessive when it exceeds 20% for tree species less attractive to game (e.g., spruce, pine) and 40% for tree species more attractive to game (e.g., fir, oak). This is assessed based on terminal shoot browsing, while lateral browsing is also taken into account, as significant lateral damage can be equally detrimental to the health and growth of affected trees.

The vast majority of forest landowners, particularly in the case of private ownership, do not calculate or claim compensation for damage caused by game on their land, whether they discover the damage themselves or through a professional forestry manager (PFM). This remains the case even when they actively implement preventive measures, such as applying repellents to seedlings. The specific method for calculating damage to forest stands is defined in Decree No. 55/1999 Coll., on the Method of Calculating Damage to Forests, later amended by Decree No. 296/2018 Coll. In cases where damage to forest stands occurs, a clear legal framework exists for calculating and claiming compensation for such damage (though the adequacy of this calculation in reflecting the actual harm, particularly in cases of repeated damage, remains open to question).

It can be stated that game damage (primarily assessed as browsing) on newly established plantations currently remains within acceptable levels, mainly due to the synergy of implemented measures—predominantly the construction of fencing, the application of repellent coatings on conifers, and increased informal "pressure" on individual hunting associations. Elevated damage exceeding the above-mentioned percentage threshold has been identified on a small scale on the property of private individuals who, after regenerating areas through natural regeneration, generally neglected to provide the necessary care for these areas, thereby failing to fulfil their legal obligation under Section 32(5) of the Forest Act. However, it must be noted that, particularly where forest regeneration is not being conducted within the statutory deadlines, increased browsing on natural regeneration can often be observed in many places. This natural regeneration could otherwise be advantageously utilised for reforestation, typically in oak or beech stands of age class 8 and higher. In the case of seedlings, browsing typically affects terminal buds, while for older individuals, partial damage to lateral branches can be found. During inspections, damage to 100% of lateral branches was identified in only two stands (Forests of the Czech Republic, s.p., LS Rožnov p. R.), and no instances of bark stripping on trunks were found on any inspected property. Predominantly, the observed damage was identified as summer browsing. Elevated damage typically occurs along the edges of reforested areas or at the (sunlit) edges of older forest stands with the presence of natural regeneration.

Although inspections generally do not record excessive browsing damage by game on forest regeneration (plantations, self-seeding) due to the aforementioned protective measures (mechanical, chemical) undertaken by forest owners, the pressure from game is evident in the undergrowth and natural regeneration. This is manifested in a reduction of species diversity and significant damage to, or even elimination of, self-seeding.

No significant new damage caused by gnawing, bark stripping, fraying or rooting was observed on any of the inspected properties. Such cases were always limited to a few individual trees, representing a negligible amount.

The recent, though in some areas still lingering, bark beetle outbreak caused a significant increase in transported timber volumes. In addition to placing greater demands on the entire transport network, timber harvesting and transportation may also have resulted in damage to trees. This includes abrasions (on root flares and trunks), broken branches, root severing, and soil disturbance, potentially setting the stage for erosion.

During all inspections conducted in 2023, no severe damage to the LDPFF was identified that would result in a reduction in forest stand quality or other limitations on forest functions. Only one instance of damage caused by erosion gullies was recorded in the Zlín Region, where timely remediation had not been carried out. However, this damage was not assessed as significant. Based on the findings, it can also be stated that, in the vast majority of cases, logging and skidding are conducted with consideration for climatic conditions. However, due to the significant variability in winter weather (with very few days when the ground freezes, especially in the South Moravian Region and the lower elevations of the Zlín Region), harvest planning has become increasingly unpredictable and challenging. The risk of erosion gullies is particularly high in the Zlín Region, in areas with flysch bedrock and sloping terrain.

All owners and managers of forest properties are proactively informed and strongly advised during CEI inspections about the necessity of maximising the use of technologies and technical measures to protect forest soil where conditions require it. They are also instructed on the potential negative impacts of logging and timber transportation on forest soil, as well as the need for utmost care of forest land and stands during post-harvest operations.

TI Olomouc

The TI Olomouc ensured the fulfilment of the component task "Damage to forest stands by wildlife" by allocating an appropriate amount of time. The most widespread type of damage to stands is some form of browsing, primarily by roe deer, and seasonally by red deer. Species in the stand composition that are less represented are more frequently damaged. Generally, deer prefer fir and deciduous trees. In stands originating from natural regeneration, damage from game is usually not very noticeable, and it can be stated that it is within an acceptable range. The lateral browsing has a greater share in the overall damage to stands. Damage from browsing is most noticeable immediately after winter. In the first half of the year, the damage is "masked" by new growth. Winter lateral browsing contributes the most to the damage.

Damage to stands from debarking was found only sporadically and to a negligible extent in the visited areas. Fresh damage to young forest stands from browsing or bark stripping was found in only one case in the Rychlebské Mountains. In stands of the second age class, the CEI did not find any fresh damage. In spruce stands, old damage from browsing is generally found in the Jeseníky and Rychlebské Mountains, particularly in stands with a dominant spruce composition (second age class and older). This damage can lead to the deterioration of these stands. Additionally, the management of these stands is problematic, as up to 100% of the trees are affected by old browsing damage.

The largest areas of first-age class stands were found in the forest property of the town of Moravský Beroun, where spruce stands were extensively harvested during the bark beetle calamity. As a result, it was necessary to prematurely develop a new management plan. This led to the creation of large clearings, which were replanted and mostly fenced, or less treated with repellents. Due to this, wildlife damage was minimal, with primarily lateral browsing being observed. All owners are showing efforts to utilise natural regeneration. Intentional clear-cutting was halted. Where the stand character allows, there is an effort to avoid reforestation altogether (Forest Management Unit of Mornstein). Generally, there is a noticeable effort to fence reforested stands. In some locations, fencing of stands is completely necessary (Žerotín village – riparian forest).

It can be stated that no significant damage to forest stands by wildlife was found on the visited properties. However, this does not reflect the actual state of wildlife and its "pressure," especially on young forest stands, due to the necessity of using protective measures. During the fulfilment of the component task, no case was found where a forest owner completely neglected the protection of stands against wildlife. Owners are forced to invest significant resources into building fences and other protective measures.

The departmental task "Monitoring of damage to the LDPFF on areas after logging and timber transport" identifies forest access as one of the main causes of the impact on forest ecosystems. When ecological limits are not respected, there is an adverse effect on the hydrological conditions of the given watershed and subsequent

logging and transport erosion. In forest management, it is essential to use the most gentle logging technologies to ensure minimal surface runoff. During logging and timber forwarding, it is necessary to prevent concentrated surface runoff of rainwater. When using heavy machinery (harvester, forwarding vehicle), attention must be given to soil and standing forest protection, as the risk of soil damage arises mainly on wet soils, where machine traffic causes structural damage to the soil due to the pressure of the machine on the ground. The pressure negatively affects the overall soil structure, gas exchange, and water movement both horizontally and vertically. Problems may arise in cases of incidental (bark beetle) logging under unsuitable hydrological conditions, where improper logging and transport technology can lead to damage to the natural environment, resulting in changes to the water regime of the forest soil and subsequent logging and transport erosion.

The TI Olomouc addresses forest damage caused by logging and timber forwarding within the framework of comprehensive inspections, suggestions, and other investigative activities. In many cases, it is difficult to assess acceptable soil damage during one of the largest bark beetle outbreaks, when record logging operations are carried out and the forest transport network is heavily overloaded. Last year, it conducted proceedings with 4 entities and imposed 4 fines totalling CZK 170,000, of which 1 fine, amounting to CZK 30,000, became legally binding.

TI Ostrava

In the activities of the TI Ostrava, the task "Monitoring of damage to the LDPFF on areas after logging and timber transport" was reported in 2023 on 8 properties due to time constraints for investigations or inspections, of which 7 cases were based on suggestions. In no case was disproportionate disruption of the soil cover proven. In one case, damage to smaller parts of young forest stands and the damage of a few dozen trees was found, which was addressed in subsequent proceedings. In the cadastral area of Kojetín near Starý Jičín, on a forest property managed by the Forests of the Czech Republic, s.p., destruction of small parts of young forest stands and the damage of a few dozen trees due to bark scraping during timber transport were proven. The matter was addressed in two administrative proceedings with the contractual partner of the Forests of the Czech Republic, s.p., the company Alexander Wood s.r.o., and its subcontractor, the self-employed individual Jiří Palo. Fines of CZK 10,000 and CZK 3,000 were imposed, with special consideration given in the case of Alexander Wood s.r.o. for the fact that they had already been fined by the Forests of the Czech Republic, s.p. with a contractual penalty amounting to tens of thousands of CZK for the same damage. In the case of Jiří Palo, significant attention was given to the fact that he had not been paid for the work performed by Alexander Wood s.r.o. (instead of being imposed with a contractual penalty).

Damage to forest stands caused by game was monitored in 2023 on 3 properties. In 2 cases, significant damage was found, particularly to natural regeneration, rather than to artificial renewal. In both of these cases, the CEI emphasised addressing the issue of reforestation and securing the area, and the damage caused by game was not addressed in subsequent proceedings.

On the property of a private individual in Krásná pod Lysou horou (Frýdek-Místek district), significant damage to some tree species was identified. However, on both forest plots, there had evidently been successful natural regeneration over several years, with a diverse representation of tree species, making it clear that the damage caused by game would not jeopardise the achievement of forest establishment within the legal time frame. According to information from the relevant PFM, damage from cloven hoofed game has decreased in recent years, partly due to the closure of a nearby winter enclosure for red deer, where wolf predation occurred. As a result, large carnivores have appeared in the area, while damage from hares has increased.

TI Liberec

The TI Liberec carried out the task "Damage to forest stands by wildlife" within 12 planned inspections. The investigation covered a total area of 4,550 ha of the LDPFF, involving various forms of ownership (municipal and private forests, forests owned by legal entities, and state-owned forests managed by the Forests of the Czech Republic, s.p.). Game damage in the Liberec region has been a long-standing issue, similar to other parts of the Czech Republic. It is present in almost all of the inspected areas of the Liberec Region. The extent of the damage depends on the landowners' approach to the issue, the species composition of the forest stands, the method of regeneration, and, importantly, the species of game and their concentration. In areas with a high concentration of game, despite the landowners' efforts, greater damage occurs to the forest stands. According to the inspection findings, the most damaged tree species by browsing are fir and oak, followed by beech, maple, rowan, and spruce. Larch and pine were damaged by fraying. Old bark stripping was also recorded. The methods of protection against game damage vary depending on local experiences, terrain, the financial capabilities of the forest owner, and the tree species being protected. Individual protection methods are used to a lesser extent. Fencing is considered the most effective way to protect against game damage. For fencing, it is important that it is not damaged (e.g., by wild boars or windfalls) and that it remains functional, so regular inspections are necessary.

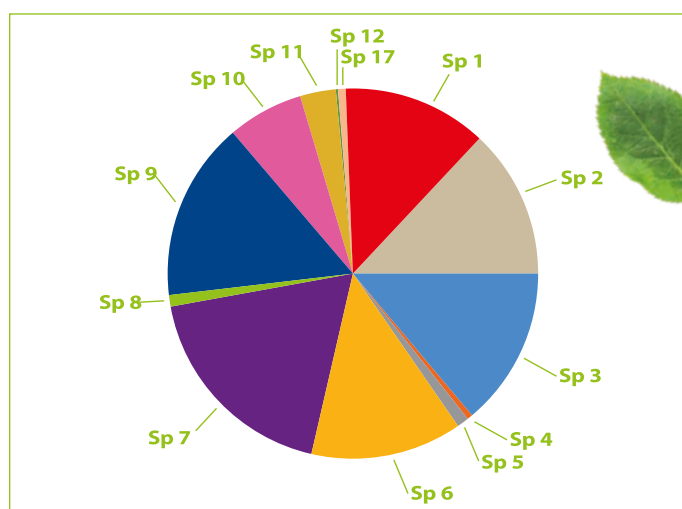
In 2023, no administrative proceedings were initiated concerning corrective measures or fines related to this task. The departmental task "Monitoring of damage to the LDPFF on areas after logging and timber transport" was carried out within the framework of 13 inspections. The level of damage to the LDPFF from logging and timber transport depends on a range of factors. Among the most important are the species and age composition of forest stands, terrain, soil load-bearing capacity, technologies used in logging and timber transport, area and volume of operations, climatic conditions under which the work is carried out, and, of course, the human factor. During the fulfilment of the departmental task, the most frequently recorded damage was to roads and soil surfaces caused by the movement of timber to the collection point, where tracks of varying depths were left by forestry machinery. In some cases, logging operations had only recently ended before the CEI inspection, and a drier period was awaited; in other cases, logging operations were not yet completed, or further logging was planned in the near future. The argument put forward by forest owners in these cases is the signed contracts with logging companies for road and soil surface repairs after the work is finished. In 2023, the FPD did not initiate any administrative or misdemeanour proceedings regarding damage to the LDPFF.

4.5.3 Overview of Specific Tasks Performance

In planned and unplanned inspections, the following 13 topics were inspected from the FPD TI level for 2023:

| Abbreviations of inspection topics | Themes of inspections | Number of inspections |
|------------------------------------|--|-----------------------|
| Sp 1 | Comprehensive control | 187 |
| Sp 2 | Development of biotic agents | 193 |
| Sp 3 | Damage by game | 194 |
| Sp 4 | Damage by European beaver | 6 |
| Sp 5 | Use of biodegradable oils and hydraulic fluids | 14 |
| Sp 6 | Damage to forests by logging, forwarding, disturbance of forest stability | 217 |
| Sp 7 | Protection of FLF, including the use of the surrounding mining areas | 245 |
| Sp 8 | Placing forest reproductive material into circulation | 20 |
| Sp 9 | Reforestation, including after illegal logging | 242 |
| Sp 10 | Compliance with the binding provisions of the FMP and FMG | 109 |
| Sp 11 | Implementation of corrective measures from administrative decisions | 55 |
| Sp 12 | Protection of the forest land fund - recreational activities | 2 |
| Sp 17 | Inspections in cooperation with the NPD pursuant to Act No. 114/1992 Coll. | 6 |

Number of inspections in 2023 according to the thematic focus



The above frequency of specific task inspections does not correspond to the total number of inspections – roles – across individual years and due to the practice that many inspections include several specific topics at the same time. This is especially the case for comprehensive inspections, which focus on all topics that are relevant to the inspected property. In 2022, the number of specific task inspections was 1,525, in 2023 it was 1,490.



4.5.4 Significant cases

TI Prague

In 2023, a case was addressed involving the legal entity, POPELÍKY s.r.o., which carried out extensive illegal terrain modifications in a steep, exposed slope on forest land in 2021. The modifications included the construction of a road and the deposition of stone rubble and soil (excavation of the slope, creation of embankments, and stockpiling). On the forest land in the cadastral area of Orlické Zlákovice, these activities took place over an area of 3588.64 m² (the total length of the terrain modifications exceeds 425 m, with the width of the modifications ranging from 3 to 12 m, and the cut into the slope reaching heights of 1.5 to 3.5 m in some places; the embankment thickness is most commonly between 1.5 and 3 m). Additionally, on another parcel of forest land in the same cadastral area, terrain modifications took place over an area of 326.98 m² (the length of the modifications and deposition is 31.1 m, with an average width of 10.5 m). The unauthorized occupation and terrain modifications are extensive and were carried out on a steep, unstable slope, which has already caused significant soil erosion. The deep cut into the slope has disturbed the overall stability of the soil layers and endangered the vegetation and surrounding forest stands, which have become more exposed

and susceptible to windthrow and soil desiccation. There have been undesirable changes in the landscape's relief and runoff conditions, such as increased concentration of rainfall runoff and drying of exposed terrain sections. The FPD imposed a fine on POPELÍKY s.r.o. under Section 4(2) of Act No. 282/1991 Coll., in the amount of CZK 3,580,000. The decision, along with the case file, was forwarded to the appellate administrative authority in December 2022. The decision became legally binding on February 28, 2023.

The FPD is currently reviewing a case involving an individual concerning forest land in the cadastral area of Orlické Zlákovice. The individual carried out unauthorized extensive and destructive terrain modifications on a steep slope near the Orlík reservoir, covering a total area of 3965.78 m². The modifications involved the excavation and redistribution of stony material, including a thin top humus layer, deep excavations, and significant embankments. The excavated cuts into the substrate were up to 3.5–4 m deep in some places. Such a large-scale intervention disrupted the overall character of the forest, its biodiversity, and terrain morphology, severely damaging the forest, which also serves a significant protective function against soil erosion. The case is in the phase of initiating a misdemeanour procedure, and a decision on the fine will be issued.

In 2023, the FPD TI issued a fine against an individual who was found guilty of unauthorized use of forest land for purposes other than fulfilling forest functions. The individual had constructed a raised wooden structure for recreational purposes (glamping). This decision was upheld by the Department of State Administration (DSA) and the Municipal Court in Prague. A decision was also issued for measures to address the identified deficiencies and ensure correction, ordering the removal of the unauthorized wooden structure on forest land in the cadastral area of Petroupim. The decision was confirmed by DSA, and the participant filed a lawsuit, which was granted suspensive effect. While the area of land occupied (35 m²) is not large, the primary issue is the unprecedented use of forest land for commercial activities such as glamping, which could potentially encourage other forest landowners to engage in similar practices.

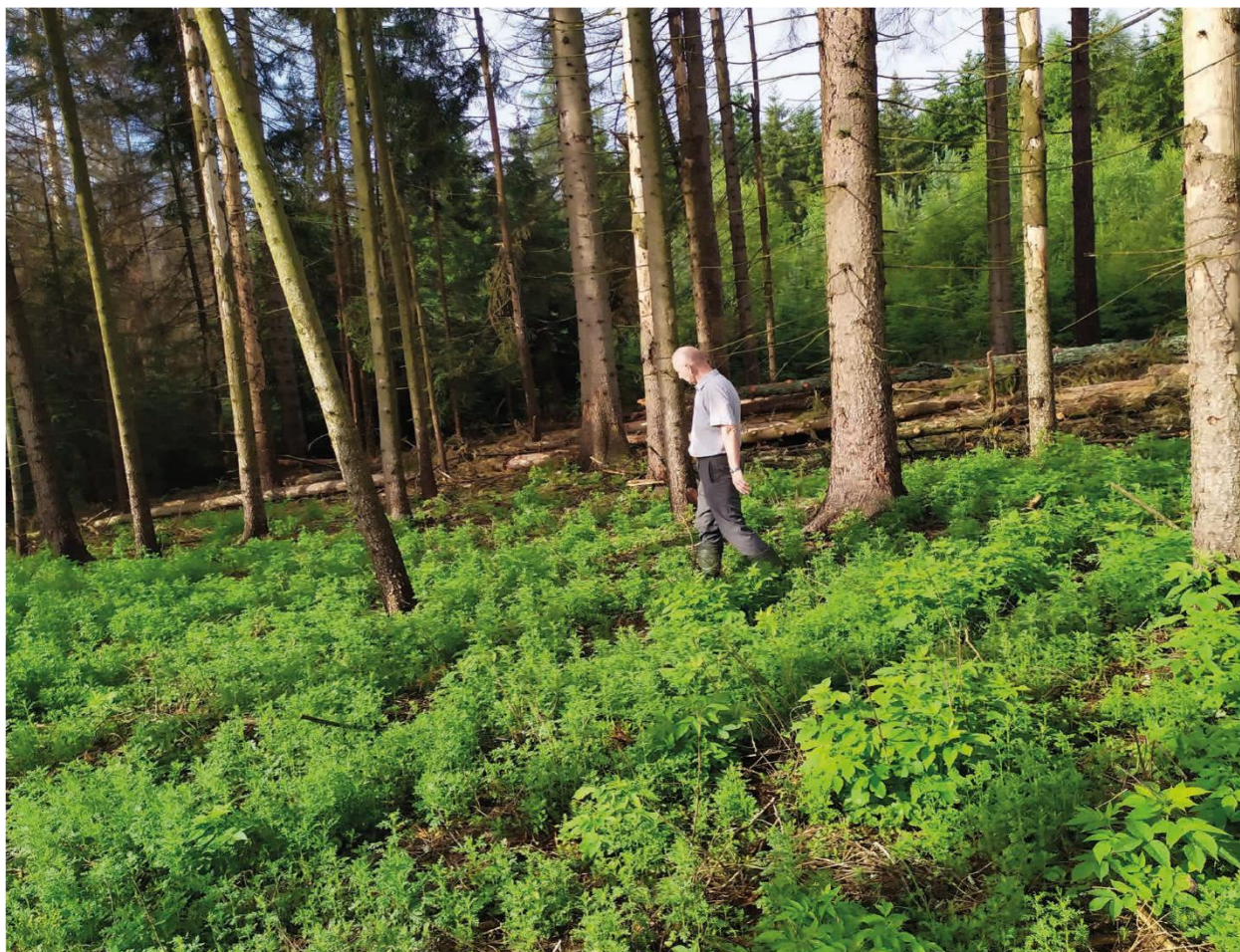
TI České Budějovice

The FPD addressed a case of illegal timber harvesting on forest land in the cadastral area of Horní Pole carried out by an individual. The defendant was fined CZK 250,000. An inspection initiated in June 2022 and subsequent administrative proceedings carried out in 2022 and 2023 by the CEI revealed the illegal intentional timber harvesting on forest land in the cadastral area of Horní Pole within the NNR Zhejral, where a clear-cut of 1.28 ha was created, which was added to an existing clear-cut, resulting in a continuous clear-cut of 1.65 ha. In parallel with the administrative proceedings, the FPD also conducted proceedings with the NPD.

