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2009

CZECH ENVIRONMENTAL INSPECTORATE



ČESKÁ INSPEKCE
ŽIVOTNÍHO PROSTŘEDÍ

CONTACTS

Compiler name: Czech Environmental Inspectorate
Compiler address: Na Břehu 267, 190 00 Praha 9
Tel: 00420 222 860 111(exchange)
Fax: 00420 283 892 662
Green line: 800 011 011
E-mail: public@cizp.cz
Internet: www.cizp.cz
Office hours: Monday and Wednesday
8.00 - 17.00
other working days
8.00 - 14.00 order an appointment
Founder name: Ministry of the Environment



The basic mission of the Czech Environmental Inspectorate is thinking of future, protection of nature and the environment. The same important like our work executive and controlling is our work in the framework of prevention and co-operation with non-governmental organizations. Relevant part of our activities is also cooperation with the public and citizens.

One of the most important changes, which was accomplished in 2009, is the new territorial disposition in the area of water protection, which respects boundaries of regions. This territorial disposition is better arranged than original disposition according to the river basins.

Czech Environmental Inspectorate more focused on punishing of purposeful delictual activities instead of prosecution of administrative mistakes and used the whole range of penalties which are stated in legislation.

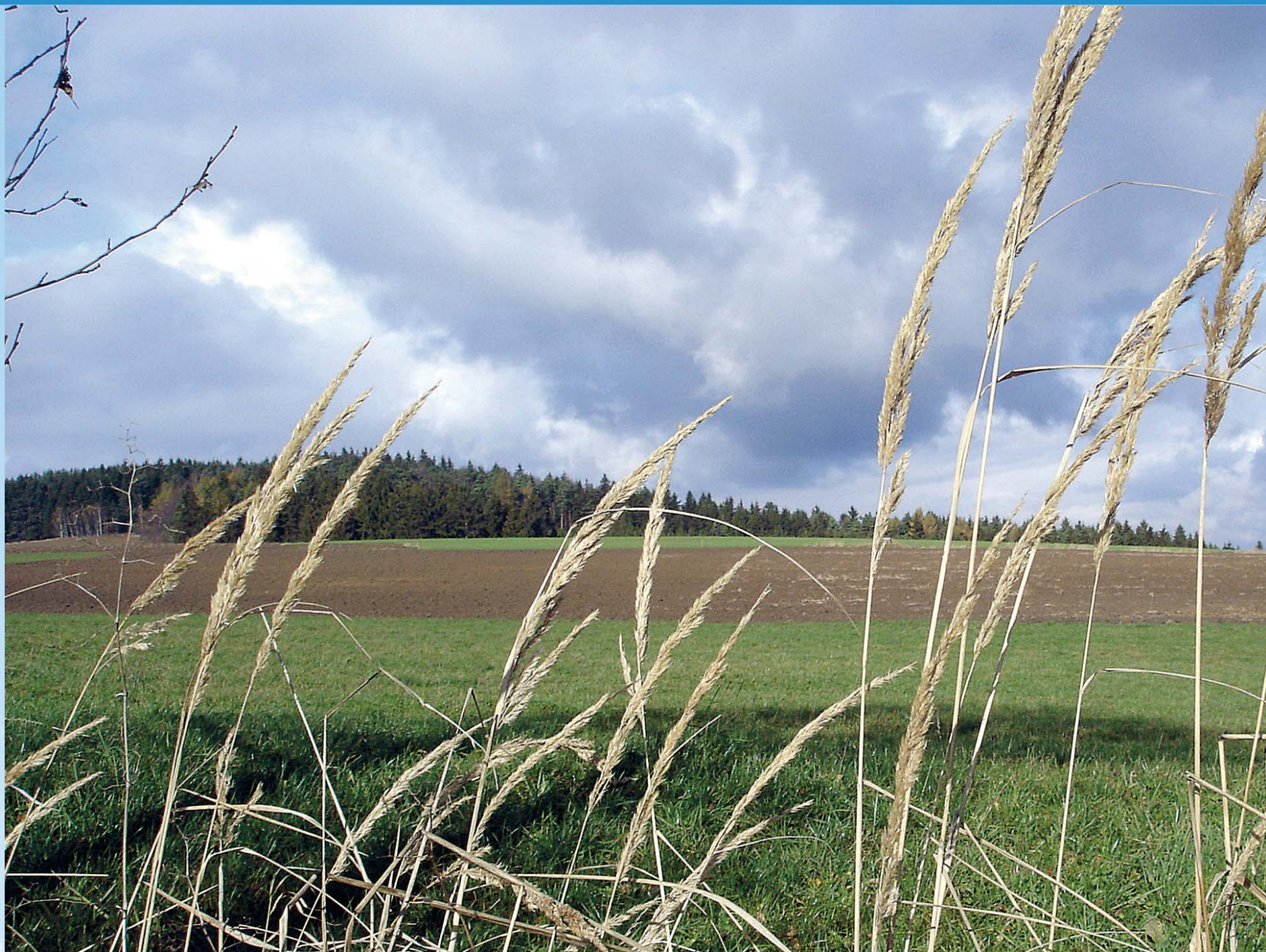
Czech Environmental Inspectorate further developed cooperation with the public. Increasing number of motions is a proof of public confidence. We dealt in this field especially with felling of trees, disallowed fills of construction materials and We dealt also with illegal imports of CITES specimens.

We paid an extraordinary attention to prevention in the area of felling of avenues around roads. We regularly informed the public about our activities and steps through the media during press conferences and by press reports publishing. Increased public information is shown preventive, too. A number of companies expressed a greater fear of the publicity of their unlawful conducts in the media.

Developmental trend of public interest for providing information was in 2009 the highest for the last five years and more requests for information were headed to the field of air protection. The overwhelming majority requests information were submitted by natural persons and more and more requests were handled informally through the discussion forum and for through the free information line, which is also used for receiving motions and complaints from citizens. We received more than 1000 inquiries in 2009 on the line.

Czech Environmental Inspectorate reform finished in 2009 and made from CEI a highly specialized and transparent body for inspection and controlling activities. CEI will continue to carry out executive, control and preventive activities, develop cooperation with the media and with citizens in protection of our nature, so that We could hand on the Earth, which was entrusted to us, to our children with a clear conscience.

Ing. Eva Tylová
Director of the Czech Environmental Inspectorate





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1. BASIC IDENTIFICATION DATA

1.1 GENERAL DATA

Czech Environmental Inspectorate

- CEI was set up in 1991 by Act No. 282/1991 Coll., on the Czech Environmental Inspectorate and its competencies in forestry protection. The other environmental sectors were gradually, in 1991-1992, incorporated.
- CEI is an independent organization subordinate to the Ministry of the Environment
- The activities of the CEI are divided into five core areas: air protection, water protection, waste management, nature protection and forest protection
- CEI was gradually assigned also additional responsibilities in other areas: protection of the Earth's ozone layer, supervision over the handling of chemical substances, industrial accident prevention, packaging management and genetically modified organisms (GMOs).

1.2 CHARACTERIZATION OF CEI ACTIVITIES

- Supervise law enforcement in the area of environmental protection
- Carry out inspections – controls
- Prescribe measures to rectify identified shortcomings
- Impose fines for non-compliance with environmental legislation
- Control trade with and handling of endangered plant and animal species as well as products made thereof (illegally obtained specimen can be confiscated)
- Impose restrictions or even order closing of operations that pose a serious danger to the environment
- Participate in joint efforts to deal with the old environmental burdens
- Process complaints put forward by citizens and legal persons
- Provide information based on requests pursuant to the Freedom of Information Act and other legal acts
- Disseminate to the public, media and the state administration the environmental data which EI obtains as a result of the performed inspections
- Draw up statements or expert reports for other state administration bodies
- Are involved in dealing with accidents in the environmental sector
- Engage in a close co-operation with the inspection authorities of EU member states associated in the IMPEL network
- Impose charges for discharging waste water into surface waters and under ground water withdrawal

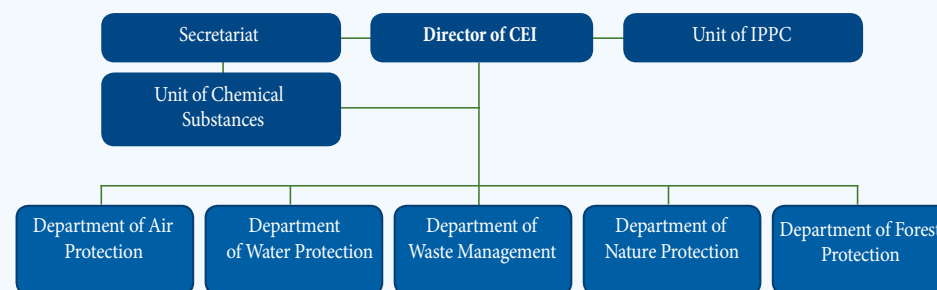
1.3 ORGANIZATIONAL STRUCTURE OF CEI

- CEI is divided into 10 regional Inspectorates and head office, CEI currently employs more than 600 staff, of which roughly 75% work as inspectors
- Regional Inspectorates: Praha, České Budějovice, Plzeň, Ústí nad Labem, Liberec, Hradec Králové, Havlíčkův Brod, Brno, Olomouc, Ostrava
- The Director of the Inspectorate is directly appointed by the Minister of the Environment

Overview of CEI competences in the individual sectors of the environment

CEI competences		Sector of the environment				
		Air	Water	Waste	Nature	Forests
supervision	controls, revisions, reviews, investigations etc.	*	*	*	*	*
sanctions	fines to legal entities	*	*	*	*	*
	fines to individuals	*	*	*	*	*
	restricting or closing operations	*	*		*	*
	seizure of illegally held specimen, seizure of products	*			*	
measures	measures for rectification of identified shortcomings	*	*	*	*	*
	dealing with old environmental burdens		*			
	dealing with accidents	*	*	*		
charges	charges (for discharging of waste water, charges for groundwater abstraction)		*			
permitting and approbations	regulation codes, co-incineration of several fuels, classification of sources	*				
statements	Statements, comments and approvals for other administrative bodies	*	*	*	*	*
suggestions	processing suggestions	*	*	*	*	*

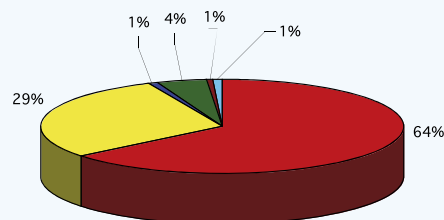
Organizational Structure of Regional Inspectorate



2. ASSESSMENT OF CEI ACTIVITIES IN 2009

2.1 DECISIONS IN ADMINISTRATIVE PROCEDURES

In 2009, CEI performed 17,432 inspections in total (14,255 inspections in 2008; 15,791 inspections in 2007). The number of inspections per inspector was 36 in 2009 (34 in 2008; 38 in 2007). In 2009, CEI initiated the total of 14,834 administrative procedures, out of that 14,706 were final (this number includes 2,061 issued decisions on fees for wastewater discharge and 9,268 issued decisions on fees for groundwater consumption).



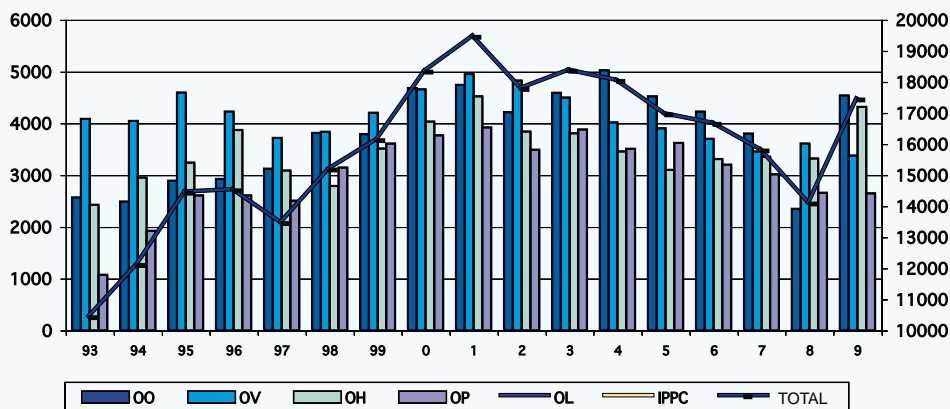
fees come into force	penalties come into force	consents + authorizations
measures	withdrawal	cessation of business

ADMINISTRATIVE DECISIONS OF PUNITIVE NATURE

CEI imposed 2 778 penalties, out of which 2,650 were final in this year (2,684 penalties, out of which 2,501 were final in 2008; 2,547 penalties, out of which 2,469 were final in 2007). The total amount of the imposed fines was CZK 164,165,643 in 2009 (CZK 142,921,818 in 2008; CZK 161,513,741 in 2007). An increase in the fines is noted especially in the water management department, namely to CZK 40,972,943 (CZK 24,424,668 in 2008; CZK 35,967,990 in 2007) and the waste management department, namely to CZK 73,836,200 (CZK 64,472,750 in 2008; CZK 76,429,000 in 2007). The significant increase in the fine amount in the water conservation segment in 2009 was partly due to cases handled in 2008, which came into force only in 2009. The fine of CZK 8,000,000 imposed on the Prague WWTP, and big fines for illegal groundwater consumption account for this in particular.

The average amount of a final penalty assessed in an administrative procedure decreased to CZK 61,949 (CZK 57,146 in 2008; CZK 65,417 in 2007). The average penalty amount differs according to segments and according to regions. The highest average penalties were imposed in waste management; the lowest ones in nature conservation, which can be explained by the nature of their activities and punitive legislation.

Development of the number of inspections pursuant to departments



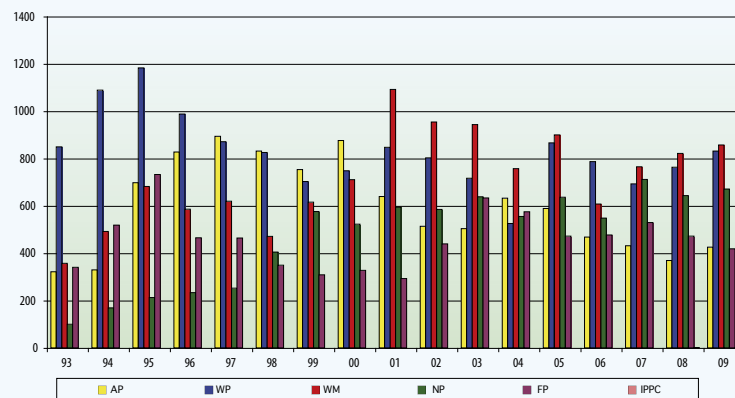
ADMINISTRATIVE DECISIONS OF REMEDIAL NATURE

After penalties, remedial decisions are the other group of decisions representing a response of an administrative body to an identified violation of law. This type of measures is issued either separately or along with penalty decisions. A total of 406 decisions on remedial measures were issued in 2009 (427 in 2008; 503 in 2007), along with 70 decisions to stop operation (51 in 2008; 66 in 2007).

The number of cases of seizing of live or non-live units by means of an administrative decision (pursuant to the CITES convention) increased to 68 (84 in 2008; 68 in 2007).

Seizure of illegally held units, restriction or stopping of a harmful activity or operation are the extreme available response of an administrative body to an identified violation of law. Their share in the total number of decisions reflects this fact.

Development of the number of punitive and remedial measures



ACTIVITIES OUTSIDE OF ADMINISTRATIVE PROCEDURES

Such activities comprise statements and opinions for other bodies, such as statements on applications for support from the State Environmental Fund (SEF), opinions on elaborated EIA studies, etc. CEI issued a total of 12,006 such statements (12,013 in 2008; 14,449 in 2007).

CEI cooperates with the Ministry of the Environment and departmental organizations, with the Directorate-General of Customs (DGC) in the field of CITES, GMO and cross-border movement of waste, with the Czech Police, the Fire Rescue Brigade, the Czech Trade Inspectorate, the Occupational Safety Inspectorate, the Public Health Service, regional and local bodies and institutions, judicial bodies, etc.

2.2 COOPERATION WITH THE PUBLIC

MOTIONS, COMPLAINTS

Investigations of motions and complaints comprise approx. 9% of total CEI activity. Motions and complaints are an important element of CEI's communication with the public. The civil public often calls attention to violations of the law which would otherwise remain unrevealed. Rightful motions are the point of departure for further procedures of the CEI, i.e., administrative procedures of punitive nature or administrative procedures to impose remedial measures. Some motions are also forwarded to other public administration (state administration or self-government) bodies for investigation. Complaints on inappropriate conduct of inspectors or on the procedures of a Regional Inspectorate of the CEI are an important feedback helping the organization to improve its work.

Numbers of motions received by CEI RIs in 2009

Prague	697
České Budějovice	269
Plzeň	296
Ústí nad Labem	250
Hradec Králové	244
Havlíčkův Brod	204
Brno	319
Olomouc	242
Ostrava	244
Liberec	190
Total	2 955

The above numbers of motions were recorded at CEI (received at the CEI's registry). However, not all of the motions were resolved completely in 2009, and some motions were forwarded to other public administration bodies. The greatest number of motions is handled by the Prague CEI Regional Inspectorate (hereinafter, the RI) every year. It can be said that the numbers of motions concerning a threat or damage to the environment received and subsequently handled in the Central Bohemian Region and the Capital City of Prague are not comparable to other areas (regions) of the Czech Republic.

Increase in motions handled in 2001 – 2009 by environmental component

Env. comp.	2001	2002	2003	2004	2005	2006	2007	2008	2009
air	199	257	366	301	308	397	441	375	359
water	190	239	241	344	240	318	354	310	406
waste	138	222	243	350	256	521	682	596	589
nature	205	225	284	567	494	649	813	986	1 252
forest	64	61	104	89	82	96	105	110	125
Total	796	1004	1238	1651	1380	1981	2395	2377	2 731

The increase in the numbers of motions concerning environmental protection submitted by the public is apparent from the above table. Since 1993, the numbers of motions have increased more than five times. The increase in interest in technical environmental protection compared to natural environmental conservation is almost equal (nature conservation in particular shows a noticeable growth trend).

A similar trend to the more than fivefold increase in the numbers of motions within individual segments of environmental protection is also apparent in the increase in the numbers of motions in regions.

As concerns handling motions and complaints, the CEI Headquarters performs methodological and inspection activities. Motions received directly by the Headquarters registry (248 in 2009, compared to 60 complaints and 321 e-mails) are always delivered to the relevant Regional Inspectorate with a binding instruction to handle the motion.

Besides the above investigations by environmental protection segments, Regional Inspectorates also reported procedures pursuant to Act no. 76/2002 Coll. on Integrated Pollution Prevention and Control, as amended. A total of 187 cases were handled pursuant to the Act.

Green line: 800 011 011

Effective from 1 September 2008, the so-called Green Line has been implemented at CEI. This is a direct and free contact between CEI and the civil public. The line is used both to inform citizens on CEI's areas of competence and to receive motions and complaints from citizens. The line is in operation every day between 8.00 am and 4.00 pm. Four inquiries daily are registered on the average. Between 1 September 2008 and 31 December 2009, we received 1,327 inquiries, among which 160 motions were identified.

INFORMATION PROVISION

Information provision helps increase the effectiveness of CEI's inspection work and establish a stronger feedback from the public. The main objective is to maintain contact with the media as well as both professional and lay public, inform on the achievements of CEI's inspection work factually and in an extent adequate to information provided, as well as provide answers to questions concerning CEI's areas of inspection and supervision competence.

In 2009, CEI handled a total of 207 requests for information, within which 62 were pursuant to Act no. 106/1999 Coll. on Free Access to Information, and 155 pursuant to Act no. 123/1998 on Access to Information on the Environment. Three requests were denied due to the administrative procedure being unfinished or the requested information not being specified.

The development trend of interest of the public in information provision in 2009 was the highest in the last five years (141 in 2008; 165 in 2007; 182 in 2006; 96 in 2005; 106 in 2004). CEI RIs in Hradec Králové and Prague registered a nearly 100% increase in the numbers of requests for information. The requests concerned nature and air protection, waste management, and cases under investigation.

The majority of requests in 2009 concerned air protection again (requests for information on the Earth's ozone layer protection prevailed; other requests were for information on the amount of emissions of pollutants from air pollution sources); the least of them concerned forest protection. More requests were also handled in the field of waste management, especially requests related to conclusions of investigations and results of administrative procedures concerning waste management. In the field of nature conservation, requests were made for information on felling or pruning trees and damaging biotopes. Information on water management concerned decisions on measures of administrative bodies in handling objectionable substances, and information on the contamination of watercourses. Other requests were for information on state administration bodies concerned, the motion handling methods, and inspections performed. The overwhelming majority of requests for information were submitted by natural persons, which testifies to the public's increasing concern with the environment and, above all, the fact that they know where to turn with a query. That is why the progressive expansion of freely accessible information, direct counselling and informing are components of the CEI information strategy, aiming to keep improving the information supply and facilitating the public access to information on CEI's activity.

Besides information provided pursuant to the above Acts of law, CEI provides the public with information upon its own initiative, in the form of brochures, leaflets, press releases and press conferences, or upon request of the media. Such information is provided immediately, outside of any time limits.

Requests for information can be made by email to: public@cizp.cz



Press conference
Liberec

3. CEI PARTICIPATION IN HANDLING ACCIDENTS

Central register of water accidents

Pursuant to Act no. 254/2001 Coll. on Water, as amended, CEI has maintained central accident records since 2002. Since 2003, CEI has cooperated with the Fire Rescue Brigade (FRB), chiefly on providing information about accidents. In 2009, CEI registered 111 accidents compliant to the accident definition in Section 40 of Act no. 254/2001 Coll. on Water.

Transport only caused 12 accidents. Fish died in 30 cases, which is comparable to 2008 (32 cases). Groundwater was affected in 4 cases. The accident originator was identified in 70 cases, that is 63% of the total registered cases. In 62 cases, CEI investigated the accident or participated in the investigation.

Accident at IVAX PHARMACEUTICALS, Opava

On 6 May 2009, Teva Czech Industries s.r.o. reported to CEI a massive groundwater contamination with dichloromethane (DCM) on the premises of a legal entity in Opava-Komárov.

In March 2009, having identified a stock difference in DCM of 10,800 litres, the company made an inspection on an underground pipeline section and replaced it after detecting corrosion and leaks. No increased DCM concentration in the soil and groundwater samples was identified. The groundwater contamination was only ascertained in an analysis of groundwater samples collected on 15 April 2009 during the regular groundwater condition monitoring, run by a remediation company as part of removing an old environmental burden. Only then was the accident reported to CEI. The company is paying the full cost of the remediation measures. CEI imposed a fine of CZK 300,000 for unpermitted handling of objectionable substances on Teva Czech Industries s.r.o. and instructed it to remedy the defective condition. Both the decisions have entered into force.



Fish death loss in a pond in Stonařov



Accident in a pond in Stonařov near Jihlava

Fish death loss in a pond in Stonařov

On the afternoon of 18 August 2009, massive fish surfacing was registered in the pond, and the first deaths occurred. When CEI staff arrived, the situation was assessed and samples collected. The water was turbid, evidently free of cyanobacteria, grey in colour, its transparency was minimal, and it smelled of fish. The scarcity of dissolved oxygen was established to be the likely (later on confirmed) cause due to the high air and water temperatures; aeration was initiated immediately. In spite of that, 800 kg of fish died, some weighing up to 20 kg.

The investigation showed that besides the unfavourable climatic conditions, the accident occurred due to an inappropriate pond management method. The fish population was inadequate to the sustaining capacity of the pond, the oxygen balance, and the aquatic conditions. No contamination with harmful substances from adjacent land was detected in the pond. The investigation also involved the FRB, the Czech Police, and Jihlava Municipal Authority.