Illegal timber harvesting on forest land in the cadastral area of Horní Pole



The case of failure to meet the obligations concerning forest protection against bark beetles on forest land in the cadastral area of Chlístov near Nadějkov, managed by an individual. The CEI imposed a fine of CZK 191,000. During an inspection in September 2022 and the subsequent administrative procedure conducted in 2022 and 2023, violations of legal regulations related to forest functions were identified. There was a failure to carry out timely and adequate sanitation of approximately 382 m³ of bark beetle-infested timber, affected by the spruce bark beetle and the glossy bark beetle, which allowed the completion of the development of a new generation of pest species on the infested trees.



Failure to ensure timely and adequate sanitation of bark beetle-infested timber



Unlawful use of the LDPFF in the cadastral area of Kolný – storage and deposition of composts and sediments.

In the case of the company DIWENDYS s.r.o., which unlawfully used forest land in the cadastral area of Kolný for purposes other than fulfilling forest functions, the administrative procedure will be completed during 2024. Through an inspection conducted in 2023 and the subsequent administrative procedure to take place in 2024, the CEI revealed illegal terrain modifications on the forest plot in the cadastral area of Kolný, covering an area of 1,684 m². The terrain modifications involved the commercial use of a former sandpit, which was supposed to be reclaimed for forest functions, for the storage and deposition of composts and sediments from the restoration of a pond. The reclamation has not yet been carried out.

TI Plzeň

The company WASTWILL, s.r.o., carried out a logging operation in April 2022 in the cadastral area of Přívozec, during which a contiguous clear-cut area of approximately 3.41 ha was created. This clear-cut connects to another clear-cut area and a freshly restored area (unsecured growth) covering approximately 1.40 ha, as well as to an unsecured forest area with low canopy cover of approximately 5.10 ha. The logging operation was not previously approved by the relevant PFM nor authorised by the relevant FSAD. This resulted in environmental damage in the forests covering a total area of approximately 9.91 ha. In connection with the logging operation, the CEI filed a criminal report for suspicion of committing the criminal offence of forest damage under Section 295 of Act No. 40/2009 Coll., the Criminal Code, as amended. However, as the CEI received notification from the police authority that applying responsibility under a different legal regulation was sufficient and that the case concerning the possible offence of "forest damage" under the cited paragraph of the Criminal Code, allegedly committed by the company, was dismissed, the CEI initiated an administrative procedure with WASTWILL, s.r.o., under Section 4(1)(c) of Act No. 282/1991 Coll. By the end of 2023, the decision was prepared for issuance. The proposed fine CZK 1,000,000.



The clear-cut created in 2022, which was not reforested by the owner

The TI Plzeň further addressed a case involving an individual who, since acquiring forest land at the end of 2019, had not taken sufficient measures to restore and secure the forest cover on five clearings in the cadastral area of Luková u Manětína, covering a total reduced area of approximately 1.20 ha, either by their own efforts or through contracts. For this offence, the CEI imposed a final fine of CZK 30,000 in October 2023 through an order. The complexity of this case mainly lies in the delivery issue, as the individual has permanent residence in the Federal Republic of Germany, and each document delivery has been returned by Czech Post.

TI Ústí nad Labem

The TI Ústí nad Labem addressed a case involving an self-employed individual who, in 2018, felled an area of approximately 0.75 ha in the cadastral area of Čeraniště. In March 2022, a reforestation inspection was carried out, but despite sending a Notice of Initiation of Inspection, the owner did not participate. It was found that reforestation had not been carried out. The FPD inquired with the FSAD Ústí nad Labem, as no request for an extension of the reforestation and securing deadline had been submitted, and based on these findings, it issued an administrative fine order for CZK 75,000. The entity submitted an objection through a law firm. A decision on the fine was issued in the same amount, and the forest owner appealed again through the law firm. In early 2023, the appeal was forwarded to the appellate authority, which fully upheld the CEI's decision. The case is currently before the court.

TI Hradec Králové

The FPD TI Hradec Králové addressed a case involving the company SNĚŽNÍK, a.s., which had long been fragmenting forest stands in connection with the development of recreational use in the Králický Sněžník area. Extensive interventions in the natural environment of the forest occur as a result of numerous investment plans by SNĚŽNÍK, a.s., from Velká Morava. The forests have been fragmented primarily due to the construction of downhill ski slopes and associated infrastructure on the slopes of the Slamník hill.

In 2023, a decision to impose a fine of CZK 200,000 became legally binding for the use of forest land for purposes other than fulfilling the functions of the forest. After carrying out an incidental logging operation on an area of nearly one hectare, SNĚŽNÍK, a.s., allowed the removal of forest litter down to the mineral soil and the uprooting of stumps for the purpose of constructing an investment project titled "Petrol Station PS 500 – Dolní Morava." The removal of the forest litter caused soil degradation and a related deterioration in the properties of the forest habitat. As a result of removing the forest litter down to the mineral soil, the conditions for forest regeneration and tree growth were worsened. The harmful intervention, which threatened the fulfillment of the forest's function, was carried out on a significant area of forest. The fined company defended itself by arguing that the forestry authority subsequently legalized the situation in the forest and issued a decision temporarily withdrawing the fulfillment of the forest's function. However, the process to withdraw the function was only initiated after the CEI inspection on-site. The Ministry of the Environment confirmed in the appeal procedure that the forest function had been threatened. The area is located within a bird protection area and a nature park.

The FPD also addressed a case involving the municipality of Libkov, which failed to process bark beetle-infested wood in a timely manner, leading to a gradual increase in infestation and the development of populations of the spruce bark beetle, northern bark beetle, and glossy bark beetle. This resulted in the emergence of a new generation of beetles into surrounding forest stands. While bark beetle-infested trees were being logged on the property, the logging was not performed with sufficient intensity. The management of the forest involved sanitizing trees that had been infested by bark beetles for a prolonged period, causing the spread of beetles from the infested trees to other stands. During an inspection of the municipality of Libkov's forest property, a large number of standing unsanitized bark beetle-infested trees were found, where the pest had completed its development and spread to surrounding spruce stands. The forest owner neglected to carry out incidental logging in time and caused an infestation of nearby spruce forests due to the unsanitized bark beetle-infested wood. The failure to carry out timely sanitation resulted in the completion of beetle development in wood with a total volume of 200 m³, leading to the emergence of a new generation of beetles into surrounding forest stands. The forest owner acknowledged the mistake and significantly increased the intensity of bark beetle tree sanitation immediately after the inspection. Before the initiation of the administrative offense procedure, all problematic stands were sanitized, as documented by the CEI. The CEI took these factors into account and set the fine at CZK 100,000. The municipality of Libkov did not appeal, and the sanction became legally binding in full.

TI Havlíčkův Brod

The FPD TI Havlíčkův Brod addressed a case involving the company Forests of the Czech Republic, s.p., which caused an environmental threat in the Štěměchy cadastral area by failing to process and sanitize bark beetle-infested wood for an extended period. Specifically, 7,633 m³ of unsanitized bark beetle-infested wood remained in one location from the beginning of 2020 until July 31, 2021. According to the forestry management records (FMR), not a single cubic meter was processed during this period. A decision imposing a fine of CZK 3,053,000 was issued in the case, and the defendant subsequently appealed. The DSA MoE confirmed the decision on April 28, 2023. The decision is currently being challenged through a court lawsuit.

The company MatPres s.r.o. was imposed a final fine of CZK 60,000 for failing to comply with the corrective measure regarding the establishment of a site-appropriate forest stand on a clearcut area older than two years.

The Forest Cooperative in Polná was imposed a fine under Section 34(8)(c) of Act No. 149/2003 Coll., on the Trade in Reproductive Material of Forest Trees, in the amount of CZK 30,000, for incorrectly maintained records of reproductive material of forest trees. The reason was incorrect or incomplete data and inaccessible records, justifying a change in the total amount of planting material by more than 10% compared to the previous state for several forest tree sections over several consecutive years. The decision on the fine became legally binding on October 25, 2023.

TI Brno

A fine of CZK 100,000 was imposed on an individual for the offence of endangering the environment by creating conditions for harmful biotic and abiotic factors. The individual, as the owner of forest property in the cadastral

area of Všechovice near Tišnov, failed to ensure proper forest regeneration on a total area of approximately 3.85 hectares from July 8, 2020 (the date the CEI's decision on the offence became legally binding).

The company AGRO Brno-Tuřany, a.s., as the supplier of reproductive material, failed to maintain proper records for each section of reproductive material. The company was imposed a fine of CZK 50,000.

The company Lesy Města Bojkovice s.r.o. was imposed a fine of CZK 100,000 for the offence of endangering the environment by creating conditions for harmful biotic and abiotic factors. The company, as the lessee of forest land in the cadastral area of Rudimov, failed to ensure long-term protection of young forest stands against damage by game on a total reduced area of approximately 1.29 hectares. As a result of this omission, the forest stands were damaged, leading to restricted growth or complete destruction of planted forest trees, which resulted in the failure to secure the forest stands within the statutory time limit.

TI Olomouc

The TI Olomouc conducted an offence proceeding with the company DŘEVO-NAVRÁTIL s.r.o. for failing to ensure the timber harvesting and transportation were carried out in a manner that would not cause excessive damage to the forest. The offender was imposed a fine of CZK 30,000 for the offence.

Additionally, the TI imposed a fine of CZK 30,000 on the company REPENA for non-cooperation during the inspection activity.

TI Ostrava

In 2023, an offence proceeding was conducted with the company Capital group SERVICE s.r.o. for failing to reforest clearings, not taking measures to prevent water erosion, failing to preserve soil cover, and not removing snowmaking equipment from the ski slope in the cadastral area of Dolní Lomná in the Beskydy Protected Landscape Area (PLA), which was not authorised by any relevant state administration authorities and was in conflict with the local municipality's zoning plan. On April 14, 2023, a decision was issued imposing a fine of CZK 1,000,000. The appellate authority partially modified the decision, reducing the fine to CZK 800,000, while confirming the remainder of the decision. The decision became legally binding on September 20, 2023.

The TI Ostrava also conducted an offence proceeding with individuals for the unauthorised occupation of the LDPPF and the placement of a building and terrain modifications (part of a modern recreational cottage) carried out in the cadastral area of Malenovice. In the first hearing, fines totalling CZK 700,000 were imposed. The decision was annulled by the MoE and returned for reprocessing. In the second hearing, a decision was issued imposing a fine of CZK 500,000, which was upheld by the MoE and became legally binding in January 2024. The proceeding regarding the imposition of measures was suspended on the recommendation of the appellate authority until another state administration authority issues a decision.

TI Liberec

The owner of the forest, a natural person, was issued a final decision imposing a remedial measure requiring him, in cooperation with a professional forestry manager, to carry out reforestation with site-appropriate tree species and to implement strict forest protection against weeding and damage by game in the forest stand in the cadastral area of Bzí near Železný Brod. This measure aimed to meet the applicable legal provisions for a reforested forest stand and create conditions for its maintenance, while fulfilling the forest's functions. Based on the final decision, which became legally binding on December 17, 2021, an alternative deadline was set for the completion of this remedial measure by June 30, 2022. Prior to the expiration of this extended deadline, the defendant transferred the forest land subject to the imposed remedial measure to another forest owner. On October 14, 2022, the CEI issued a decision finding the defendant guilty for failing to implement strict protection of the forest against weeding and damage by game on the relevant forest land between December 17, 2021 and May 30, 2022. A fine of CZK 20,000 was imposed. The defendant appealed this fine, and the appellate authority upheld the CEI's decision with a final decision issued on January 10, 2023.

The company MORAVOSPED, spol. s r.o., was issued a final decision (which became legally binding on October 15, 2021) imposing a remedial measure requiring it, in cooperation with a professional forestry manager, to carry out reforestation with site-appropriate tree species and implement strict forest protection against weeding and damage by game in the cadastral areas of Chlístov near Železný Brod and Bratříkov, on a total deforested area of 7.18 hectares, by June 30, 2022. Before the deadline expired, the defendant transferred the relevant forest land, subject to the imposed remedial measure, to other forest owners. On November 7, 2022, the CEI issued a decision recognizing the defendant's failure and imposing a fine of CZK 60,000 for not implementing strict protection of the forest against weeding and damage by game on the relevant forest lands. The defendant appealed the decision, and the appellate authority upheld the CEI's decision with a final decision issued on January 9, 2023.

4.5.5 Conclusion of inspection activities

At the level of the Forest Protection Department, there was a long-standing personnel shortage, which made it difficult to manage tasks related to forest condition supervision. Therefore, efforts focused mainly on ongoing cases, significant cases, and suggestions. Each inspector was responsible for approximately 64,000 hectares of monitored forests. The limitation of field inspection activities inevitably resulted in a reduction in the number of administrative offence proceedings related to fines and corrective measures. This was partly due to the complex and complicated nature of some of the investigated suggestions, whose investigation was time-consuming and increased the capacity workload of the inspectors last year.

The inspection procedures themselves are still influenced by factors that persist from the past, i.e., the procedures are more complex due to the complicated nature of determining the state of affairs, where relevant documentation is often lacking due to rapidly changing circumstances. Also, subsequent administrative offence proceedings are becoming increasingly demanding, as some cases require a more detailed understanding of other legislation, particularly in the areas of building law and waste management. Another issue is the decision-making and permitting activities of certain administrative authorities (e.g., building authorities, state forestry administration bodies, etc.), which often act contrary to the interests of forest and environmental protection.

In addition to the ongoing issues in forest protection, primarily due to the impact of insect pests, administrative offences related to the unauthorised use of forest land for purposes other than fulfilling the functions of the forest, waste disposal, terrain modifications, construction, or other unauthorised land encroachments have remained a persistent trend. As a result of the bark beetle calamity, exceptionally large clearings have been created, the reforestation and subsequent maintenance of which is objectively challenging not only from a natural perspective but also economically and time-wise. The current population numbers of cloven-hoofed game species may significantly hinder efforts to regenerate the clearings. According to information from the third cycle of the National Forest Inventory in the Czech Republic, forest stands are most damaged in the northern and north-western parts of the country, border areas in eastern Czechia, and the regions of South Moravia, Zlín, Olomouc, and Moravia-Silesia. Therefore, an important step is the planned amendment of Act No. 449/2001 Coll., on Hunting, which should significantly contribute to addressing the game situation.

In 2023, there was no significant increase in activities related to unauthorised timber extraction, likely due to the overall sufficient supply of timber on the market.

The Forest Protection Department will continue to focus on inspections aimed at the use of biodegradable oils and hydraulic fluids in mechanised equipment on forest land. An ongoing trend in inspection activities will be the continuous monitoring of forest land damage and encroachments, game damage, and the regeneration of forests on harvested areas (clearings) resulting from the bark beetle calamity.

The FPD considers maintaining and deepening cooperation with the locally competent forest and hunting authorities as important, primarily for mutual information exchange and the elimination of duality within the conducted inspection and administrative activities. Inspections of reproductive material have been carried out for several years in cooperation with the Forestry Management Institute (FMI), and this cooperation in this area is functional and problem-free.

A significant advancement is the ongoing process of equipping the FPD TIs with devices featuring global navigation satellite systems and acquiring unmanned aerial vehicles capable of capturing imagery in difficult-to-reach terrains and over larger areas. This technology allows for more accurate results in inspection activities, thereby improving the defensibility of outcomes in front of appellate bodies or potentially in court.

The FPD sees a positive role in its educational activities, such as frequently informing forest owners about their obligations.



4.6 Participation of the CEI in the resolution of accidents in 2023



Central record of accidents in waters in 2023

Under the Water Act, the CEI has been maintaining a central record of accidents since 2002. In 2023, 237 accidents were recorded in this register, which met the definition of an accident according to Section 40 of Act No. 254/2001 Coll., on Water.

Accidents caused by transport continue to show a yearly decline. In 2023, 52 such accidents were recorded, accounting for 21% of the total cases. Fish kills were observed in 34 cases, representing 14% of the total number of incidents. This indicator also showed a decrease compared to the previous year.

Contamination of groundwater occurred in three cases, and in two additional cases, both groundwater and surface water were contaminated. The cause of the accident was identified in 146 cases.

The CEI independently investigated or actively participated in the investigation of 82 cases.

Throughout 2023, other accidents were reported to the Inspectorate but were not included in the central record of accidents due to their minor scope and no impact on water quality.

Distribution of accidents by causes in 2023

| Cause of the accident | Number of accidents | % |
|-------------------------------------|---------------------|------------|
| human factor | 65 | 27.5 |
| technical factor | 37 | 15.6 |
| human + technical factor | 37 | 15.6 |
| natural factor | 28 | 11.8 |
| human + natural factor | 8 | 3.4 |
| human + technical + natural factors | 1 | 0.4 |
| undetected | 61 | 25.7 |
| TOTAL | 237 | 100 |

Distribution of accidents by substances released in 2023

| Group of substances | Number of accidents | % |
|-----------------------------------|---------------------|------------|
| petroleum substances | 111 | 46.8 |
| waste water | 16 | 6.7 |
| chemicals other than heavy metals | 22 | 9.3 |
| sludges and suspended solids | 7 | 3.0 |
| agricultural activity | 13 | 5.5 |
| food products | 1 | 0.4 |
| oxygen deficiency | 5 | 2.1 |
| other substances | 13 | 5.5 |
| undetected | 49 | 20.7 |
| TOTAL | 237 | 100 |



One of the cases in which the CEI actively participated in the management of activities during an incident involving surface waters in 2023 was the fire at the CVP Galvanika s.r.o. facility, which broke out on June 9, 2023 at the Ždánice operation 03, likely due to a fault in the electrical installation. The fire caused extensive damage not only within the company premises. During the firefighting efforts, highly alkaline extinguishing water containing other harmful substances leaked into the Trkmanka stream. The CEI participated in monitoring the water quality in the stream several days after the fire.



Fire at the CVP Galvanika s.r.o. facility – Ždánice operation



4.7 Integrated agendas

The core activity of the CEI within integrated agendas is Integrated Pollution Prevention and Control (IPPC). This is a preventive and progressive method for regulating industrial and agricultural activities in relation to the environment, which builds upon the separate component approach and end-of-pipe technology strategy. These technologies primarily removed pollution at the output using separators, filters, or other cleaning devices, often resulting, from an overall environmental protection perspective, in the transfer of pollution from one environmental component (air, waste, water) to another. IPPC places primary emphasis on a preventive approach, where environmental pollution is prevented before it occurs by selecting appropriate production processes and technologies, known as Best Available Techniques (BAT), and by using substances that are as environmentally friendly as possible.

This integrated approach to environmental protection as a whole is ensured at the CEI, under the coordination and collaboration of experienced inspectors specializing in these agendas, i.e., coordinators of integrated agendas (CIA), through the technical environmental protection departments of the inspection (air protection, waste management, and water protection).

The main activity in this area is supervisory (inspection) activity. Another significant and preventive activity is non-supervisory, such as issuing expert opinions by the inspectorate (within the framework of EIA, IPPC, EMAS, etc.).

4.7.1 The legal framework for activities in the area of integrated agendas

The Inspectorate in the area of integrated agendas ensures the performance of state administration, which is delegated to it by legal regulations on environmental protection, in their valid and effective wording, and directly applicable EU regulations, particularly the following laws:

- No. 76/2002 Coll., on Integrated Pollution Prevention and Control, on the Integrated Pollution Register, and on Amendments to Some Other Acts (IPPC Act),
- No. 25/2008 Coll., on the Integrated Pollution Register and the Integrated System for Fulfilling Environmental Reporting Obligations, and on Amendments to Some Acts (IPR Act),
- No. 167/2008 Coll., on Preventing Ecological Damage and its Remediation, and on Amendments to Certain Acts,
- No. 100/2001 Coll., on Environmental Impact Assessment and on Amendments to Some Related Acts,
- Regulation (EC) No. 166/2006 of the European Parliament and of the Council establishing the European Pollutant Release and Transfer Register (E-PRTR).

4.7.2 Overview of tasks performed in the field of integrated agendas, supervision (inspections)

Implementation of the inspection plan (programme) by territorial inspectorates

For the implementation of the inspection plan (programme) by territorial inspectorates for the given year, the "Programme of Routine Inspections" is essential. The "Inspection Programme" contains information about the planned inspections of facilities and the information about the environmental protection specialist department that will conduct the inspection at the facility that year. The Programme of Routine Inspections is similar to the annual plans of the specialized technical environmental protection departments and corresponds with them.

The Programme of Routine Inspections is developed from the "IPPC Facility Inspection Plan," which is set for a fixed period of three years and updated annually. The IPPC Facility Inspection Plan was prepared based on the risk assessment of the facilities for the three-year period, i.e., 2023 to 2025, continuing from the plans for the periods 2014–2016, 2017–2019, and 2020–2022. For 2023, this plan included 1,485 active IPPC facilities with an integrated permit (IP). The inspection plan also reflects (includes) the specific tasks of specialized departments at these facilities.

The inspection plan (programme) for 2023 was adjusted operationally when needed, with the transfer of inspected entities between the semesters or replacements being made.

The inspection plan (programme) for TIs within integrated agendas was adhered to in the specified number (see below).



Integrated agendas

The activities of the specialist departments of the CEI within integrated agendas are included in the previous chapters (4.1, 4.2, 4.3, and if applicable, 4.4–4.6).

The priority of inspections of facilities within the scope of the IPPC Act is the acceptance of provisions set out, in particular, in Sections 19 (b), 20 (b), 34, and 37 of this Act, within the implementation of European Parliament and Council Directive 2010/75/EU on industrial emissions of November 24, 2010. According to these provisions, it is necessary to observe the period between two on-site inspections (one to three years depending on the risk of the facility). This places significant demands on the frequency and scope of inspections, as well as on the further activities of the Inspectorate in this area.

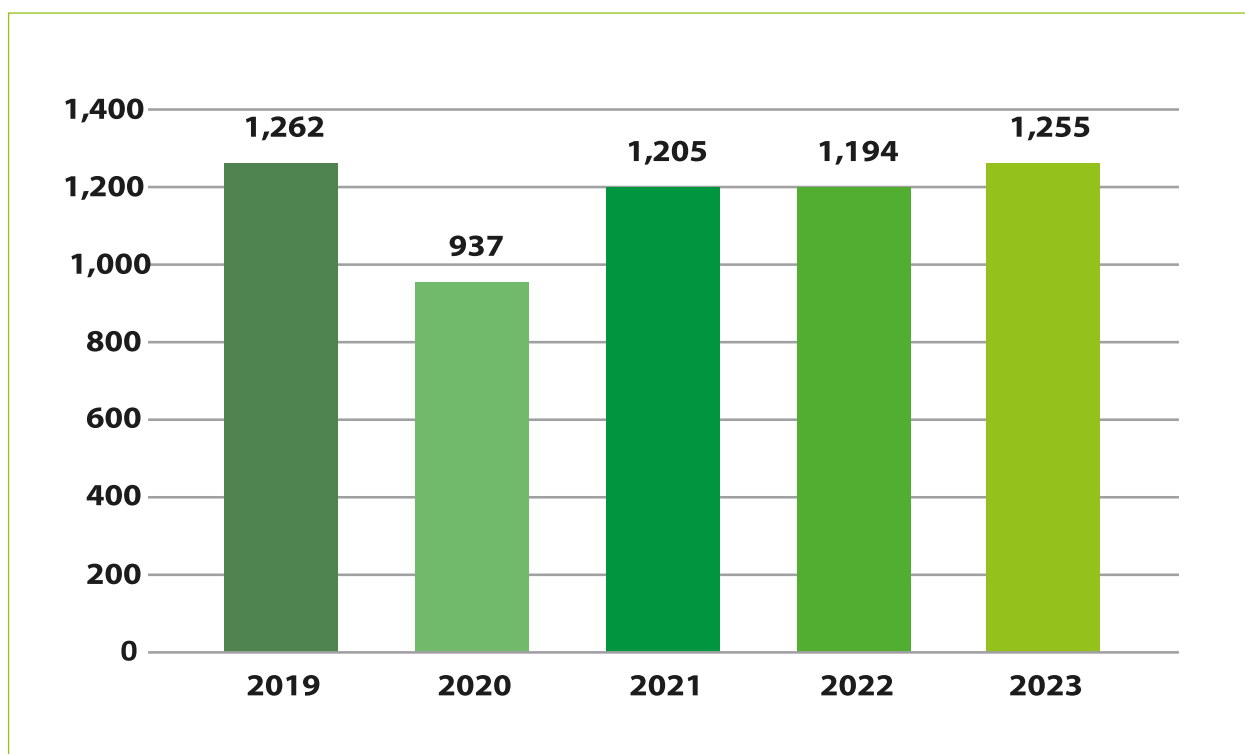
The program for all inspections within the integrated agendas for 2023, based on the inspection plan, was set at 1,032 inspections. In reality, inspectors conducted 1,255 inspections in 2023. This includes extraordinary inspections, particularly based on suggestions, media cases related to accidents, or non-standard operations, as well as the potential execution of repeated inspections at the same facilities, such as in cases of significant violations of binding conditions (approximately 21%). The program was completed successfully.

In 2023, the Inspectorate within its scope of integrated agendas conducted a total of 1,255 inspections, initiated 169 administrative/offence proceedings, issued 164 decisions and orders, and imposed fines totalling CZK 10,437,620 based on 159 final decisions (including from previous periods). Of these, three final decisions involved a reprimand as the penalty, and in one case, the penalty was waived. Additionally, one final decision was issued concerning corrective measures.

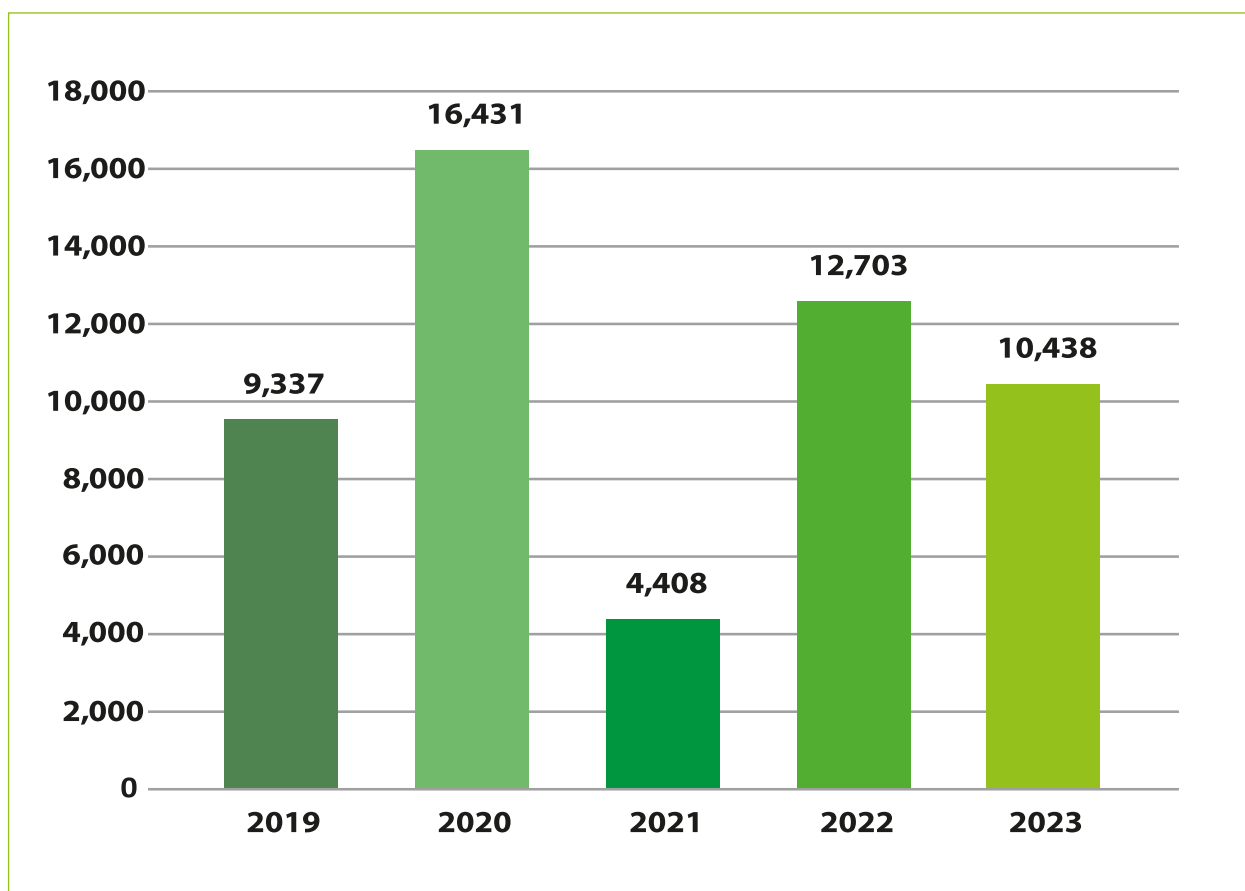
The range of fines imposed in legally binding decisions within the scope of integrated agendas ranged from CZK 5,000 to CZK 1,800,000 (the latter being imposed on the company FCC Regios, a.s., operating the "Landfill S-003 REGIOS in the cadastral area of Úholičky").

The average amount of a fine imposed per legally binding decision (order), in aggregate for integrated agendas, was approximately CZK 65,600.

The number of inspections within the integrated agendas



The amount of fines imposed within the integrated agendas in thousand CZK



Integrated prevention (Act No. 76/2002 Coll.)

The regular inspection programme within integrated prevention (Act No. 76/2002 Coll.) for 2023, developed based on the inspection plan, was set at 676 inspections. In the area of integrated prevention, the Inspectorate carried out a total of 863 inspections at IPPC facilities in 2023 thus, the regular inspection programme was fulfilled. Based on these inspections, 133 administrative/offence proceedings were initiated, 136 decisions and orders were issued, and based on a total of 132 decisions in legal force, fines amounting to a total of CZK 10,042,620 were imposed. Of these, a reprimand was applied in three decisions in legal force, and in one case, the penalty was waived. Furthermore, one legally binding decision on remedial measures was issued.

The average fine imposed per decision (order) in legal force during this period within integrated prevention was approximately CZK 76,100.

Main inspection findings

The Inspectorate identified violations of environmental protection regulations and non-compliance with binding operational conditions of IP, which primarily involved, for example:

● Water protection:

- discharge of wastewater without a permit or after its validity has expired,
- excessive discharge of all types of wastewater,
- exceeding the permitted amount of groundwater or surface water extraction,
- handling hazardous substances on water management unprotected areas,
- failure to perform monitoring (e.g., leachate from the landfill before transport to the WWTP, quality in monitoring wells),
- failure to conduct leakage tests.

● Air protection:

- exceeding pollutant emissions (e.g., carbon monoxide, sulfur dioxide),
- failure to use biotechnological products,
- failure to monitor landfill gas or violations of the operational regulations, including leaks or failure to connect landfill gas collection wells (to the cogeneration unit).

● Waste management:

- improper handling of hazardous waste (waste similar to municipal waste), handing over waste to an unauthorized person, failure to maintain records, incorrect reporting on waste production and handling, failure to report the transfer of substances in waste, insufficient documentation of the quality of incoming waste (waste oils) at the facility,
- depositing waste other than those authorized on the landfill site,
- failure to operate according to operational regulations (technical operating conditions, etc.), and more.

- **Failure to comply with the reporting obligation under the IPPC Act.:**

changes to the IP,
reports on the fulfilment of the binding conditions of the IP,
extraordinary situations,
failure to report measurements within the required timeframe.

- **Other violations:**

discrepancy between approved documents and the description of the facility.
exceeding the permitted capacity of the facility
operation without an integrated permit (IP)



In 2023, the largest share of offences consisted of violations of integrated permit conditions or violations of the integrated permits' approved operating rules/plans (97%), followed by failure to comply with reporting obligations (2.3%). The remainder consisted of offences for failing to notify the transition of an integrated permit. The first group under the IPPC Act also includes offences related to operating facilities without a valid integrated permit.

A separate chapter remains the issue of changes to departmental laws and their reflection in the integrated permit (IP).

Integrated Pollution Register (Act No. 25/2008 Coll.)

In terms of compliance with the IPR Act, the Inspectorate carried out 279 inspections in 2023, of which 241 were within integrated controls (according to the IPPC Act), and 38 IPR inspections were standalone. A total of 271 inspections were planned, so the plan was fulfilled. The total amount of fines imposed in legally binding decisions for failure to comply with reporting obligations to the IPR amounted to CZK 395,000. With 27 final decisions, the average fine was CZK 14,600.

The sanctions imposed, as in previous years, ranged at the lower end of the legal scale, which is a maximum of CZK 500,000, from CZK 5,000 to CZK 40,000 (legally imposed on the company VETROPACK MORAVIA GLASS a.s., Kyjov plant).

Offences under Act No. 125/2008 Coll. can be divided into three groups. The most common group in 2023 were offences consisting of providing incorrect information in IPR reports (50% share), followed by offences consisting of failure to report emissions and transfers of pollutants or waste, or late reporting of such data (33.3%). The final group consisted of offences related to failure to maintain records in accordance with Act No. 25/2008 Coll. (16.7%).

It is almost a rule that large operators of facilities (e.g. with an issued IP) comply with the obligations set out by the relevant legislation much better than other entities, especially small and medium-sized industrial facilities and agricultural operations. Based on the inspection activity of the inspectors in the field of IPR, it can, however, be stated that overall awareness of the obligations arising from the relevant legislation and its compliance is still improving.



Ecological damage (Act No. 167/2008 Coll.)

No administrative proceedings related to the Act on Preventing Ecological Damage and its Remediation, and the Amendment of Certain Acts, have been initiated so far, due to the absence of relevant offenses related to certain obligations arising from the Act.

In 2023, the Inspectorate carried out a total of 113 inspections on compliance with the Act on Preventing Environmental Damage. The planned 85 inspections were completed. Basic risk assessments were submitted. No offenses were identified.

In 2023, the Inspectorate received 6 requests for the imposition of preventive or corrective measures under the Environmental Damage Act, which led to the initiation of administrative proceedings at the request of the petitioner for the imposition of such measures concerning the prevention or removal of the consequences of potential environmental damage. Furthermore, in 2023, the Inspectorate handled proceedings regarding the imposition of corrective measures initiated in previous years. In 2023, the proceedings regarding the imposition of corrective measures initiated in 2021 at the request of three associations concerning the 2020 Bečva River disaster were concluded. In these proceedings, no damage to surface waters was proven, and due to the absence of pre-incident data for protected species of wild animals, further evidence could not substantiate the requests. As a result, the requests were rejected on these grounds.

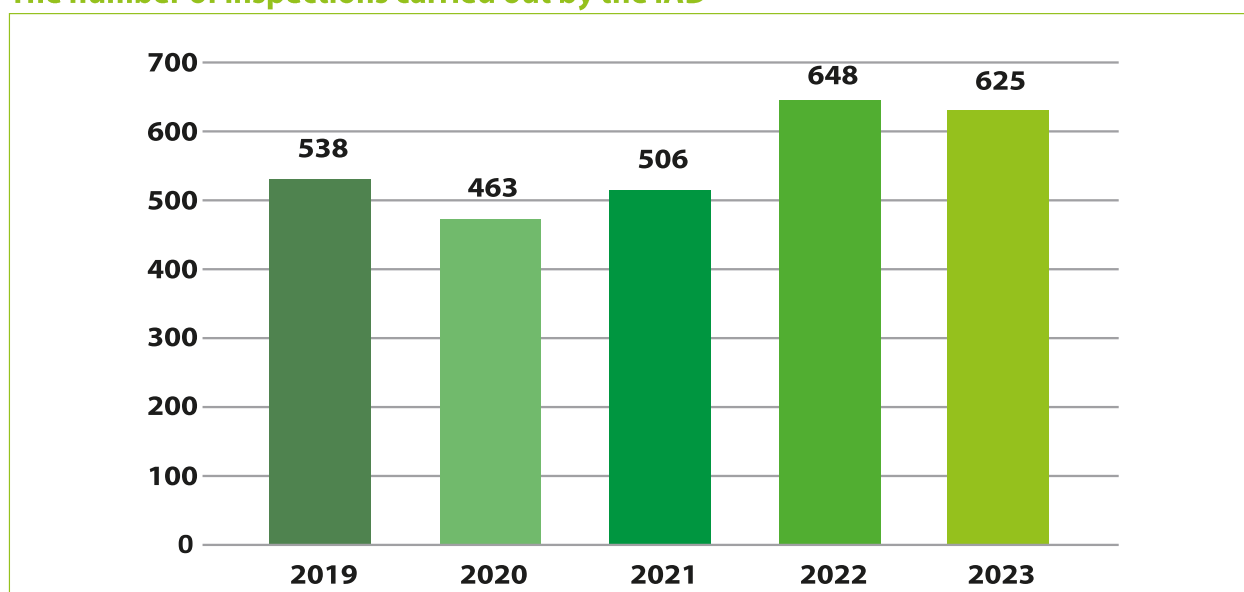
Integrated Agendas Department (IAD)

Specialised Coordinators of Integrated Agendas in the Integrated Agendas Department (IAD), in close cooperation with the expert departments of technical environmental protection, conducted, participated in, collaborated on, or coordinated 625 inspections at facilities and establishments. This number includes both inspections under the Integrated Pollution Prevention and Control (IPPC) Act (236), the Integrated Pollution Register (IPR) Act (276), and the Act on Preventing Ecological Damage (113). During the monitored period, the CIA initiated a total of 64 administrative/offence proceedings. The number of decisions (including orders) that became legally binding in 2023 was 56, with the total amount of fines in legal force amounting to CZK 2,798,620. In 2023, no penalty was imposed for a warning, and in one case, the penalty was waived (an offence during the "COVID" measures period). No decision was issued to suspend operations, nor did any decision on non-cooperation according to the Inspection Procedure become legally binding during the monitored period.

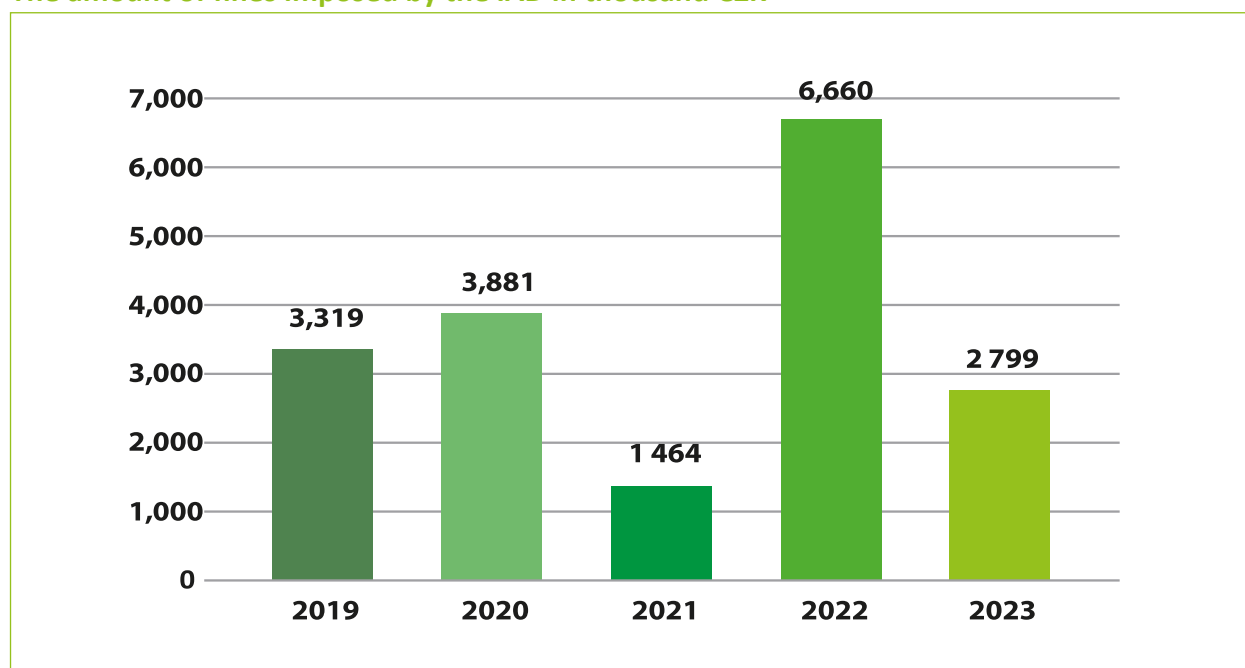
The range of fines imposed in legal force varied from CZK 5,000 to CZK 954,640 (the final fine imposed on KRONOSPAN CR, spol. s r.o., operating the "KRONOSPAN – Production of Particleboard" facility).

The average fine imposed per decision (order) in legal force during this period was approximately CZK 50,000.

The number of inspections carried out by the IAD



The amount of fines imposed by the IAD in thousand CZK



Basic departmental tasks for the IAD

The so-called integrated inspections were carried out as:

- OC, overall control – control of the entire integrated permit (IP), with the possibility of inspecting departmental laws,
- CC, component control – control of one or two components of the integrated permit (IP), with the possibility of inspecting other departmental 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. Decree No. 295/2011 Coll. (financial security; basic or detailed risk assessment),
- SC, specific control of a facility “suspected” of operation without IP,
- More inspections were carried out together, e.g. OC + CIPR, CC + CED, OC + CIPR + CED.