Liberec WWTP failure

On the late morning of 1 October 2009, an extensive failure occurred in the high-voltage power grid in the area, which lasted for some 10 hours. The blackout caused the Liberec WWTP to cease to operate, resulting in all the incoming wastewater discharging into the Lužická Nisa without any treatment. CEI

handled the emergency immediately upon notification. In co-operation with Povodí Labe, s.p., the flow rate in the Lužická Nisa was enhanced and a cross-border accident was reported to the control room. The emergency could have been avoided had the Liberec WWTP had a backup power supply available. That is why CEI demands the Liberec WWTP to acquire such a permanently available backup supply and include its operation in its emergency plan.



Massive contamination of the Bílina

On the evening of 23 December 2009, a contamination of the Bílina River with petroleum derivatives (a mixture of pyrolysis petrol products) was detected. They leaked from a disused storm sewer on the premises of UNIPETROL RPA, s.r.o. in Litvínov to the Bílý potok and then to the Bílina River. Povodí Ohře, s.p., reported the accident to CEI. The initial intervention was made by Most FRB in co-operation with UNIPETROL RPA, s.r.o. FRB. Several scum boards were installed in the Bílý potok and the Bílina. Fish died in the accident and a strong petrol odour lingered around the Bílina River. CEI made an inspection investigation and the river board in the presence of a representative of UNIPETROL RPA, s.r.o., on 24 December 2009. Czech Police officers were also present. The results of collected samples confirmed that the Bílina River down to Velvěty had been contaminated with C10-40 petroleum hydrocarbons (up to tens of mg/litre of water) and significant amounts of aromatic hydrocarbons such as benzene, toluene, xylene and styrene (up to tens of µg/litre of water). The samples also showed unusual quantities of naphthalene. The case is under CEI investigation and an administrative procedure will be initiated with the company due to the significant contamination of surface waters with a mixture of pyrolysis petrol products.



Accident on the Bílina river - Unipetrol

Classification of accidents by groups of leaked substances in 2009

Class of substances	No. of accidents	%
petroleum derivatives	46	41,5
wastewater	23	20,7
sludge and undissolved substances	6	5,4
animal husbandry waste	5	4,5
chemicals excl. heavy metals	4	3,6
food products	3	2,7
oxygen deficit	3	2,7
chlorinated hydrocarbons	1	0,9
heavy metals	1	0,9
other substances	2	1,8
not determined	17	15,3
Total	111	100,0

Classification of accidents by the main causes of occurrence in 2009

Cause of accident	No. of accidents	%
human error	46	41,5
technical cause	23	20,7
nature	9	8,1
not determined	33	29,7
Total	111	100,0

4. CEI ACTIVITIES BY DEPARTMENT

4.1 PROTECTION OF THE AIR, OZONE LAYER AND CLIMATE SYSTEM OF THE EARTH

ASSESSMENT AND TRENDS OF ACTIVITIES IN 2009

The numbers of inspections performed, entities inspected, and the proportion of planned versus unplanned inspections in the CEI's working areas of protection of the air, ozone layer and climate system of the Earth did not change significantly in 2009. Whereas the total number of inspections decreased slightly by 165 to 4,541 in 2009 compared to 2008, the number of entities inspected increased from 2,523 in 2008 to 2,636 in 2009. The proportion of planned versus unplanned inspections in 2009 was identical to that in 2008, remaining at 46 : 54. The number of penalty procedures for proven offences increased by 52 compared to 2008 to 360 in 2009; likewise, the number of final decisions increased by 58 to 344. Many of the penalty decisions quoted multiple proven offences, so their number was roughly double. The total amount of fines imposed in 2009 increased by approx. CZK 0.5 million compared to 2008, totalling over CZK 18 million, but the average fine decreased to CZK 53,470. In 2009, the number of fines imposed exclusively pursuant to the Air Protection Act on operators of especially large sources decreased from 7 to 1, but the numbers of fines imposed on operators of large and medium-sized sources of air pollution increased. Offences by operators of especially large sources of air pollution constituting violation of air protection requirements were handled pursuant to the IPPC Act. The amounted to 10, and the total amount of fines for air offences was CZK 770,000. The amount of fines imposed to entities handling controlled substances more than doubled from CZK 0.88 million in 2008 to CZK 1.88 in 2009. The average fine for offences by entities handling controlled substances increased from CZK 23 thousand in 2008 to CZK 70 thousand in 2009.

Compared to the year before, the number of imposed orders to remedy increased by some 10% to 64, within that, the number of imposed orders to meet an emission limit increased to 10. The number of decisions ordering stopping a source of pollution remained at the level of the year before.

Due to the unsatisfactory air quality in some areas of the Czech Republic, notably air pollution with volatile dust and other monitored pollutants, CEI's inspection activities focused on high-emitting sources in power generation, fuel processing and production, and other industrial sources in addition to

relatively less important sources of air pollution, like in the year before.

The number of handled motions decreased to 359 in 2009, but number of instances of information provision increased from 46 in 2008 to 55 in 2009. In spite of this positive trend of the numbers of motions decreasing, the motions are frequently concerned with unbearable botheration with smoke and odour from small combustion sources of air pollution operated to heat family houses. The second most frequent category of motions comprises notifications of botheration with odour from sources operated to apply paints using various methods, activities involving biological processing of raw materials or waste, and husbandry farming, including related activities..

OVERVIEW OF FULFILMENT OF DEPARTMENT-BASED TASKS

Inspections of observing emission limits and other duties by operators of especially large, large and medium-size air pollution sources – the fundamental and most extensive of the department tasks – were performed in a similar manner as in the previous years, continuously during inspections with the sources operators, inspections on reports on authorised measurements submitted to CEI by source operators, and also based on the CEI's own measurements performed by the Air Protection Department of the Headquarters. Inspections planned for the period in question were predominantly performed in accordance with the plan. Other – unplanned – inspections were performed operatively, in connection to the current situation and needs. A part of such unplanned inspections also comprises inspections performed in connection with investigating submitted motions.

In 2009, Air Protection Department inspectors performed a total of 3,706 inspections of especially large, large and medium-sized sources, as well as 441 inspections of small sources in connection with investigating submitted motions and categorization of the sources. The share of unplanned inspections in the total number of the inspections performed was slightly above one half (53%). Although the number of investigated motions decreased slightly from 408 motions in 2008 to 359 in 2009, the share of motions against operators of small stationary sources remained relatively high and the number of forced inspections of small sources increased from 348 in 2008 to 441 in 2009. A total of 4,541 inspections were performed at the Air Protection Department – in the fields of air protection, ozone layer protection and protection of the climatic system of the Earth.

In the period in question, 344 decisions on fines for violation of duties in

protection of the air, ozone layer and climatic system of the Earth came into force, totalling CZK 18,393,000, which was CZK 447 thousand more than in 2008. The fines were imposed in amounts corresponding to the gravity of the violated duties and with regard to the rate of the environmental impact of the source or activity. Only one fine of CZK 50 thousand was imposed on an operator of an especially large source pursuant to the Air Protection Act, and another 10 fines were imposed on operators of this category of sources pursuant to the IPPC Act.

The average amount of fines imposed on operators of large sources was CZK 66,300; it was CZK 43,200 in the case of operators of medium-sized sources, CZK 60 thousand for operators of facilities registered in the carbon dioxide emissions permit trading system, and finally, CZK 70 thousand for persons handling controlled substances.

In 2009, CEI issued 2 final decisions to stop operating a source, in both cases due to operating the source without permission of the air protection authority. One case was when ASTRON print, s.r.o., in Prague was ordered to stop operating its large source – printing works – without permission of the air protection authority. The operator respected the CEI decision and stopped the operation of the source. The other case was a source operated by DUROtherm Thermoforming Czechia, s.r.o., in Krupka. By CEI decision, the company was ordered to stop the operation of a stationary source of air pollution – an extruder for PP burl wrap. Inspecting whether the final decision was respected, CEI found out that the source was still in operation. The company was there imposed a fine of CZK 500,000. The operator was given permission for test operation of the air pollution source in question by decision of the Ústí nad Labem Regional Authority in January 2010. Four more cases of operating a pollution source without permission of the air protection authority were identified in 2009, but will only be resolved in 2010.

Air Protection Departments of Regional Inspectorates as well as the Air Protection Department of the Headquarters collected summary operating records of especially large and large sources for the purposes of maintaining the air quality information system, which also includes a register of air pollution sources. Detailed verification of completeness and correctness of the data was not performed in all cases but only as part of inspections on source operation sites or upon notification of the processor and the entity charged with maintaining the database – the Czech Hydrometeorological Institute.

In 2009, decisions on delimiting the air pollution sources and their classification in the source categories concerned above all especially large, large and medium-sized sources where changes in designed capacities occurred, and small sources categorized in connection with handling motions. For several years, the numbers of decisions on categorization issued have oscillated between 100 and 200. In 2009, 141 sources total were categorized, out of which 50 were small sources.

In the period in question, a total of 33 waste incinerators and co-incinerating facilities were operated and inspected (26 incinerators, including 3 municipal waste incinerators and 23 hospital or industrial waste incinerators, and 7 co-incinerating facilities). In 2009, we identified one instance of exceeding pollutant emission limits for mercury and aggregate polychlorinated dibenzodioxin and polychlorinated dibenzofuran concentration, one instance of operating an incinerator without supervision of an authorised entity, and one instance of failure to monitor emissions in line with legal requirements in air protection. All the three cases were small incinerators with relatively low air quality impacts. Some of the incinerators were refurbished as part of their periodical maintenance, e.g. the Benešov hospital incinerator, the incinerator at SAKO in Brno, and Purum s.r.o. in Kolín. The operation of incinerators and co-incinerating facilities, observance of air protection requirements and all changes are monitored by our inspectors continually, and monthly reports on the condition of incinerators and co-incinerating facilities are submitted to the Air Protection Department of the Headquarters to develop a summary paper submitted to the Czech Hydrometeorological Institute, in charge of maintaining and publishing the register of this category of sources. The procedure to impose a penalty on Lafarge Cement, a.s., for operating a co-incinerating facility without a functional continual measurement of organic emissions, which had been initiated by a finding in 2008, was concluded in 2009.

Three departmental thematic tasks were planned for all Regional Inspectorates and the Air Protection Department of the Headquarters for 2009, namely (1) inspections of observance of emission ceilings and pollution emission reduction plans by operators of existing especially large combustion sources and selected other air pollution sources; (2) inspection of fulfilment of obligations under MoE Decree no. 362/2006 Coll., determining the odorous substance concentrations near sources listed in Section 3, Item c), and collection of measurement reports; (3) inspections of handling recovered controlled substances that cannot be reused any more and have to be disposed of.

In 2009, a total of 128 inspections of entities authorized to perform the defined activities took place. In particular, these were inspections of entities authorized to measure emissions and pollution, perform dispersion analyses and elaborate expert reports. These inspections consisted in both checking the measurement records, expert reports and dispersion analyses, and the inspectors' direct involvement in actual measurements at the sources. Inspections of activities of entities authorized to elaborate expert reports or dispersion analyses are performed especially in connection to issuing binding statements and permits for the construction and modification of sources where the CEI is the body concerned in procedures conducted by regional authorities. In connection with the Act on Requirements on Greenhouse Gas Emission Permit Trading, inspections of entities authorized to verify the amounts of greenhouse gas emissions rank in this area as well.

Inspections of observing the duties and prohibitions in the segment of protection of the Earth's ozone layer were focused on observing the defined duties by entities handling controlled substances and products which contain such substances, with an emphasis on the ban on the use of selected controlled substances, and on inspections of observing the duties on part of operators of cooling or air conditioning equipment containing controlled substances in quantities greater than 3 kg which are not mobile. As part of the departmental thematic task focused on handling recovered controlled substances that are banned from use and have to be disposed of, inspections were performed concerning the handling of the most frequent controlled substances: CFC-12 and CFC-114. These inspections detected and proved 4 entities to violate their duties. In one instance, 0.5 kg of recovered CFC-12 coolant was reused while servicing a cooling device; three entities (E K O T E R M E X, a. s., ORV Morava s.r.o., and ECOWASTE s.r.o.) were proven to place the controlled substance CFC-114 on the market and transferred the substance along with another controlled substance in a way that resulted in their loss. In the gradual and uncontrolled transfer of the controlled substances among the three above entities, a total of 1,535 kg of the controlled substances HCFC-22 and CFC-114 were lost. None of the entities handling the two substances made a breakdown of the two controlled substances and determined their respective shares in the total weight. The controlled substance CFC-114 was not demonstrably disposed of or submitted to an authorised entity for disposal. In the period in question, CEI performed 153 inspections of observing the duties to protect the ozone layer. Violation of some of the duties were found in 27 instances, and fines totalling CZK 1,882,000 were imposed. No imports

of controlled substances and products which contain such substances were registered in 2009.

Along with inspections of combustion sources and other sources included in the carbon dioxide emission permit trading system, observance of all requirement set by Act no. 695/2004 Coll. and requirements made in permits by the Ministry of the Environment was inspected. In 2009, 97 inspections were performed, and only two instances of violation of the duty report on changes to facilities included in the carbon dioxide emission permit trading system were identified; two fines totalling CZK 120,000 were imposed for them.

Inspections under the departmental thematic task – observance of emission ceilings and pollution emission reduction plans – focused on existing especially large combustion sources and sources listed in the annex to Government Decree no. 372/2007 Coll. on Programme to reduce emissions from existing especially large combustion sources. The observance of emission ceilings for the entire year 2008 – the first year of the duty – was inspected in 2009. A total of 93 existing especially large combustion sources were inspected. The inspections found that the said national emission reduction programme and the emission ceilings defined therein were only relevant for 85 of the sources. Seven sources had reduced their rated power output below the especially large source category, and one was not operated. Comparison of the sum of the pollutant emission ceilings for the said 85 sources with the actual annual emissions determined that these air pollution sources actually emitted much fewer pollutants into the air than permitted by the emission ceilings: only 62% of the permitted emissions were made for solid pollutants, only 81% for sulphur dioxide, and only 87% for nitrogen oxides. Seven of the operators were found to have swapped their emission ceilings or observed a shared emission ceiling based on Regional Authority permits. These swaps resulted in shifts of permitted annual solid pollutant emissions (20 tonnes), sulphur dioxide (640 tonnes), and nitrogen oxides (709 tonnes). In 19 instances, the annual emissions were detected to be above those permitted by the emission ceilings, including 2 instances for solid pollutants, 7 instances for sulphur dioxide, and 10 instances for nitrogen oxides. Since most of those cases were sources within the scope of the IPPC Act, the cases have been handled in co-operated with Integrated Prevention Departments.

As part of another departmental thematic task, reports on authorised measurements of odorous substance concentrations for sources listed in Section

3, items b) and c) of MoE Decree no. 362/2006 Coll., were collected in 2009, and the results stated in the reports were evaluated. A total of 628 reports on authorised measurements of odorous substance concentrations were collected and evaluated, including from 71 compost plants and biogas stations with maximum detected odorous substance concentrations of 57,391 OUE/m³ past the biofilter in the biogas stations and 56,316 OUE/m³ from compost maturing, with other concentrations ranging from thousands of OUE/m³; 15 fodder manufacturers with maximum detected odorous substance concentrations of 26,441 OUE/m³ past the biofilter, 82,253 OUE/m³ for drying kilns, 18,125 OUE/m³ in fish meal manufacturing, and thousands of OUE/m³ for granulation; 5 rendering plants with odorous substance concentrations from hundreds to 17,040 OUE/m³, 2,500 OUE/m³ in the shop floor ventilation exhaust gas, and 575 OUE/m³ at the perimeter boundary; 63 industrial wastewater treatment plants with maximum detected odorous substance concentrations of 83,208 OUE/m³ for a chemical industry wastewater treatment plant and ranging from hundreds to thousands of OUE/m³ for most other treatment plants; 346 municipal wastewater treatment plants with maximum detected odorous substance concentrations of 56,490 OUE/m³ for a sludge digester, 61,554 OUE/m³ for rough pre-treatment, around 50,000 OUE/m³ for sludge management, and from tens to hundreds to thousands odour units for most other treatment plants; 55 wood processing units with maximum concentrations of 83,636 OUE/m³ for a wood drying kiln, and thousands to tens of thousands OUE/m³ for other wood drying kilns; 4 cellulose plants with maximum concentrations of 1,037,442 OUE/m³ from the process, 2,600-5,000 OUE/m³ for recovery boilers, 5,500-8,000 OUE/m³ past the biofilters, and 120 OUE/m³ in the roof ventilation air mass; 19 rubber processing plants with maximum concentrations of 8,985 OUE/m³ from a final curing furnace, from hundreds to a thousand OUE/m³ for other furnaces and under one hundred OUE/m³ for shop floor ventilation; 22 lamination plants with maximum concentrations of 7,762 OUE/m³ from lamination, 600-800 OUE/m³ past the biofilters, and around 100 OUE/m³ at the perimeter boundary; 1 coffee roasting plant with concentrations of 22,615-45,809 OUE/m³ in various exhausts; 9 bakeries with maximum concentrations of 24,081 OUE/m³ from a confectionery oven, 14,000-15,000 OUE/m³ from common bread ovens, and hundreds, exceptionally thousands of OUE/m³; 15 smoking plants with maximum detected concentrations of 105,524 OUE/m³, mostly tens of thousands of OUE/m³, rarely hundreds to thousands of OUE/m³; and 3 slaughterhouses with maximum detected concentrations of 20,305 OUE/m³ from tallow rendering, and hundreds to thousands OUE/m³ for other operations.

A total of 34 administrative procedures were held with operators of selected sources for failure to make an authorised measurement of odorous substance concentrations or making them late

OVERVIEW OF FULFILMENT OF SPECIFIC TASKS

CEI Headquarters

The Air Protection Department of the Headquarters performed inspection measurements of pollutant emissions based on requirements of Regional Inspectorates, chiefly in connection with investigating motions concerning operation of some sources and in order to verify emissions in cases where measurements of emissions performed by authorized entities were found to be on the borderline of emission limits or otherwise suspicious. In the period in question, CEI performed 68 own pollutant measurements, within which 8 instances of exceeding the emission limit were detected. Such measurements represented the grounds for imposing penalties and remedial measures managed by relevant Regional Inspectorates. Besides collection of pollutant samples, samples were collected and assessed to determine emission concentrations of odorous substances using dynamic olfactometry.

In connection with the collection of data of summary operational records of especially large and large air pollution sources, the Air Protection Department of the Headquarters both arranged forwarding of the data from the central register to Regional Inspectorates and collected the data of summary operational records of the sources which submit their records in the paper form, and subsequently submitted them to the Czech Hydrometeorological Institute. In 2009, CEI collected and forwarded summary operational records for 3,638 sources in this way. Furthermore, it processed monthly summary materials on operation of incineration plants and co-incineration facilities for the Czech Hydrometeorological Institute.

Furthermore, the Air Protection Department arranged inter-laboratory comparison of analyses for entities who had asked the Ministry of the Environment for issuance of decisions on authorization to perform measurements of emissions and pollution. In 2009, eight inter-laboratory comparison of analyses were performed and their results formed part of the background information for the authorisation procedures conducted by the Ministry of the Environment.

Inspections of observing duties and prohibitions in handling controlled sub-

stances or products which contain such substances, listed in both national legal regulations and Regulation of the EP and Council (EC) no. 2037/2000, were performed by employees of the Air Protection Department of the Headquarters in 16 natural persons and legal entities. The Air Protection Department of the CEI Headquarters handled complex cases independently or in cooperation with relevant Regional Inspectorates. For identified violations of duties in the field of the Earth's ozone layer protection, the Air Protection Department imposed 13 fines totalling CZK 1,417,000, for both neglecting duties in preventing leakage of controlled substances by entities operating installations with more than 3 kg of coolants, and for violating the ban on handling prohibited controlled substances. The average fine imposed by the Air Protection Department of the CEI Headquarters was CZK 109,000.

CEI Regional Inspectorates

As part of specific tasks, activities of individual CEI Regional Inspectorates focused on inspections of problematic classes of sources in respect of air protection within their territorial competences. Given both the large extent of inspected areas and the specific focus of departmental and departmental thematic tasks, only two Regional Inspectorates, namely Olomouc RI and Brno RI, planned specific inspection tasks focusing on reducing volatile organic compound emissions in 2009; one other Regional Inspectorate, the Havlíčkův Brod RI, planned an inspection on sources operated by KRONOSPAN CS and KRONOSPAN OSB. As part of the said specific tasks performed by these Regional Inspectorates, 28 inspections were performed, resulting in 14 administrative procedures on the imposition of fines, and 1 procedure on source categorisation.

IMPORTANT CASES Important cases handled by the Air Protection Departments of the Regional Inspectorates and the Air Protection Department of the CEI Headquarters in 2009 can be divided into two groups, the first one of which encompasses those cases notified by citizens based on their own observations, and the other one comprising the CEI's own findings.

In 2009, citizens mostly alerted to air pollution due to odours, smoke and solid pollutants. Important cases in this class included operations involving organic ethanol production (Agroetanol TTD, a.s., in Dobruška and PLP, a.s., in Trmice), biogas production, rendering plants (IC-PARK ENERGO, a.s., BPS Svojšíň; ASAVET Biřkov), foundries (Krkonoská slévárna, s.r.o., in Hostinné; FERAMO METALLUM INTERNATIONAL s.r.o. in Brno), sur-

face finish and printing (KATAFORENIS CZ, s.r.o., in Dašice; Vyra Casket s.r.o., in Choceň; ASTRON print, s.r.o., in Prague), polymer processing and insulation production (Knauf Insulation, spol. s r.o., in Krupka; DUROtherm Thermoforming Czechia, s.r.o., in Krupka).

Important cases identified by CEI included cases of exceeding emission limits (DAIHO CZECH s.r.o., in Plzeň, CZK 100,000 fine; COM-TIP s.r.o. in Prague, CZK 150,000 fine; NELI servis, s.r.o., in Liberec, CZK 130,000 fine; Jihomoravská armaturka spol. s r.o., CZK 200,000 fine; Spatra ČKD Kutná Hora, a.s., CZK 150,000 fine); failure to observe emission reduction plans (ČKD Blansko Strojírny, a.s., CZK 300,000 fine), operating sources in conflict with operating rules (IC-PARK ENERGO, a.s., BPS Svojšíň, CZK 750,000 fine; ASAVET Biřkov, CZK 250,000 fine; FINIDR, s.r.o., in Český Těšín, CZK 200,000 fine), and failure to perform duties in handling controlled substances and products that contain controlled substances (Telefonica O2 Czech Republic, a.s., CZK 900,000 and CZK 100,000 fines; EKOTERMEX, a.s., CZK 160,000 fine).

OPINIONS, STATEMENTS AND COOPERATION WITH OTHER BODIES

The crucial part of this activity follows from CEI's position as a concerned body in proceedings involving air protection requirements conducted by regional authorities. The number of this type of statements decreased slightly in 2009 compared to 2008 (from 4,290 in 2008 to 3,831 in 2009). In the period in question, the number of requests for opinions on projects supported from the State Environmental Fund increased from 81 in 2008 to 100 in 2009. Another major part of the agenda is the co-operation on statements concerning requests to issue integrated permits and statements concerning notifications, documentations and expert reports in environmental impact assessment processes. The total number of statements and opinions issued for other bodies was 5,716 in 2009: only 212 fewer than in 2008.

It follows from the division of competences among air protection bodies that cooperation of CEI with relevant regional authorities is clearly the closest in respect of the CEI's position as the body concerned in procedures conducted by regional authorities and incorporating air protection conditions, in connection with the location, building and operation of sources. Cooperation and communication with regional authorities can be regarded as good in general, usually even where problematic cases need resolving. Contacts with municipal authorities mostly concern dealing with motions against operation of small air pollution sources in which case the CEI (and/or upon veri-

fying or determining the source category) delegates such cases to the municipal authority for investigation and execution. For the needs of the Ministry of the Environment, CEI gathered all records on odorous substance concentration measurements in sources listed in Parts B and C of the Schedule to Ministry of the Environment Regulation no. 362/2006 Coll.; 628 reports were collected in total.