Specific tasks

Specific tasks carried out in 2023 primarily included specific controls (SC), i.e. controls of facilities to determine whether they fall under the IPPC, as well as inspections based on tasks from the MoE (for all planned inspections of facilities with direct discharge status, at least the conditions for this discharge will be inspected). Additionally, all types of inspections were carried out based on tasks addressing current regional issues (e.g., inspections of facilities where serious violations of the Integrated Prevention Act, accidents, or media-covered incidents have occurred in the past).

Accidents

Integrated Agendas Coordinators collaborated in addressing 12 accidents or non-standard operations at IPPC facilities, such as at the TI Ostrava and TI Liberec. Summary data on accidents are provided in Chapter 4.6.

Suggestions

The Integrated Agendas coordinators actively participate in addressing suggestions and petitions, particularly in cases related to the responsibilities of multi-departmental units. Their main task was to ensure a coordinated approach in handling these cases. Summary data on suggestions are provided in Chapter 3.1.

Reports on inspections

The Inspectorate is required under Section 20(b)(9) of the IPPC Act to prepare a report after every on-site inspection, in addition to the inspection protocol. This report must describe the inspection findings and conclude on any further actions to be taken, i.e. a report on the inspection. According to Section 20(b)(11) of this Act, the report must also be published through the Integrated Prevention Information System (IS IPPC), managed by the MoE, within four months of the on-site inspection. However, the report can only be prepared after the deadline for submitting objections to the inspection findings in the protocol, as specified in Section 13 of Act No. 255/2012 Coll. on Inspection Procedures.

The individual territorial inspectorates upload these inspection reports to the IS IPPC within the required deadlines. In 2023, a total of 708 inspection reports by the CEI were uploaded to the IS IPPC (both interim and final reports), of which 700 were final inspection reports by the CEI.



4.7.3 Non-supervisory activities of the CEI in the field of integrated agendas

This activity primarily includes the preparation of expert opinions:

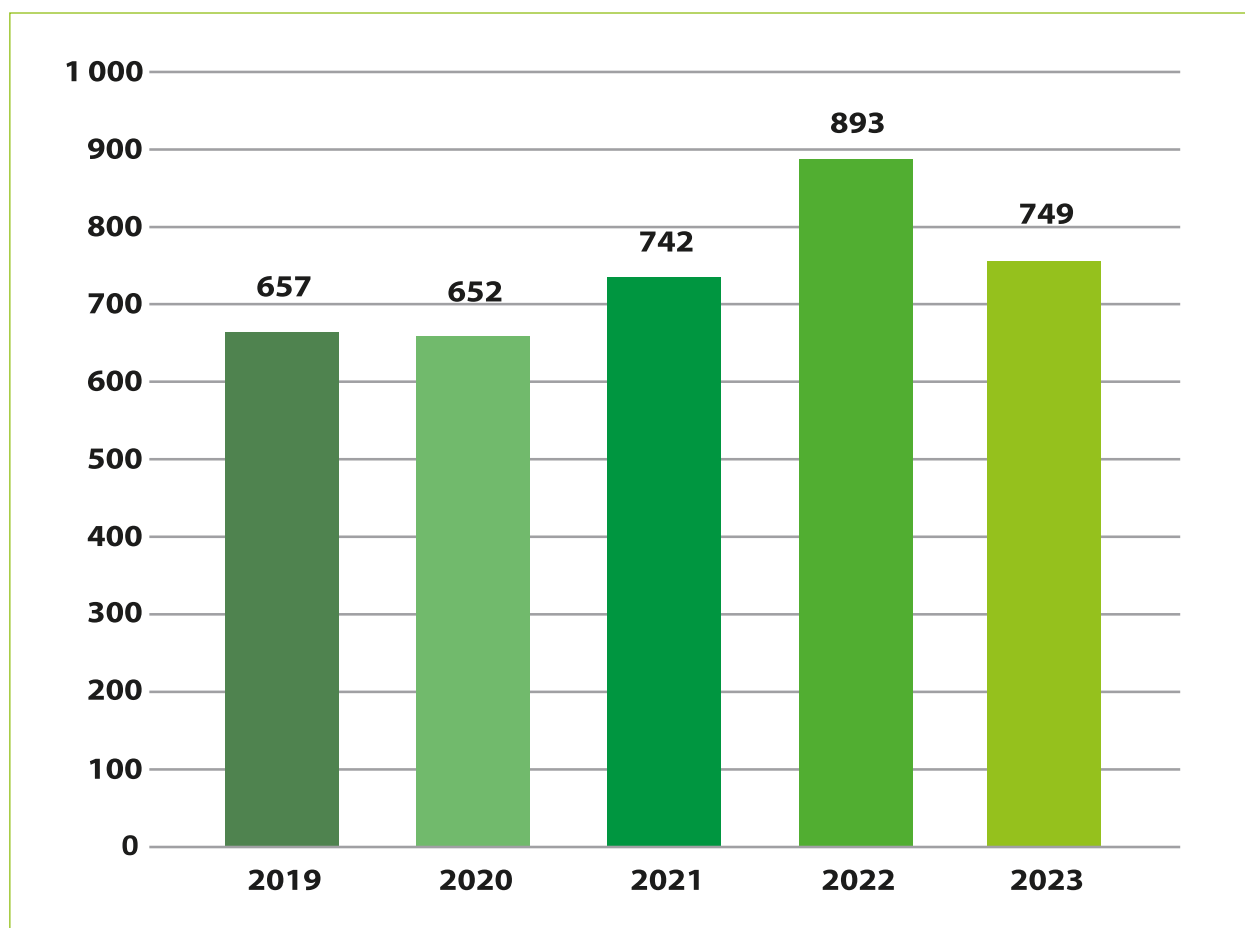
- within the environmental impact assessment process, i.e. EIA/SEA,
- on applications for integrated permits or changes to or reviews of IPs,
- to the environmental management and audit system - in the framework of EMAS, EMS registration,
- under the Safe Enterprise (SE) programme,
- in the context of planning and construction proceedings, to the project documentation,
- to permit the operation of IPPC plants from the point of view of air protection and approval of operating rules,
- to environmental audits,
- in the context of requests for information pursuant to Act No. 123/1998 Coll., Act No. 106/1999 Coll., etc.

EIA/SEA – summary data for the Inspectorate

In 2023, the Inspectorate processed a total of 749 statements regarding projects, documentation, assessments, concept notifications, and concept proposals within the EIA/SEA process. Compared to the previous year, this represents an approximately 16% decrease in the number of statements issued (893).

The trend of more frequent use of Section 15 of Act No. 100/2001 Coll., on preliminary discussions with the CEI, by the notifier or proponent is confirmed.

Issued statements by the CEI within the RIA/SEA process over the last five years



Generally, the proposed projects predominantly involve commercial warehouse complexes, transport infrastructure, residential complexes, and the expansion and modernization of farms. The most significant issue with constructions anticipated on agricultural land is the occupation of the most fertile soils.

Another issue arises with projects where the specific use of the halls is not defined. Consequently, the submitted dispersion studies fail to comprehensively assess the actual conditions that will occur after the project is implemented and operational. Such studies only evaluate the traffic load associated with the project's operation. Without a clear determination of the purpose of the halls or the specific activities that will take place within them, it is not possible to adequately assess the impacts of the project on various components of the environment. Moreover, the actual use of the halls can often differ significantly from the initial plans.

According to the Inspectorate, the intention of commercial entities (notifiers) to build production facilities (particularly without specific designation) and storage facilities on arable land should not outweigh the public interest in the protection of ALF. Given that unused industrial and agricultural sites exist across the Czech Republic (see the national brownfield database), it is in the interest of environmental protection to prioritise the use of these locations.

Significant EIA cases

TI Plzeň

In its comments on the notification of the project "Waste Biogas Station Vejprnice–Change in Input Materials," the CEI suggested that, based on the Air Protection Department's prior experience with similar technologies, the project should undergo further assessment under Act No. 100/2001 Coll. The proposal concerned a partially functional modification of input materials in an already operational biogas station with a valid operating permit.

The modification would allow the station to process waste, primarily animal by-products and kitchen waste from canteens. Given the facility's designed capacity, the project falls under category 6.5 of the IPPC Act as amended. The operation of the project will only be permissible with a valid integrated permit.

Another discussed project was the proposed realignment of Road I/27 in the section Švihov-Klatovy, with a total length of approximately 6.2 km. The entire route of the proposed realignment lies within the protective zone of the third degree of the Úhlava River, which serves as a surface water source for the Plzeň–Homolka water treatment plant. The preparer of the project notification did not address whether the project violates the measures or obligations set out in the decision by which this zone was designated in 1985. Furthermore, the route crosses the outer protective zone of the second degree for the groundwater source supplying the Štěpánovice water mains and passes in close proximity to the Štěpánovice pond. The notification preparer did not comment on these aspects from the perspective of water quality protection. For these reasons, the CEI requested additional assessment of the project under Act No. 100/2001 Coll.

TI Ostrava

The Ostrava Inspectorate addressed the proposal to remove sludge fields in Ostrava-Kunčičky and fly ash ponds (R1, R2, R3) — sludge fields — by filling them with inert material as part of the area's revitalisation. The CEI demanded the full process primarily because the CEI considered the project to be unjustified and involved an operator with a problematic track record in waste management. This was followed by three preliminary discussions of the proposal and consultations. The assessment was concluded.

The TI Ostrava also commented on the expansion of a facility for the utilisation of waste – edible oils and fats. The process involves the treatment of edible oils into industrial raw material through heating, sedimentation, and centrifugal separation, with a capacity of 33,885 tonnes per year. The CEI raised concerns from the perspective of the APD and WPD. Cumulative impacts were not assessed, despite the proposal being pre-discussed (under Section 15 of Act No. 100/2001 Coll.). The CEI demanded the full process. The assessment concluded with the finding that the proposal would not have a significant impact on the environment or public health and therefore would not undergo further evaluation.

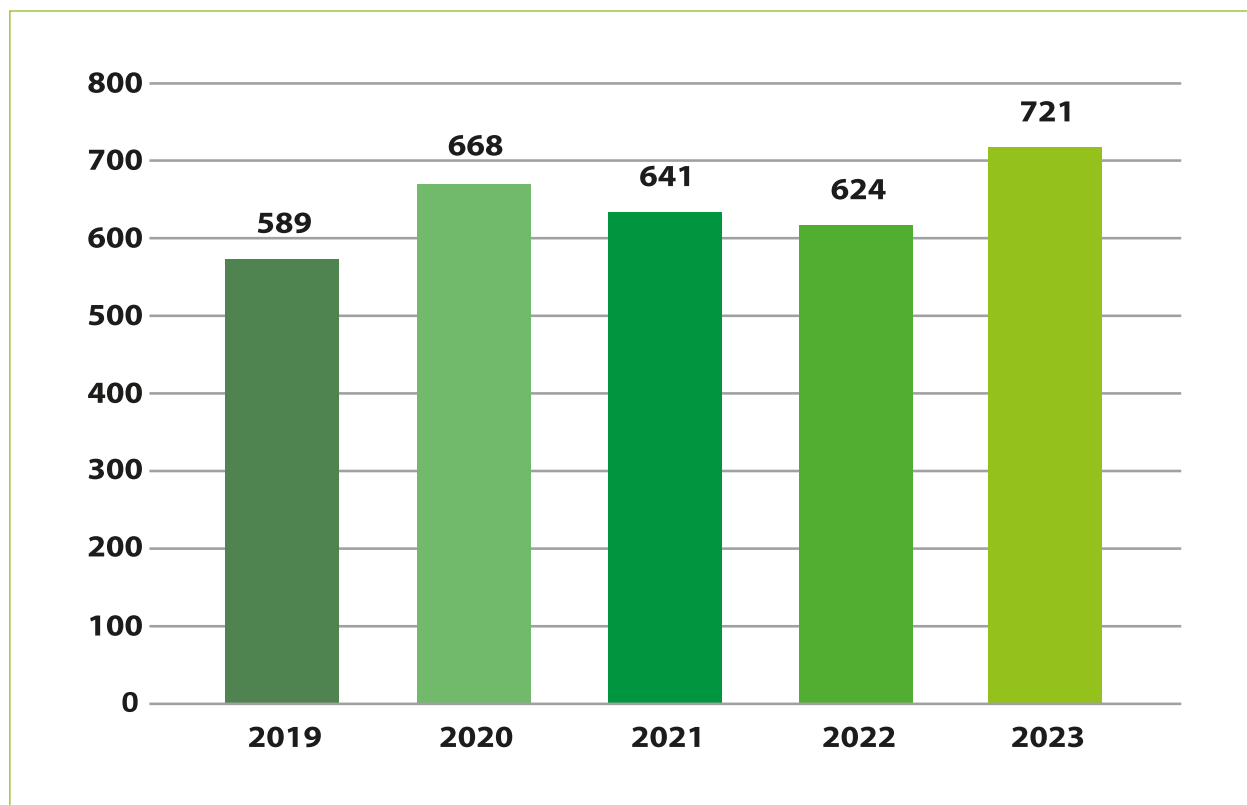
Applications for the issuance of integrated permits and modifications

The CEI actively cooperates with regional authorities in the area of integrated prevention. This cooperation includes issuing opinions on integrated permits (IP), on significant changes to IP (much more frequently), and also on IP reviews.

In 2023, the Inspectorate processed a total of 721 opinions on applications for the issuance or amendment of integrated permits. Compared to the previous year, this represents an approximately 15% increase in issued opinions (624). In several cases, CEI representatives also participated in oral hearings regarding applications for the issuance or amendment of IP.



Issued opinions by the CEI on applications for the issuance or amendment of IPs over the last five years



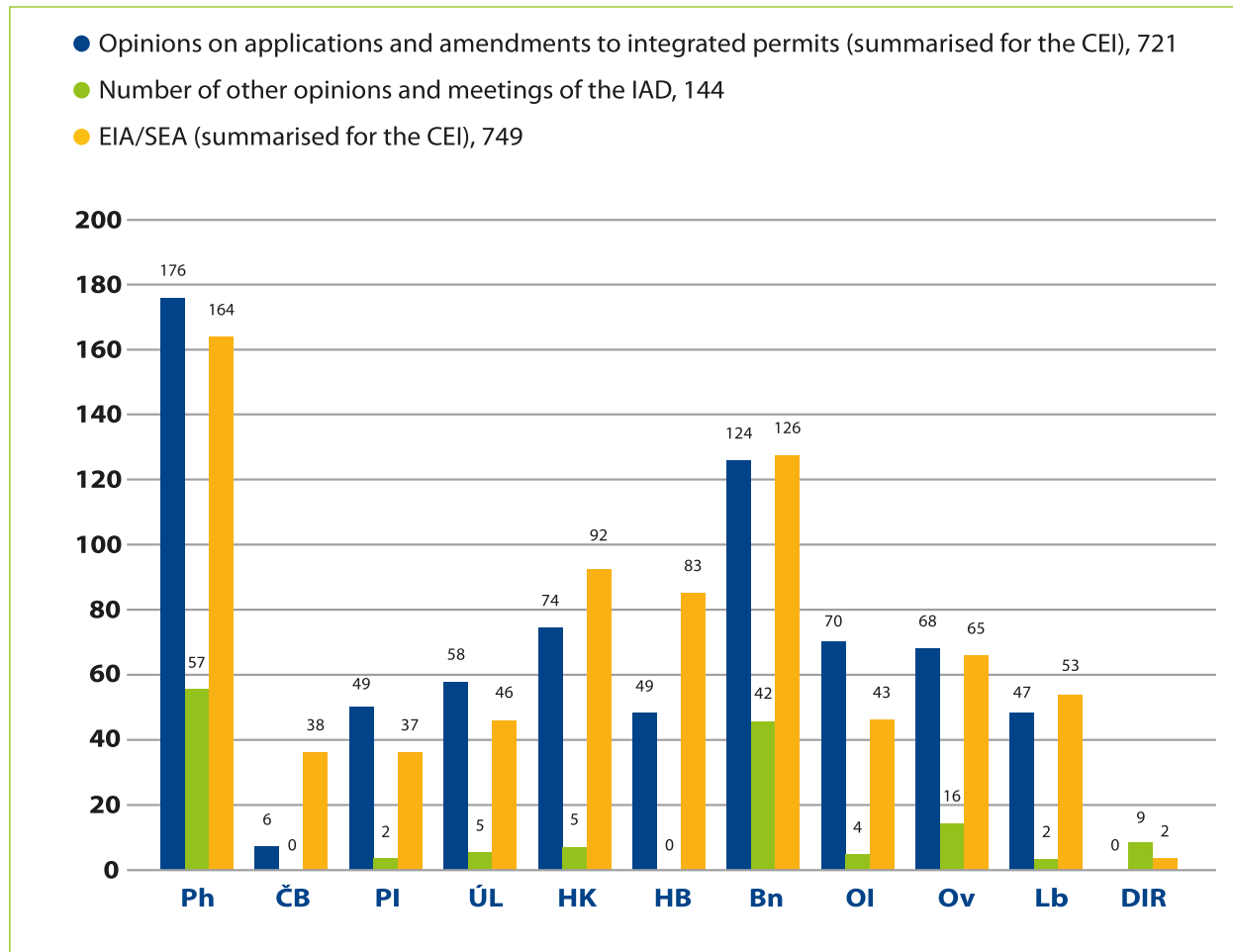
In the opinions on changes to IPs related to the expansion of landfill capacity, the Inspectorate has taken a unified stance and consistently points out the changes in legislation regarding waste management, as well as the ban on the disposal of mixed municipal waste in landfills from 2030, when the amount of waste deposited should be significantly reduced (60% recycling). For these reasons, the Inspectorate rigorously examines why operators are seeking to expand landfills, as the operations of these facilities should gradually be phased out in the interest of environmental protection.



Other expert opinions

The coordinators of integrated agendas at the individual TI and at the CEI Directorate further prepared or collaborated on an additional 144 opinions (within the EMAS certification, the Safe Enterprise Programme, ecological audits, etc.), as shown in the graph below.

Opinions issued by the coordinators of integrated agendas (TI and CEI Directorate)



4.7.4 Significant cases from inspection activities

TI Havlíčkův Brod

The operator KRONOSPAN CR, spol. s r.o., of the facility "KRONOSPAN – Production of particle boards" repeatedly exceeded the permitted maximum daily surface water withdrawal from the Jihlava River in 2018. Through this action, they unlawfully withdrew 9,101 m³ of surface water. Throughout the entire month of August 2018, the flow rate in the Jihlava River was below the Q364 value, and the operator was required to cease surface water withdrawal. However, the operator unlawfully withdrew a total of 14,765 m³ of surface water from the Jihlava River. These actions were in violation of the integrated permit for the aforementioned facility. The Inspectorate imposed a fine of CZK 954,640 on the operator in a new hearing on the violations under Act No. 76/2002 Coll. (following the previous annulment and remittance for a new hearing by the appellate authority). The sanction was upheld by the appellate authority. At the beginning of 2024, the operator used an extraordinary remedy and submitted a request for a review of the MoE's confirming decision, while also filing an administrative lawsuit against the MoE's decision with the Municipal Court.

TI Ostrava

The operator AGRO PRODUKCE s.r.o. operated the facility "Oldřšov Hen Farm" for part of 2021 without the appropriate permit for the listed sources of air pollution specified in Annex No. 2 of Act No. 201/2012 Coll. After exceeding the capacity limit, the facility operated for part of 2021 without the required integrated permit. The Inspectorate imposed a fine of CZK 250,000 on the operator under the IPPC Act.

TI Olomouc

The operator Bergasto s.r.o. operated the facility "Decontamination Area Loučka" in violation of the integrated permit by handling hazardous waste that was not listed in the list of accepted waste in the integrated permit. Additionally, they accepted waste that did not meet the required quality parameters for acceptance into the facility, handled waste in a way that increased the risk of negative environmental impacts, and operated an air pollution source in violation of the approved operating rules. The Inspectorate imposed a fine of CZK 150,000 on the operator under the IPPC Act.

TI Liberec

The operator AAH Czech s.r.o. operated the facility "PUR Foam Production" in violation of the integrated permit (IP). The violation occurred by failing to prevent the release of harmful substances into the Svitávka River, not conducting leak tests on storage tanks, providing incorrect data when fulfilling reporting obligations under Act No. 25/2008 Coll., and failing to submit protocols from one-time emissions measurements in accordance with Act No. 201/2012 Coll. The Inspectorate imposed a fine of CZK 150,000 on the operator in a joint procedure for the violations under the IPPC Act.