CONCLUSIONS OF INSPECTION ACTIVITIES

Positive trends in the inspection activities include the growth in the numbers of inspected entities, focusing the inspection activity on field inspections, and a reduction in inspections of observance of administrative duties (blanket checking of summary operational records). In spite of the slight decrease in the numbers of inspections performed, the numbers of proven offences and fines imposed increased. Both the efficiency of inspections in the field of the Earth's ozone layer protection and the amount of fines imposed increased substantially.

Based on the results of inspections of observance of emission ceilings by operators of existing especially large combustion sources, it can be concluded that the instrument is not an effective regulation for emissions of major pollutants. The permitted pollutant emissions show some leeway if compared to the actual annual emissions.

Motions due to botheration with odour and smoke from small combustion sources used in heating family houses and flats, as well as botheration with odour from sources involving biological processing of raw materials or waste and animal husbandry, including related activities, continued to be filed.

4.2 WATER PROTECTION AND PREVENTION OF SERIOUS INDUSTRIAL ACCIDENTS

ASSESSMENT AND TRENDS OF ACTIVITIES IN 2009

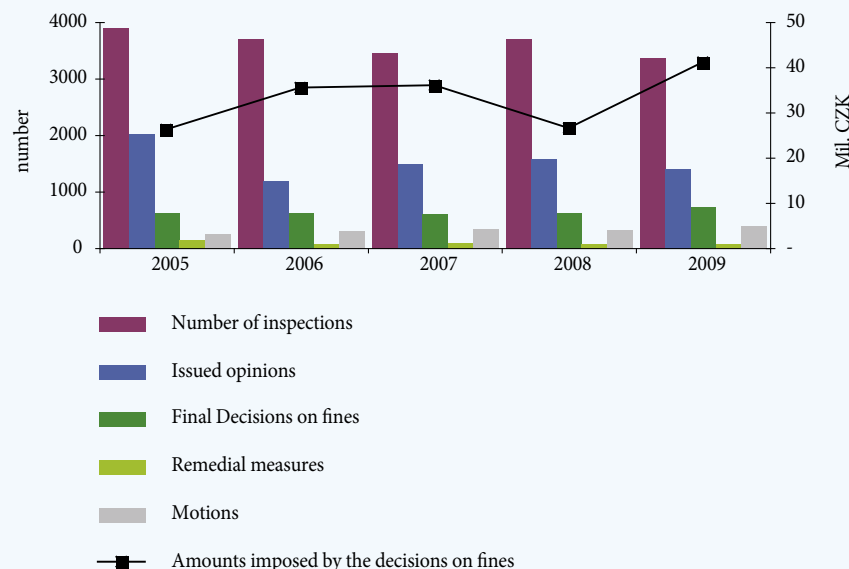
The work of the Water Protection Department in 2009 was affected by the shift of territorial competences among Regional Inspectorates on 1 July 2009. The original territorial competences, largely corresponding to the large river basins, was replaced by a division of competences according to the regional boundaries to improve administrative transparency. The shift has mostly affected Prague Inspectorate, competent for Prague and a number of municipalities with extended powers increased from 15 to 27. The shift brought not only substantial administrative burden to inspectors in the mid-year, but also affects the inspection work in so-called "transferred" territories, where cases

previously handled by different Inspectorates had to be picked up, and agenda transfers will continue in 2010.

In spite of the above, the drop in the inspection work was only slight. A total of 3,378 inspections were performed in 2009, including 1,748 planned ones. Water Protection Department inspectors took part in 191 inspections pursuant to Act no. 76/2002 Coll., on Integrated Prevention. In the period concerned, 733 decisions came into effect imposing fines totalling CZK 40,972,943, and 93 remedial measures were imposed with legal effect. Nearly one quarter of the unplanned inspection work comprised handling motions, where only 40% of the 406 motions handled were justified, and about 12% led to the initiation of administrative procedures.

An overview of the Water Protection Department work in the last five years is shown in the chart below. Both the numbers of fines imposed and their total amount increased significantly in 2009. Compared to 2008, the total fine amount grew by 55%.

The cooperation on preparing an amendment to the Water Act continued in 2009, with CEI trying to assert its experience with application practice in the comment procedure, which would have led to elimination of the problems arising from the current legal setting. However, most of the comments were not accepted.



OVERVIEW OF FULFILMENT OF DEPARTMENTAL TASKS

Monitoring of major wastewater treatment plants with volume greater than 10,000 EI

The purpose of the annual review of the major wastewater treatment plants is to inspect on the legal status of the major pollution sources, connected with the identification of the actual status of pollution generated and discharged. At the same time, the status quo of the progress of renovation of WWTP and sewerage for the Czech Republic's conurbations over 10,000 EI, listed by the Czech Republic as priorities towards meeting the requirements of Council Directive 91/271/EEC on urban wastewater treatment, is reviewed. In 2009, this review concerned 220 sources in the Czech Republic. They included 185 municipal WWTP (i.e., plants processing sanitary or mixed sanitary/industrial wastewater) with expected capacity over 10,000 equivalent inhabitants (EI) and 35 sources of industrial wastewater.

Among the reviewed municipal WWTP, 142 has their actual capacity depending on the input load greater than 10,000 EI, and in 2008, treated 626 million m³ of wastewater with an input contamination of 164 thousand tonnes of BOD₅, corresponding to a load of approx. 7.5 million EI. Nearly one half of that load was introduced to 11 WWTP with capacities exceeding 100,000 EI. The treated wastewater from these sources discharged into watercourses contained 3,285 tonnes of BOD at an average concentration of 5.2 mg/l (160 thousand tonnes removed), 22,279 tonnes of COD at an average concentration of 30.7 mg/l (367 thousand tonnes removed), 8,482 tonnes of total nitrogen at an average concentration of 12.4 mg/l (21.8 thousand tonnes removed), and 444 tonnes of phosphorus at an average concentration of 0.97 mg/l (3.6 thousand tonnes removed). The average efficiency of pollutant removal from wastewater was 98.0% for BOD, 94.4% for COD, 68.9% for total nitrogen, and 83.7% for phosphorus. The quantity and quality of wastewater discharged did not change significantly compared to the year before.

It can be concluded from the established figures that most of the WWTP over 10,000 EI are already meeting the requirements of Council Directive 91/271/EEC. The construction or renovation of a small part will continue in 2010; the limits required by the Directive can be expected to be met in 2011. The largest municipal WWTP – the Prague Central WWTP – is an exception, where the construction of the new process plant indispensable to meet the limits has not even begun. The Czech Republic's commitment arising from the transitional period to meet the Directive requirements will therefore certainly not be fulfilled for this source by 31 December 2010.

The conditions identified in WWTP operation and observance of water ma-

nagement authority permits are satisfactory. All the reviewed WWTP discharged wastewater based on valid regional water management authority permits; some of the permits were not yet in line with valid legislation (total nitrogen indicator). Beginning in 2010, limits should be set based on the watercourse pollution standards, which should theoretically lead to stricter emission limits. In practice, however, the existing emission limits are motiballed due to very generous limits of BAT, representing the highest degree of wastewater treatment that may be required by a permitting authority, so that the stricter limits, thus reduced pollution discharged into watercourses, will mostly not happen although it is necessary to achieve desirable pollution standards. Monitoring results for 2008 show that although 85% of the WWTP show the BAT limits for total phosphorus and 55%, for total nitrogen in the effluent, the pollution standards of these indicators, causing eutrophication, are seriously exceeded in the watercourses. To achieve them, the limit concentrations would have to be reduced below the existing BAT levels, which the new legislative amendments do not permit. A possible solution is to modify the BAT limits to make them less conforming to WWTP operators and more so the water quality protection.

Based on information collected in CEI reviews, 14 fines totalling CZK 9.8 million were imposed for violating provisions of Act no. 254/2001 Coll. and came into force in 2009. Most were imposed for exceeding permitted limits for wastewater discharge into surface waters. Most of the instances were identified based on independent monitoring, conducted by review laboratories in an very limited extent as part of discharge fee inspections. In contrast, results of self-monitoring, which is the basic, legally required form of inspection, typically do not exceed permitted limits. In the overwhelming majority of sources monitored, this form of inspection is conducted by laboratories in close proprietary association with the source operators, meaning that their objectivity is questionable. Review results show clearly that using such data for limit observance inspection is very ineffective for inspection authorities. The inspection process may only improve with changing the method of inspecting the quality of wastewater discharged by introducing monitoring entirely independent of the operators or owners of the treatment facilities.

Inspections of waste water treatment plants with volumes from 500 to 10,000 EI

Inspections performed under this task focused chiefly on observance of limits set by water management authority decisions for pollution discharged with wastewater and wastewater quantities, and on meeting of other requirements

made in those decisions. A total of 264 WWTP of the category up to 10,000 EI were inspected in 2009.

Information obtained in the inspections led to 27 fines totalling CZK 1.7 million being imposed largely for discharging wastewater into surface waters in conflict with a water management authority decision and in violation of other duties, consisting in failure to arrange measurements of the quantity or quality of wastewater discharged. Administrative procedures on imposition of fines were initiated in another 14 cases. This means that demonstrable violations of rules were identified in 15% of the sources reviewed.

Administration of fees for discharging wastewater into surface waters

Administration of fees for discharging wastewater into surface waters continued to be processed in 2009. Fee assessments for 2008 were issued between February and April, totalling CZK 271 million. Most of the fees were assessed for COD (approx. CZK 75 million), inorganic nitrogen (approx. CZK 76 million) and quantity of wastewater discharged (approx. CZK 107 million). The postponed amount of fees due to construction or upgrading of treatment facilities amounted to CZK 56 million in 2008, representing about 20% of the final amount of the fees. Decisions on fee advances for 2010 were issued between October and December 2009. A total of 989 advance assessments were issued for the amount of approx. CZK 270 million.

The trend of continuously decreasing assessed fee amounts does not change and is due to the decreasing fees for pollution discharged, whereas fees for wastewater quantity and numbers of charged sources do not change. In spite of great efforts of CEI and SEF, an update of the charging limits was not implemented; it would have resulted in the renewed primary purpose of the fees as an economic instrument for reducing the quantities of pollution discharged into surface waters. All the prepared proposals were deleted from the Water Act amendment under the guise of the economic crisis, although the proposed change of limits only implied a return to the amount of fees paid in 2000, excluding the inflation rate. Large amounts of phosphorus and nitrogen will therefore continue to be discharged into surface waters without a chance to motivate WWTP operators economically to reduce the pollution.

After the completion of the selective procedure for inspection laboratories and measurement teams for 2009-2010, inspections of charged entities were performed in the latter half of the year using the inspection laboratories and measurement teams funded by the SEF. The total expected number of inspection for the entire period is 5,150 inspection samplings and 320 inspection volume measurements; about one third of that amount was performed in

2009. The assumption that the results obtained are applicable in inspecting the observance of permitted limits (checks of permitted maximums) rather than in verifying the correct work of authorised laboratories was proven. Even where a difference is found between the results of authorised and inspection laboratories, it is very difficult to prove error by the authorised laboratory and use the result from the inspection laboratory to calculate (increase) the fee. The low effectiveness of the inspection is further decreased by the fact that due to the non-functional charging limits, 85% of the sources is only charged for the quantities of wastewater discharged and the inspection of pollution discharged is ineffective. In spite of that, the fee was increased based on the results of inspection analyses in several cases; the total increase was about CZK 5.5 million. The change in the fee for the Ústí nad Labem WWTP is worth mentioning: the fee for the AOX indicator was increased by over CZK 5 million based on results of several analyses by the inspection laboratory, which were substantially above those quoted by the operator's authorised laboratory. The operator appealed against the increase in the charge, but the body of appeal affirmed the CEI decision in full.

Groundwater consumption

Inspections of groundwater consumers continued in 2009, focusing chiefly on consumption of groundwater based on valid permits by water management authorities as well as fulfilling the fee obligations. These inspections took place both as part of the inspection work of the Regional Inspectorates and in cooperation with the SEF, like in 2008. A total of 65 fines for illegal consumption and 364 fines for failure to pay fees were imposed, totalling CZK 5.6 million and CZK 4.8 million, respectively.

A total of 4,845 decisions on fees for 2008 and 4,185 decisions on advances for 2010 were issued, worth CZK 757,574,602 and CZK 1,206,206,072, respectively. Moreover, 238 additional decisions on fees for 2009 were issued, worth CZK 19,075,028.

Inspections of agricultural management under Cross Compliance

Based on Regulation of the Council no. 73/2009 and Regulation of the Commission no. 796/2004, inspections of Cross Compliance with respect to observance of inspection requirements of Council Directive 80/68/EEC, on the protection of groundwater against pollution caused by certain dangerous substances, were performed in 2009. The inspections focused chiefly on compliance with requirements of Section 39 of the Water Act, i.e., water security of storage facilities for mineral and farm fertilisers, bulk fodder, petroleum

derivatives, including fuel filling station, preparations for plant protection, field deposits, stable areas, and dung terminals.

With respect to meeting the inspection requirements of Council Directive 80/68/EEC, 109 agricultural businesses were inspected in 2009; they had been selected using predefined risk analysis factors.

Inspections identified deficiencies in a quarter of the agricultural businesses. In most cases, they concerned water endangerment or contamination due to unpermitted handling of objectionable substances. Other cases included inadequately hydraulically secured storage and handling areas (fuel filling stations, dung terminals old silage troughs, old underground concrete pits); control systems for detection of leaks of stored substances were missing; emergency plans were not developed and approved; there was unpermitted groundwater consumption and unpermitted wastewater discharge; fee payment duties were eluded.

A total of 14 administrative procedures on imposition of fines were initiated (13 of the fines are still in legal force, worth CZK 391,550), along with 24 administrative procedures on imposition of remedial measures.

Elimination of minor deficiencies was ordered by ordering remedial measures to be recorded (such as emptying an silage trough pit, cleaning handling areas, developing operating rules for an oil storage facility, updating an emergency plan).

The worst situation was identified in Zbirožská a.s. The company received 7 decisions on the imposition of fines worth CZK 253,550. With respect to the proactive attitude of the new corporate management, the individual fines were imposed near the lower limit of the lawful fine range. In addition to illegal groundwater consumption, they concerned unpermitted handling of objectionable substances threatening chiefly surface waters and groundwater and their respective environments. In particular, there were leaks of dung water, silage and haylage juices, missing control systems for detection of leaks of stored substances in underground single-shell fuel tanks not permitting visual inspection, inadequate fuel filling station handling areas, poor repair of dung terminals, etc. At the same time, the company received 45 orders for remedial measures. All the decisions entered into force. In this case, many defects could be avoided by the company implementing adequate measures.

Examinations pursuant to Act no. 59/2006 Coll. on Prevention of Serious Accidents

The examinations were performed based on an annual inspection schedule in cooperation with integration inspection bodies pursuant to Act no. 59/2006 Coll. on Prevention of Serious Accidents. The purpose was to inspect all the

110 entities classified in group B, and 30 selected entities in group A. In the case of one entity, inclusion in the relevant group was being discussed at the time of making the inspection schedule. In total, 152 inspections, including 141 as per the schedule approved by the MoE, and 29 unplanned inspections were performed.

Adherence to safety management systems was the primary objective of the CEI inspections in 2009.

Additionally, a joint inspection was performed by German and Czech inspectors at Dow Olefinverbund GmbH operation at Böhlen in October 2009.

Violation of Act no. 59/2006 Coll. was identified in one company, which did not follow approved safety documentation. The regional authority empowered to impose a fine for the administrative offence in question did not initiate an administrative procedure and did not impose a penalty.

Emergency situation: Diesel oil leak from an underground storage tank

On 23 January 2009, diesel oil leaked from an underground storage tank in Facility 07 in Šlapanov. Specifically, the underground tank was overfilled, and 8-10 m³ of the extra oil leaked into groundwater and surface waters. A substantial quantity of the leaked oil was captured by the drainage system and transferred to the WWTP. Resolute measures to minimise the impact of the accident were implemented immediately after its occurrence and within hours and day after it. Representatives of relevant state administration bodies discussed the event and resolved that it had not been an serious accident pursuant to Act no. 59/2006 Coll., since its relevant criteria were not met. The operator implemented organisational and technical measures to prevent the event from recurring, and the facility control system will be modified. The competent water management body imposed a fine of CZK 125,000 on the operator; the decision is in force.

The IRB held a tactical drill exercise in Facility 07 Šlapanov under the auspices of the Vysočina Regional FRB in May 2009.

Inspection of old environmental burdens and lasting accidents

Monitoring sites of old environmental burdens belongs among important activities in respect of water protection, which is why the task has been performed repeatedly for many years. The inspection activity focuses on sites included in the lasting accident database, while priority attention is given to those that pose significant environmental burdens in terms of long-term environmental and health risks. At present, CEI registers over 400 sites, and remediation

works have been completed on one half of the originally registered lasting accident sites. In 2009, 462 inspections were performed under this task.

Old environmental burdens, handled based on environmental contracts with the Ministry of Finance of the Czech Republic, are an important part of CEI inspection work from ordering measures to inspecting on their implementation to final statements concerning observance of limits. The problem is that the acquirers are the recipients of the orders; their chances to influence the remediation process are minimal. In contrast to the standard procedure, remediation works on many sites were halted, and the number of new selective procedures is limited, due to the so-called Big Environmental Commission in preparation. Under these circumstances, the Ministry of Finance may only allocate funds in exceptional cases of direct endangerment of groundwater sources or where the halt to the remediation works may result to previously expended funds being wasted.

In 2009, remediation works were completed in the formed Mikov, a.s. in Míkulášovice (presently ELCAR -DOS, s.r.o. and LISTRA EB, s.r.o. Praha), in the Ústí nad Labem Region strategic industrial zone, on the SPZ Triangle site, the Chabařovice landfill, and BALAKOM, a.s. site in Opava. The remediation in Hexion Specialty Chemical, a.s. (former Chemické závody Sokolov, a.s.), where the first stage of remediation was completed.

Another example of a successful remediation is the removal of the environmental burden at PARAMO, a.s., branch facility in Kolín. The sludge lagoons were near complete remediation. In 2009, the company guarantee was increased in order to do works necessary to complete the remediation of the seriously contaminated groundwater. The remediation has been in progress since 1996. The priority event under monitoring is the progress of remediation works in the former chemical and pharmaceutical factory FARMAK, a.s. in Olomouc, mainly because the site belongs to the Morava River Quaternary Protected Groundwater Accumulation Area, and the eastern border of the plot is also the border of the Class II Buffer Zone of the Černovír exterior water sources, operated for bulk supplies of drinking water to the population of Olomouc District.

Inspection of fisheries in selected fish ponds

The purpose of this inspection was to assess the impacts of fisheries on water quality in selected semi-intensive and intensive fish ponds, or the impacts on water quality in downstream watercourses, if any, including an assessment of the existence, validity and completeness of water management documentation and observance of requirements set therein.

In 2009, 52 inspections were performed in 42 inspected entities. A total of 59

fish ponds and 13 pond fishery systems were inspected, including associated fishery facilities.

The inspections identified 5 instances of unpermitted water handling, 3 instances of violation of conditions of exemptions from the ban on using objectionable substances under Section 39, Para 7 of Act no. 254/2001 Coll., and 5 instances of application of objectionable substances without such exemptions. In one case, the entity failed to remove tree seedage from the pond dam.

Based on the said findings, 3 administrative procedures were initiated and more are going to be initiated.

The inspection results indicate that the least violations of legal requirements occurred in large-scale professional fisheries mostly established as successors of the former National Fisheries. Moreover, it was found that pond fish-outs frequently lead to increased sediment discharge, but the issue is largely not covered by existing decisions and operating rules.

However, it must be said that if fishery production principles and professional practices are observed, the impacts on water quality are not devastating; in some cases, it even remedies some other anthropogenic effects.

CEI inspections in ammonia operations in 2009

This departmental task and its performance is part of the draft conceptual design for improving the safety of operation of cooling facilities, developed by the MoE upon request of the Public Defender of Rights. The purpose of the inspections was to gain an overview of security in ammonia cooling facilities and perform a review of observance of legal regulations in water protection and serious accident prevention. The inspection focused chiefly on selected operations in the food industry (freezing plants, breweries, meat processing plants, poultry operations, dairies) and ice stadiums.

The inspections concentrated on determining the amounts of coolants, cooling methods and water security precautions, the legal conditions of the facilities, review of operating rules, safety documentation and emergency plans, and preventing accident situations. A total of 51 operations were inspected. Out of the entities inspected, 24 operations belong to the category of installations using more than 5 t of ammonia; 18 facilities are in the category of 1-5 t of ammonia; and 7 are in the category with the maximum quantity of ammonia under 1 tonne. The current quantities of ammonia were identified to be much lower than the permitted maximums in many of the operations.

Integrated permits pursuant to Act no. 76/2002 Coll. on Integrated Prevention were issued to these facilities in eight cases. Facilities have been or are being renovated in 29 cases, and some of them, particularly the new ones with

fully automated operations, show a very high level of security. Elimination of less momentous deficiencies, such as the installation of compliant detection and signalling devices, completion of emergency plans, development of reports on non-inclusion in the Serious Accident Prevention Act regime, was handled by way of written reports. Measures imposed by CEI on entities inspected in previous years had been performed.

Inspection of settling basins

An inspection of settling basins was newly included among the departmental tasks in 2009. The purpose of the task was to check selected settling basins for observance of the Water Act and waste management legislation. For that reason, inspections were performed in cooperation by Water Protection and Waste Management Department inspectors.

Concerning water protection, the inspections focused on reviewing the legal status of the settling basins, i.e., building permits for hydraulic structures pursuant to Section 15 of the Water Act, or integrated permits. Moreover, the wastewater discharge conditions pursuant to Section 8 of the Water Act and observance of set permissible pollution limits were checked. Methods of storm water drainage, infiltration water regime, and results of monitoring those were also reviewed. Last but not least, the performance of the technical and safety supervision and emergency plans were subjected to inspection.

Inspections took place both at actively operated settling basins and on sites that are being reclaimed, as well as settling basins no longer operated. A total of 27 inspections were performed on 26 sites.

Based on the water management inspections performed, the inspected settling basins were found to not pose any significant risks in respect of possible endangerment of groundwater and surface water quality with objectionable substances, and settling basin operation, observance of permits in force, operating and handling rules were found to be satisfactory.

The Water Protection Department initiated no administrative procedures in connection with this departmental task in 2009. One administrative procedure concerning exceeding the total aggregate emission limit will be initiated with the operator of a settling basin in Central Bohemia in 2010.

Since no material shortcomings were identified in this area, the task was not included among departmental tasks for 2010. However, water management supervision over settling basin operation will continue to be performed as part of the work of Regional Inspectorates as and when needed.

OVERVIEW OF FULFILMENT OF SPECIFIC TASKS

A total of 579 inspections were performed within the 33 specific tasks that

focus on issues concerning the respective territories of the Regional Inspectorates every year.

Nearly 60% of the tasks pursued issues similar to previous years. Inspections of fuel filling stations, and small and scattered pollution sources, such as spa and holiday resorts, industrial zones and chemical operations, recurred. Sources in catchment areas of drinking water reservoirs are also inspected periodically. Inspections of sports airfields were included newly.

Several years of inspections of pollution sources in the Botič catchment area have led to improved wastewater treatment regime, resulting in improved water quality in the river.

Almost 1/5 of the inspections of pollution sources in the Třeboňsko, Šumava, Bílé Karpaty and Železné hory Protected Landscape Areas led to the initiation of administrative procedures, mostly concerning unpermitted wastewater discharges, unpermitted groundwater consumption, and violation of duties in handling objectionable substances. However, none of the cases handled were of such an extent and impact as to significantly affecting the environment in the areas in question.

During a four-day field trip, 24 inspections of selected business were performed in the south-eastern part of Třebíč District. Eight administrative procedures were initiated, including six concerning the imposition of fines for unpermitted wastewater discharges into surface waters and groundwater, unpermitted groundwater consumption, and violations consisting in failure to meet the requirements of permits to discharge pre-treated wastewater into surface waters, and two concerning the ordering of remedial measures. The total amount of the fees imposed was CZK 287,950.

Based on deficiencies identified under specific tasks, 11 remedial measures were ordered and over 100 administrative procedures on fines were initiated. Fines in excess of CZK 2,480,000 were imposed. Since some of the administrative procedures have not been completed, the number of fine assessments imposed is not final.

IMPORTANT CASES

Pražské vodovody a kanalizace a.s.

In 2008, wastewater discharged from the Central WWTP in Prague showed recurring and significant excesses in the maximum emission limits set in the water management authority permit, namely for ammonia nitrogen, BOD, US, COD and total phosphorus. CEI imposed a fine of CZK 16,000,000 on the entity. The fee amount was set with respect to the pollution source size and the quantity of pollution discharged above the limits. Moreover, it reflected the delayed and inadequate handling of the accident situation by the operator, which significantly contributed to the material and lasting violation of limits. Since the entity had violated its duties defined by the Water Act repeatedly wi-

thin one year, the fine imposed was doubled in accordance with the Water Act. However, the entity appealed the CEI decision, and the body of appeal reduced the fine to CZK 8,000,000. The decision entered into force in March 2009.



Sedlnice Natur waste

NATUR ODPADY s.r.o.

In February 2008, an unannounced inspection of a formed ammunition warehouse in Sedlnice, performed based on a motion, found that the building contained 159.95 tonnes of objectionable substances, including petroleum sludges containing metals, organic resins, and sludges containing tar. These objectionable substances were not stored in a way to prevent them from leaking into the soil or mixing with rain water. In addition, the entity did not have an accident plan developed and approved. Based on inspection measurements and following analyses of soil samples, remedial measures to remove the contaminated soil were imposed on the entity in 2008, and a fine of CZK 700,000 for unpermitted



handling of objectionable substances entered into legal force in 2009. The case will continue into the following year.



Mine waters in Družba

Sokolovská uhelná, assignee - mine waters in Družba mine

In the summer of 2009, tens of kilometres of the Novosedelský and Loučský brooks and, subsequently the Ohře River, were repeatedly accidentally contaminated. CEI imposed a fine of CZK 1,000,000 on the contamination originator. The precautionary measure, consisting in building a Družba sedimentation tank, were not completed in 2000.

Zetor a.s. and Foundry HEUNISCH Brno, s.r.o.

Based on a motion, CEI inspected the wastewater discharges from the plant shared by both businesses in Brno-Líšeň. The plant is connected to Brno municipal sewerage. Analyses found that the wastewater Zetor a.s. had discharged into the municipal sewerage had a content of heavy metals (Hg and Cd) many times exceeding the maximum permissible concentrations set in the regional authority permit. CEI imposed a fine of CZK 300,000 on the company, which was affirmed by the body of appeal. Furthermore, the inspection found that Foundry HEUNISCH Brno, s.r.o. had been discharging process wastewater containing especially hazardous substances (Hg and Cd) into the Zetor a.s. plant sewer without a necessary permit. CEI imposed a fine of CZK 300,000 on the entity for discharging wastewater without permission. The entity appealed the decision, but it was affirmed by the body of appeal.

Blovce Slaughterhouse WWTP

After accident condition was identified and requested documents were not submitted in December 2008, a fine of CZK 20,000 was imposed on the operator in January 2009. Subsequently, in March 2009, CEI imposed a fine of CZK 260,000 for unpermitted wastewater discharge on the operator, conditional upon elimination of the defective condition. Since a subsequent inspection in May identified recurring violation of the Water Act by unpermitted wastewater discharge, CEI initiated an administrative procedure with the operator concerning the imposition of a fine of CZK 400,000 and suspending the WWTP operation from 1 August 2009 onwards until the shortcomings would be eliminated. The operator appealed the decision too late and the body of appeal affirmed it. Although Blovice Slaughterhouse s.r.o. began implementing remedial measures in June 2009, the total nitrogen and phosphorus indicators exceeded the limit values "m". The water management authority issued a permit to discharge wastewater for an absolutely necessary period of time, and the body of appeal annulled the CEI decision. However, it ruled that should the operator fail to intensively continue working towards meeting legal requirements, CEI was allowed to issue a decision on ending operation.

On 16 February 2010, Jatky Blovice s.r.o. commission a laboratory analysis of the wastewater discharged. It found that all the "p" limits set by the valid permit to discharge wastewater were being observed.



Blovce Slaughterhouse

OPINIONS, STATEMENTS AND COOPERATION WITH OTHER BODIES

Water Protection Department inspectors issued 156 opinions for the purpose of subsidy from the SEF, elaborated 58 audits and 1,191 other opinions and statements, e.g., on safety documentation under the serious accident prevention agenda, building documentation, environmental burdens, and water management procedures. The Water Protection Department (WPD) is involved in commenting on EIA and IPPC documentation registered by the CEI Integrated Prevention Department.

The WPD cooperates with the Czech Police, the FRB (chiefly in handling accidents), catchment area authorities, and other state administration and self-government bodies. Some of the inspectors are involved in teaching expert subjects dealing with environmental protection, and exploit regional media to inform the public on their work and achievements in water protection. Moreover, they are members of international committees, involved in IMPEL working groups, and cooperate with environmental protection bodies in neighbouring countries.

CONCLUSIONS OF INSPECTION ACTIVITIES

In 2009, work in water protection again concentrated chiefly on tasks derived from respective Acts of law. We consider it meaningful to mention some of the events and changes that had an impact on the Department's work.

First and foremost, they included the change in territorial competences on 1 July 2009. It was a shift away from the traditional watershed division to a regional division, resulting in a unification of territorial competences with the spheres of air protection and waste management. Cooperation with the SEF on inspecting fees for groundwater consumption continues, and unpermitted consumption and exceeding permitted consumption limits continue to be identified, including in public water boards. This results in massive penalties, which may lead to the destruction of certain entities.

Groundwater inspections related to agricultural subsidies stopped in 2009; they will be performed by the agricultural sector inspection authority; the Inspectorate will perform checks pursuant to national legislation and forward any deficiencies identified to the agricultural inspectorate. Handling old environmental burdens was again hindered by the preparation of the so-called Big Environmental Commission, which resulted in remediation on some sites being postponed. Consequently, this may lead to the completed works being wasted and pose threats to groundwater sources.

Cooperation with the MoE and SEF on the preparation of an amendment to the Water Act and related regulations was an important part of our work. Unfortunately, the proposals concerning fees, minimum flow rates, and adjustments of wastewater discharge limits were only accepted partly.

4.3 WASTE MANAGEMENT, CHEMICAL SUBSTANCES AND BIOCIDES PRODUCTS

ASSESSMENT AND TRENDS OF ACTIVITIES

In 2009, the waste and packaging management agenda was separated from the relatively distant agenda of chemical substances and biocides products within the Waste Management Department. A separate Chemical Substances Section was established at the CEI Headquarters, and Chemical Substances Offices in the Regional Inspectorates. In 2009, the WMD work focused chiefly on handling hazardous waste in order to inspect the entire cycle from the origination to the final utilisation or elimination. Some of the inspections on the final stage of elimination of hazardous waste were performed in cooperation with the SEF. Like in previous years, WMD and CSS inspectors did a sizeable portion of expert work. It is attested by the number 3,501, which is the total number of entities inspected in the period in question. There were 1,019 planned inspections of entities, and 2,482 unplanned. The number of unplanned inspections includes 589 motions. A total of 836 administrative procedures were initiated, and 782 decisions on the imposition of fines entered into force, totalling CZK 73,836,200.

In addition, 14 CEI decisions ordering remedial measures entered into force in the period in question. Waste and packaging management issues are handled by 76 inspectors at the Headquarters and the Regional Inspectorates. They performed 2,233 inspections, including 484 based on motions. Issues of handling chemical substances and products, handling biocides, and inspecting of duties derived from the REACH Regulation are dealt with by 15 inspectors at the Headquarters and the Regional Inspectorates. They performed 285 inspections focused on observing duties under the Chemical Substances and Products Act and the Biocides Act, including 19 inspections based on motions. The other 985 inspections performed by the said 15 inspectors as part of the RAPEX European information system are notable. The important finding is that the 985 inspections only proved 2 instances of violation of legal regulations. This leads to the question whether the mandatory performance of inspections by CEI under this European system is effective and efficient. For the time being, however, CEI cannot avoid having to perform these not entirely effective inspections.

OVERVIEW OF FULFILMENT OF DEPARTMENT-BASED TASKS

Inspections of various types of waste elimination facilities

Waste elimination facilities comprise chiefly landfills and incinerators as well as waste processing facilities (codes D2, D8 and D9) and settling basins. By nature, this class also includes “facilities” such as illegal dumps and unpermitted landscaping mostly using construction waste. As a rule, the Inspectorate is notified of illegal dumps by motions. Most of the inspected authorised facilities are operated based on integrated permits. In 2009, a total of 342 inspections were performed (156 planned and 186 unplanned), including 103 inspections based on motions received.

In the long run, landfills are the most frequent waste elimination facilities in the Czech Republic. A total of 160 landfills were inspected, including all landfills for depositing hazardous waste. Violations identified have so far led to the initiation of 34 administrative procedures, and 28 decisions on fines, totalling CZK 5,178,000, have entered into force. The most frequent material violation was the operation of landfills in conflict with approved operating rules or binding requirements of an approval or integrated permit. Several cases of fire inside landfills in several regions of the Czech Republic were investigated in 2009.

Moreover, 26 waste incinerators were inspected. Violations identified led to the initiation of 9 administrative procedures, and 7 decisions on fines, totalling CZK 425,000, entered into force. The most frequent violation was wrong continual keeping of records on waste, errors in annual waste generation and handling reports, failure to secure hazardous waste from leaks, and missing identification sheets in hazardous waste collection points.

A total of 39 waste processing facilities were inspected in 2009. Violations identified led to the initiation of 10 administrative procedures, and 9 decisions on fines, totalling CZK 1,315,000, entered into force. They mostly included waste solidification and biodegrading facilities, decontamination areas, and neutralising and de-emulsifying stations. The Inspectorate considers the recategorisation of waste accepted by the facilities as N (hazardous) to O (others), without eliminating the hazardous properties of the waste, to be the major identified violation. Furthermore, operators of facilities failed to perform required chemical analyses, maintained waste records wrongly or not in the required extent. Inspections of certificates of eliminating the hazardous properties of waste were also performed, and several instances of not sending a copy of certificates of assessment of the hazardous properties of the waste were found.

A total of 17 inspections of settling basins were performed in 2009; 1 administrative procedure was initiated and 1 legitimate fine of CZK 30,000 was imposed. The operation of settling basins is mostly handled under an integrated permit as part of operating a power plant, heating plant or another industrial facility; however, cases where settling basin operation was not included in an integrated permit were found. Minor errors in records were found; fly ash and slag samples were collected in several cases to perform chemical analyses. The factual handling of power plant waste has long been in the centre of CEI's attention. It turns out that the area needs monitoring, mainly due to the risk aspects of the other methods of handling these outputs.

Other inspections focused on other non-specific facilities where waste is disposed of: so-called illegal dumps. They mostly receive illegal deposits of construction or municipal waste as well as earth with immixed rubble and hazardous waste. Waste is often burnt on these sites. Violations of non-business natural persons were also handled. Like in previous years, we cooperated with other state administration bodies, chiefly on handling motions received concerning illegal waste deposits; representatives of locally competent municipal authorities of municipal authorities with extended powers were involved in field investigations. Removals of illegally deposited waste were achieved in several cases. We continued to cooperate with the SEF on inspecting hazardous waste landfills and hazardous waste processing facilities. Cooperation with regional authorities can be viewed as positive; they presented requested operating rules of facilities and made changes proposed by the Inspectorate where applicable, and their representatives participated in some of the inspections in person.

Inspections of various types of waste utilization facilities

The departmental task included the performance of inspections of operators of facilities processing biodegradable waste (BDW), facilities for waste utilization on the ground surface or utilization of construction waste, producing alternative fuels, utilizing cross-border imported waste, facilities under Section 14, Para 2 of the Waste Act (e.g., cement works, glass works, steel works, paper mills), and others. Out of the 301 entities performed, 122 inspections took place based on motions received. A total of 85 administrative procedures were initiated in 2009, including 31 in investigations based on motions. A total of 59 decisions entered into force. The total amount of legitimate fines was CZK 7,382,100 in 2009. The most frequent violations were operating facilities in conflict with requirements of integrated permits, failure to employ the facility technology in accordance with its operating rules, wrong record keeping or missing records in operating logs. Inspections in facilities for waste utilization

on the ground surface or utilization of construction waste proved frequent handling of waste in facilities not defined for that, i.e., without appropriate regional authority approval. Moreover, we identified inadequate records on quality of waste accepted by the facilities, and minor instances of operating facilities in conflict with operating rules and deficiencies in record keeping.

Car wrecking yards

The car wrecking yard inspection schedule newly included facilities that were new or not inspected in the previous year as well as businesses that had been found to violate valid regulations in the past. A total of 97 businesses were inspected in 2009, including 32 inspections based on motions. Violations identified led to the initiation of 39 administrative procedures, and 36 fines, totalling CZK 3,786,000, came into force in 2009. The average fine amount was CZK 105,167. The greatest fine imposed was CZK 1,000,000. The inspections showed again that the legislative problem of unclear definition of a car wreck perseveres, operators violate requirements set by the valid operating rules of their facilities, handle waste in places not intended for that, exceed the permitted capacities of facilities, and last but not least, collect fees for accepting complete car wrecks although the law orders them to accept complete selected car wrecks free of charge. Car wrecks continue to be dismantled illegally by natural persons. Some inspections were performed in cooperation with trade and building authorities; others, in the presence of officers of municipal authorities with extended powers and municipal representatives. The Czech Criminal Police Service cooperated on some of the inspections. The experience of several recent years shows that these joint inspections are an efficient and highly effective inspection method.



Inspections of various types of facilities collecting and buying waste

The inspection schedule for 2009 included both large and smaller stationary facilities for collecting and buying waste, municipal recycling yards, and facilities for mobile waste collection. In most cases, the businesses inspected focused on buying ferrous and non-ferrous metal waste; their smaller part collects and buys sludges, waste oils, construction waste, plastic waste, tyres,



Profiakont České Budějovice

and medical waste. A total of 245 entities were inspected, including 49 inspections performed based on motions received. Violations identified led to the initiation of 70 administrative procedures and 116 decisions on the imposition of fines. A total of 122 fines, totalling CZK 15,569,500, entered into force in 2009. The average fine amount was CZK 127,618; the greatest fine in force was CZK 5,050,000. The most frequent violations concerned operating facilities in conflict with approved operating rules, handling wastes in places not intended for that, failure to maintain prescribed records, accepting wastes not permitted by operating rules, submitting waste to unauthorised entities, and multiply exceeded capacities of facilities. Investigations based on motions frequently involved representatives of municipal authorities with extended powers, trade authorities, and Czech Police or municipal police. Inspections of mobile facilities for collection and buying waste and vehicles transporting waste were performed in cooperation with the Road Transport Service Centre and the Czech Traffic Police Service. Inspections of collection and buying of metal waste are also performed in cooperation with the CTI. CEI regards joint inspections as very positive, especially because representatives of these administrative bodies are highly familiar with local conditions and interested in effectively resolving the investigated cases.

Product recollection (PRecoll)

In 2009, inspection activities were divided into a part concerning electrical appliances (EA) and inspections pursuant to Section 38. Given the intricate EA legislation and its overlaps with PRecoll issues under Section 38, the inspections mostly dealt with motions referring to poor handling of PRecoll by the last retailers, both in practical respects and with respect to informing consumers about the PRecoll facility. The planned inspections focused on:

- a) the service sector – car repair shops, tyre repair shops and other handling of tyres and used mineral oils (PRecoll or waste regimes). This year's task focused chiefly on handling motions concerning charging fees for the acceptance of used tyres.
- b) last retailer inspections due to the lasting low PRecoll yield, particularly concerning primary electricity sources – galvanic cells.

A total of 115 inspections were performed, 10 administrative procedures on the imposition of fines were initiated, and four of them entered into force. Moreover, 5 administrative procedures concerning illegal handling of collected products were initiated. The total legitimate fines were CZK 192,000 in 2009. Inspections of handling used oils showed no material violations of law; charging fees for collecting used tyres was inspected in tyre repair shops. As a result of inspections and queries by entities, the concept of handling these commodities as waste is gradually being abandoned in favour of PRecoll, including by business entities. Cooperation with other state administration bodies was not exploited very much in last year's inspections; CENIA analyses will be used for inspections of obliged entities in the following year.

Electrical and electronic appliances

Inspections in the area of electrical appliances (EA) and electrical waste in 2009 focused chiefly on observance of duties by last EA retailers. Only a minor part of the inspections focused on duties of EA manufacturers due to the negative state concerning funding the handling of historic electrical appliances (HEA) as a result of the long-lasting litigation to determine whether the MoE acted in accordance with valid legislation when allocating licences to operators of collective HEA handling systems. Therefore, administrative procedures on the imposition of fines with EA manufacturers not paying fees to the authorised collective system could not be finalised. Inspections of EA processors were also sporadic. In the entire EA domain, including handling electrical waste, 66 inspections were performed and 8 administrative procedures on the imposition of fines were initiated. The total amount of fees that entered into force 2009 was CZK 95,000. Both the relatively small amount

and the experience from inspection work indicate that EA retailers in particular are now much better at meeting their duties towards consumers. This is predominantly a result of many years of targeted inspections by CEI focused chiefly on big retail chains, but information campaigns by manufacturers and collective systems have also played a significant role. Furthermore, the Inspectorate dealt with several instances of wrong disposal of obsolete office appliances. Owners acted unlawfully by submitting their decommissioned EA to an entity that was neither a processor nor a collective system nor performed that duty for an EA manufacturer. The Inspectorate imposed a fine on both the submitting companies and especially the beneficiary, who raised profits on selling precious metals.

Inspections of industrial enterprises and other waste originators

Inspections focused chiefly on observance of waste originators' duties derived from the Waste Act. Larger entities in engineering, metallurgy and energy generation were inspected in 2009, with a major focus on handling waste in the "hazardous" category. In addition, attention was paid to large medical facilities. In many cases, medical facilities were found to lack general awareness of duties imposed on them by the Waste Act. Inspections were also performed in municipalities, retail chains, logistics and office centres, and last but not least, new enterprises in particular regions. Like in previous years, deficiencies identified in the inspections concerned mostly failure to perform the duty of collecting waste sorted by type and category. The greatest single penalty imposed for this violation was CZK 350,000. Other frequent violations of the Waste Act included handling hazardous waste without approval of relevant state administration bodies and failure to report on the waste types and quantities and methods of disposing them. In 2009, a total of 1,057 inspections were performed, including 259 based on motions. Violations identified led to the imposition of 328 administrative procedures on imposition of fines. The total amount of 310 legitimate fines was CZK 11,168,000. The highest single fine imposed was CZK 500,000. The said figures indicate an increase in the inspection activity in this area compared to 2008.

Inspections of adherence to the Chemicals Act

A total of 230 operations were inspected for adherence to Act no. 356/2003 Coll., on Chemical Substances and Chemical Products and amending certain acts, as amended (Chemicals Act) in 2009. The selection of particular operations to be inspected was made by Regional Inspectorates. Inspections under the Chemicals Act included supervision over the classification, pack-

aging and labelling hazardous chemical substances and chemical products (173 operations), supervision pursuant to Regulation of European Parliament and Council (EC) no. 648/2004 on Detergents (24 operations), and supervision pursuant to Regulation of European Parliament and Council (EC) no. 1907/2006 on Registration, Evaluation, Authorisation and Restriction of Chemical Substances (REACH; 33 operations). Besides, CEI performed inspections under the RAPEX (985 operations). Inspections were performed based on notifications by the Ministry of Industry and Trade. Out of the 39 notifications investigations, CEI only proved two hazardous products introduced to the Czech consumer market.

A total of 54 decisions on fines under the Chemicals Act entered into force in 2009. The total amount of fines assessed was CZK 2,785,000. The greatest legitimate fine was CZK 600,000.

Fines were imposed for failure to meet requirements of the Chemicals Act, namely for not presenting documentation for classification of chemical products and wrong packaging and labelling of chemical products (42 instances). Some of the companies had not arranged the development of material safety data sheets or their contents were not in compliance with the REACH requirements (9 instances). One entity was found to have failed to observe Regulation of European Parliament and Council (EC) no. 648/2004 on Detergents. Two procedural fines were assessed under Act no. 552/1991 Coll. on State Supervision.

For 2010, CEI again plans to perform inspections of classification, packaging and labelling of chemical substances and products. Inspections of material safety data sheets will follow the REACH Regulation in 2010.

Inspections pursuant to the Biocides Act

Under Act no. 120/2002 Coll. on conditions for introducing biocides and active substances on the market (Biocides Act), CEI performed 53 inspections in 2009, finding violations in 11 instances. Failures to meet the requirements of the Act consisted largely in inadequate labelling of biocides, and duties relating to promotion and advertising were not performed in some cases. Nine decisions on imposition of fines entered into force in 2009. The total amount of fines imposed was CZK 196,000.

Inspections pursuant to the Packaging Act

Under Act no. 477/2001 Coll. on Waste, 174 inspections were performed in

2009. A total of 100 entities were inspected based on a call by the MoE for their inadequate performance of duties concerning their registration in the List of Entities that bear responsibility for recollection or reuse of packaging waste. In spite of being requested to do so, these entities had failed to remedy deficiencies in their “Annual Reports on Packaging and Packaging Waste”. Violations identified led to the initiation of 69 administrative procedures. A total of 65 decisions entered into force, imposing total penalties of CZK 1,989,000. Compared to previous years’ findings, the number of entities importing substantial quantities of goods intended for consumers. These entities were frequently investigated by CEI based on motions filed by the Customs Authority. The greatest fine that entered into force in 2009, amounting to CZK 720,000, was imposed for inadequate performance of recollection and reuse of packaging waste by a bottled water manufacturer

OVERVIEW OF FULFILMENT OF SPECIFIC TASKS

The particular specific tasks were chosen by the Inspectorate primarily due to good grasp of local issues. They mostly consisted in inspections of waste management of municipalities, in medical facilities, and agricultural enterprises. Moreover, specific tasks focused on handling waste from titanium dioxide production and by construction companies, handling earth and waste rock, inspections of old environmental burdens, landscaping, handling waste in food production facilities and retail chains, trans-boundary shipment of waste, observance of MoE decisions relating to trans-boundary shipment, handling car wrecks, inspections in cooperation with other state administration bodies, and inspections of companies dealing with integrated logistics and haulage. One of the Regional Inspectorates focused on inspections of facilities for waste reuse, such as recycling yards and mobile waste crushers. These inspections mostly concerned the methods of transferring processed waste into products and further utilisation of such processed waste, or products. Within all the specific tasks, 233 inspections were performed, including 55 based on motions received. A total of 71 administrative procedures were initiated and 69 decisions entered into force. The total amount of fines in force was CZK 4,653,000 in 2009.

IMPORTANT CASES

There were many important cases deserving of a separate commentary in 2009, and did not only involve cases of imposing a fine of several million

Czech crowns on an entity. To name but a few, a company (MEGAWASTE, spol. s r.o.) performed collection of hazardous and other waste in its approved mobile devices, and then stored the collected waste in a facility where waste handling was not permitted. Given the large amount of the waste, the company was assessed a fine of CZK 750,000. Another company, (ORV MORAVA s.r.o.) handled hazardous waste in a former farming co-operative complex in a facility not intended for that. These were dozens of 200-litre barrels containing liquid waste paints and solvents. The waste was mixed with sawdust to produce an “alternative fuel”. The waste was not labelled in any way, making them difficult to identify, and were not secured against leaks. This operation even led to a situation jeopardising the health of persons in the area. The company was assessed a fine of CZK 800,000. The company then took all the waste away from the complex. Another case, also covered by the media, was the extensive inspection of Czech Railways and Railway Infrastructure Administration. The inspection proved that the said entities had sold used impregnated wooden railway sleepers (waste) as “products” to various entities. An administrative procedure has been initiated concerning the affair. If you are interested in finding out about other cases handled by the Waste Management Department, feel free to visit CEI website.