TI Ostrava

The operator AVELI ECO s.r.o. operated the facility "Controlled Landfill of Mixed Municipal Waste Dvorce–Rejchartice" in violation of the integrated permit (IP) by accepting several thousand tonnes of waste in 2020, without the actual properties of this waste meeting the conditions for its acceptance into the soil storage facility as specified in the list of waste types in the facility's operating rules. Furthermore, in 2020, the operator failed carry out the annual landfill monitoring within the required scope of the integrated conditions. Specifically, the company did not verify the percentage fill of the landfill, did not check the compliance with the design (particularly the slope of the embankments), and did not assess the overall deformation of the landfill in relation to the subsequent reclamation. Additionally, the operator did not notify the Regional Authority of the Moravian-Silesian Region about a change in the use, operation method, or extent of the facility that could have environmental consequences, as they failed to notify the change in the operation of the facility regarding waste storage. The Inspectorate imposed a fine of CZK 150,000 on the operator under the IPPC Act.



4.7.5 Conclusion

It can be stated that in most cases, specific operator violations do not recur during subsequent inspections. The overall decrease in detected violations is due both to greater operator discipline and the frequency of inspections at facilities with an integrated permit (IP). In each facility, the Inspectorate has conducted at least three inspections (although usually more), which inevitably leads to a lower number of detected violations. The vast majority of "chronic deficiencies" in the facilities have already been identified, rectified by the operators, and, if necessary, sanctioned by the Inspectorate. The detected violations are therefore more likely to be random and often less significant.

During inspections, inconsistencies in facility descriptions are often identified, and following the inspection, the Inspectorate provides feedback to the regional authority, which can then correct these discrepancies as part of the review process. Similarly, in the case of outdated or irrelevant conditions, such as references to obsolete legislation in integrated permits, particularly in the areas of waste management and water protection, these can also be addressed.



Legislative inadequacy

Legislative inadequacy still appears to be problematic in the case of addressing suggestions about odour.

There also appears to be some legislative ambiguity regarding wastewater (under Act No. 254/2001 Coll.) and water-based liquid waste (wastewater under Act No. 541/2020 Coll.). This issue became apparent during discussions and the resolution of input limits for waste management facilities that are also waterworks – biological wastewater treatment plants. The waste producer can easily circumvent the operating regulations and classify the waste as wastewater, which is not subject to any quality records, only the quantity is documented.

In the area of ecological damage (harm) under Act No. 167/2008 Coll., the problem is that there is no database for basic and detailed risk assessments. Operators store these assessments in what is known as the "drawer." Moreover, a penalty cannot be imposed for failing to prepare a basic or detailed risk assessment according to the current regulations, as Act No. 167/2008 Coll. does not include the relevant offence for this obligation, as stated in Section 14(1) of the Act. In 2023, the Inspectorate participated in amending of Act No. 167/2008 Coll.

Findings from inspections

If all requested documents are available on-site during the inspection, only a few documents are included in the case file (in the electronic file system). However, if the operator is unable to provide everything on-site and sends documents gradually, or if the CEI has to repeatedly request additional missing documents, the number of documents in the file can reach dozens. The inclusion of a large number of subsequently provided documents increases the workload for the CIA and potentially other members of the inspection team.

International and domestic cooperation, prevention

An important activity of the IAD inspectors in 2023 was cross-border cooperation with Slovakia (Ministry of the Environment of the Slovak Republic and Slovak Environmental Inspectorate) within the framework of the BAT forum. Additionally, the coordinators of integrated agendas continued to actively participate, as far as possible, in the activities of technical working groups, particularly at the Ministry of the Environment ("Regions and Integrated Prevention") and the Ministry of Industry and Trade ("Forum for Exchange of Information on BAT").

The Inspectorate actively and effectively cooperates with other state administration bodies, particularly with regional authorities, which issue permits for the operation of individual facilities under the Integrated Pollution Prevention and Control (IPPC) Act. The goal of this cooperation is to improve the quality of IP, ensure IP compliance with the current state of the facility, and formulate specific binding operational conditions with regard to their enforceability, thereby ensuring a high level of environmental protection. However, the gradual increase in the number of IP changes leads to more demanding inspections, which in the area of integrated prevention require precision in preparation and sufficient time.

However, within its activities, the Inspectorate does not focus strictly on imposing fines; it also emphasizes prevention and utilizes "soft methods".



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

5.1 Ethics and integrity



Rules of ethics

The Rules of ethics for civil servants and employees in employment relationships performing activities under Section 5 of Act No. 234/2014 Coll., on Civil Service, as amended (CSA), are established by the CSA, specifically Section 77(1) and (2) and Section 81, and by the Service Regulation of the Deputy Minister of the Interior for Civil Service No. 13/2015 of December 14, 2015 (available here: <https://www.mvcr.cz/sluzba/clanek/sluzebni-predpisy.aspx?q=Y2hudW09MTA%>), valid until December 31, 2023. Article 9 of the Service Regulation of the Deputy Minister of the Interior for Civil Service focuses on preventing risks of corruption and fraud and on mitigating undesirable external influences that could jeopardise the proper performance of service. The rules of ethics for employees in employment relationships are governed by Act No. 262/2006 Coll., the Labour Code, as amended, specifically Sections 303 and 304.

Among the documents that CEI employees also follow in the area of ethical conduct are the Rules of Ethics and Principles of Behaviour and Conduct for Employees of the Ministry of the Environment, published on the CEI website in the "Anti-Corruption Programme" section (<https://www.cizp.cz/cizp/protikorupcni-program>).

The purpose of the Rules of Ethics in force at the CEI is to ensure that all employees consciously and actively adhere to ethical principles when performing their assigned tasks and protecting the interests of the state. Employees are regularly trained in the Rules of Ethics and are formally informed about new documents. The compliance with the Rules of Ethics is the responsibility of the head of each organisational unit of the CEI.

Reporting Suspicions of Unlawful Conduct

With the entry into force of Act No. 171/2023 Coll., on the Protection of Whistleblowers (APW), the CEI, as an obligated entity, implemented an internal reporting system. This system was formally introduced through CEI Directive No. 15/2023, as amended, on the protection of whistleblowers and related internal measures within the CEI. The internal reporting system replaced the previously existing measures related to reporting suspicions of unlawful conduct, including corrupt practices, established pursuant to Government Regulation No. 145/2015 Coll., on measures related to reporting suspicions of unlawful conduct in a public office.

The Director of the CEI, pursuant to Section 9(2)(b) of the APW, appointed the designated person and the substitute designated person. The designated person handles and processes notifications submitted by civil servants employed at the CEI, other employees assigned to the CEI, or individuals performing voluntary activities, internships, or professional placements at the CEI. The CEI explicitly excludes the acceptance of notifications from individuals who do not perform work or similar activities for the obligated entity under Section 2(3)(a), (b), (h), or (i) of the APW.

Notifications can be submitted using the following methods:

- 1) By phone or in person, by prior arrangement with the designated person.
- 2) In writing:
 - To the email address: prosetrovatel@cizp.cz
 - In the case of sending a notification via the CEI registry, postal, or courier services, always seal the envelope properly and visibly mark it with the text "DO NOT OPEN – NOTIFICATION FOR INTERNAL WHISTLEBLOWER SYSTEM – FOR THE ATTENTION OF THE DESIGNATED PERSON ONLY".



- Written notification dropped into the designated mailbox located in an unmonitored area to the right of the main entrance to the CEI Directorate (this option was cancelled in 2024).

Employees have access to information about the internal reporting system on the CEI website in the "[Internal Reporting System](https://www.cizp.cz/cizp/vnitřní-oznamovací-systém)" section (<https://www.cizp.cz/cizp/vnitřní-oznamovací-systém>), including basic information for whistleblowers, contact details for designated persons, and a link to the external reporting system overseen by the Ministry of Justice. Alternatively, the whistleblower may contact law enforcement authorities directly.

5.2 Anti-corruption programme

The internal anti-corruption programme of the Czech Environmental Inspectorate (IAP CEI) is based on the requirements of the Czech Government, which are repeatedly outlined in government resolutions, adopted strategies, and action plans. The current foundational document is the Government Concept for Combating Corruption for 2023–2026, which represents a medium-term strategic anti-corruption document of the government, summarising the basic principles of government anti-corruption policy. This concept is followed by the Action Plan for Combating Corruption for 2023 and 2024, which is the first of the action plans implementing the Government Concept for Combating Corruption for 2023–2026.

The IAP of the CEI is a set of procedures and measures for managing corruption risks, which employees are required to follow. Its goal is to minimize the conditions that could lead to corrupt practices within the CEI and to protect the property and interests of the state. The IAP of the CEI consists of five main parts: Creating and strengthening the anti-corruption climate; Transparency; Managing corruption risks and monitoring controls; Procedures in case of suspicion of corruption; Evaluation of the internal anti-corruption programme. The currently valid IAP of the CEI is always published on the CEI website in the "[Anti-corruption Programme](https://www.cizp.cz/cizp/protikorupcni-program)" section (<https://www.cizp.cz/cizp/protikorupcni-program>).

The implementation of the IAP of the CEI is regularly evaluated and aligned with the anti-corruption policy of the Government of the Czech Republic and the Ministry of the Environment. Corruption risks are identified at the level of individual departments within the CEI, and rules for their management are established. Procedures for reporting corrupt practices and processes to limit the conditions for the occurrence of corrupt activities are also defined. Employees are familiarized with the documents and procedures in the area of anti-corruption policy and regularly educated in this area.

As part of its efforts for maximum transparency, the CEI publishes contracts in accordance with the Contract Register Act and further contracts and invoices through the Ministry of the Environment's Open Data platform. Twice a year, the CEI publishes a list of advisors and advisory bodies on its website in the "Advisory Bodies of the CEI" subsection (<https://www.cizp.cz/cizp/poradni-organy-cizp>).

In recent years, no cases of corruption have been recorded at the CEI. Additionally, no contracts with partners or suppliers have been terminated or not renewed due to violations of ethics or regulations related to corruption.



5.3 Handling of complaints

Complaints against inappropriate behavior or procedure of the CEI

The CEI, as part of its activities, also investigates complaints filed under Section 175(4) of the Code of Administrative Procedure, both complaints against the actions of the administrative authority and complaints regarding inappropriate behavior by officials. Information on how to file complaints is published on the CEI's website in the "[Contact Us](https://www.cizp.cz/obratte-se-na-nas)" section (<https://www.cizp.cz/obratte-se-na-nas>).

Complaints about inappropriate behaviour of employees or the procedures of individual units of the territorial inspectorates or the CEI Directorate provide important feedback that helps the organisation improve its work. In order for a complaint to be properly investigated, it must contain clear and understandable information about

what specific procedure is being referred to and in what way the complainant perceives inappropriate behaviour or incorrect procedure. After a proper and objective assessment, the CEI will conclude whether the complaint is considered justified, partially justified, or unjustified. In cases where the complaint is deemed justified or partially justified, measures are taken to correct the issue, prevent a recurrence of inappropriate procedures, and improve the performance of public administration.

In 2023, the CEI received a total of 41 complaints, of which 37 were deemed unjustified. Two complaints were considered partially justified, and two complaints were deemed justified. A comprehensive overview of the complaints received, broken down by individual territorial inspectorates and the Directorate, is provided in the following table. Compared to the previous year, this represents a noticeable increase in the number of complaints addressed, although there was a decrease in the proportion of justified or partially justified complaints. This trend indicates an increased public interest in the proper performance of public service duties.

The number of complaints regarding the inappropriate behaviour of inspectors or the procedures of the TI of the CEI addressed in 2023 by individual territorial inspectorates or the CEI Directorate

| Territorial inspectorate | Number of received complaints | of which | | |
|--------------------------|-------------------------------|-----------|---------------------|-------------|
| | | Justified | Partially justified | Unjustified |
| Prague | 5 | 0 | 0 | 5 |
| České Budějovice | 3 | 1 | 0 | 2 |
| Plzeň | 9 | 0 | 0 | 9 |
| Ústí nad Labem | 2 | 0 | 0 | 2 |
| Hradec Králové | 2 | 0 | 0 | 2 |
| Havlíčkův Brod | 0 | 0 | 0 | 0 |
| Brno | 1 | 0 | 0 | 1 |
| Olomouc | 3 | 0 | 0 | 3 |
| Ostrava | 2 | 0 | 0 | 2 |
| Liberec | 3 | 1 | 0 | 2 |
| Directorate | 11 | 0 | 2 | 9 |
| Total | 41 | 2 | 2 | 37 |



5.4 Data protection and compliance with legislation

In 2023, the CEI did not receive any complaints regarding its actions or procedures related to privacy violations, trade secrets, data loss, or unauthorized disclosure of information. Furthermore, the CEI did not fail to comply with any laws or regulations in the social (labour law) field or in the use of products and services.

In 2023, the CEI paid:

- for fines related to traffic violations: CZK 0,
- costs of appeal proceedings related to the annulment of a imposed fine: CZK 0,

In 2023, no payment order was issued related to a breach of budgetary discipline.



Hradecká

DIESE
STATT VON HADE
DIE GESTUTTE
FÜR IN GROSSE
KRIEGEN
FAHRENDEN
DIE SEBASTIAN
ERRICHTEN
LASSEN

711

4 Procurement procedures and supply chain in 2023

The CEI is one of the subsidiary organisations of the Ministry of the Environment that adheres to the rules for centralised state procurement (the centralised public procurement system) and is also a public contracting authority that follows a range of legal and internal regulations when awarding public contracts (for more details, see the website: www.cizp.cz/cizp/verejne-zakazky).

Supply chain

The supply chain primarily represents continuous outsourcing:

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

The Public Procurement Department (PPD) also administers public contracts related to currently needed professional training and the purchase of equipment for inspectors, contributing to the improvement of the quality of inspection activities.

In 2023, based on public procurement administered by the PPD, 28 contracts were concluded with a total financial volume exceeding CZK 10,200,000 excluding VAT. Among the most significant and largest public procurement contracts was the divided contract titled: "Provision of reception services in administrative buildings of the CEI" worth CZK 3,614,400 excluding VAT for the Territorial Inspectorate of the CEI in Prague, Plzeň, and Havlíčkův Brod.

Other significant public procurement contracts included "Provision of flights, tickets, accommodation, and related services for the CEI" worth CZK 1,900,000 excluding VAT, "Reconstruction of the PZTS (Electric Security System and Electric Fire Alarm, including graphical extension) at the Territorial Inspectorate of the CEI in Ostrava" worth CZK 1,191,401 excluding VAT, and "Reconstruction of the gas boiler room at the TI Plzeň" worth CZK 976,237 excluding VAT.

In 2022, the CEI introduced a Dynamic Purchasing System (hereinafter referred to as "DPS") for providing laboratory services and geological surveys for the CEI. It is divided into four categories: waste management, water protection – wastewater and surface water, water protection – groundwater and geological environment, and chemicals in products. Laboratory services refer to the qualified collection of gas, solid, and liquid samples according to the DPS category, followed by their qualified analysis. In 2023, 8 contracts were concluded within the DPS.

Verification of environmental impacts, employment procedures, and societal impacts among suppliers

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

The CEI routinely applies environmental requirements to individual public contracts. This principle has been utilised particularly in contracts for cleaning services, interior painting, façade cleaning, and similar services. For instance, the public contract titled "Provision of cleaning services in the building of the territorial inspectorate of the CEI in Ostrava" included a requirement for an "environmentally friendly product."

In the public contracts titled "Provision of cleaning services in the building of the territorial inspectorate of the CEI in Ostrava" and "Provision of reception services in the administrative buildings of the CEI," the contracts were reserved exclusively for suppliers employing individuals with disabilities—so-called reserved contracts, where suppliers were required to provide confirmation from the labour office demonstrating compliance with this criterion as part of their tender submission.

During the social screening of suppliers for public contracts, in addition to the standard checks (compliance with legal and contracting authority requirements), an inspection was conducted to verify that the condition of the reserved contract was met. This required suppliers to employ at least 50% of their workforce in protected workplaces as individuals with disabilities.



7 Employee environment and human resources

The CEI considers employee care a fundamental value and the cornerstone of its expertise. Its primary approach includes direct interaction between management and employees across all territorial inspectorates, a focus on continuous employee training, and an emphasis on occupational safety. The human resource management strategy prioritises controlling and reporting in human resource management, as well as the professional growth and development of employees.

A key change in 2023 was the appointment of a new head of the Service Authority, the dissolution of the Personnel and Legal Department, and the establishment of the Internal Services Department, which includes the Personnel Department. One of the main tasks, in connection with the amendment to the Civil Service Act no. 384/2022 Coll., effective from January 1, 2023, was to announce selection procedures for eight current department directors. Given the average age of CEI employees, there was already a noticeable turnover of staff in 2023 due to the retirement of experienced employees reaching pension age.

As of December 31, 2023, the CEI had 536 employees, comprising 307 women and 229 men. CEI employees work at the Directorate, the territorial inspectorates in 10 regions, and two branch offices. The majority of employees (77.4%) hold specialised inspector positions, and 82.5% have a university education. Employees with more than 10 years of experience at the CEI make up 58.6% of the workforce.

The CEI employs civil servants, whose employment relations are governed by the Civil Service Act (CSA), as well as employees under standard employment contracts, whose rights and obligations are regulated by the Labour Code (LC).

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

| Year | 2019 | 2020 | 2021 | 2022 | 2023 |
|--|------------|------------|------------|------------|------------|
| Absolute number of employees as at 31.12. | 557 | 546 | 540 | 533 | 536 |
| Prague and Central Bohemia | 62 | 62 | 63 | 59 | 59 |
| České Budějovice | 39 | 36 | 37 | 34 | 37 |
| Plzeň | 43 | 43 | 40 | 43 | 43 |
| Ústí nad Labem | 50 | 52 | 50 | 50 | 47 |
| Hradec Králové | 44 | 44 | 43 | 41 | 41 |
| Havlíčkův Brod | 38 | 36 | 36 | 35 | 35 |
| Brno | 55 | 51 | 50 | 50 | 51 |
| Olomouc | 36 | 34 | 30 | 32 | 32 |
| Ostrava | 46 | 48 | 47 | 47 | 44 |
| Liberec | 33 | 30 | 31 | 29 | 30 |
| Directorate (in Prague) | 111 | 110 | 113 | 113 | 117 |

Number of employees broken down by type of employment relationship and employment

| Year | 2019 | 2020 | 2021 | 2022 | 2023 |
|---|------------|------------|------------|------------|------------|
| Total number of employees as at 31.12. | 557 | 546 | 540 | 533 | 536 |
| Percentage of employees covered by a collective agreement/agreement | 100 | 100 | 100 | 100 | 100 |
| Employees in top management: executives + department directors /civil servants/ | 17 | 17 | 16 | 16 | 16 |
| of which women | 2 | 2 | 2 | 3 | 3 |
| of which men | 15 | 15 | 14 | 13 | 13 |
| Professional staff /civil servants/ | 446 | 421 | 439 | 412 | 415 |
| of which women | 229 | 213 | 216 | 214 | 218 |
| of which men | 217 | 208 | 223 | 198 | 197 |
| Support staff /employees in employment/ | 94 | 108 | 101 | 105 | 105 |
| of which women | 86 | 92 | 85 | 86 | 86 |
| of which men | 8 | 16 | 16 | 19 | 19 |
| Employment for an indefinite period | 504 | 505 | 528 | 486 | 512 |
| of which full time | 490 | 496 | 519 | 477 | 506 |
| of which part-time | 14 | 9 | 9 | 9 | 6 |
| Fixed-term employment* | 53 | 41 | 12 | 47 | 24 |
| of which full time | 52 | 40 | 12 | 47 | 23 |
| of which part-time | 1 | 1 | 0 | 0 | 1 |
| Number of WOMEN as of 31. 12. | 317 | 307 | 301 | 303 | 307 |
| Indefinite employment (women) | 278 | 278 | 294 | 277 | 279 |
| of which full time | 266 | 269 | 286 | 268 | 273 |
| of which part-time | 12 | 9 | 8 | 9 | 6 |
| Fixed-term employment (women) | 39 | 29 | 7 | 26 | 28 |
| of which full time | 38 | 29 | 7 | 26 | 25 |
| of which part-time | 1 | 0 | 0 | 0 | 3 |
| Number of MEN as of 31. 12. | 240 | 239 | 239 | 230 | 229 |
| Indefinite employment (men) | 226 | 227 | 234 | 209 | 219 |
| of which full time | 224 | 226 | 233 | 209 | 219 |
| of which part-time | 2 | 1 | 1 | 0 | 0 |
| Fixed-term employment (men) | 14 | 12 | 5 | 21 | 10 |
| of which full time | 14 | 11 | 5 | 21 | 9 |
| of which part-time | 0 | 1 | 0 | 0 | 1 |

* Fixed-term - according to Section 21 of the Act on Social Service, civil servants who have not yet passed the civil service examination are recruited for a fixed term.

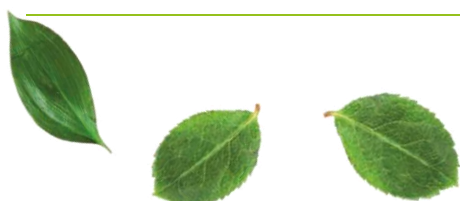
Once civil servants have passed the civil service exam, their fixed term is changed to an indefinite term.