Megawaste, ORV Morava

OPINIONS, STATEMENTS AND COOPERATION WITH OTHER BODIES

CEI WMD officers issued 655 opinions, expert reports and statements for other bodies in 2009. The most numerous categories were responses concerning documentation submitted as part of EIA and IPPC processes, and expert reports issued for the SEF.

WMD cooperation with other state administration bodies shows a growing trend. High effectiveness and quality of cooperation is especially required in handling cases with major environmental impacts on both the national and international levels. The quality of communication among the MoE, CEI, regional authorities and other state administration bodies such as customs offices, Czech Police and the SEF, is continually improving, contributing in the long run chiefly to the resolution of certain particular cases or mutual agreements on improving the quality of relevant legislation. An example of such cooperation is the involvement of CEI representatives in many expert inter-departmental working groups, dealing with fundamental issues relating to both inspection work practice and legislation as such. In the field of international cooperation, WMD representatives take part in annual conferences held by the IMPEL cluster for trans-boundary waste shipment as well as conferences held as part of projects in which the WMD has been actively involved in the long run. As part of a project aiming, among other things, at unifying the inspection practices of inspection authorities of EC Member States and consistent penalties for illegal trans-boundary waste shipment, 17 thematic inspections were performed in 2009.

CONCLUSIONS OF INSPECTION ACTIVITIES

CEI WMD officers achieved their annual inspection schedule in 2009, and as mentioned above, performed a large amount of inspection work unplanned or based on numerous motions. Both the numbers of administrative procedures initiated and the total amount of fines imposed show that it is continually necessary to perform systemic inspections of waste management. The direction of the inspection work in 2009 showed that there are still many problems in particular in the area of hazardous waste management. Experience from inspections performed in 2009 confirmed that doing business in waste management may be economically attractive, but adherence to legal regulations in force is the prerequisite for truly successful and respectable enterprise.

4.4 NATURE PROTECTION AND CITES

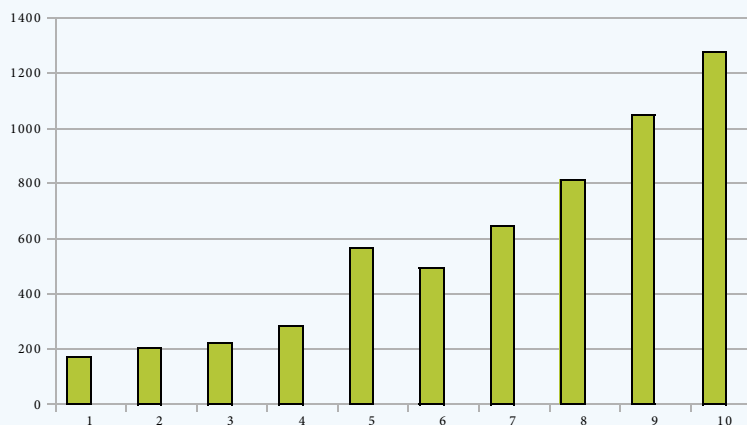
ASSESSMENT AND TREND OF ACTIVITIES IN 2009

The legislative changes in some of the departmental acts of law in 2009 have so far not have any cardinal impacts on the scope of work of the CEI Nature Protection Department. Act no. 114/1992 Coll., on Nature and Landscape Protection (Act 114) continues to be the central legal regulation in the area; however, it underwent several cardinal amendments in late 2009. Act no. 349/2009 Coll. entered into effect on 1 December 2009; it amended Act 114 in respect of competences, binding statements, exemptions, protection of sites of European importance, keeping of especially protected animals, operation of rescue stations, and protection of trees. Given the continually increasing public interest in nature protection issues, some of the amendments to the Act, including the tree protection, seem to be problematic and questionable. Seeing the initial responses to these amendments, we can expect a real threat in the coming years consisting in lower level of protection of trees outside forests and further decreases in greenery notably where most needed, i.e., inside cities and towns. That situation is at least alarming, including given the trend in citizens' motions (see below). In other supervised nature protection areas (genetically modified areas and zoological gardens), the inspection activity practically did not change year-on-year, amounting to no more than 5% of the total work load. A similar situation concerns inspection of international trade in protected species (CITES), where the numbers of cases with a potential environmental impact have been steadily decreasing. Petty fines are imposed chiefly for delayed registrations and similar cases of little importance. Of course, this trend is related to the Czech Republic's EU accession in 2004 and the subsequent entry into the Schengen Zone, progressively not only

making the Czech Republic an internal European country, but also shifting inspection of trade with third countries practically exclusively to active international airports.

For several years in a row, invariable trends have affected assessment of the inspection work; they have cardinal impacts on CEI work particularly in nature protection. Above all, these include the steadily growing numbers of citizens' motions concerning activities that may truly harm nature. About one half of the motions have been legitimate, and proportionately, up to 70% of the motions received concern tree protection, while the rest comprises motions dealing mostly with protection of especially protected animal species (lately, mostly swifts and bats near human settlements). Nature Protection Inspectors alone received and dealt with 1,252 motions (16 additional motions were handled for IPPC).

Increase in the numbers of motions in 2000 - 2009



The roots of this long-term trend in numbers of motions can be found chiefly in the pitiable performance of state administration particularly at the level of municipal authorities, which are entrusted with powers of approving nature protection bodies concerning tree protection. Every year, the Inspectorate comes across cases where the applicable nature protection bodies are reluctant to deal with motions received and ditch their duties to the CEI. As a result, many citizens who had demanded justice at municipal authorities in vain turn to the CEI either directly or via the Ministry of the Environment.

Inconsistency, laxity, reluctance and formality of some of the nature protection bodies thus discourage active citizens from their interest in the state of the environment, which may lead to fatal consequences in future.

The following trend is observed in the other monitored parameters of activity. The numbers of inspections have not changed substantially year-on-year, and following a certain decrease, they have stabilised around 2,500 inspections a year. The ratio of planned inspection to unplanned ones also practically has not changed (1 : 2), which is related primarily to the aforementioned continual increase in motions and the associated lower numbers of planned targeted inspections. In 2009, the number of statements and opinions issued decreased by approx. 24% compared to 2007-2008; it was 1,173, which was still about 1,000 statements more than in 2006.

The numbers of decisions on fines issued also have not changed substantially, ranging around 450 a year; the total legitimate fines imposed in 2009 decreased to CZK 9,894,000, which is CZK 4,851,000 less than in 2008. However, the growing trend of numbers of decisions to restrict and stop activity under Section 66 of Act 114 was maintained; these are much more important and effective for environmental protection than penalty procedures. These prohibiting decisions require determination, foresight and high professional and legal proficiency of inspectors, and are frequently subjected to criticism, including by some bodies of appeal (MoE RDSA). The Inspection believes that the use of non-penalty preventive instruments in nature protection is one of the cardinal aspects of supervision over conservation of favourable conditions for improving the state of the environment in the Czech Republic. The numbers of motions filed with state administration bodies and reports on perpetration have practically not changed year-on-year, and the other monitored parameters have also not shown significant variation.

Trade in Endangered Species – CITES

In 2009, CEI RI and Headquarters inspectors performed 360 inspections pursuant to Act no. 100/2004 Coll. (CITES) and initiated 119 penalty procedures. CEI imposed fines (decisions in force) totalling CZK 734,900 concerning CITES. In addition, 62 procedures on seizure of animals were performed (880 animals and 250 g of sturgeon caviar were seized). Prague Ruzyně Airport, being the only point of entry into the EU territory of the Czech Republic for trade shippings of animals, is the centre of routine CITES inspection work. Out of the above total number of inspections, 199 were performed at Prague Ruzyně Airport, leading to 34 penalty procedures with legitimate fines totalling CZK 66,900, and 44 procedures on seizure of animals. Regional interna-

tional airports – primarily Ostrava Mošnov – from where charter flights are dispatched, are growing in importance. The number of CEI inspections at the customs post office also increased due to the new inspection mechanisms implemented by the Customs Administration. There was a noticeable decrease in the numbers of inspections performed and fine amounts in 2009, while maintaining the numbers of penalty procedures and procedures on seizure of animals. Notable cases in 2009 included the legitimate fine of CZK 210,000, imposed on a legal entity for selling more than 3/4 kg of illegal genuine sturgeon caviar.

In 2009, CEI held a seminar with international speakers on CITES enforcement for inspectors, customs officers, and police officers. It was a follow-up on the successful first seminar held in the previous year. A platform for an e-learning version of the educational programme for CITES inspection and enforcement bodies in the Czech Republic was also made in 2009.

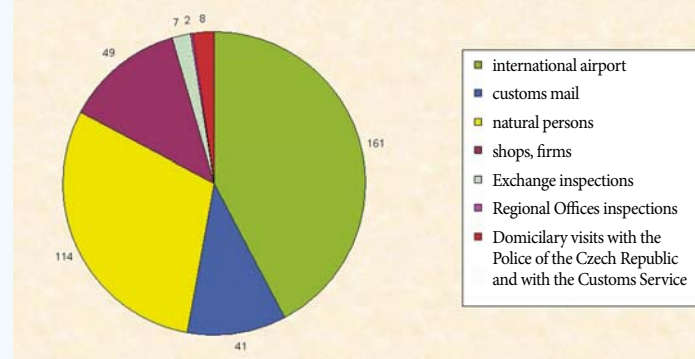
International cooperation is a standard component of CEI work on CITES; it involves active membership in EU bodies and world-wide organisations, and cooperation on handling cases of illegal trade in endangered species.



Genetically modified organisms

In 2009, a total of 46 inspections were performed, in the GMO domain, including 15 focusing on field experiments, 21 on entities handling GMOs in the closed handling mode, and 10 inspections based on 2 motions. The inspections mostly focused on new entities. In addition, all the field experiments in progress approved by the MoE were inspected. These mostly comprised experiments with transgenic maize, potatoes, Stanley prune, flax, and tobacco.

Inspection activities CEI in the field of CITES in 2009



The inspections performed did not identify any substantial shortcomings immediately threatening the environment, with the exception of one entity that handled GMOs unlawfully (administrative procedure not completed yet). Inspections only identified minor administrative shortcomings, which were corrected on the spot or handled by the ordering of remedial measures. Only one fine, amounting to CZK 10,000, was imposed on a haulier not possessing a licence to handle GMOs for importing transgenic animals (mice) in 2008. In May 2009, CEI dealt with an MoE motion filed based on a notification from Germany concerning a low admixture of unpermitted maize varieties in seeds. CEI ordered 4 agricultural entities to stop the cultivation before the generative procreation stage, which the growers observed.

The GMO consultation in April included a lecture on risks associated with growing GM crops in the Czech Republic, and a training course on collecting samples from GM vascular plants was held in June 2009. In the course of 2009, inspectors could attend several expert lectures and seminars concerning GMOs, organised by the MoA, MoE, and the Crop Research Institute. Cooperation with the Slovak Environmental Inspectorate (SEI) continued in 2009 with SEI and CEI inspectors meeting at a seminar titled “Implementing biological safety legislation in the EU context”. As a follow-up, EEP inspectors from EU countries met in Tatranská Polianka as part of the European Enforcement Project on Contained Use and Deliberate Release of GMOs, where CEI inspectors participated. The meeting was attended by representatives of 17 EU countries.



fish GMO Dánio Rario

Zoological gardens

CEI performed inspections in zoos in relation to periodical inspections of licensed zoos organised by the MoE DIPB with the MoE Committee for Zoos. In 2009, inspections were performed in 11 zoological gardens. CEI was involved through RI in 5 cases, and Inspectorate Headquarters officers who are members of the Committee for Zoos participated in all the inspections. Inspections in licensed zoos identified no shortcomings that would constitute a conflict with requirements made in their operating licences.



OVERVIEW OF FULFILMENT OF SPECIFIC TASKS

Inspection of activities subsidized by the Ministry of the Agriculture within the Programmes 129120 and 129130 in ponds, reservoirs and watercourses. Focused on fulfilment of defined nature protection conditions

Within this task, 27 inspections were performed, focusing chiefly on observance of Act 114 when doing construction works associated with the implementation of projects funded from the above subsidy brackets. Requirements were not met in only one case, and the administrative procedure is still in progress. In one case, due to significant interference with beds of watercourses, the CEI requested the NLPA for an expert assessment of the impacts of the construction work in question on potential biotopes of especially protected plant and animal species. The results of the assessment will only be available in early 2010. In another case, the investigation results were forwarded to the Water Protection Department, which initiated an administrative procedure with the fishpond operator.

Inspectors found that the implementation of many of the planned projects had not commenced in 2009 due to the subsidies not having been allocated or works postponed for future years. We will therefore continue monitoring these works and include inspections of them in the work schedule for 2010. However, the general problem with this type of projects is that the relevant municipal authorities with extended powers issue an approval for almost any interference with important landscape elements.

Administrative procedures associated with this task initiated based on inspections performed in 2008 were also concluded in 2009. A fine of CZK 60,000 and remediation measures were imposed in one of them, and another procedure was cancelled.

Inspections of farming entities as part of the Cross Compliance process focusing on defined inspection requirements

In 2009, so-called cross inspections were performed in 139 farming entities, focusing on observance of legal requirements on farming under the Cross Compliance system. Out of that, 97 entities were inspected with respect to requirements of the Birds Directive, and 79 were inspected with respect to requirements of the Habitats Directive. The selection of the entities was made centrally based on a risk analysis conducted. The selection was most influenced by the size of the farmed land, area of permanent grassland, and overlaps with a small-scale Specially Protected Area or Special Area of Conservation. In accordance with the EU requirement, 25% of the entities inspected were selected at random.

Inspections did not find any violations of the law and set inspection requirements serious enough to result in a proposal to reduce the di-

rect subsidy for farming, or in imposing a monetary penalty. The reason is the relatively low chance of identifying and proving illegal conduct, especially in areas seriously transformed by agricultural activity with minimum presence of protected elements. On the other hand, it is evident that the rules for reducing the direct subsidies in the event of violating inspection requirements are set very benevolently. Large-scale protected area administrations also have a significant share in defining appropriate farming methods.

Inspections found minor deficiencies in at least nine cases; they were resolved by agreement with the inspected entities on the spot. The agreed measures and their deadlines were included in written reports and scheduled for subsequent inspection. Mostly these were minor injuries to trees outside forests, minor or potential injuries to watercourses and alluvial plains in connection to cattle grazing, and not quite appropriate management of sites populated with corncrakes. The agreed measures mostly involved fencing off parts of land to prevent injury by grazing cattle, specified terms and methods for mowing in respect of securing protection of an SAC or corncrake sites.



Cross Compliance

Inspections of observance of requirements of exemptions from basic protection requirements of NNR defined in Section 29 of Act no. 114/1992 Coll. made by government resolutions before 2004 under Section 43 of Act no. 114/1992 Coll.

A total of 39 inspections were performed in connection to this departmental task. Failure to observe the exemption requirements was only identified in three cases. They consisted chiefly in partial failure to observe the requirements, while failure to observe the deadline for submitting a final report does not show any material signs of illegal conduct. Inspection findings led to the initiation of 1 administrative procedure, in which a legitimate fine of CZK 30,000 was imposed. In connection to the inspection activity under this task, several subsequent inspections were scheduled for 2010 because some of the exemptions to be inspected had not been applied or had only been applied partially. In some cases, other activities near NNR were identified that might constitute a breach of the Nature and Landscape Protection Act.

Inspectorate-wide review of especially protected areas (EPA) and Natura 2000 sites focusing on the territory of the Karlovy Vary Region

This was a comprehensive review in accordance with CEI work guidelines in Section 80 of Act 114. So far, Inspectorate-wide reviews had focused on large-scale protected areas (PLA) and the performance of state administration in them. The Ore Mountains and other areas of the Karlovy Vary Region are not protected on a large scale, but still are home to many valuable small-scale EPAs managed by the Regional Authority. The inspection focused on the performance of state administration by the Karlovy Vary Regional Authority in managing the EPAs (securing management of the EPAs). A total of 29 protected areas and one SAC.



Laydy Orchid, Marsch Orchid



Inspections found no unpermitted conduct of any entities that would constitute a reason for initiating a procedure. Instances of unpermitted drainage of peat bogs around the year 2000 and felling and clearing forest from peat bog spruce woods around the year 1990 in old reserves established before 1939 were found. These acts have lapsed and, moreover, it is difficult to prove where and whether these areas exist, since maps are missing and the establishment papers are legally dubious. However, these are oldest and most valuable protected areas in the Region. Two protected areas in Cheb District were abolished in the 1990s, one of which was assessed to be valuable (a small virgin remnant of a wet spruce wood). The area will be assessed with respect to protection requirements in 2010 and proposed for re-establishment if applicable. In addition, the NR Chlum does not secure protection of the endemic Manětín Rowan, and will be proposed for reclassification. No natural or quasi-natural forest ecosystem is registered in the Ore Mountains area, whereas such forests do exist (including, above all, Mountain Bog Pine forests on raised bogs). Several such forests were identified as part of the review and documented subsequently; the information was passed to the national natural forest register.

OVERVIEW OF FULFILMENT OF SPECIFIC TASKS

General protection

Trees - specific tasks concerning tree protection were scheduled by 90% of the Regional Inspectorates in 2009. Inspectors mostly focused on inspecting observance of the tree replanting requirements (60% of RI). It can be concluded that no errors were found in most cases and the tree replanting requirements were met. Tree replanting was also checked in respect of state administration activity in ordering tree replacement. These inspections of state administration performance were associated with inspections of felling approval processes. We performed 84 inspections. Some deficiencies were identified. Closer specifications of tree species or terms for planting them were missing. Municipal Nature Protection Department officers were provided with methodological support.

Inspections of felling roadside greenery were scheduled by 20% of the RI. Six inspections were performed and felling along roads was found in several cases to have taken place in an extent greater than reported. Unjustified felling was stopped in one case.

Two Inspectorates had scheduled inspections of memorial trees in their respective administrative territories. They performed 17 inspections and found no substantial violations. Inadequate signage was identified sporadically.

Important landscape elements - Inspections of important landscape elements were performed by 40% of the RI. They performed 46 inspections focusing, for example, on small water bodies and wetlands with protected species, or determining their overall conditions. No violations of law were identified.

State administration performance - inspections of state administration performance were made by 50% of the RI. Inspections mostly reviewed municipal authorities in villages and towns. Errors of nature protection bodies at the lowest levels of state administration have been a problem in nature protection and tree protection for many years. These are far from mere formalities; rather, they affect fundamental principles of assessing condition of trees before felling them, process errors, etc.

Remedial measures - inspections of performing remedial measures were made by 3 RI. Legal violations were not identified in most cases, and measures ordered were being performed in full. Eleven inspections were made in total. The measures included a removal of spruces planted on specific plots within a nature monument (NM) established in order to protect a Spring Snowflake population.

Small hydropower plants (SHP) - inspections of observance of Section 50 of NLPA by SHP operations were scheduled by 30% of the RI. No substantial violations were identified. The absence of a gauge or water level mark denoting the surface level for the minimum required flow rate in some SHP proved to be a fundamental obstacle to inspection work.

Others - Brno RI defined inspecting revitalisations of water reservoirs as a specific task. They performed 4 inspections of reservoirs. All of them had been revitalised in order to secure conditions for reproduction of amphibians. In two cases, excessive fish populations were indicated, which might have a negative impact on the amphibian populations. The NLPA was informed about the findings.

Territorial protection

General inspections of small-scale EPAs - inspections of small-scale EPAs were performed by 70% of the RI; they focused chiefly on the condition of the subject of protection, signage condition, meeting of basic and detailed protection requirements, performance of management interventions, and formal correctness of establishment papers. A total of 145 inspections were performed and no substantial violations of law were found. The deficiencies identified (in-

adequate signage, inappropriate management, incorrect establishment papers) were handled by way of motions for remedy filed with the respective managers. Only one fine of CZK 50,000 in the Ostrava Region for unpermitted vehicle access, pheasant breeding without approval of a nature protection authority, and unpermitted lighting of fires.

Inspections of small-scale EPAs focusing on damage to forest ecosystems by game biting - this type of task was performed by 30% of the RI in 10 small-scale EPAs as a follow-up on an identical departmental task in previous years. The rate of damage to naturally growing young trees by game biting differed from EPA to EPA, and variations in the damage were identified in most of the EPAs.

Inspections of large-scale EPAs - inspections of large-scale EPAs were performed by 30% of the RI; 25 inspections were made in total. In Olomouc Region, inspections focusing on illegal vehicle access to the Litovelské Pomoraví PLA resulted in the imposition of 9 fines totalling CZK 22,000. In Ústí nad Labem Region, the inspections mostly dealt with activities associated with the construction of the D8 motorway through the České Středohoří PLA (tree felling, affecting biotopes of protected species); two instances of potential violation of law were identified (still under investigation). In South Bohemia, a multiple-day inspection took place in cooperation with the FPD, focusing on forestry management in the Šumava NP and PLA (still under investigation).

NATURA 2000 – SAC - inspections in Special Areas of Conservation (SAC) focused on the condition of the subjects of protection, observance of requirements on preventive protection, and field signage. This type of inspections was performed by 40% of the RI (30 inspections in total), and no substantial legal violations were identified. Only one intervention resulting in damage to the subject of protection in a SAC was identified. This was breeding carp in a fishpond in Plzeň Region which is part of a SAC for protection of the Fire-bellied Toad. The harmful activity was ordered stopped and a remedial measure was imposed.

Other inspections related to territorial protection - other types of specific tasks focused on inspections of observing requirements of CEI decisions pursuant to Section 66 of Act 114 (5 inspections) and on inspections of measures ordered by CEI (4 inspections). No violations of law that would result in the initiation of an administrative procedure were found, because all the inspected entities were performing the measures ordered.

Species protection

Inspections of observing legislation when keeping EPS - this type of inspections was performed by 80% of the RI; breeders, retailers, sales exhibitions, taxidermists, bird markets, and rescue stations were inspected. A total of 33 planned inspections were performed and 17 administrative procedures were initiated. Kept animals were seized in two cases; sales were prohibited in one case. The violations mostly consisted in failure to prove the origin of the kept animals and breeding without permission or a valid exemption.



Inspections of observing basic protection requirements concerning interventions with natural evolution or biotopes of EPS - this type of inspections was performed by 50% of the RI; they concerned both observance of protection requirements of EPS and observance of exemption requirements pursuant to Section 56 of the NLPA. They included requirements for fishpond mud removal and lagging and renovation of prefabricated blocks of flats. In Ústí nad Labem

and Olomouc Regions, they also focused on inspecting the condition of summer and winter habitats of the Chiroptera mammals (horseshoe and roundleaf bats). A total of 27 planned inspections were performed, resulting in 3 administrative procedures. The total amount of penalties imposed was CZK 34,000 for failure to observe the deadline for draining a fishpond for mud removal and for completion of works). One administrative procedure resulting from an investigation will be initiated in 2010.

Species and, to some extent, territorial protection is related to two major issues handled by the Inspectorate in 2009. Subsidies to lagging of prefabricated blocks of flats under the MoE programme Green Light to Savings has again expanded construction works with a direct impact on the protection of the EPS Common Swift and, to some extent, bat populations. In this context, CEI regularly deals with cases of disrespect to the protection requirements of the said EPS by way of bans and restrictions, and possibly penalties too. In 2009, the MoE issued a methodological guideline for nature protection bodies in securing protection of nesting swift populations, and Prague Municipal Authority issued a regulation on protection of swifts in renovations in Prague towards the end of the year. Both the papers may be of substantial help in protecting the EPS.

The Inspectorate also applied restricting decisions pursuant to Section 66 of Act 114 in favour of protecting some invertebrate and plant EPS threatened by the use of large-scale machine soil treatment when reforesting. This was in the alluvial forest at the confluence of the Dyje and Morava, a SAC and a Biosphere Reserve. The removal of wood material and homogenisation of the soil profile with milling machines leads directly to the destruction of biotopes of the Stag Beetle, Cinnabar Bark Beetle, Spotted Longhorn Beetle, the Fire-bellied Toad and the Danube Crested Newt, to name a few. The issuance of any exemptions for EPS will be decided by the relevant nature protection body. The managing entity, which owns the land, appealed the decision.