Breakdown of staff by education and gender – as of December 31, 2023

| Education achieved | men | Women | Total | |
|-------------------------------|------------|------------|------------|--------------|
| Primary | 1 | 0 | 1 | 0.2 % |
| Secondary vocational | 0 | 5 | 5 | 0.9 % |
| Complete secondary | 2 | 10 | 12 | 2.2 % |
| Complete secondary vocational | 9 | 60 | 69 | 12.9 % |
| Higher vocational | 1 | 6 | 7 | 1.3 % |
| University | 216 | 226 | 442 | 82.5 % |
| Total | 229 | 307 | 536 | 100 % |

Duration of employment of staff - status as at December 31, 2023

| Duration | number | % |
|----------------|------------|--------------|
| Up to 5 years | 133 | 24.8 % |
| Up to 10 years | 89 | 16.6 % |
| Up to 15 years | 77 | 14.4 % |
| Up to 20 years | 80 | 14.9 % |
| Over 20 years | 157 | 29.3 % |
| Total | 536 | 100 % |



7.1 Personnel management

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

- Collective agreement and collective bargaining agreement,
- Work Regulations of the Czech Environmental Inspectorate (effective from May 1, 2012),
- Salary Regulations (effective from June 1, 2012),
- 14/2012 Directive on training of the CEI employees (effective from April 20, 2022),
- 3 /2015 Service Regulation on the application of the Work Regulations of the Czech Environmental Inspectorate to the service relationships of civil servants under the Civil Service Act (effective from August 10, 2015),
- 10/2015 Service regulation regulating the application of the Civil Service Act in the Czech Environmental Inspectorate (effective from December 4, 2015),
- 1/2019 Directive on Remuneration of Civil Servants (effective from February 7, 2019), including an amendment effective from May 1, 2024,
- 10/2019 Service Regulation establishing the procedure for the performance of service evaluation of civil servants assigned to the Czech Environmental Inspectorate (effective from November 7, 2020),
- 17/2023 Service Regulation issuing the internal systemisation of the Czech Environmental Inspectorate as amended by Amendment No. 2 with effect from March 1, 2024.
- 24/2022 Methodological Guideline - Employee Satisfaction Survey (effective from November 1, 2022)
- 25/2022 Service Regulations - Adaptation Process (effective from November 1, 2022)
- 26/2022 Methodological Guideline - Management of Innovative Initiatives by Employees (effective from November 1, 2022)
- 27/2022 Human Resources Policy (effective from November 1, 2022)

Employment

Due to the nature of its activities, the CEI primarily offers qualified positions. The key focus is on employee retention, which is measured by the voluntary turnover rate.

At the end of the year, 33 systematised positions were unfilled at the CEI. The current task for the CEI leadership remains the stabilisation and development of key professions. The average voluntary turnover rate at the CEI remains relatively low at 6.52%, although it has again increased compared to the previous period.

Changes in employee numbers are monitored through regular internal reporting and evaluated by the leadership. Both employment and service positions are filled through public recruitment procedures. As part of the goal to increase staffing levels at the CEI, 89 recruitment procedures for filling service positions and 24 for filling employment positions were conducted.

In 2023, the work of the Personnel Department focused on the quality and timely implementation of legislative changes in labour law, the Civil Service Act, salaries, and training.

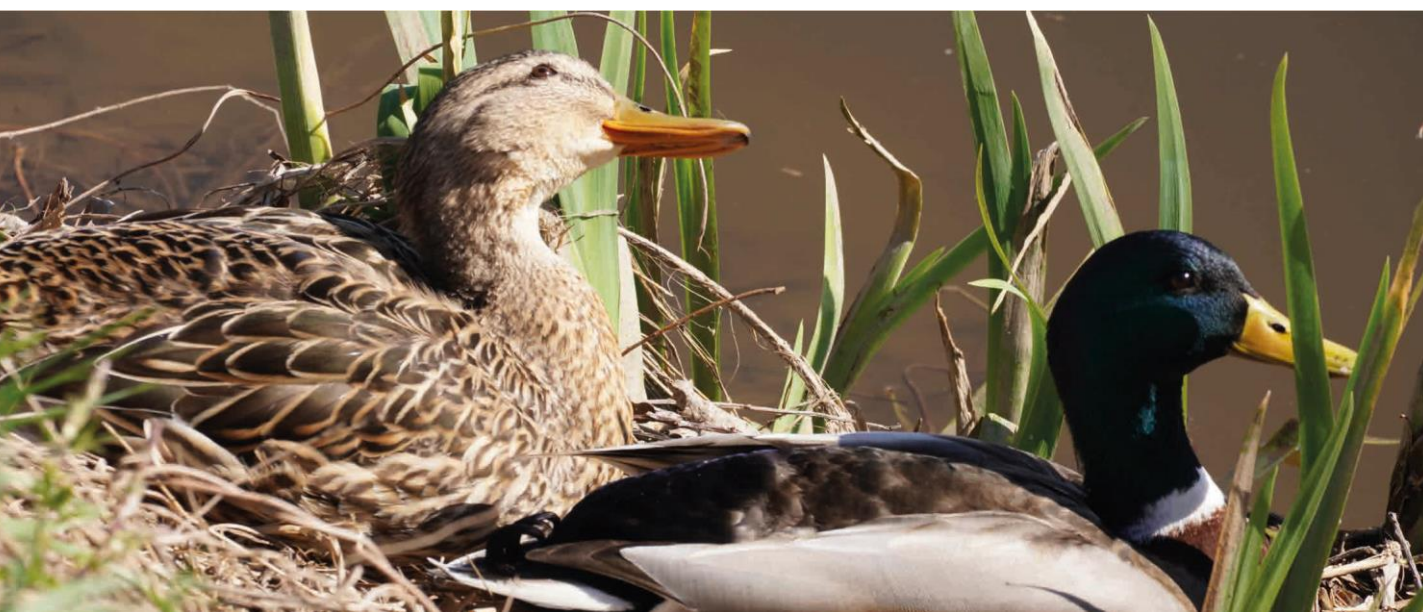
Total number and ratio of new employees and staff turnover rate 2019-2023

| | 2019 | 2020 | 2021 | 2022 | 2023 |
|--|------------|-------------|------------|------------|-------------|
| Total number of staff recruited in the year | 54 | 43 | 33 | 46 | 52 |
| of which women | 39 | 28 | 21 | 24 | 30 |
| under 30 years of age | 9 | 5 | 6 | 8 | 7 |
| 30-50 years of age | 22 | 16 | 12 | 12 | 18 |
| over 50 years | 8 | 7 | 3 | 4 | 5 |
| of which men | 15 | 15 | 12 | 22 | 22 |
| under 30 years of age | 3 | 5 | 2 | 6 | 5 |
| 30-50 years of age | 6 | 6 | 6 | 14 | 14 |
| over 50 years | 6 | 4 | 4 | 2 | 3 |
| Absolute number of employees as at 31.12. | 557 | 546 | 540 | 533 | 536 |
| Total number of employees who left their jobs in a given year | 50 | 55 | 46 | 51 | 49 |
| of which men | 19 | 16 | 18 | 26 | 26 |
| under 30 years of | 2 | 1 | 1 | 3 | 1 |
| age 30-50 years of | 6 | 7 | 4 | 7 | 12 |
| age over 50 years | 11 | 8 | 13 | 16 | 13 |
| of which women | 31 | 39 | 28 | 25 | 23 |
| under 30 years of | 5 | 4 | 5 | 4 | 6 |
| age 30-50 years of | 16 | 16 | 13 | 13 | 9 |
| age over 50 years of | 10 | 19 | 10 | 8 | 8 |
| % voluntary turnover * | 6 | 6.4 | 4.4 | 5.6 | 6.52 |
| (Includes forced departures including organisational changes, retirements, departures due to injury, death) | 6 | | 4.4 | 5.6 | 6.52 |
| % of total employee turnover | 9 | 10.1 | 8.5 | 9.6 | 9.2 |
| Total number of terminations in a given period (year) × 100 / average number of employees on the register in a given year. | 9 | | 8.5 | 9.6 | 9.2 |

*These are terminations of service by employees. It does not include voluntary retirements, terminations of service by the employer (termination during probationary period, dismissal from the post of manager), terminations of service by law, terminations of service by expiry of a certain period.

Overview of economic, health and social benefits of employees (excluding pensions) for permanent full-time employees 2022

| | Employees in top management (management + department director) (civil servants) | Professional staff (civil servants) | Support staff (employees in employment) |
|---|---|--|--|
| Average monthly number of employees per year | 16 | 415 | 105 |
| Collective agreement | YES | YES | YES |
| % of employees covered by a collective agreement | 100% | 100% | 100% |
| Employee life insurance | NO | NO | NO |
| Health care allowance | YES | YES | YES |
| Disability insurance, insurance against the permanent consequences of accidents | NO | NO | NO |
| Parental leave | according to the LC | according to the LC | according to the LC |
| Financial support for supplementary pension schemes | YES | YES | YES |
| Increased severance pay for termination of employment due to organisational change under a collective agreement | NO | NO | NO |
| Executive life insurance, disability insurance | NO | NO | NO |
| Sick leave (5 days/year) | YES | YES | YES |
| 13th salary | NO | NO | NO |
| Allowance for meals | YES | YES | YES |
| Services related to factory catering | NO | NO | NO |
| Protective drinks and vitamin preparations | NO | NO | NO |
| Allowance for children's recreation | YES | YES | YES |
| Family recreation allowance | YES | YES | YES |
| Working with the elderly | NO | NO | NO |
| Jubilee rewards | YES | YES | YES |
| Tuition fees for university staff | NO | NO | NO |
| Contribution to cultural and sporting activities | YES | YES | YES |
| Rewards and financial gifts | YES | YES | YES |
| On-call pay (by law), not a benefit | NO | NO | NO |
| Social assistance | YES | YES | YES |
| Extension of annual leave entitlement by 1 week per calendar year above the basic rate | NO | NO | NO |
| Interest-free loans | YES | YES | YES |



Diversity and Equal Opportunities

The Czech Environmental Inspectorate is an organisation that respects equal opportunities for both men and women. When selecting employees, the primary focus is on the candidates' expertise. Pay transparency is ensured through salary tariffs. Equal pay is based on the system of service evaluation for employees.

The individual departments within the organisation are diverse in terms of gender, age, and experience. The organisational culture does not tolerate any form of direct or indirect discrimination that supports gender stereotypes. The limiting factor is, to some extent, the specific structure of candidates for vacant positions, as the centrally set tariff structure makes the offered salary unattractive for middle-aged candidates with experience. The employment regulations stipulate the requirement for work discipline and adherence to rules of courtesy and consideration.

The CEI supports equal opportunities within the organisation, offering flexible working hours with the option of part-time employment, thus facilitating all employees, regardless of gender, to balance their private and professional lives.

Completing the e-learning course on equal opportunities was required of all newly hired employees in 2023.

Employee-management relations at the CEI

Civil servants and employees in service/employment relationships have separate collective agreements/contracts; the collective agreement/contract applies to all employees of the CEI.

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

Composition of management bodies and structure of employee categories in 2023

| | Men | Women | Total |
|--|------------|------------|------------|
| Employees in top management (management + department directors) /civil servants/ | 13 | 3 | 16 |
| Professional staff /civil servants/ | 197 | 218 | 415 |
| Support staff /employees in employment/ | 19 | 86 | 105 |
| Total | 229 | 307 | 536 |

7.2 Education

In 2023, the following mandatory training sessions were held:

- Initial introductory training (number of participants 41)
- Initial follow-up training (number of participants 15)
- Proficiency tests according to the Act No. 250/2019 Coll, on Misdemeanours (number of participants 13)
- Specialist training of inspectors (number of participants 34)
- Civil service exams (number of participants 34)

This number does not include legally required training, which was attended by a total of 1,456 employees last year. These trainings are divided into:

- Occupational safety and health management (number of participants 31)
- OSH employees (number of participants 192)
- FP management (number of participants 31)
- FP employees (number of participants 192)
- First aid (number of participants 29)
- Drivers (number of participants 495)
- Working at heights (number of participants 444)
- Protection of classified information (number of participants 38)

In the period 2023, a total of 1,167 e-learning mandatory trainings were held in the area of combating corruption in public administration, personal data protection under the GDPR and other legal regulations, cyber security and equal opportunities for women and men in the Czech Republic and the EU.

In 2023, a total of 897 employees were trained within 126 face-to-face courses and conferences. This number includes educational events, which we categorize as follows:

- Internal courses: mass training sessions of the CEI (number of events: 10, number of participants: 492),
- External courses: individual training sessions (number of events: 7683, number of participants: 146),
- Conferences (number of events: 24, number of participants: 111).

Employees of the CEI have access to the online training platform Rentel, which, in addition to mandatory courses, offers a wide range of optional training. The most popular trainings included communication and soft skills. A total of 27 employees participated in optional e-learning training.

Due to the current security situation, the area of cybersecurity remains a priority for 2024. Throughout the year, several waves of online training focused on current cyber risks and defence against potential computer system attacks were held, in which CEI employees participated.



7.3 Occupational safety and health

Principles ensuring occupational safety

Occupational safety and health is one of the key priorities of the CEI. The Organization and Management of OSH Directive primarily regulates the activities of the professional employees of the CEI, who work in a very diverse and demanding environment of various companies and locations, where they inspect operations with pollution sources or investigate environmental damage or threats.

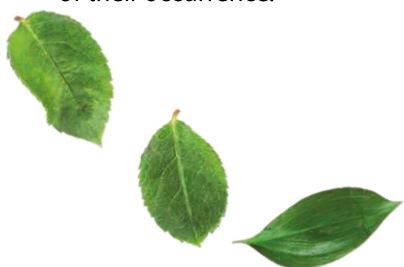
The state of OSH is reviewed annually through a comprehensive audit conducted by an external company, followed by the verification of compliance with directives ensuring occupational safety for CEI employees.

The CEI conducts regular safety training for employees, and all are familiarised with applicable general and internal occupational safety and health regulations. All CEI employees are provided with protective work equipment that meets the highest safety standards for their work activities, and any damaged equipment is replaced with new items.

Occupational safety matters are part of collective agreements and contracts. In accordance with the provisions in the collective agreement or collective arrangement, the CEI Trade Union Committee supervises occupational safety, representing all CEI employees and addressing OSH issues with the management of the CEI. They regularly participate in the annual comprehensive OSH audit, inspect records, and report on work-related accidents, among other tasks.

Accidents, missed days, and absences

The high effectiveness of OSH management and employee discipline is demonstrated by the very low accident rate, with only three work accidents occurring in 2023. The main causes of work accidents were unpredictable work risks or human factor failure. Between 2015 and 2023, there were no fatal accidents or occupational diseases. All accidents are meticulously recorded at all workplaces, including investigations into the causes of their occurrence.



Values of injury, sickness, missed days and absenteeism of CEI employees

| | unit | 2019 men | 2019 woman | 2019 Total | 2020 man | 2020 woman | 2020 Total | 2021 man | 2021 woman | 2021 Total | 2022 man | 2022 woman | 2022 Total | 2023 man | 2023 woman | 2023 Total |
|---|-----------------|----------|------------|------------|----------|------------|------------|----------|------------|------------|----------|------------|------------|----------|------------|------------|
| Average monthly of employees in year | absolute number | 243 | 310 | 553 | 237 | 309 | 546 | 239 | 301 | 540 | 230 | 303 | 533 | 229 | 307 | 536 |
| Number of all accidents at work | absolute number | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 2 | 1 | 3 | 2 | 1 | 3 |
| Number of registered accidents at work leading to a working of incapacity in length minimum 3 days (GRI Injury) | absolute number | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total number of serious occupational accidents leading to hospitalisation of more than 5 days | absolute number | 0 | 0 | 0 | 0 | 1 | 1 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total number of days absent due to occupational injury and illness (GRI lost day) | days/shifts | 0 | 0 | 0 | 0 | 88 | 88 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Values of injury, sickness, missed days and absenteeism of CEI employees

| | unit | 2019 | 2020 | 2021 | 2022 | 2023 |
|--|-----------------|------|-------|------|------|------|
| Injury frequency rate (Number of registered work accidents per 100 employees) (CZ norm) | relative number | 0.00 | 0.18 | 0.00 | 0.00 | 0.37 |
| Average number of lost calendar days per registered injury (Average number of lost days per registered injury) | absolute number | 0.00 | 88.00 | 0.00 | 0.00 | 19.5 |
| Absence due to sickness, work and non-work accidents (% of total time worked) (CZ norm) | % | 4.63 | 6.19 | 4.32 | 5.00 | 4.8 |
| Unscheduled absence rate Absence due to unscheduled absences: sickness, working and non-work-related injuries (% of the planned time pool) (GRI Absentee rate) | % | 3.84 | 5.67 | 3.7 | 4.3 | 4.2 |
| Percentage of sick days; Ratio of the number of calendar days of sickness absence times 100 to the number of calendar days multiplied by the number of employees (GRI Lost day rate) | % | 0.00 | 4.84 | 3.52 | 3.1 | 2.67 |
| LTIFR (Lost Time Injury Frequency Rate) Represents the number of injuries after at least three days of disability divided by the total number of hours worked, expressed in millions of hours. | absolute number | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |



8 Energy and material intensity of the CEI activities

The CEI purchases all the energy it consumes from suppliers whose selection is carried out under the centralised procurement system. The supplier of electricity was EP Energy Trading, a.s., of natural gas Pražská plynárenská a.s.

The aim of the CEI is to reduce the consumption of individual energy sources, whose consumption is influenced by climatic conditions. The consumption of petrol and diesel is influenced by the number of inspections and the distance of the inspected objects. The CEI does not use significant quantities of any raw materials or supplies.

In 2023, energy audits and building energy performance certificates were prepared for all buildings owned by the CEI. From these documents, measures have been identified, the implementation of which will gradually reduce energy consumption. In 2023, the gas boiler room at TI Plzeň was reconstructed.

Independently of these measures, the CEI implements partial measures to reduce energy consumption - e.g. installation of energy - saving light bulbs and fluorescent lamps or purchase of energy-saving appliances with higher energy efficiency.

In 2023, the fleet was renewed, specifically by replacing 8 petrol-fuelled EURO 6 vehicles with EURO 2 vehicles. This replacement reduced CO₂ emissions and noise pollution. In the coming years, we foresee a gradual replacement of about 15% of petroleum-based passenger vehicles with alternative fuel vehicles.

Waste management is governed by a separate internal directive. Waste generated by CEI activities is sorted (separated) waste, municipal waste and bulk waste - e.g. discarded furniture, batteries, electrical waste, fluorescent lamps, light bulbs, etc. In 2023, the Inspectorate received an ENVIRONMENTAL IMPACT CERTIFICATE for 2023 for the return of collected waste and subsequent recycling. The waste is handed over to regional waste collection companies for disposal. The wastewater are discharged to the public sewer.



Weight of waste (kg) of the CEI and the disposal-overview for 5 years

| | 2019 | | 2020 | | 2021 | | 2022 | | 2023 | |
|--|-----------------|-------------|-----------------|-------------|-----------------|-------------|-----------------|-------------|-----------------|-------------|
| | Dangerous waste | Other waste | Dangerous waste | Other waste | Dangerous waste | Other waste | Dangerous waste | Other waste | Dangerous waste | Other waste |
| Total production | | | | | | | | | | |
| Reuse (utilisation in another process) paper, plastic, glass | 37 | 41,950 | 25 | 32,095 | 4,625 | 17,127 | 425 | 23,166 | 4,140 | 19,395 |
| Incineration / municipal waste | | 43,560 | | 18,456 | 0 | 17,701 | 0 | 12,381 | 0 | 10,672 |

The amount of other waste is determined mainly by mixed waste (employees also eat at the workplaces), packaging from ordered and delivered shipments (printer paper, notebooks, hygiene products, etc.). In addition, there is a collection point at the Directorate for sorted waste-paper, plastics, glass, tetra-packs and metals, also serving two neighbouring buildings where The CEI is part owner - the others are flats.

Energy, fuel and water consumption of the CEI - overview for 5 years

| | Type of fuel or energy | Unit | 2019 | 2020 | 2021 | 2022 | 2023 |
|--|------------------------|----------------|---------|---------|---------|---------|---------|
| Resources purchased and consumed energy | petrol | l | 61,791 | 37,465 | 39,092 | 49,910 | 51,415 |
| | diesel | l | 50,120 | 36,425 | 34,245 | 38,414 | 39,494 |
| | electricity* | kWh | 592,471 | 437,085 | 511,851 | 461,062 | 440,971 |
| | natural gas | m ³ | 80,866 | 82,249 | 98,712 | 81,339 | 72,373 |
| | thermal energy | GJ | 2,032 | 1,517 | 2,430 | 1,041 | 1,620 |
| Drinking water consumption from municipal water supply or other water service | | m ³ | 6,840 | 3,934 | 3,803 | 4,041 | 4,369 |

* The origin of electricity supplied to the CEI as an end customer by EP ENERGY TRADING a.s. in 2023 was: from coal 47.50%, from nuclear facilities 40.95%, from natural gas 5.86%, from sources using renewable energy sources including guarantees of origin 5.45%, from sources using secondary energy sources 0.13%, from oil and petroleum products 0.11%, from other sources 0.01%.