IMPORTANT CASES

RI in Liberec

The greatest fine was imposed to a self-employed natural person for blanket felling of continuous tree growths without permission of a nature protection authority, without a binding opinion on intervention with an important landscape element (ILE), and in conflict with a ban pursuant to Section 66 of Act 114, issued by the Inspectorate. The offender felled over 1,900 trees in Kunratice u Cvikova, Svor and Radvanec cadastral areas, and sold them to wood processing operations. He also made harmful interventions with the ILE of the course and alluvial plain of the Boberský potok, and the course and alluvial

plain of an unnamed tributary to the Dobranovský potok and its source streams. Pursuant to Section 86 of Act 114, the self-employed natural person was ordered to perform substitute remedial measures consisting in reforesting of selected plots in Lindava, Radvanice, and Kunratice u Cvikova cadastral areas and subsequent management for a period of five years. The fine imposed was CZK 1,700,000, but the body of appeal reduced the penalty to CZK 1,400,000.



RI in Prague

The greatest fine was originally imposed to a legal entity for disturbing landscape character, harmful interference with an ILE, and unpermitted interference with the natural evolution of especially protected plant species by placing and operating various structures supporting a golf course in Podbořánky cadastral area in the Jesenícko Nature Park without approval of a nature protection authority. The entity did that and other activities, such as intensive mowing in places with especially protected plant species without an exemption under Section 56 of Act 114 even on plots that belong to the Podbořánský potok alluvial plain, that is ILE by legal definition. The Inspectorate imposed a penalty of CZK 2,000,000 for these violations; it was reduced to a mere CZK 200,000 based on an appeal.

RI in Plzeň

The felling of oak trees in Aš cadastral area was an interesting instance of law dodging. These were eight oaks standing at the edge of a skiing resort, which had been shedding branches as a result of artificial snowing. Aš Municipal Authority issued a decision permitting the felling, which was appealed by a



Aleý Štířín

procedure participant (a citizens' association). Although the appeal procedure was in progress, Aš Municipal Authority had the trees felled in February 2009 and subsequently announced the felling pursuant to Section 8, Para 4 (critical condition). Felling pursuant to Section 8, Para 4 may be done in events of direct threat to life or health or where considerable material damage is imminent, i.e., in sudden events that could not be predicted, such as injury to a tree by storm, wind, etc. The body of appeal had to stop the procedure since the subject of the procedure had ceased to exist. CEI therefore imposed a fine of CZK 80,000 on Aš Municipal Authority, which the party appealed. The MoE ordered a new hearing of the case, and the Inspectorate provided more evidence based on which it again imposed a fine of CZK 80,000 in October 2009. The party appealed that decision too, and the appeal procedure is now in progress. CEI continues to regard the act as an abuse of Section 8, Para 4 of Act 114 with the aim to thwart public involvement in decision-making on nature protection via a citizens' association.



RI in Brno

NPD at the RI in Brno had issued a decision prohibiting a farming co-operative in its jurisdiction from farming parts of land in the protected area of the Rudlické Kopce Nature Monument in 2005. A fine of CZK 450,000 for failure to observe the decision was imposed on the entity in 2006, and affirmed in an appeal procedure. In spite of that, the entity continued its illegal conduct in the following years, which was why the Inspectorate again assessed a penalty for failure to observe a ban or restriction on activity formulated pursuant to Section 66, totalling CZK 900,000. The party appealed the penalty and no final decision has been made in the appeal procedure so far.



RI in Ústí nad Labem

The conduct of a company that rented land intended for the development of a logistics centre for farming is certainly an interesting case. The plots were demonstrably home to a large number of especially protected animal species. The farming activity consisted chiefly in deep tilth and subsequent spraying with dung water. The purpose was to destroy all the EPS and their biotopes completely. Negative interventions with the EPS biotopes occurred on parts of the land, and some were directly killed and their local populations severely affected. CEI therefore issued three decisions pursuant to Section 66 of Act 114 (restriction and ban on activity) in connection to this event.

The Headquarters

Another interesting and, to some extent, milestone case was the decision pursuant to Section 86 of Act 114 with which the Inspectorate Headquarters ordered Prague Road Maintenance (TSK) to perform several measures in a four-line Silver Linden avenue in Prague 6. Based on a motion filed by a citizens' association, CEI investigated the owner's violation of duty to care for trees, resulting in the felling of 31 grown lindens. The health of the trees had been assessed by several experts in the long run, so the Inspectorate worked with the conclusions of 7 expert reports. Based on the documentation and its own investigation, CEI concluded that the duty under Section 7 of Act 114 had really been violated, and ordered TSK to arrange maintenance of most of the trees proposed for felling and to plant trees in all the vacant spots in the four-line avenue.



Praha 6 Thákurova

OPINIONS, STATEMENTS AND COOPERATION WITH OTHER BODIES

The number of opinions issued in 2009 decreased compared to 2008, yet they were again more than 1,000, chiefly NPD responses in EIA processes. Unfortunately, the Inspectorate has recently noted an increase in very dubiously prepared documentations, disregarding fundamental principles of territorial assessment and distorting study conclusions. The Inspectorate therefore filed several proposals to the MoE to seize authorisations to conduct EIA. In spite of CEI's objections, many EIA procedures are concluded in the announcement stage. This conduct constitutes a constriction of the effectiveness of the tool in controlling harmful projects. The numbers of audits and opinions for the SEF are negligible.

In their inspection work and beyond it, such as in expert attendance of promotional events on nature protection, the inspectors cooperate with numerous organisations and institutions. Close cooperation with the Ministry of Agriculture is necessary on inspecting agricultural operations under the Cross Compliance (CC) project; we also need to cooperate with MoA departmental organisations on GMO issues across the full range of inspection work. Cooperation with the Nature and Landscape Protection Agency (NLPA) is indispensable; it assists the Inspectorate in complicated cases with its expertise and makes use of CEI's expertise in administrative procedures. In some cases, the Inspectorate applies for assistance to the Czech Police and Customs

Administration officers, particularly concerning controversial perpetrators of administrative offences. Inspections in zoos are performed in cooperation with the applicable MoE Department and State Veterinary Administration of the Czech Republic. Long-term cooperation with the Slovak Environmental Inspection has developed in the area of biological safety (see the chapter on GMO). Every year, NPD officers are involved in many events of promotional and educational nature throughout the country, including expert lectures at conferences, expert attendance at the Mikroklima event in Prague, lectures at schools, etc. To support CEI own inspection work, the NPD Headquarters prepare expert papers, which it elaborates into binding methodological instructions, and arranges further professional training by means of seminars and training sessions. Among other things, the methodology for unifying steps in elaborating responses to EIA documentation was published in 2009, focusing on landscape character assessment. This was connected to expert seminars and field trips headed by leading professionals, and participation of selected inspectors in a 70-lesson course at the CTU, completed with an exam and final thesis.

Media promotion of our activities would certainly deserve a chapter on its own. The nature protection inspectors in fact do not even need to be very proactive towards journalists, because some of the issues are so much the subject of public attention that most media consult the Inspectorate of their own accord. Tree protection issues have long been covered by the press, radio and television, particularly in connection to the maintenance of roadside tree lines and their removal at the end of the growing season. The current legislative changes, mentioned above, can be expected to put an end to most of the CEI inspectors' activities in tree protection. A massive development of golf courses has also been occurring throughout the country recently, which is associated with insensitive interference with the landscape and especially protected species. Judging by the recent development, media-attractive cases of conflict between nature protection (Inspectorate) and development projects near towns and villages (family houses inside buffer zones or directly inside small-scale protected areas, sports grounds interfering with landscape and destroying especially protected species, etc.).

CONCLUSIONS OF INSPECTION ACTIVITIES

Conclusions formulated in the Inspectorate's work report for 2008 were confirmed in 2009. They included chiefly the pressure of developers to build up open country, where CEI faces not only a massive shrinkage in the Agricultural Land Fund (ALF), but also efforts to place buildings in small-sca-

le especially protected areas (EPA), their buffer zones and nearby locations that are directly connected to the protected phenomena. Unfortunately, this is frequently permitted by nature protection authorities themselves, issuing exemptions without having concrete figures on the state of biocenoses in the EPAs, which would be a precondition for objective decision-making. As mentioned above in the section on responses to EIA documentations, error occurs quite frequently in assessing territorial impacts, and we have also come across instances of approval to highly controversial changes of master plans. All of that contributes to legalisation of harmful interventions with landscape, and the Inspection then has very limited powers to reverse the situation. In general, even where the makers of master plans take their jobs seriously and with a timeless perspective, successive partial changes tend to be approved, thus rendering the plans, strategic in terms of nature protection, useless. These local, often private interests result in further landscape fragmentation, shrinkage of the ALF, reduced biodiversity, etc.

Another dangerous trend is the effort to influence public administration decisions in environmental protection politically, which the Inspection has so far been resisting in nature protection and only witnessing such influences on other state administration bodies. That is one of the reasons why the public are increasingly referring their concerns exclusively to CEI, even though some other state nature protection bodies dispose of analogous inspection powers. However, it is a question how long the Inspectorate is going to be able to treat the growing numbers of citizens' motions responsibly. Certain hope lies in the trend observed by the Inspectorate in recent years, consisting in a certain increase in professionalism of NGOs, which receive good legal support by means of goal-directed public outreach, and thus become full-fledged parties in non-penalty procedures in the field of nature protection. The NGOs' partial shift from aggressive and pressure action to influencing decision-making processes in compliance with law is a promise for the future.

Conversely, the inconsistent and, in some cases, even conflicting attitudes of bodies of appeal (MoE RDSA) to individual cases in appeal procedures is a long-standing, unresolved problem. Not only is the legal appraisal different in different regions, but the bodies of appeal reassess the factual conclusions of CEI decisions and dispute fine amounts freely without providing further evidence. Since the RDSA thus frequently release the entities from their liability for damage done to the environment, the public, learning about the results of cases via involved citizens' associations or media publicity, is rightfully dis-

concerted. Such decision-making further encourages the notion of inoperativeness of state administration and inadequate legal protection of the indubitable public interest that is environmental and, specifically, nature protection.



Avenue Štiřín

4.5 FOREST PROTECTION

ASSESSMENT AND TREND OF ACTIVITIES

CEI performed 1,765 inspections in the field of forest protection in 2009. The inspections reviewed the properties of 1,562 entities. Many of the inspections involved multiple petty forest owners, or their petty forest properties. Like in previous years, the scheduled inspections were mostly comprehensive, focusing on the overall condition of the forest properties and compliance with legislation in the owners' management work. The legal framework for the inspection activities comprised chiefly Act no. 282/1992 on the Czech Environmental Inspection and its jurisdiction in forest protection, Act no. 289/1995 Coll. on forests and amending certain acts of law (Forest Act), Act no. 114/1992 Coll. on Nature and Landscape Protection, and Act no. 149/2003 Coll. on the circulation of reproductive materials of tree species significant for forests (Act on Trading Forest Tree Reproductive Materials, or Act 149), including their respective executive regulations. The total number of inspections performed in 2009 was slightly lower compared to 2008. In spite of an absence of wind calamities, the explanation can be found in the slight increase in bark beetle activity. It is a consequence of the calamities in the previous two years as well as the management

method in Šumava National Park. On the other hand, bark beetle activity was maintained at basic or slightly raised levels in some typical bark beetle locations in 2009.

Compared to 2008, the inspection results in 2009 led to a slight decrease in the penalties imposed in administrative procedures concerning threatening or damaging the forest environment. Given the frequency of the inspections, this result can be seen as positive and a proof of improving forestry management. A total of 176 decisions on the imposition of fines were issued in 2009, and 171 decisions entered into force.

Administrative procedures on the imposition of fines were mostly initiated for failure to take measures in forest protection from the bark beetle, to observe legal terms for reforestation following logging, and to perform duties in protecting forest land, for illegal use of land intended to perform forest functions, and failure to perform remedial measures ordered based on identified deficiencies. The total amount of fines in force in the field of forest protection was CZK 5,424,600. This was another decrease compared to 2008, amounting to some 16%. It corresponds to the new concept of the purpose of inspection work, with preventing damage to forest functions by way of educational events and frequent counselling, chiefly in relation to petty forest owners, becoming its main goal and future trend. In accordance with that concept, administrative decisions primarily ordered remedial measures based on deficiencies identified; there were 243 such orders. The number was almost identical to that in 2008, when 245 remedial measures were ordered.

The Forest Protection Department alone handled 125 motions received in 2009. They mostly dealt with various aspects of forestry management and illegal use of forest land for purposes other than forest functions.

CEI Forest Protection Department lodged one report on the commitment of a crime – devastating logging – in 2009. This is a proof of the significantly improving forestry management in the recent years.

OVERVIEW OF FULFILMENT OF DEPARTMENT-BASED TASKS

Proportion of amelioration and reinforcement trees (ART) and their condition in forests planted in 1997-2001

The objective of the CEI department-based tasks for 2009 was to acquire objective data on forest condition in connection with damage to forest by game, and on the actual proportion of ART after the expiry of the legal period for

forest culture securing.

The scope of the investigation was as follows:

- cover all types of ownership;
- selection of entities throughout the supervised territory;
- minimum size of inspected entities was 50 ha;
- minimum number of entities was 10 per region;
- for Czech Forests and Military Forests and Farms, the inspected entity was a forest district or forest office

A total of 209 inspections of the proportion of ART and 216 inspections of damage due to game were performed; that is 425 inspections of 222 entities (forest owners) divided by forest ownership as follows:

Proportion of ART:

		No. of inspections	
		ART	Game
State-owned	Czech Forest Co.	94	95
	Military Forests and Farms	4	4
	National Parks	4	5
Municipalities		77	80
Privat forest		30	32

Based on the inspection and assessment of the actual proportion of ART after the expiry of the legal period for forest culture securing, it can be concluded that the legal obligation to reforest with a proportion of ART was observed in the overwhelming majority of cases; in many cases it was above the legal percentage and often using the natural rejuvenation potential of those trees. After the securing deadline, the proportion of ART mostly remained at the levels defined by a regulation for each CHS.

Failure to observe the proportion of ART pursuant to Annex 3 to Regulation no. 83/1996 Coll. was mostly justified as follows:

- reforestation of a forest management unit with a forest management plan made before Act no. 289/1995 Coll. was in effect, i.e., before mandatory proportions of ART were defined;
- unrestrained rejuvenation of the major economic tree species, typically spruce;
- renewal in progress with a potential to increase the proportion of ART additionally;
- changed spatial division of forest.

Inspections of the proportion of ART found no substantial or significant deficiencies; 6 instances of minor deficiencies were identified, which led to the initiation of 3 administrative procedures ordering remedial measures.

The results of the inspection of the proportion of ART in Czech Forest areas show a certain inaccuracy as accurate figures from the forest management records were not always available due to changes in the company's software.

Damage done by game to forest of age classes I and II

Damage by lateral biting is the most common in unsecured forests. This usually does not pose any environmental damage, and the owner does not suffer any loss of increment. Damage due to biting of terminal buds, resulting in reduced growth, are usually quantified and paid for by hunting operators. In inspected forests, most damage due to game was found to be eliminated by effective protective measures, i.e., full areal fencing of broadleaved trees and firs, using individual enhancement protection, and treatment of most coniferous trees with repellents. However, it is questionable whether the relatively good condition of protected cultures is not a result of the forest owners' extremely high cost of forest protection instead of an effective reduction of the great numbers of bisulcate game, which have long been excessive, below the standard (maximum) numbers pursuant to hunting legislation. The finding of substantially reduced damage by biting and peeling by Red Deer; most damage detected was older. However, significant damage by biting due to moufflon are still registered in Plzeň Region, where the introduced invasive Sika Deer do damage. Substantial damage due to the Sika are also reported from Karlovy Vary Region.

The inspections show clearly that no substantial damage was found in areas of adequately performed protection of forest from game. That is the case of Liberec Region. The Fulnek Municipal Forest near Ostrava is an exception with unusual damage due to biting in spite of protection performed. Given the exceptionality of the case, nevertheless, the method of protection applied cannot be challenged. Another example is the Pozdátín Forest District managed by the Náměšť nad Oslavou office of Czech Forests. Since the district is in a post-calamity situation with an abnormal proportion of unsecured forest, the application of autumn coating against biting is above the minimum legal requirement. However, the forest cultures in the district are still seriously damaged in light of the considerable roe deer population and failure to apply summer spraying against biting. The case has not been concluded.

Inspections of damage due to game identified one serious case, where an administrative procedure resulted in the imposition of a fine of CZK 350,000.

This is the case of long-term disregard to abnormal damage in the Radějov Game Park, where Strážnice Czech Forest office is the entitled manager. In addition, 6 minor deficiencies were identified, which led to the initiation of 3 administrative procedures ordering remedial measures.

The FPD at the RI in České Budějovice dealt with damage due to game in small forest properties as a specific task, which led to the initiation of 5 administrative procedures ordering remedial measures and a proposal of a fine of CZK 30,000 for failure to perform a remedial measure.

OVERVIEW OF FULFILMENT OF SPECIFIC TASKS

In 2009, CEI inspection work in this area focused on the current and specific issues in different regions, and was conducted as part of both thematic and comprehensive inspections (along with department-based tasks). Its content can be divided into the following thematic categories in relation to forest functions as environmental components: logging, forest transport, forest protection, binding provisions of forest management plans and forest management outlines, protection of land intended to perform forest functions, use of biodegradable oils and hydraulic fluids, performance of remedial measures ordered, circulation of reproductive materials of forest trees, and other inspections. The inspection activity resulted in the following conclusions:

- Like in previous years, CEI registered a reduced frequency of instances of illegal logging, chiefly the most momentous ones in larger forest areas.
- According to CEI findings, the most frequent deficiency identified in 2009 was the delayed processing of bark-beetle timber and allowing the bark beetle to spread into surrounding forest. Beyond doubt, this is related to the increased wind calamity logging in 2007 and 2008. The reduced number of accidental logging after wind calamities translated into reduced environmental damage due to heavy logging machinery.
- Besides the forest damage due to the bark beetle, which was the subject matter of a department-based task, no other substantial instances of forest damage due to other insect pests, or their increased populations, were identified. The more important cases of failure to observe binding provisions of forest management plans and forest management outlines (total logging, minimum proportion of amelioration and reinforcement trees when reforesting, minimum size of thinning interventions in forests under 40 years of age) were identified in inspections chiefly with respect to illegal intentional logging.

- Like in previous years, most of the RI identified frequent instances of illegal use of forest land for purposes other than performance of forest functions (e.g., buildings, skiing resorts, etc.) and contamination of forest with waste and litter.
- Inspections of the use of biodegradable fuel and hydraulic fluids employing the hydroxam test were mostly performed at random directly in the forests; systemic inspections were performed in several companies providing forestry services. The inspections dealt with chainsaws, wheeled tractors, and other devices. Deficiencies were only identified sporadically, which can be attributed to CEI's long-lasting pressure on this aspect.

The identified failures to perform remedial measures ordered previously by CEI in administrative procedures based on identified deficiencies mostly concerned cases of failure to reforest clearings after logging and to process bark-beetle timber. These cases were subsequently handled in administrative procedures, mostly by imposing fines.

Given the nation-wide importance of the issue, the trend of CEI inspections focused on circulation of reproductive materials of forest trees (i.e., inspections of the material production and suppliers) pursuant to Act no. 149/2003 Coll. continued in 2009. These inspections identified deficiencies more or less rarely.

IMPORTANT CASES

The greatest fine imposed in 2009 was CZK 360,000; it was imposed by the RI in Hradec Králové on a legal entity that had neglected forest protection from the bark beetle. They had processed bark-beetle timber with a delay, which had led to a significant spread of the pest into surrounding forests. The party's legal representative appealed the procedure, the case was handed over to a body of appeal to decide; it had not reached a decision by the end of 2009.

Another, no less important case is that of a self-employed natural person operating nation-wide, on whom the RI in Hradec Králové imposed a fine of CZK 350,000 for repeated illegal logging and neglecting forest protection from the bark beetle. On 6 August 2009, FPD inspectors performed a check on the owner's forest property and found that a clearing covering 1.01 ha, segmented into three separate clearings, was created following an illegal logging in April 2009. Concerning forest protection, it was ascertained that logging leftovers and unprocessed tops of the logged spruce trees had been left lying in the forest, and were severely attacked by calamity insect pests, namely the Spruce Wood Engraver and the Spruce Bark Beetle, between May and July. CEI ordered the forest owner to process and remediate the bark-beetle timber by 20



August 2009, and initiated an administrative procedure on the imposition of a fine for illegal logging. On 25 August, an inspection of the performance of the remedial measure was performed, which found that the forest owner had not respected the CEI decision and that bark beetles were spreading in the surrounding spruce woods. A fine of CZK 350,000 was imposed on owner on 15 September; he did not appeal the decision so it entered into force.

The same natural person committed a violation of legal regulations concerning forest protection from insect pests – bark beetles – in a forest property at Psárov, in the jurisdiction of the RI in České Budějovice. The inspection found unprocessed, non-remediated bark-beetle material in the size of 214 trees (some 110 m³) from which the matured Spruce Bark Beetles had spread into surrounding forests owned by the same owner as well as neighbouring private owners. CEI imposed a fine of CZK 150,000 on the forest owner for damaging the forest environment. The decision entered into force in early 2010 and is now executable.

The most important cases in 2009 included the extensive damage to forest cultures and young forest due to biting, gnawing and chipping by game in the Radějov Game Park, handled by the FPD of the CEI RI in Brno. The inspection in the state and municipality-owned forest land belonging to the game park identified 52 substantially damaged vegetation groups, while the inspection only dealt with a network of vegetation groups selected at random to cover the entire area in question and yield relevant information for the assessment of the overall condition of the game park. The disproportionate damage (20-95% of fresh injuries) was beyond doubt the result of high numbers chiefly of fallow and red deer, inadequate conditions in the game park (structure,

supporting capacity, etc.) and insufficient forest protection. A fine of CZK 350,000 was imposed on the manager of the state-owned forest land and remedial measures were ordered. The decision had not entered into force by the end of 2009. The preparation of a penalty administrative procedure with the game park leaseholder, a legal entity, was also initiated.

The RI in Hradec Králové imposed a fine of CZK 300,000 on a legal entity for failing to reforest clearings. In Trees within an area of 4.5 ha in a private forest at Nové Lesy near Dvůr Králové were partially cut in December 2005, and had to be felled in the course of 2006. The perpetrator of the partial cutting was not ascertained although CEI had investigated the case in cooperation with the Criminal Police and a state forest management office. The current owner purchased the forest in question in 2006, stating in the purchase contract to be aware of the condition of the forest and the obligation to reforest the clearings within two years. CEI performed an inspection of the performance of the obligation to reforest the clearings in 2008, but the vast clearing had not been reforested, which was why the FPD ordered the forest owner to reforest the clearing by 31 October 2008 as a remedial measure. An inspection of the performance of the remedial measure took place in February 2009 to find that the forest owner had ignored the CEI decision. In light of that, an administrative procedure with the forest owner was initiated in January, and a decision on the imposition of a fine of CZK 300,000 and ordering an extended period for performing the remedial measure was issued on 9 April 2009.



Jaroměřice

In the jurisdiction of the RI in Havlíčkův Brod, a legal entity announced to a state administration body its intention to perform deliberate clear-cutting on forest plots 320 and 321/3 at Věžná na Moravě (Žďár nad Sázavou District) amounting

to 387 m³ within an area of 0.86 ha. Neither the amount nor the location of the logging were observed, resulting in a 1.20 ha clearance being created by the company in late 2006, which it would not reforest by the legal deadline. Moreover, it logged the core of a younger forest causing it to disintegrate, and failed to process some 5.5 m³ of bark-beetle timber in the winter of 2008-2009. The Inspectorate began investigating the case on 19 March 2009, and issued a decision on the imposition of a fine of CZK 276,000 on 25 June 2009.

OPINIONS, STATEMENTS AND COOPERATION WITH OTHER BODIES

CEI FPD issued 222 opinions, expert assessments, statements for other bodies and as part of responses to EIA documentation in 2009, which is a figure similar to that in 2008. Expert statements for the Czech Police concerning cases of damage to forest functions (failure to process bark-beetle timber, illegal logging, etc.) comprised the most numerous group. Others were analogous statements and opinions for regional and municipal authorities, state forest administration bodies, district courts, PLAs, and one for a citizens' association.

Basic cooperation with other bodies consisted in mutual transfers of cases depending on the specific scopes of competence and environmental impacts. In general, we mostly cooperate with municipalities with extended powers and, when inspecting small forest properties, with professional forest managers. CEI thus acquires valuable information on inspected forest properties and as foundations for inspections, such as information on forest management plans and outlines, on forest management departments, etc. Representatives of state forest administration bodies and forest management departments are also frequently involved in the inspection work.



Havlíčkův Brod

We maintain good professional cooperation with the Czech Police, including on delivering mail, and with the relevant central state administration bodies, i.e., the Ministries of the Environment and Agriculture. The level of cooperation with regional authorities has increased. CEI cooperates professionally with other bodies and institutions if needed, such as national park and protected landscape area administrations, the Forestry and Game Management Research Institute, the Mendel University Faculty of Forestry and Wood Technology, etc. Inspection activities in the area of circulation of reproductive materials of forest trees pursuant to Act no. 149/2003 Coll. and involvement in selected joint inspections are coordinated with the Forest Management Institute.

CONCLUSIONS OF INSPECTION ACTIVITIES

Results of CEI inspection work for 2009 again confirm the improving trend in forest management in most regions. This is true in spite of the numerous substantial fines imposed. The principle continues to be to cover the entire country and all types of ownership evenly, yet increased targeted attention remains on problematic regions and problematic forest land owners. The overwhelming majority of inspections only identified minor deficiencies, which were frequently resolved by agreement on the spot or by ordering remedial measures.

The bark beetle menace remains a major problem for future: it looms in and around Šumava National Park, in Northern Moravia and Silesia and several other areas in the centre of the country, i.e., mainly forests damaged by the Ivan wind calamity in the summer of 2008. In light of the relatively more frequent deficiencies in the area of using forest land fund, the area too will be the subject of increased CEI attention in the coming period.



bark beetle-Červená Hora

5. IPPC

The core of the activity is supervision work in integrated prevention pursuant to the Integrated Prevention Act, Act on Integrated Environmental Pollution Register in connection to the EC Regulation establishing E-PRTR, and Act on Preventing Environmental Injury.

Other activities include opinions and statements primarily concerning EIA processes, IP requests or IP changes, subsidies from Environmental Operating Programmes called by the SEF, EMAS, project documentation, as part of the Safe Enterprise programme, on environmental audits, etc. We are involved in drafting new legislation; e.g., the integrated agenda section of an MoE working group is preparing a Government Regulation on the Energy Efficiency Act, and we also coordinate handling of motions and informing the public.

ASSESSMENT AND TRENDS OF ACTIVITIES

IPPC inspections and fines

A total of 779 inspections were performed in 626 facilities. Operation without IP: RI continued to performed checks in facilities under the regime of transitional provisions pursuant to Section 42 of the Integrated Prevention Act, imposing on operators an obligation to possess an IP by 30 Oct 2007. A total of 86 application procedures for IP that started late were identified, including 79 legitimate ones. In addition, 20 inspections whether facilities fall under IPPC were performed. The Integration Department participated in 193 other reviews, checks and inspections performed by other expert departments. In 2009, 164 decisions on fines, incl. orders, entered into force. The fines imposed ranged from CZK 1,000 to CZK 7 million, and the total amount of fines in force was CZK 15,578,000. The average amount of fines in force was CZK 95,000. Out of the total of 17 combined decisions, CZK 232,000 were assessed for the Air Protection Department, and CZK 220,000 for the Waste Management Department.

IMPORTANT IPPC CASES

Velký Karlov Biogas Station – inspection (ID, WPD, WMD)

On 10, 12 and 19 February 2009, inspection was performed in “ZEVO, spol. s r.o., Velký Karlov Biogas Station” at Hrádek u Znojma, 671 28 Velký Karlov, in order to confirm whether the operator operated the facility without a valid IP and to verify the performance of the requirements of a CEI decision restricting the operation of the facility consisting in a ban on processing animal by-products and stopping operation of the Hygienising Room – the process part of the facility in which by-products enter the facility, which entered into force on 9 December 2008.

With respect to the Waste Act, the company is not entitled to accept waste.

CEI had communicated the opinion to the operator before based on a statement by the MoE. Now the Act is clearly construed by the MoE Methodological Instruction “On approving BGS”.

The operation of the Hygienising Room was found to not have been stopped; the facility continued to be operated without a valid IP and to accept and utilise waste.

Based on the findings, the Regional Veterinary Station was requested to investigate and, if necessary, annul the approval for veterinary disposal work issued to ZEVO spol. s.r.o. for Velký Karlov Biogas Station, and to investigate whether blood was not immixed in the digested product and dumped in fields. Based on the inspection findings, a petition to order execution was also lodged.

On 23 June 2009, CEI issued a decision on a fine in which it imposed a fine of CZK 7,000,000 on ZEVO, spol. s.r.o. for an administrative offence of operating without a valid integrated permit. The operator appealed the decision. The appeal was submitted to MoE RDSA, which declined it and affirmed the CEI decision in full. The operator brought a legal action against it in October 2009.



BPS Velký Karlov

The facility possesses an IP based on a prerequisite for performing the EIA intent for the construction preparation stage. The facility was problematic from the start of operation in late 2007: it was a frequent botherance to the inhabitants with odours from its stillage drier. CEI RI in Ústí nad Labem handled

numerous motions related to the distillery odour. The distillery was permitted to start test operation on 31 May 2008. In early May, the operator installed two deodorising units at the drier exhaust, intended to reduce the exhaust odour substantially. Since the odour was not reduced enough to stop being a major botheration, the test operation of the distillery was not extended; the operation could only be extended after a drier waste vapour condenser would be installed. The condenser was installed in July 2008, and on 6 August 2008, Trmice Municipal Authority Building Department issued a permit for temporary use of the building for test operation until 15 January 2009. According to CEI findings, the installation of the condenser and the deodorising units in the stillage drier significantly reduced the odour related to stillage drying.

After the stillage drier odour has been reduced, another odour has been registered: this time it is directly related to the bioethanol production. The operator admitted that the odour might exist, and said that the test operation involved some non-standard processes in cleaning and disinfecting the equipment or its modification, which also became a local source releasing aromatic substances. Several dealings took place between CEI and the company representatives; the operator presented a list and description of planned measures to eliminate the problems, including deadlines for their implementation. On 22 December 2008, CEI made a positive response to the test operation permit until 30 April 2009 based on its involvement in the verbal dealings and an on-site investigation associated with PLP's application for a test operation permit, on the condition that the measures listed in the paper presented would be implemented by the set deadlines. CEI APD monitored the implementation of the measures. A permit to modify a building prior to completion was issued for the modifications made on 24 April 2009. On 30 April 2009, CEI issued a statement on PLP's application for a permit to temporary use of the building, setting the conditions under which the building could be operated. On 4 May 2009, Trmice Municipal Authority Building, Transport and Environment Department issued a decision permitting temporary use of the building “Trmice Industrial Distillery” until 31 July 2009 (the operator had requested until 16 Oct 2009). On 28 July 2009, Trmice Municipal Authority Building, Transport and Environment Department issued a decision not permitting further use of the distillery for test operation. The permission to continue its temporary use was negatively commented by Ústí nad Labem Municipal Authority, Regional Public Health Office, Regional Authority, and CEI. PLP a.s. continued to operate Trmice Distillery without permission after 31 July 2009. On 19 August 2009, PLP a.s. filed a motion to

the Ústí nad Labem Regional Authority pleading a review procedure concerning the permit for temporary use of the building “Trmice Industrial Distillery” until 31 July 2009. In this review procedure, Ústí nad Labem Regional Authority Planning and Building Department issued a decision on 28 August 2009, permitting test operation of the distillery until 16 Oct 2009 (instead of the original 31 July 2009). After 16 Oct 2009, no further temporary use of the distillery in test operation was permitted; PLP a.s. reportedly applied for a building approval to Litvínov Municipal Authority Building Department. Litvínov Building Department took over the procedure concerning Trmice Industrial Distillery due to the possible bias of Trmice Building Department.



PLP Trmice

In addition, Ústí nad Labem Regional Authority received an application for a modified IP on 1 July 2009. The procedure concerning the issuing of the modified IP will be suspended according to the Regional Authority, as it is going to commission an expert study for the setting of emission limits for odorous substances. The odour from Trmice Distillery has not been eliminated. The situation has improved somewhat following the installation of a centrifuge for removing liquid from the stillage, which is then not dried but sold for fodder wet, and the odour is neither so intense nor so frequent now.

IPR

IPR inspections were performed in 428 operations. Within that, 211 were IPR

inspections as part of inspections of meeting IP requirements. There were 76 separate IPR inspections, and 141 inspections were via correspondence in the form of comparison against operating records of the Air Pollution and Source Registry, or by correspondence investigation. In IPR inspection according to the list that CEI received from CENIA in November 2008, all of the 209 operations were inspected, including 67 inspections performed by Integration Department inspectors separately or as part of inspections directly in the operations; see above; another 75 inspections were done via correspondence in 2009. The total amount of imposed fines in force for failure to meet the IPR reporting requirements was CZK 494,000. Given the 75 decisions, the average amount of an IPR fine was CZK 6.6 thousand.

The IPR supervision work overwhelmingly identified unimportant formal misdemeanours of operators or misunderstandings and delayed reporting. The overwhelming majority of the IPR fines were at the bottom end of the legal range CZK 3-10 thousand, chiefly in the form of on-site orders. An exception is Galvanoplast Fischer Bohemia, k.s., in Liberec, which failed to perform its duties although it exceeds the thresholds for pollutants (Cu, Ni, Cr) in waste transfer several times. The IPR fine imposed by the DI of the RI in Liberec was CZK 100,000 (violating an IP condition). The MoE declined the appeal, and the decision entered into force on 30 April 2009.

OTHER INTEGRATED ACTIVITIES

EIA

CEI made a total of 1,724 statements concerning plans, documentations, reviews, notifications of concepts, and draft concepts under EIA/SEA – Act no. 100/2001 Coll. Compared to the previous year, the number of assessed EIA plans decreased slightly (2,202). The economic crisis is probably felt depending on the region, partially enhanced by the amendment of the EIA Act no. 216/2007 Coll. on plans below the thresholds (defined by Act no. 186/2006 Coll.).

Frequently handled EIA plans in 2009 included plans to build wind power plants the execution of which was not justified by energy efficiency reasons and which did not belong to the proposed places according to CEI. The masts are up to 100 high and perceived as negative interference with landscape character. Wind power plants with a rated capacity of 42 MW were put into operation last year. They included plans to build the WPP in Bačálky in Hradec Králové Region with an output of 6 MW, which is fundamentally refused by local inhabitants, and WPP in Lichkov near the Polish border in Pardubice Region with four masts.



BPS Velký Karlov

Important EIA cases:

Galerie Šantovka shopping centre in the former MILO factory in Olomouc. According to the risk analysis elaborated by SCES – Group, spol. s.r.o., the site is excessively contaminated with heavy metals, chiefly Ni, Cd, Be, Pb, and organic pollutants, chiefly petroleum derivatives and PAH. CEI verified that the system of monitoring bores on the site had been removed during the demolition works, thus preventing periodical verification of the site contamination. The plan did not deal with remedying the contaminated groundwater. It only dealt with solid waste. For that reason, CEI disapproved of the implementation of the plan without required in-situ remediation.

Forest Golf Resort Praha a.s. – RI in Prague and Plzeň commented on the EIA documentation of the plan to build a golf course in Prague-Klánovice pursuant to the EIA Act. Having assessed the presented documentation, it concluded that there were fundamental nature protection and forest protection concerns, and therefore, disapproved of the implementation of the plan, as it would result in the disintegration of a connected ecosystem and destruction of a substantial number of biotopes. On 13 Oct 2009, CEI received a letter from the MoE on ending the EIA procedure for the plan based on the applicant's request.

Dinopark Ostrava (MSK1314) – With its extent, the plan falls under Annex 1, Category II, Items 10.6 and 10.13. The plan was implemented without a preceding EIA process. CEI made a notification of the non-compliance with legal regulations, and lodged a motion to the Moravia-Silesia Regional Authority to review the planning permit issued; the Regional Authority affirmed the unlawfulness of the planning permit and initiated a procedure concerning the matter.

Requests for IP

A total of 464 responses to requests for IP or modifications thereof were made in 2009. Moreover, CEI officers were present in 62 verbal dealings concerning the issuing of IP.

Opinions and statements, voluntary instruments

Integration Departments of CEI RI coordinated or elaborated 75 statements for the SEF and 572 other statements on ISO 14001, as part of the Safe Enterprise programme, and concerning requests for registration in the EMAS system, environmental audits, planning procedures, and including elaboration of information reports.

Accidents

Twelve accidents in facilities under IPPC were handled in 2009. Important cases included the investigation by RI in Prague at the Benátky nad Jizerou Managed Landfill, operated by AVE CZ waste management s.r.o. The hazardous waste landfill in Benátky nad Jizerou caught fire on 1 May 2009. The Inspectorate made a Report on Inspection Findings. At present, the case is in the stage of a decision on a fine being issued. The Inspection has only repeatedly extended the period for AVE CZ to comment on the decision groundwork, as the company commissioned its own expert study.

**CONCLUSIONS OF INSPECTION ACTIVITIES**

Poor quality IP are a recurrent shortcoming identified in the inspections; they often contain out-of-date information in respect of valid legislation (references to out-of-date departmental legislation, including emission limits, frequency and scope of monitoring), contradictions between binding conditions of operation and information in IP attachments (operating rules), and binding conditions of operation that cannot be inspected or enforced ("use as little as possible", etc.). These imperfections are eliminated continuously, i.e., CEI lodges motions to modify binding conditions of operation by immediately informing relevant regional authorities.

The year 2009 saw a continued increase in the number of cases where inspected entities stopped operation in part or in full due to the economic crisis and failed to report that as a change to regional authorities.

Moreover, IPR inspection activity indicated a high proportion of inspected entities that had violated their reporting duties pursuant to Act no. 25/2008 Coll. CEI frequently had to inform the operators additionally about the connection of the Act with EC Regulation 166/2006 establishing E-PRTR as well as about its direct effects.



Milevsko



Waste water treatment plant in Kostelc u Jihlavy

6. INTERNATIONAL COOPERATION

A total of 45 trips abroad were made in 2009, attended by 86 officers.

During the Czech EU Presidency, the 3rd General Meeting of IMPEL took place in Prague, in the preparation of which CEI and the MoE participated actively. The following General Meeting was held in Stockholm in December.

Throughout 2009, a CEI representative was involved in the work of the IMPEL Committee, and CEI and MoE officers jointly attended the 4th IMPEL conference in Sibiu, Romania. The conferences are held every three years and aim at familiarising the public and NGO, European Commission and European Parliament representatives with the work of the IMPEL network, particularly with the outcomes of completed projects.

CEI inspectors were involved in the work of Cluster I (improving approval, inspection and enforcement) and Cluster II – TFS (trans-boundary waste shipments), and participated in the TFS conference as every year.

In addition, inspectors were involved in the following IMPEL projects: electronic waste, lessons learnt from accidents, a comparison project on approval and inspections in pig farms, environmental indicators, meeting of contact persons for trans-boundary waste shipments, exchange days, and another stage of the project to do the right things. This was the third stage of the project, focusing on implementation of inspection planning according to recommendations on minimum criteria for environmental inspectorates. A handbook for inspection planning was developed in the first stage; training on how to use the handbook took place in the second stage; and the third stage focused directly on the practical application of the handbook in planning inspections in different member states. The handbook has been translated into Czech and can be downloaded from the CEI website (www.cizp.cz – Foreign Relations – IMPEL).

In March 2009, the Czech Republic initiated a meeting including a discussion on the possible topics for projects funded from INTERREG and dealing with nature protection and forestry. The projects would follow up on the work of the Greenforce network. The meeting was attended by colleagues from the Netherlands, Scotland, Latvia, FYR Macedonia, and a representative of EU DG Environment.

In June, two CEI inspectors attended a workshop on implementing the NATURA 2000 network in Spain, where the main topic was restricting forestry in favour of nature protection. As part of the Czech EU Presidency, CEI officers attended discussions of the forestry working group of the EU Council.

The Czech Republic is represented by CEI inspectors in CITES issues at meetings of expert groups focusing on law enforcement in endangered species protection. The 21st meeting of the Wildlife Working Group, two meetings of the EU Enforcement Group and a meeting of the advisory group to the EU-TWIX pan-European database project took place in 2009. The latter group was founded in order to compile a database of information on trade in endangered animal and plant species in the EU and for fast communication among EU law enforcement bodies.

A CEI inspector for CITES inspection attended the CITES E-commerce Workshop, focusing on illegal trade in protected animals and plants. Two colleagues lectured at a workshop of the ECENA network, held as part of a training programme on environmental crime. In addition, the 2nd year of the CITES enforcement training programme took place in the Czech Republic in 2009; it was intended for CEI inspectors, customs officers and police officers. The workshop was attended by foreign lecturers from the Netherlands and the UK.

Last but not least, our inspectors were actively involved in the EU training group and a workshop of the EU group dealing with illegal trade in reptiles.

As part of so-called executive international relations, our inspectors represented the Czech environment department in meetings of international committees for protection of boundary waters and major rivers (International Commission for Protection of the Oder and Elbe, the Danube Commission, Austrian Border Waters).

A CEI representative attended a forum held by the European Chemicals Agency (ECHA), which serves information exchange on enforcing the REACH regulation.

Based on a cooperation agreement with Slovakia, several foreign work trips were made, dealing chiefly with water protection and waste management issues.

Most of the foreign trips were made in connection to performing the Czech Republic's contractual obligations within international organisations, treaties and protocols on the one hand, and activities directly related to EU membership on the other. In total, CEI expended CZK 551,886 on the foreign trips, while a large part of the costs were funded directly from the European Commission budget.



7. HUMAN RESOURCES

7.1. PERSONNEL MANAGEMENT

Legal and salary conditions of employees of the Czech Environmental Inspectorate follow the Labour Code no. 262/2006 Coll. and Government Regulation no. 564/2006 Coll. on salary conditions of employees in public services and administration, as amended by Government Regulation no. 74/2009 Coll., and Government Regulation no. 469/2002 Coll., defining the catalogue of jobs and qualification requirements.

New Organisational Rules of the Czech Environmental Inspectorate were adopted as of 26 March 2009. Two branch offices were set up: the Regional Inspectorate in Plzeň now has a branch office in Karlovy Vary, and the Regional Inspectorate in Brno now has a branch office in Zlín. Moreover, a Chemicals Department was established at the Headquarters, and Chemicals Offices at the Regional Inspectorates.

An addendum to the Organisational Rules dated 18 June 2009 specified some of the competences of management employees.

ESSENTIAL PERSONNEL DATA

Employees distribution according to age and gender - situation as at 31. 12. 2009

Age	Male	Female	Total	%
Up to 20 years	0	0	0	0
21 - 30 years	81	66	147	22
31 - 40 years	105	95	200	30
41 - 50 years	69	102	171	27
51 - 60 years	92	45	137	20
61 years and more	5	3	8	1
Total	352	311	663	100,0

Employees distribution according to education and gender - situation as at 31. 12. 2008

Achieved education	Male	Female	Total	%
Elementary	0	0	0	0
Skilled	0	0	0	0
Secondary specialist	4	2	6	1
Secondary complete	20	26	46	7
Secondary special. complete	18	35	53	8
College specialist	19	20	39	6
University	305	214	519	78
Total	366	297	663	100

Overall information on average pays as at 31. 12. 2009

	Total
Average gross monthly pay	24.250,-

Overall information on origination and termination of occupational and official relations of employees in 2009

	Number
Assumed office	167
Left office	103

Duration of the occupational and official relations of employees - situation as at 31. 12. 2009

Duration	Number	%
Up to 5 years	298	45
Up to 10 years	221	33
Up to 15 years	97	15
Up to 20 years	38	6
More than 20 years	9	1
Total	663	100,0

7.2 TRAINING

A new CEI Directive no. 7/2009 was drafted in the course of 2009, and entered into force on 1 December 2009. It deals mostly with organisational changes in the introductory initial training system.

Compulsory training of newly admitted employees was performed based on Government Resolution no 1542/2005. This introductory initial training was attended by 125 employees in three courses. This daily training course is organised and lectured by CEI. The chief purpose is to familiarise with the specific issues at CEI, basic knowledge and legal standards for performing activities in state administration. Another compulsory training component is the advanced initial training, which was supervised professionally by the State Administration Institute in the period in question. The four e-learning courses were attended by 111 employees. The contents chiefly includes basics of legal awareness, administrative rules, public administration in the Czech Republic, public finance, EU basics, etc. Expert officers and inspectors attended the extended training consisting in both theoretical and practical specialised training. Nine employees accomplished it on four dates. The English, German and Spanish languages were learnt in courses by 140 and 105 employees in the first and second halves of the year, respectively. The further education for employees was mostly arranged by the State Administration Institute, our own teachers, and external agencies. These events were attended by a total of 916 people. This number is more than the total number of CEI employees, since some of them attended multiple courses.



8. ECONOMY

8.1 THE BUDGET

Being an organizational component of the state, the Czech Environmental Inspectorate controlled budgetary means other than investment means totalling CZK 368,335,000, and budgetary investment means totalling CZK 20,667,000 in 2009. The total budgetary means thus amounted to CZK 389,012,000.

CEI also controlled a limit of other than budgetary means from insurance benefits totalling CZK 1,747,893. Within that, CZK 163,214 were used in bracket 5171 (repairs and maintenance), and CZK 1,584,679 in bracket 6121 (buildings and structures).

The total CEI expenditure limit was CZK 390,759,893. Throughout the year in question, a total of CZK 390,283,645 of investment and non-investment means were spent. The unspent means, totalling CZK 460,656, were transferred to the unspent expenditures record for 2009.

Adjusted Budget as at 31.12.2009 / in CZK thousand/

Indicator	Adjusted budget as at 31.12.2009
I. Income of the state organizational unit	1 500
II. Expenses total	389 012
1. Current expenses total:	368 335
Wage resources of the state organizational unit	211 929
Premium	71 750
Cultural and Social Needs Fund transfer	4 212
Other current expenses	80 444
* ISPROFIN 315-Ministry of the Environment	8 872
2. Investment expenses	20 677
incl.: * ISPROFIN 315 - Ministry of the Environment	20 677
Limit of wages and of the number of employees in organizations that provide compensation pursuant to Act No. 143/92 Coll.	
Wage resources total	211 929
incl.: * limit of salary resources	210 590
* other payments for work (other personnel costs)	1 339
b) Number of employees	663
c) Average salary in CZK	26 469
* State organizational unit - salaries + other personnel costs + social security legislation	283 679

Drawing of non-investment expenses in 2009

Indicator	Budget	Limit	Drawn	Saving
Wages	210 590 000,00	210 590 000,00	210 588 043,00	1 957,00
Other wages			1 957,00	-1 957,00
Water Protection Department	1 339 000,00	1 339 000,00	1 339 000,00	0,00
Social security and medical insurance	71 750 000,00	71 750 000,00	71 750 000,00	0,00
Other than budgetary resource				0,00
Wage expenses total	283 679 000,00	283 679 000,00	283 679 000,00	0,00

Indicator	Budget	Limit	Drawn	Saving
Other current non-investment expenses	71 572 000,00	71 572 000,00	71 330 829,01	241 170,99
Transfer to cultural and Social Fund	4 212 000,00	4 212 000,00	4 206 843,00	5 157,00
Transfer to CSNF from other than budget. res.				0,00
CEI's other than budgetary resource	0			0,00
Other than budgetary resource-increase for received premium		163 214,00	163 214,00	0,00
Current non-investment expenses total	75 784 000,00	75 947 214,00	75 700 886,01	246 327,99

Indicator	Budget	Limit	Drawn	Saving
ISPROFIN ICT expenses	6 500 000,00	6 500 000,00	6 286 184,48	213 815,52
ISPROFIN expenses - computer equipment	2 372 000,00	2 372 000,00	2 371 486,74	513,26
ICT other than budgetary resource				0
ISPROF. Non investment total	8 872 000,00	8 872 000,00	8 657 671,22	214 328,78

Non investment expenses total	368 335 000,00	368 498 214,00	368 037 557,23	460 656,77
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8.2 INVESTMENT

CEI investment in 2009 was planned and made in accordance with the table below.