9 Economics

In 2023, the CEI managed a final expenditure budget of CZK 539,869.48 thousand. Of this, the final budget for wage expenditures, including allowances and the Cultural and Social Needs Fund (SCNF), amounted to CZK 393,123.93 thousand, the final budget for current expenditures was CZK 84,659.05 thousand, and the final budget for expenditures recorded in programme financing amounted to CZK 62,086.504 thousand.

9.1 Expenditure of funds in 2023

Expenditure of non-investment expenses for 2023

Expenditure on salaries and accessories

For 2023, the Czech Environmental Inspectorate was approved funds for salaries and other payments for work performed in the amount of CZK 275,411.16 thousand, of which CZK 234,522.16 thousand was for employees under the Civil Service Act, CZK 37,853.04 thousand for employees in employment relationships, and CZK 3,035.96 thousand for other work-related payments.

During the year, budget amendments occurred, and after changes, the budget for salaries of employees under the Civil Service Act was increased to CZK 235,776.85 thousand. The budget for salaries of employees in employment relationships was reduced to CZK 36,149.53 thousand. The budget for salaries of employees in employment relationships was increased by claims from unspent funds amounting to CZK 5,956.33 thousand, while employees under the Civil Service Act received claims of CZK 12,144.84 thousand, and other work-related payments included claims of CZK 2,789.08 thousand.

The final budget and actual expenditures as of December 31, 2023 are shown in the table below.

in CZK

| Indicator | Final budget | Spending | Balance at 31.12.2023 |
|--|-----------------------|-----------------------|-----------------------|
| Salaries of staff in employment | 41,536,323.00 | 39,267,217.00 | 2,269,106.00 |
| Salaries of staff in civil service positions | 240,914,090.00 | 237,720,033.00 | 3,194,057.00 |
| Expenditure on other payments for work carried out | 5,825,035.00 | 5,294,896.00 | 530,139.00 |
| Compulsory social security contributions | 73,120,558.00 | 69,452,633.00 | 3,667,925.00 |
| Compulsory health insurance contributions | 26,440,938.00 | 25,203,982.00 | 1,236,956.00 |
| Basic SCNF allocation | 5,286,984.00 | 5,286,984.00 | 0.00 |
| Total salary expenditure | 393,123,928.00 | 382,225,745.00 | 10,898,183.00 |

The number of employees as of January 1, 2023 was 478 in the civil service and 93 in the employment relationship. The total authorised staff limit was 571.

During the year, adjustments were made based on A-header no. 1000000978 and no. 2000000071, after which the final number of employees was 570, of which 94 were employees in employment relationships and 476 were in civil service.

The actual recalculated number of employees as of December 31, 2023 was 531.32, of which 440.93 were employees in civil service and 90.39 were employees in employment relationships.

As indicated by the submitted analysis of employment and salary expenditure for 2023, the approved limits for salary and other payments for work performed were not exceeded.0000000000000000

0Expenditure on other current operating expenditure

| In CZK | | | |
|--|---------------|---------------|-----------------------|
| Indicator | Final budget | Spending | Balance at 31.12.2023 |
| Other current non-investment expenditure | 84,659,046.47 | 72,811,333.35 | 11,847,713.12 |



Expenditure incurred recorded in the programme financing information system

in CZK

Under the Development and Renewal of Material and Technical Equipment programme, funds amounting to CZK 10 million were transferred to the CEI from the MoE budget. Additionally, claims of CZK 52.08 million were engaged. The final budget amounted to CZK 3.72 million for non-investment funds and CZK 58.37 million for investment funds.

The expenditure of funds under the Development and Renewal of Material and Technical Equipment programme in 2023 is shown in the table below.

| Indicator | AP | CUE |
|----------------|--------------|---------------|
| Investment | 5,139,305.60 | 24.068.501.10 |
| Non-investment | 0.00 | 2,515,267.90 |

Expenditure of programme funding according to individual actions for the year 2023

Non-investment expenditure

in CZK

| Name of event | Final budget | Reality | Unspent |
|--|---------------------|---------------------|---------------------|
| Multi-factor user authentication (smart cards) | 4,906.40 | 0.00 | 4,906.40 |
| Renewal of personal computer equipment | 3,714,874.18 | 2,515,267.90 | 1,199,606.28 |
| Total non-investment expenditure | 3,719,780.58 | 2,515,267.90 | 1,204,512.68 |

Investment expenditure

in CZK

| Name of event | Final budget | Reality | Unspent |
|---|----------------------|----------------------|----------------------|
| Multi-factor user authentication (smart cards) | 1,426,798.00 | 0.00 | 1,426,798.00 |
| IDM-management of user identities and roles | 111,321.00 | 111,320.00 | 1.00 |
| Security and print control (Safe Q) | 700,000.00 | 0.00 | 700,000.00 |
| Reconstruction of the LAN network at TI | 3,887,682.84 | 120,290.94 | 3,767,391.90 |
| Central Agenda Information System (CAIS) | 23,950,262.50 | 8,749,812.50 | 15,200,450.00 |
| Replacement of telephone exchanges with Voip system | 1,800,000.00 | 0.00 | 1,800,000.00 |
| Renewal of server infrastructure at the TI | 3,595,648.10 | 3,595,648.10 | 0.00 |
| Encrypted data transmission | 1,189,430.00 | 1,189,430.00 | 0.00 |
| IP address space management system | 164,181.15 | 0.00 | 164,181.15 |
| Windows server license | 1,000,000.00 | 0.00 | 1,000,000.00 |
| Acquisition of MS SQL server licenses | 1,000,000.02 | 0.00 | 1,000,000.02 |
| ESXi server recovery (crash) | 4,234,879.00 | 4,234,879.00 | 0.00 |
| License "MS 2022 User Call" | 870,000.00 | 0.00 | 870,000.00 |
| Upgrade Flowmon license from ADS-S to ADS-B | 796,736.60 | 796,736.60 | 0.00 |
| Aggregated action of the CEI | 3,263.40 | 0.00 | 3,263.40 |
| TI Brno - reconstruction of air handling equipment | 420,000.00 | 0.00 | 420,000.00 |
| Costs for the commissioning of the Kynžvart Spa | 88,790.00 | 0.00 | 88,790.00 |
| Reconstruction of sewerage and water supply connection Lázně Kynžvart - emergency condition | 381,169.00 | 381,169.00 | 0.00 |
| Upgrading of the security level for TI Brno, České Budějovice, Havlíčkův Brod and Ostrava - connection to the SCO of the Police of the Czech Republic | 961,135.67 | 961,135.67 | 0.00 |
| Spa Kynžvart-installation of ESS Trade Fides terminal equipment | 91,000.00 | 90,999.99 | 0.01 |
| Reconstruction of gas boiler room TI Plzeň | 1,181,247.00 | 1,181,247.00 | 0.00 |
| Off-road cars 11 pcs | 8,722,349.02 | 7,359,308.00 | 1,363,041.02 |
| CEI purchase of wallboxes | 1,355,000.00 | 0.00 | 1,355,000.00 |
| Replacement of the cooling units of DIR servers | 328,140.00 | 328,139.90 | 0.10 |
| Purchase a DJI Terra drone license for offline | 107,690.00 | 107,690.00 | 0.00 |
| Total investment expenditure | 58,366,723.30 | 29,207,806.70 | 29,158,916.60 |



9.2 Total income assessment

The total income of the CEI in 2023 amounted to CZK 1,940,870. The highest income for the CEI was primarily made up of insurance compensation, management costs, enforcement, and administrative fines.

Overview of income according to budget items

| Item type | Adjusted budget | Reality |
|---------------------------------------|-----------------|------------------|
| 2132-Revenue from rent | 350,000 | 0 |
| 2310-Revenue from disposals | 0 | 12,900 |
| 2322-Income from insurance claims | 0 | 1,096,380 |
| 2324- Costs of proceedings, execution | 500,000 | 782,800 |
| 2329-Other revenue | 0 | 48,760 |
| 4132-Transfers from other own funds | 0 | 30 |
| Total earnings | 850,000 | 1,940,870 |

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

- 2132** – This budget item includes revenue from the rental of office spaces at the territorial inspectorates in Havlíčkův Brod and Liberec, which was terminated in 2023. Therefore, no income was generated. This situation is permanent, and no income has been budgeted for the forecast for 2024.
- 2310** – This budget item includes revenue from the sale of unnecessary assets and personal protective equipment.
- 2322** – This budget item includes income from insurance claims – reimbursements from insurance companies.
- 2324** – This budget item includes income from administrative costs, executions, and administrative fines.
- 2329** – This budget item includes a refund from the Czech Social Security Administration (CSSA) for the compensation of paid leave related to activities for children and youth in 2022, which, however, was transferred to the deposit account in 2023 and therefore accounted for as income in the state revenue (SR).
- 4132** – This budget item includes income from unspent salary funds for the period of December 2022.

10 Financial statements as at December 31,

Balance Sheet

| Item number | Item name | Synthetic account | 1 | 2 | 3 | 4 |
|--------------|--|-------------------|-------------------|----------------|----------------|----------------|
| | | | ACCOUNTING PERIOD | | | |
| | | | CURRENT | | | PREVIOUS |
| | | | BRUTTO | CORRECTION | NET | |
| TOTAL ASSETS | | | 970,980,836.75 | 379,730,587.91 | 591,250,248.84 | 570,124,015.16 |
| A. | Fixed assets | | 858,294,338.16 | 379,730,587.91 | 478,563,750.25 | 463,800,696.36 |
| I. | Intangible fixed assets | | 73,820,691.91 | 37,466,494.57 | 36,354,197.34 | 25,938,057.80 |
| 1. | Intangible results of research and development | 012 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Software | 013 | 30,774,159.14 | 20,233,784.40 | 10,540,374.74 | 10,971,451.30 |
| 3. | Valuable rights | 014 | 183,000.00 | 181,696.00 | 1,304.00 | 1,387.00 |
| 4. | Emission allowances and preferential caps | 015 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Small intangible fixed assets | 018 | 17,051,014.17 | 17,051,014.17 | 0.00 | 0.00 |
| 6. | Other intangible fixed assets | 019 | 0.00 | 0.00 | 0.00 | 0.00 |
| 7. | Intangible fixed assets in progress | 041 | 25,812,518.60 | 0.00 | 25,812,518.60 | 14,965,219.50 |
| 8. | Advances made for intangible fixed assets | 051 | 0.00 | 0.00 | 0.00 | 0.00 |
| 9. | Intangible fixed assets held for sale | 035 | 0.00 | 0.00 | 0.00 | 0.00 |
| II. | Tangible fixed assets | | 784,473,646.25 | 342,264,093.34 | 442,209,552.91 | 437,862,638.56 |
| 1. | Land | 031 | 12,527,113.00 | 0.00 | 12,527,113.00 | 12,527,113.00 |
| 2. | Cultural items | 032 | 11,491.00 | 0.00 | 11,491.00 | 11,491.00 |
| 3. | Buildings | 021 | 518,513,504.72 | 171,669,190.82 | 346,844,13.90 | 354,175,673.91 |
| 4. | Separate tangible movable assets and sets of tangible movable assets | 022 | 139,083,409.94 | 69,450,908.76 | 80,863,012.16 | 69,184,737.80 |
| 5. | Growing units of permanent crops | 025 | 0.00 | 0.00 | 0.00 | 0.0 |
| 6. | Small tangible fixed assets | 028 | 101,143,993.76 | 101,143,993.76 | 0.00 | 0.0 |
| 7. | Other tangible fixed assets | 029 | 0.00 | 0.00 | 0.00 | 0.0 |
| 8. | Tangible fixed assets in progress | 042 | 1,963,622.85 | 0.00 | 1,963,622.85 | 1,963,622.85 |
| 9. | Advances made for tangible fixed assets | 052 | 0.00 | 0.00 | 0.00 | 0.0 |
| 10. | Tangible fixed assets held for sale | 036 | 0.00 | 0.00 | 0.00 | 0.00 |
| III. | Non-current financial assets | | 0.00 | 0.00 | 0.00 | 0.0 |
| 1. | Equity interests in persons with decisive influence | 061 | 0.00 | 0.00 | 0.00 | 0.0 |
| 2. | Equity interests in persons with significant influence | 062 | 0.00 | 0.00 | 0.00 | 0.0 |
| 3. | Debt securities held to maturity | 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 term deposits | 068 | 0.00 | 0.00 | 0.00 | 0.0 |
| 6. | Other non-current financial assets | 069 | 0.00 | 0.00 | 0.00 | 0.0 |
| 7. | Financial fixed assets acquired | 043 | 0.00 | 0.00 | 0.00 | 0.0 |
| 8. | Advances made on fixed 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 repayable financial assistance provided | 462 | 0.00 | 0.00 | 0.00 | 0.0 |
| 2. | Long-term receivables from assigned loans | 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 non-current 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 |
| | | | BRUTTO | CORRECTION | NET | |
| B. | Current assets | | 112,686,498.59 | 0.00 | 112,686,498.59 | 106,323,318.80 |
| I. | Stocks | | 0.00 | 0.00 | 0.00 | 0.00 |
| 1. | Acquisition of material | 111 | 0.00 | 0.00 | 0.00 | 0.0 |
| 2. | Material in stock | 112 | 0.00 | 0.00 | 0.00 | 0.0 |
| 3. | Material 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 stocks | 139 | 0.00 | 0.00 | 0.00 | 0.0 |
| II. | Short-term receivables | | 73,249,931.50 | 0.00 | 73,249,931.50 | 70,164,953.44 |
| 1. | Subscribers | 311 | 0.00 | 0.00 | 0.00 | 0.0 |
| 2. | Bills of exchange for collection | 312 | 0.00 | 0.00 | 0.00 | 0.0 |
| 3. | Receivables for discounted securities | 313 | 0.00 | 0.00 | 0.00 | 0.0 |
| 4. | Short-term advances granted | 314 | 3,886,865.47 | 0.00 | 3,886,865.47 | 2,805,888.27 |
| 5. | Other receivables from operating activities | 315 | 68,406,724.53 | 0.00 | 68,406,724.53 | 66,450,472.53 |
| 6. | Short-term repayable financial assistance provided | 316 | 0.00 | 0.00 | 0.00 | 0.0 |
| 7. | Short-term receivables from assigned loans | 317 | 0.00 | 0.00 | 0.00 | 0.0 |
| 9. | Receivables from employees | 335 | -3,729.13 | 0.00 | -3,729.13 | 62,117.50 |
| 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. | Retirement savings | 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 other similar monetary benefits | 342 | 0.00 | 0.00 | 0.00 | 0.0 |
| 15. | Value added tax | 343 | 0.00 | 0.00 | 0.00 | 0.0 |
| 16. | Claims on persons other than selected government entities | 344 | 0.00 | 0.00 | 0.00 | 0.0 |
| 17. | Claims on selected central government institutions | 346 | 0.00 | 0.00 | 0.00 | 0.0 |
| 18. | Receivables from selected local governments | 348 | 0.00 | 0.00 | 0.00 | 0.0 |
| 19. | Receivables from tax administration | 352 | 0.00 | 0.00 | 0.00 | 0.0 |
| 20. | Tax redistribution accounts | 355 | 0.00 | 0.00 | 0.00 | 0.0 |
| 21. | Receivables from foreclosure and other disposals of foreign property | 356 | 0.00 | 0.00 | 0.00 | 0.0 |
| 22. | Other receivables from tax administration | 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 futures and options | 363 | 0.00 | 0.00 | 0.00 | 0.0 |
| 25. | Receivables from financial operations in progress | 369 | 0.00 | 0.00 | 0.00 | 0.0 |
| 26. | Financial collateral receivables | 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 granted for transfers | 373 | 0.00 | 0.00 | 0.00 | 0.0 |
| 29. | Short-term mediation of transfers | 375 | 0.00 | 0.00 | 0.00 | 0.0 |
| 30. | Accrued expenses | 381 | 883,076.98 | 0.00 | 883,076.98 | 762,201.98 |

| Item number | Item name | Synthetic account | 1 | 2 | 3 | 4 |
|-------------|--|-------------------|-------------------|------------|----------------|----------------|
| | | | ACCOUNTING PERIOD | | | |
| | | | CURRENT | | | PREVIOUS |
| | | | BRUTTO | CORRECTION | NET | |
| B. | Current assets | | 112,686,498.59 | 0.00 | 112,686,498.59 | 106,323,318.80 |
| 31. | Deferred income | 385 | 0.00 | 0.00 | 90.00 | 0.0 |
| 32. | Doubtful accounts active | 388 | 0.00 | 0.00 | 0.00 | 0.0 |
| 33. | Other short-term receivables | 377 | 76,993.65 | 0.00 | 76,993.65 | 84,183.16 |
| III. | Short-term financial assets | | 39,436,567.09 | 0.00 | 39,436,567.09 | 36,158,365.36 |
| 1. | Equity securities for trading | 251 | 0.00 | 0.00 | 0.00 | 0.0 |
| 2. | Debt securities for trading | 253 | 0.00 | 0.00 | 0.00 | 0.0 |
| 3. | Other securities | 256 | 0.00 | 0.00 | 0.00 | 0.0 |
| 4. | Short-term time deposits | 244 | 0.00 | 0.00 | 0.00 | 0.0 |
| 5. | Other current accounts | 245 | 38,000,902.69 | 0.00 | 38,000,902.69 | 34,506,463.29 |
| 6. | State financial asset accounts | 247 | 0.00 | 0.00 | 0.00 | 0.0 |
| 7. | Treasury liquidity management and sovereign debt accounts | 248 | 0.00 | 0.00 | 0.00 | 0.0 |
| 8. | Tax sharing and shared administration accounts | 249 | 0.00 | 0.00 | 0.00 | 0.0 |
| 9. | Current account | 241 | 0.00 | 0.00 | 0.00 | 0.0 |
| 10. | CSNF current account | 243 | 1,435,664.40 | 0.00 | 1,435,664.40 | 1,650,874.07 |
| 14. | Current accounts of funds of organisational units of the State | 225 | 0.00 | 0.00 | 0.00 | 0.0 |
| 15. | Price lists | 263 | 0.00 | 0.00 | 0.00 | 1,028.00 |
| 16. | Money on the way | 262 | 0.00 | 0.00 | 0.00 | 0.0 |
| 17. | Checkout | 261 | 0.00 | 0.00 | 0.00 | 0.0 |

| | | | 1 | 2 |
|-------------------|--|-------------------|-------------------|-------------------|
| Item number | Item name | Synthetic account | ACCOUNTING PERIOD | |
| | | | CURRENT | PREVIOUS |
| TOTAL LIABILITIES | | | 591,250,248.84 | 570,124,015.16 |
| C. | Equity | | 484,875,456.52 | 469,034,528.18 |
| I. | Entity assets and adjusting items | | 488,994,891.33 | 488,994,891.33 |
| | 1. Assets of the entity | 401 | 727,357,406.25 | 727,357,406.25 |
| | 2. Privatisation Fund | 402 | 0.00 | 0.00 |
| | 4. Exchange rate differences | 405 | 0.00 | 0.00 |
| | 5. Valuation differences on initial application of the method | 406 | -238,435,713.18 | -238,435,713.18 |
| | 6. Other valuation differences | 407 | -28,185.74 | -28,185.74 |
| | 7. Corrections of previous accounting periods | 408 | 101,384.00 | 101,384.00 |
| II. | Funds of the entity | | 1,435,664.40 | 1,623,395.07 |
| | 2. Cultural and Social Needs Fund | 412 | 1,435,664.40 | 1,623,395.07 |
| | 4. Reserve fund from other titles | 414 | 0.00 | 0.00 |
| III. | Economic result | | -5,246,352,772.31 | -4,777,562,154.69 |
| | 1. Profit or loss for the current financial year | | -468,790,617.62 | -426,740,245.75 |
| | 2. Outturn under approval procedure | 431 | 0.00 | 0.00 |
| | 3. Economic result of previous accounting periods | 432 | -4,777,562,154.69 | -4,350,821,908.94 |
| IV. | Revenue and expenditure account of budgetary management | | 5,240,797,673.10 | 4,755,978,396.47 |
| | 1. Revenue account of organisational units of the State | 222 | -1,940,876.32 | -2,064,643.98 |
| | 2. State | 223 | 486,760,152.95 | 448,146,627.39 |
| | 3. Special expenditure account | 227 | 0.00 | 0.00 |
| | 4. State budget management account | | | |
| | Aggregated income and expenditure of previous accounting periods | 404 | 4,755,978,396.47 | 4,309,896,413.06 |
| D. | Foreign sources | | 106,374,792.32 | 101,089,486.98 |
| I. | Reserves | | 0.00 | 0.00 |
| | 1. Reserves | 441 | 0.00 | 0.00 |
| II. | Long-term liabilities | | 0.00 | 0.00 |
| | 1. Long-term loans | 451 | 0.00 | 0.00 |
| | 2. Long-term repayable financial assistance received | 452 | 0.00 | 0.00 |
| | 3. Long-term liabilities from issued bonds | 453 | 0.00 | 0.00 |
| | 4. Long-term advances received | 455 | 0.00 | 0.00 |
| | 5. Long-term guarantee liabilities | 456 | 0.00 | 0.00 |
| | 6. Long-term notes payable | 457 | 0.00 | 0.00 |
| | 7. Other non-current liabilities | 459 | 0.00 | 0.00 |
| | 8. Long-term advances received for transfers | 472 | 0.00 | 0.00 |
| | 9. Long-term mediation of transfers | 475 | 0.00 | 0.00 |

| Item number | Item name | Synthetic account | 1 | 2 |
|-------------|--|-------------------|-------------------|----------------|
| | | | ACCOUNTING PERIOD | |
| | | | CURRENT | PREVIOUS |
| III. | Short-term liabilities | | 106,374,792.32 | 101,089,486.98 |
| 1. | Short-term loans | 281 | 0.00 | 0.00 |
| 2. | Discounted short-term bonds (bills of exchange) | 282 | 0.00 | 0.00 |
| 3. | Short-term liabilities from bonds issued | 283 | 0.00 | 0.00 |
| 4. | Other short-term loans | 289 | 0.00 | 0.00 |
| 5. | Suppliers | 321 | 0.00 | 0.00 |
| 6. | Bills of exchange for payment | 322 | 0.00 | 0.00 |
| 7. | Short-term advances received | 324 | 37,997.94 | 85,05.00 |
| 8. | Liabilities from shared management | 325 | 689,639.99 | 691,240.00 |
| 9. | Short-term repayable financial assistance received | 326 | 0.00 | 0.00 |
| 10. | Staff | 331 | 0.00 | 0.00 |
| 11. | Other payables to employees | 333 | 18,866,909.00 | 17,679,671.00 |
| 12. | Social security | 336 | 6,727,091.00 | 6,644,998.00 |
| 13. | Health insurance | 337 | 2,903,212.00 | 2,867,063.00 |
| 14. | Retirement savings | 338 | 0.00 | 0.00 |
| 15. | Income tax | 341 | 0.00 | 0.00 |
| 16. | Other taxes, fees and other similar monetary benefits | 342 | 1,538,320.00 | 1,474,113.00 |
| 17. | Value added tax | 343 | 0.00 | 0.00 |
| 18. | Liabilities to persons outside the selected government institutions | 345 | 0.00 | 0.00 |
| 19. | Liabilities to selected central government institutions | 347 | 40,560,311.00 | 39,970,352.60 |
| 20. | Commitments to selected local government institutions | 349 | 30,511,625.00 | 28,822,525.00 |
| 21. | Advance taxes 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 accounts | 355 | 0.00 | 0.00 |
| 25. | Liabilities from foreclosure and other disposals of foreign property | 357 | 0.00 | 0.00 |
| 26. | Other liabilities arising from tax administration | 359 | 0.00 | 0.00 |
| 27. | Short-term guarantee liabilities | 362 | 0.00 | 0.00 |
| 28. | Fixed futures and options | 363 | 0.00 | 0.00 |
| 29. | Liabilities from financial operations in progress | 364 | 0.00 | 0.00 |
| 30. | Financial collateral liabilities | 366 | 0.00 | 0.00 |
| 31. | Liabilities arising from subscriptions for outstanding securities and shares | 368 | 0.00 | 0.00 |
| 32. | Short-term advances on transfers received | 374 | 0.00 | 0.00 |
| 33. | Short-term mediation of transfers | 375 | 0.00 | 0.00 |
| 34. | Treasury liquidity and debt management liabilities | 248 | 0.00 | 0.00 |
| 35. | Deferred expenditure | 383 | 0.00 | 0.00 |
| 36. | Accrued income | 384 | 0.00 | 0.00 |
| 37. | Doubtful accounts passive | 389 | 0.00 | 0.00 |
| 38. | Other current liabilities | 378 | 4,539,686.39 | 2,854,419.38 |

Profit and loss statement

| Item number | Item name | Synthetic account | 1 | 2 | 3 | 4 |
|-------------|---|-------------------|-------------------|-------------------|----------------|-------------------|
| | | | ACCOUNTING PERIOD | | | |
| | | | CURRENT | | PREVIOUS | |
| | | | Main activity | Economic activity | Main activity | Economic activity |
| A. | TOTAL COSTS | | 471,362,490.47 | 0.00 | 429,585,854.37 | 0.00 |
| I. | Costs from operations | | 471,327,111.55 | 0.00 | 429,241,760.65 | 0.00 |
| 1. | Material consumption | 501 | 6,748,574.14 | 0.00 | 7,656,277.49, | 0.00 |
| 2. | Energy consumption | 502 | 6,939,510.78 | 0.00 | 5,559,553.69 | 0.00 |
| 3. | Consumption of other non-stackable supplies | 503 | 0.00 | 0.00 | 0.00 | 0.00 |
| 4. | Goods sold | 504 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Fixed asset activation | 506 | 0.00 | 0.00 | 0.00 | 0.00 |
| 6. | Activation of current assets | 507 | 0.00 | 0.00 | 0.00 | 0.00 |
| 7. | Change in own production stocks | 508 | 0.00 | 0.00 | 0.00 | 0.00 |
| 8. | Repair and maintenance | 511 | 4,702,966.00 | 0.00 | 5,275,448.95 | 0.00 |
| 9. | Travel | 512 | 4,671,878.51 | 0.00 | 3,807,071.63 | 0.00 |
| 10. | Representation costs | 513 | 292,373.75 | 0.00 | 252,414.40 | 0.00 |
| 11. | Activation of intra-organisational services | 516 | 0.00 | 0.00 | 0.00 | 0.00 |
| 12. | Other services | 518 | 33,755,081.05 | 0.00 | 29,319,877.17 | 0.00 |
| 13. | Labour costs | 521 | 284,726,649.00 | 0.00 | 260,598,514.00 | 0.00 |
| 14. | Statutory social insurance | 524 | 94,656,823.00 | 0.00 | 87,291,854.00 | 0.00 |
| 15. | Other social insurance | 525 | 0.00 | 0.00 | 0.00 | 0.00 |
| 16. | Statutory social costs | 527 | 10,519,997.00 | 0.00 | 8,039,763.00 | 0.00 |
| 17. | Other social costs | 528 | 0.00 | 0.00 | 0.00 | 0.00 |
| 18. | Road tax | 531 | 0.00 | 0.00 | 0.00 | 0.00 |
| 19. | Real estate tax | 532 | 1,460.00 | 0.00 | 2,596.00 | 0.00 |
| 20. | Other taxes and fees | 538 | 652,423.00 | 0.00 | 216,082.00 | 0.00 |
| 21. | Indirect tax refunds | 539 | 0.00 | 0.00 | 0.00 | 0.00 |
| 22. | Contractual penalties and default interest | 541 | 0.00 | 0.00 | 351.40 | 0.00 |
| 23. | Other fines and penalties | 542 | 10,600.00 | 0.00 | 18,100.00 | 0.00 |
| 24. | Donations and other gratuitous transfers | 543 | 0.00 | 0.00 | 0.00 | 0.00 |
| 25. | Material sold | 544 | 0.00 | 0.00 | 0.00 | 0.00 |
| 26. | Deficits and damages | 547 | 39,780.50 | 0.00 | 0.00 | 0.00 |
| 27. | Creation of funds | 548 | 5,286,984.00 | 0.00 | 5,213,562.00 | 0.00 |
| 28. | Depreciation of fixed assets | 551 | 14,324,461.87 | 0.00 | 13,601,940.00 | 0.00 |
| 29. | Intangible fixed assets sold | 552 | 0.00 | 0.00 | 0.00 | 0.00 |
| 30. | Tangible fixed assets sold | 553 | 0.00 | 0.00 | 0.00 | 0.00 |
| 31. | Land sold | 554 | 0.00 | 0.00 | 0.00 | 0.00 |
| 32. | Establishment and settlement of provisions | 555 | 0.00 | 0.00 | 0.00 | 0.00 |
| 33. | Creation and settlement of provisions | 556 | 0.00 | 0.00 | 0.00 | 0.00 |
| 34. | Costs of receivables disposed of | 557 | 0.00 | 0.00 | 0.00 | 0.00 |
| 35. | Cost of small fixed assets | 558 | 3,665,123.25 | 0.0 0 | 2,170,825.01 | 0.0 0 |
| 36. | Other operating expenses | 549 | 332,425.70 | 0.00 | 217,529.91 | 0.00 |
| II. | Financial costs | | 35,378.92 | 0.00 | 344,093.72 | 0.00 |
| 1. | Securities and shares sold | 561 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Interest | 562 | 26,133.00 | 0.00 | 338,936.42 | 0.00 |
| 3. | Exchange rate losses | 563 | 9,245.92 | 0.00 | 5,157.30 | 0.00 |
| 4. | Fair value revaluation expense | 564 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Other financial costs | 569 | 0.00 | 0.00 | 0.00 | 0.00 |

| | | | 1 | 2 | 3 | 4 |
|-------------|---|-------------------|-------------------|-------------------|---------------|-------------------|
| Item number | Item name | Synthetic account | ACCOUNTING PERIOD | | | |
| | | | CURRENT | | PREVIOUS | |
| | | | Main activity | Economic activity | Main activity | Economic activity |
| III. | Transfer costs | | 0.00 | 0.0 | 0.00 | 0.00 |
| 1. | Transfer expenditure of selected central government | 571 | 0.00 | 0.00 | 0.00 | 0.00 |
| 3. | Pre-financing costs of selected central government transfers | 575 | 0.00 | 0.00 | 0.00 | 0.00 |
| IV. | Cost of shared taxes and charges | | 0.00 | 0.00 | 0.00 | 0.00 |
| 1. | Shared personal income tax costs | 581 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Shared corporate income tax expense | 582 | 0.00 | 0.00 | 0.00 | 0.00 |
| 3. | Shared value added tax costs | 584 | 0.00 | 0.00 | 0.00 | 0.00 |
| 4. | Cost of shared excise duties | 585 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Cost of other shared taxes and charges | 586 | 0.00 | 0.00 | 0.00 | 0.00 |
| V. | Income tax | | 0.00 | 0.00 | 0.00 | 0.00 |
| 1. | Income tax | 591 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Additional income tax levies | 595 | 0.00 | 0.00 | 0.00 | 0.00 |
| B. | TOTAL REVENUES | | 2,571,872.85 | 0.00 | 2,845,608.62 | 0.00 |
| I. | Income from operations | | 2,560,682.98 | 0.00 | 2,556,665.62 | 0.00 |
| 1. | Revenue from the sale of own products | 601 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Revenue from the sale of services | 602 | 704,275.79 | 0.00 | 892,633.43 | 0.00 |
| 3. | Rental income | 603 | 0.00 | 0.00 | 291,913.31 | 0.00 |
| 4. | Revenue from goods sold | 604 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Revenue from administrative charges | 605 | 0.00 | 0.00 | 0.00 | 0.00 |
| 7. | Proceeds from court fees | 607 | 0.00 | 0.00 | 0.00 | 0.00 |
| 8. | Other income from own performance | 609 | 0.00 | 0.00 | 0.00 | 0.00 |
| 9. | Contractual penalties and default interest | 641 | 0.00 | 0.00 | 0.00 | 0.00 |
| 10. | Other fines and penalties | 642 | 572,613.19 | 0.00 | 530,078.00 | 0.00 |
| 11. | Proceeds from disposal of receivables | 643 | 0.00 | 0.00 | 0.00 | 0.00 |
| 12. | Proceeds from the sale of materials | 644 | 0.00 | 0.00 | 0.00 | 0.00 |
| 13. | Proceeds from the sale of intangible fixed assets | 645 | 0.00 | 0.00 | 0.00 | 0.00 |
| 14. | Proceeds from the sale of tangible fixed assets other than land | 646 | 4,200.00 | 0.00 | 385,000.00 | 0.00 |
| 15. | Proceeds from the sale of land | 647 | 0.00 | 0.00 | 0.00 | 0.00 |
| 16. | Drawdown of funds | 648 | 0.00 | 0.00 | 0.00 | 0.00 |
| 17. | Other operating income | 649 | 1,279,594.00 | 0.00 | 457,040.88 | 0.00 |
| II. | Financial returns | | 11,189.87 | 0.00 | 288,943.00 | 0.00 |
| 1. | Proceeds from the sale of securities and shares | 661 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Interest | 662 | 0.00 | 0.00 | 0.00 | 0.00 |
| 3. | Exchange rate gains | 663 | 1,971.42 | 0.00 | 0.00 | 0.00 |
| 4. | Fair value gains on remeasurement | 664 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Income from non-current financial assets | 665 | 0.00 | 0.00 | 0.00 | 0.00 |
| 6. | Other financial income | 669 | 9,218.45 | 0.00 | 288,943.00 | 0.00 |
| III. | Revenue from taxes and charges | | 0.00 | 0.00 | 0.00 | 0.00 |
| 1. | Personal income tax revenue | 631 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Corporate income tax revenue | 632 | 0.00 | 0.00 | 0.00 | 0.00 |
| 3. | Revenue from social insurance | 633 | 0.00 | 0.00 | 0.00 | 0.00 |
| 4. | Value added tax revenue | 634 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Revenue from excise duties | 635 | 0.00 | 0.00 | 0.00 | 0.00 |
| 6. | Revenue from property taxes | 636 | 0.00 | 0.00 | 0.00 | 0.00 |
| 7. | Revenue from energy taxes | 637 | 0.00 | 0.00 | 0.00 | 0.00 |
| 8. | Road tax revenue | 638 | 0.00 | 0.00 | 0.00 | 0.00 |
| 9. | Revenue from other taxes and charges | 639 | 0.00 | 0.00 | 0.00 | 0.00 |

| | | | | | | |
|-----|---|-----|-----------------|------|-----------------|------|
| IV. | Revenue from transfers | | 0.00 | 0.00 | 0.00 | 0.00 |
| 1. | Revenue of selected central government institutions from transfers | 671 | 0.00 | 0.00 | 0.00 | 0.00 |
| 3. | Revenue of selected central government institutions from pre-financing of transfers | 675 | 0.00 | 0.00 | 0.00 | 0.00 |
| V. | Revenue from shared taxes and fees | | 0.00 | 0.00 | 0.00 | 0.00 |
| 1. | Revenue from shared personal income tax | 681 | 0.00 | 0.00 | 0.00 | 0.00 |
| 2. | Revenue from shared corporate income tax | 682 | 0.00 | 0.00 | 0.00 | 0.00 |
| 3. | Revenue from shared value added tax | 684 | 0.00 | 0.00 | 0.00 | 0.00 |
| 4. | Revenue from shared consumption taxes | 685 | 0.00 | 0.00 | 0.00 | 0.00 |
| 5. | Revenue from shared property taxes | 686 | 0.00 | 0.00 | 0.00 | 0.00 |
| 6. | Revenue from other shared taxes and fees | 688 | 0.00 | 0.00 | 0.00 | 0.00 |
| C. | OPERATING RESULT | | | | | |
| 1. | Economic result before tax | 631 | -468,790,617.62 | 0.00 | -426,740,245.75 | 0.00 |
| 2. | Economic result of the current accounting period | 639 | -468,790,617.62 | 0.00 | -426,740,245.75 | 0.00 |





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Abbreviations and Explanation

| | |
|--------------|---|
| ALF | Agricultural land fund |
| BAT | Best available techniques |
| BDW | Biodegradable waste |
| BGS | Biogas station |
| BOD | Biochemical oxygen demand |
| BWWTP | Biological wastewater treatment plant |
| CC | Cross Compliance: a policy instrument for the introduction of minimum standards in the areas of public health protection, animal health and welfare, plant health and the environment (protection of soil, water, biodiversity, etc.) |
| CEI | Czech Environmental Inspectorate |
| CFU | Czech Fishing Union |
| CIA | Coordinators of integrated agendas |
| CIS | Central information system |
| CITES | Convention on International Trade in Endangered Species of Fauna and Flora |
| CLP | Regulation No. 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures |
| COD | Chemical oxygen demand |
| CSA | Civil Service Act |
| CSNF | Cultural and Social Needs Fund |
| CSO | Czech Society for Ornithology |
| CUE | Claims for unspent expenditures |
| CWWTP | Central wastewater treatment plant |
| DIR | CEI Directorate |
| DSA | Department of State Administration |

| | |
|-----------------|--|
| EC | Emission cap |
| ECA | Communication from the European Commission "EU actions to environmental compliance and governance" |
| EDS/SMVS | Registration subsidy system and management of state-owned property |
| EEA | European Economic Area |
| EEE | Electric and electronic equipment |
| EFM | Expert Forest Manager |
| EFTA | European Free Trade Association |
| EH | Environmental harm |
| ECHA | European Chemicals Agency |
| EIA | Environmental Impact Assessment |
| EL | Emission limit |
| EMAS | Environmental Management and Audit System |
| EMS | Environmental Management System |
| ENV | Environment |
| ERDD MoE | Environmental Risk and Damage Department of the Ministry of the Environment |
| EU | European Union |
| FA | Forest administration |
| FCR | Forests of the Czech Republic, s. p. |
| FMG | Forest management guidelines |
| FMI | Forest Management Institute |
| FMP | Forest management plan |
| FMR | Forestry management records |
| FP | Fire protection |
| FPD | Forest Protection Department |

| | |
|----------------|--|
| FRS | Fire Rescue Service |
| GIOS | Główny Inspektorat Ochrony Środowiska, Polish Environmental Inspectorate |
| GMO | Genetically modified organisms |
| GMVP | Genetically modified vascular plants |
| GRI | Global Reporting Initiative |
| HW | Hazardous waste |
| CHI | Czech Hydrometeorological Institute |
| IA | Integrated agendas |
| IAD | Integrated Agendas Department |
| IMPEL | Network of environmental inspection authorities of EU states |
| IP | Integrated permit |
| IPPC | Integrated Pollution Prevention and Control |
| IPR | Integrated Pollution Register |
| IRI | Impel Review Initiative (Voluntary evaluation of individual organizations involved in the international network of inspections and agencies dealing with environmental protection) |
| IRS | Integrated Rescue System |
| IS IPPC | IPPC information system |
| ISFRO | Integrated System for Fulfilling Reporting Obligations |
| KRNAP | Krkonoše National Park |
| LDPFF | Land designed for the performance of forest functions |
| LF | Legal force |

| | |
|------------------|--|
| LF | Legal force |
| MEP | Municipality with extended powers |
| MFCR | Ministry of Finance of the Czech Republic |
| MFE CR | Military Forests and Estates of the Czech Republic, s. p. |
| MIT | Ministry of Industry and Trade |
| MMW | Mixed municipal waste |
| MoA | Ministry of Agriculture |
| MoE | Ministry of the Environment |
| NCACR | Nature Conservation Agency of the Czech Republic |
| NLPA | Nature and Landscape Protection Act |
| NM | Nature Monument |
| NNM | National Nature Monument |
| NNR | National Nature Reserve |
| NP | National park |
| NPČS | České Švýcarsko National Park |
| NPĐ | Nature Protection Department |
| NPŠ | Šumava National Park |
| NR | Nature Reserve |
| ODP | Ozone depletion potential |
| OEB | Old Environmental Burdens |
| OSH | Occupational Safety and Health |
| PCB | Polychlorinated Biphenyls |
| PCDD/PCDF | Polychlorinated dibenzodioxins and polychlorinated dibenzofurans |
| PCR | Police of the Czech Republic |

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| PE | Population equivalents |
| PLA | Protected landscape area |
| RA | Regional Authority |
| RAPEX | Rapid Alert System of Non-Food Products |
| REACH | Regulation No. 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and restriction of Chemicals and establishing a European Chemicals Agency |
| RIA | Railway Infrastructure Administration |
| RMD | Roads and Motorways Directorate |
| RPHA | Regional Public Health Authority |
| RS | Regulated substances |
| RSLF | Registered significant landscape feature |
| SAIF | State Agricultural Intervention Fund |
| SBP | Soil Block Parts |
| SEA | Strategic Environmental Assessment |
| SEF | State Environmental Fund |
| SEI | Site of European Importance |
| SHPP | Small hydroelectric power plant |
| SKEI | Slovakian Environmental Inspectorate |
| SLF | Significant landscape feature |
| SP | Solid pollutants |
| SPA | Specially protected areas |
| SPS | Specially protected species |
| TI | Territorial inspectorate |
| TLS | Technical landfill security |

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|-------------|---|
| WEEE | Waste electric and electronic equipment |
| WMD | Waste Management Department |
| WPD | Water Protection Department |
| WWTP | Wastewater treatment plant |







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