Activity	Action No.	Title	Budget	Drawn	Saving
115010/33	115013D005	Building reconstruction of RI České Budějovice	5 064 000,00	5 061 589,58	2 410,42
115010/33	115013D006	Double garage construction at RI Ústí n. L.	450 000,00	449 915,25	84,75
115010/33	115014D007	Air condition purchase at RI Praha	245 000,00	244 978,00	22,00
115010/33	115014D008	Air condition purchase at RI Brno	350 000,00	349 630,00	370,00
115010/33	115013D007	Heating reconstruction at Directorate in Praha	1 184 000,00	1 183 526,40	473,60
115010/33	115014D009	Purchase of personal automobiles	4 956 000,00	4 955 440,55	559,45
115010/33	115011D003	Date storage of CEI and conversion into PDF	2 500 000,00	2 490 717,00	9 283,00
110010/33	110013D008	Electricity distribution reconstruction at KV	1 218 000,00	1 217 571,00	429,00
115010/33	115011D004	Purchase of computer equipment	2 325 000,00	2 324 091,90	908,10
115010/33	115013D009	Reception desk coverage at Directorate in Praha	136 000,00	136 000,00	0,00
115010/33	115014D010	Purchase of 4 vehicles	2 249 000,00	2 247 950,00	1 050,00
115010/33	115013D005	Reconstruction of RI České Budějovice	1 584 679,00	1 584 679,00	0,00
Capital investment total			22 261 679,00	22 246 088,68	15 590,32

Overall Income Evaluation in 2009

Indicator	Approved budget	Adjusted budget	Drawn
1. 2131 Income from land leases			1 950,00
2. 2132 Income from leases of other property and parts of property			313 873,09
3. 2133 Income from leases of movable assets			3 600,00
4. 2141 Income from interests			36 544,18
5. 2143 Implemented exchange rate profits			0
6. 2310 Income from selling of short-term and small long-term assets			5 999,00
7. 2322 Received adjustments	200 000,00	200 000,00	2 107 713,00
8. 2324 Received other than capital contributions and compensations	300 000,00	300 000,00	2 205 123,60
9. 2328 Non-identified income			0
10. 2329 Other non-taxable income not included	1 000 000,00	1 000 000,00	53 590,00
Non taxable income - subtotal			4 728 392,87
11. 3113 Income from selling other tangible long-term assets			75 600,00
Capital income - subtotal			75 600,00
12. 4132 Transfers from other our own funds			32 669,00
13. 4135 Transfers from funds of the state organizational units			0,00
Received (transfers from our own funds) – subtotal			32 669,00
Total	1 500 000,00	1 500 000,00	4 836 661,87

Forming and Drawing of title to unearned expenses in 2009

Indicator	Balance 2008	Forming 2009	Drawn 2009	Transfer into 2010
Profiling expenses	6 340,31	229,92	0	6 570,23
Non-profiling expenses	1 095,20	246,32	0	1 341,52
Total	7 435,51	476,24	0	7 911,75

CONTACTS

Directorate	Adress	E-mail	Phone/fax +420
	Na Břehu 267 190 00 Praha 9	public@cizp.cz	tel.:283 891 564 fax:283 892 662
Regional Inspectorate	Adress	E-mail	Phone/fax +420
Praha	Wolkerova 40 160 00 Praha 6	public@ph.cizp.cz	tel.: 233 066 111, fax: 233 066 103 disaster reporting: 731 405 313
Plzeň	Klatovská tř. 48 301 22 Plzeň	public@pl.cizp.cz	tel.: 377 236 783, fax: 377 237 289 disaster reporting: 731 405 350
Hradec Králové	Resslova 1229 500 02 Hradec Králové	public@hk.cizp.cz	tel.: 495 773 + linka, fax: 495 211 175 disaster reporting: 731 405 205
České Budějovice	Dr. Stejskala 6, P.O.BOX 32 370 21 České Budějovice	public@cb.cizp.cz	tel.: 386 109 111, fax: 386 357 581 disaster reporting: 731 405 133
Ústí nad Labem	Výstupní 1644 400 07 Ústí nad Labem	public@ul.cizp.cz	tel.: 475 500 547, fax: 475 500 042 disaster reporting: 731 405 388
Havlíkův Brod	Bělohradská 3304 580 01 Havlíkův Brod 1	public@hb.cizp.cz	tel.: 569 496 111, fax: 569 429 822 disaster reporting: 731 405 166
Brno	Lieberzeitova 14 614 00 Brno	public@bn.cizp.cz	tel.: 545 545 111, fax: 545 545 100 disaster reporting: 731 405 100
Olomouc	Tovární 41 772 00 Olomouc	public@ol.cizp.cz	tel.: 585 243 410, fax: 585 243 410 disaster reporting: 731 405 262
Ostrava	Valchařská 15/72 702 00 Ostrava	public@ov.cizp.cz	tel.: 595 134 111, fax: 596 115 525 disaster reporting: 731 405 301
Liberec	Tř. 1. máje 858/26 460 01 Liberec 1	public@lb.cizp.cz	tel.: 485 340 888, fax: 485 340 712 disaster reporting: 723 083 437

ABBREVIATIONS AND EXPLANATIONS

BCD	Alkaline catalytic decomposition
BSK	Biochemical oxygen consumption
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
ČIŽP	Czech Environmental Inspectorate
ČHMÚ	Czech Hydrometeorological Institute
ČOV	Waste water treatment plant
ČSPHM	Fuel filling station
ČR	Czech Republic
EIA	Assessment of environmental impacts
EK	European Commission
EO	Equivalent population
EU	European Union
EVL	European significant locations
GMO	Genetically modified organisms
HZS	Fire and Rescue Corps
CHSK	Chemical oxygen consumption
CHKO	Natural preserve
CHÚ	Conservation area
IMPEL	Network of environmental inspection authorities of EU countries
IPPC	Integrated prevention and pollution elimination
LHP	Forest economy plan
LHO	Forest management framework
MZCHÚ	Small-area specially protected areas
MŽP	Ministry of the Environment

NL	Undissolved substances
OI	Regional inspectorate
OkÚ	District Authorities
OOH	Waste Management Department
OOL	Forest Protection Department
OOO	Air Conservation Department
OOP	Environmental Protection Department
OOV	Water Conservation Department
OÚ	Municipal Authorities
RAPEX	European information system of products dangerous for consumers
PPO	Trans-border transport of wastes
PHARE	Poland and Hungary: Assistance for Restructuring (extended to other countries)
PUPFL	Plots intended for forest function
SFŽP	State Environmental Fund
SRS ČR	State Phytosanitary Administration of the Czech Republic
	TWINNING Program of cooperation between the institutions of the EU member states and the candidate states
ÚČOV	Central waste water treatment plant
ÚKZÚZ	Central Institute for Supervising and Testing in Agriculture
VKP	Significant landscape element
VZCHÚ	Large-area specially protected territories
ZCHD	Specially protected species
ZCHÚ	Specially protected area pursuant to Act no. 114/92 Coll.

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009

Regional inspectorate	Number of inspectors	Number of inspections	Issued standpoints and statements	Decisions of fines			Other decisions									Fee agendas		Number of solved accidents	Number of handled motions and petitions	Number of motions to state administration bodies	Number of filed notifications of crime
				All decisions on fines issued in the period observed	All decisions that came to force in the period observed	Final and conclusive decisions, total amount (CZK)	Number of final decisions - stopping or restriction of activities, operation or its part	Number of final decisions on seizing/ confiscation	Number of final decisions on remedial measures in the period observed	Number of decisions on adherence to emission limits	Number of decisions on determining the emission limit for burning of multiple fuel types	Number of issued approvals of the rules of regulation	Number of issued decisions on source categorization	Seizing and stopping of validity of certifications on hazardous properties of waste	Number of issued decisions on fees for discharging waste water	Number of issued decisions on fees for underground water consumption					
PH	65	2 081	2 561	239	214	23 085 800	5	4	61	6	1	0	28	0	294	948	14	694	3	0	
ČB	39	1 413	548	293	280	17 854 800	16	0	58	0	1	0	1	1	159	1 018	13	241	6	1	
PI	48	2 046	1 003	290	262	24 817 304	8	3	53	7	0	0	5	0	240	1 073	4	264	10	3	
UL	40	1 720	1 096	181	177	13 551 800	6	0	17	0	0	0	6	0	188	597	4	239	2	0	
HK	44	1 757	925	203	183	11 397 525	8	1	20	0	0	0	12	0	220	1 255	6	196	12	1	
HB	34	1 437	706	319	321	11 072 179	3	1	52	3	0	0	4	0	123	824	6	163	11	2	
BN	59	2 153	2 641	458	457	31 904 827	11	3	46	14	0	0	62	0	352	1 810	3	319	4	6	
OI	32	1 487	627	325	315	6 932 783	4	1	33	3	0	0	14	0	166	833	7	199	4	0	
OV	47	1 853	1 412	244	226	13 441 525	3	11	16	3	0	0	4	0	230	427	15	235	5	2	
LB	32	1 245	422	177	163	8 623 200	6	0	49	3	0	0	4	0	89	483	8	181	5	1	
Directorate	56	240	65	49	52	1 483 900	0	44	1	0	0	0	1	0		0	0	0	7	7	
Total	496	17 432	12 006	2 778	2 650	164 165 643	70	68	406	39	2	0	141	1	2 061	9 268	80	2 731	69	23	

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009 Waste management department

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Regional inspectorate	Numbert of inspectors	Number of inspected entities	Number of inspections	Issued standpoints and statements			Decisions in administrative procedures												Refraining of certification	Number of handled motions and petitions	Number of handled accidents	Number of filed notifications of crime
				SEI	Audits	Other	Fines					Remedial and protective measures				Suspension on certification validity concerning hazar-dous properties of waste						
							All decisions on fines issued in the period observed	All decisions that came to force in the period observed	Final decisions on fines issued in the period observed	Final decisions on fines issued from previous periods	Total amount (CZK)	All decisions on remedial measures issued in the period observed	All decisions on remedial measures came to force in the period observed	Final decisions on remedial measures issued in the period observed	Final decisions on remedial measures from previous periods	All final issued decisions	Final decisions issued in the period observed	Final decisions issued from previous periods				
PH	16	407	462	16	51	1	103	105	89	16	9 196 500	1	1	0	1	0	0	0	0	108	0	0
ČB	8	293	440	10	0	3	69	65	60	5	10 600 000	0	0	0	0	0	0	0	1	37	0	0
PL	10	498	779	10	0	2	128	116	112	4	16 538 000	4	3	3	0	0	0	0	0	92	0	0
UL	9	354	341	7	9	52	91	85	80	5	7 751 000	2	1	1	0	0	0	0	0	64	0	0
HK	9	313	380	0	0	0	66	40	36	4	2 618 000	4	3	3	0	0	0	0	0	33	0	0
HB	7	280	318	15	0	0	81	91	74	17	5 415 000	1	1	1	0	0	0	0	0	15	0	0
BN	14	474	544	35	0	308	125	115	111	4	8 592 100	4	1	1	0	0	0	0	0	70	0	1
OL	6	232	291	13	0	0	50	46	33	13	1 798 000	0	0	0	0	0	0	0	0	46	0	0
OV	9	361	386	3	1	16	53	56	52	4	7 472 500	0	0	0	0	0	0	0	0	78	2	0
LB	8	289	378	5	0	98	70	63	56	7	3 855 100	4	4	4	0	0	0	0	0	46	5	0
Directorate	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	107	3 501	4 319	114	61	480	836	782	703	79	73 836 200	20	14	13	1	0	0	0	1	589	7	1

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009 Water Protection Department

Regional inspectorate	Number of inspectors	Number of examinations, revisions and inspections		Participation in integrated inspections pursuant to Act. No. 76/2002 Coll.	Issued standpoints and statements			Decisions in administrative procedures												Number of handled motions	Accidents			Number of filed notifications of crimes
		Out of that, inspections pursuant to Act. No. 59/2006 Coll.	All decisions on fines issued in the period observed		All decisions on fines came to force in the period observed	Out of that, final decisions for failure to submit the fee report or statement	Final decisions on fines issued in the period observed	Final decisions on fines from previous periods	Total amount (CZK)	Out of that, amount of fines for failure to submit the fee report or statement	Fines				Remedial measures				Stopping of activities (operation)		Total amount of registrated accidents in water	Accidents investigated by the CEI		
											All decisions on remedial measures issued in the period observed	All decisions on remedial measures came to force in the period observed	Final decisions on remedial measures issued in the period observed	Final decisions on remedial measures from previous periods										
PH	13	480	36	24	16	45	320	28	19	5	17	2	8 880 000	55 000	2	3	2	1	0	119	22	14	0	
CB	7	319	5	7	12	1	66	81	77	44	74	3	2 781 300	860 000	17	16	16	0	0	50	4	4	0	
PL	12	387	19	32	18	3	150	79	75	10	67	8	4 734 804	130 000	23	25	23	2	1	32	5	4	0	
UL	10	365	23	17	9	0	58	31	29	2	25	4	1 661 700	20 000	6	6	6	0	0	24	15	4	0	
HK	10	328	21	31	38	0	98	43	58	28	40	18	4 579 525	490 000	3	3	3	0	0	15	10	6	0	
HB	6	233	8	13	8	0	21	59	57	19	52	5	1 377 479	330 000	10	10	10	0	0	28	8	6	0	
BN	12	450	20	11	24	0	341	180	188	83	172	16	9 312 727	1 005 000	8	10	8	2	0	47	13	3	0	
OL	7	246	15	18	21	0	52	148	146	125	139	7	2 737 783	1 340 000	4	4	4	0	0	32	10	5	0	
OV	11	354	15	18	5	0	74	62	53	13	48	5	3 543 525	360 000	6	7	5	2	0	25	21	13	0	
LB	5	216	19	20	5	9	11	33	31	17	31	0	1 364 100	260 000	8	9	7	2	0	34	3	3	0	
Directorate	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	101	3 378	181	191	156	58	1 191	744	733	346	665	68	40 972 943	4 850 000	87	93	84	9	1	406	111	62	0	

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009

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Regional inspectorate	Fees												
	Fees for waste discharging, (Section 89 of Act No. 254/2001 Coll.)						Fees for underground water consumption, (Section 88 of Act no. 254/2001 Coll.)						
	Issued decisions on advance payment change	Issued decisions on advance payments for 2010	Determined amount of advance payments for 2010 (CZK)	Issued decisions on fees for 2008	Final decisions on fees for 2008	Amount of final fees for 2008 (CZK)	Additional decisions on advance payments for 2009	Additional amount of advance payments for 2009 (CZK)	Issued decisions on advance payments for 2010	Determined amount of advance payments for 2010 (CZK)	Issued decisions on fees for 2008	Final decisions on fees for 2008	Amount of final fees for 2008 (CZK)
PH	0	175	38 431 246	119	119	36 854 414	26	1 942 253	611	220 331 427	311	311	65 248 538
CB	4	77	17 477 102	78	78	9 841 302	9	338 214	498	64 276 037	511	509	38 552 900
PL	3	104	10 406 647	133	133	11 011 328	48	3 115 247	469	65 736 407	556	554	52 634 278
UL	9	81	62 661 015	98	98	63 600 275	16	1 243 046	254	89 823 502	327	327	74 241 751
HK	1	94	37 146 360	125	125	62 946 310	48	5 592 006	592	278 948 734	615	615	131 391 379
HB	0	76	9 625 027	47	47	3 030 568	11	568 538	486	53 578 155	327	327	24 555 846
BN	7	169	17 547 313	176	176	20 252 314	49	3 178 490	524	168 142 951	1 237	1 237	155 739 707
OL	4	62	12 608 307	100	100	14 075 656	17	1 836 354	345	143 112 080	471	471	102 099 194
OV	5	106	55 168 835	119	119	46 104 527	1	46 000	192	56 038 711	234	234	42 969 209
LB	0	45	9 707 684	44	44	2 941 971	13	1 214 880	214	66 218 068	256	256	70 141 800
Directorate	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	33	989	270 779 536	1 039	1 039	270 658 665	238	19 075 028	4 185	1 206 206 072	4 845	4 841	757 574 602

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009 Air Protection Department

Regional inspectorate	Number of inspectors	Number of inspected entities	Number of inspections	Issued standpoints and statements			Decisions in administrative procedures											Number of SPE verifications	Emissions measurements			Number of handled motions and petitions
				SEI	EIA/IPPC	Others	Fines					Measures			Approvals		Source categorization		Number of measurements with limits exceeded	Number of measurements without limits exceeded	Interlaboratory comparison of tests	
							All decisions issued in the period observed	All decisions that came to force in the period observed	Final decisions on fines issued in the period observed	Final decisions on fines from previous periods	Total amount (CZK)	Adherence to emission limits	Stopping or restriction of activities	Other	EL - burning of multiple fuel types	Rules of regulation						
PH	12	355	537	15	792	378	35	30	26	4	2 450 000	6	1	5	1	0	28	432	0	0	0	87
CB	7	159	206	16	163	0	29	29	26	3	1 290 000	0	0	0	1	0	1	185	0	0	0	7
PL	9	249	403	15	444	23	27	28	27	1	1 851 000	7	0	4	0	0	5	325	0	0	0	22
UL	9	316	566	13	226	296	14	14	12	2	1 940 000	0	1	0	0	0	6	163	0	0	0	55
HK	9	188	612	10	294	38	42	31	28	3	1 389 000	0	0	0	0	0	12	390	0	0	0	27
HB	7	210	336	8	325	17	57	53	51	2	1 266 000	3	0	1	0	0	4	294	0	0	0	16
BN	12	489	666	6	698	589	63	69	55	14	4 324 500	14	0	4	0	0	62	593	0	0	0	57
OL	7	196	417	6	293	50	34	36	27	9	767 500	3	0	3	0	0	14	252	0	0	0	22
OV	11	295	499	7	496	344	25	23	22	1	826 000	3	0	1	0	0	4	189	0	0	0	40
LB	7	163	260	4	100	10	21	18	18	0	872 000	3	0	7	0	0	4	142	0	0	0	26
Directorate	10	16	39	0	0	40	13	13	13	0	1 417 000	0	0	0	0	0	1	3 638	8	60	8	0
Total	100	2 636	4 541	100	3 831	1 785	360	344	305	39	18 393 000	39	2	25	2	0	141	6 603	8	60	8	359

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009 IPPC

Regional inspectorate	Number of inspectors	Number of examinations, revisions and inspections				Activities in examinations, revisions and inspections reported by other departments	Issued standpoints and statements				Decisions in administrative procedures														Accidents	
		Number of checked facilities	Inspections of facilities so far without Integrated Permit according to Act No. 76/2002 Coll.	Number of inspections	Applications for issuance of the integrated permit		EIA	Oral negotiations concerning IP issuance, incl. oral sessions compulsory pursuant to Act No. 76/2002 Coll.	Other negotiations, standpoints and statements	Initiation of administrative procedures to impose a fine	Fines pursuant to Act No. 76/2002 Coll.								Stopping of operation of the facility or its part	Refraining from imposing the fine	Number of handled motions and petitions	Number of registered accidents (facilities under IPPC)	Number of filed notifications of crimes (agenda IPPC)			
											Decisions on fines issued in the period observed	Final decisions on fines issued in the period observed	Decisions on fines that came to force from previous periods	Total - all decisions on fines that came to force in the period observed	Total amount (CZK)	Out of that, amount of fines for air protection issues that came to force in the period observed	Out of that, amount of fines for water protection issues that came to force in the period observed	Out of that, amount of fines for waste management issues that came to force in the period observed								
PH	5	45	2	45	10	87	388	2	57	8	21	16	7	23	1 305 000	0	0	115	0	0	0	1	0			
CB	4	37	2	39	12	3	84	2	33	20	19	13	2	15	1 423 000	25	0	75	0	1	0	5	0			
PL	4	76	3	76	9	7	161	6	47	7	9	9	0	9	850 000	0	0	20	0	0	0	2	0			
UL	3	43	0	44	40	20	151	5	110	6	14	12	4	16	984 000	0	0	0	0	0	0	3	0			
HK	4	93	7	93	4	83	191	4	24	19	19	18	2	20	824 000	0	0	0	0	0	0	0	0			
HB	4	42	1	42	74	56	75	11	4	16	16	16	0	16	852 000	62	0	0	0	0	0	1	0			
BN	4	85	0	112	5	108	271	1	152	5	19	18	4	22	8 255 000	145	0	10	0	0	0	0	0			
OL	2	74	0	123	6	15	119	4	25	4	19	18	1	19	467 000	0	0	0	0	0	0	0	0			
OV	4	68	2	136	20	65	202	20	96	4	20	17	2	19	238 000	0	0	0	0	2	0	0	0			
LB	3	63	3	69	13	20	82	7	24	7	7	5	0	5	380 000	0	0	0	0	0	0	0	1			
Directorate	6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Total	43	626	20	779	193	464	1 724	62	572	96	163	142	22	164	15 578 000	232	0	220	0	3	0	12	1			

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009

Nature protection department + CITES

Regional inspectorate	Number of inspectors	Number of inspections	Issued standpoints and statements		Decisions in administrative procedures													Number of handled motions and petitions	Number of motions to state administration bodies	Number of filed notifications of crime
			SEI	Other (including EIA)	Fines										Restriction / stopping activities	Seizing	Measures			
					Illegal activities of legal entities and physical persons - entrepreneurs					Delicts of physical persons										
					All decisions on fines issued in the period observed	All decisions that came to force in the period observed	Final decisions on fines issued in the period observed	Final decisions on fines issued from previous periods	Final and conclusive decisions, total amount (CZK)	All decisions on fines issued in the period observed	All final decisions on fines	Final decisions on fines issued in the period observed	Final decisions on fines issued from previous periods	Final and conclusive decisions, total amount (CZK)						
PH	13	393	0	354	25	15	13	2	1 047 000	21	17	16	1	59 300	4	4	4	353	3	0
ČB	6	223	0	90	28	27	25	2	683 000	26	21	20	1	192 500	16	0	7	133	6	1
PL	7	234	0	117	17	12	11	1	450 000	22	16	16	0	84 500	7	3	3	106	10	3
UL	5	190	3	134	16	16	13	3	1 092 000	1	2	1	1	7 100	5	0	1	86	2	0
HK	8	169	0	142	7	12	7	5	461 000	10	9	7	2	73 000	8	1	3	113	12	1
HB	5	328	0	68	44	43	41	2	1 090 500	22	20	18	2	88 100	3	1	2	102	11	1
BN	10	283	2	104	29	25	23	2	576 000	29	25	24	1	404 000	11	3	2	126	4	5
OL	5	214	0	24	26	24	20	4	639 000	28	27	26	1	86 500	4	1	7	85	4	0
OV	7	287	0	82	23	21	18	3	798 000	55	51	48	3	238 500	3	11	6	86	5	2
LB	5	130	0	47	9	10	6	4	1 638 000	25	24	22	2	186 000	6	0	1	62	5	0
Ř	9	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0	1	0	2	0
Total NPD	80	2 451	5	1 168	224	205	177	28	8 474 500	239	212	198	14	1 419 500	67	24	37	1 252	64	13
Directorate CITES	7	199	0	13	2	2	2	0	9 000	34	37	32	5	57 900	0	44	0	0	5	7
Total	87	2 650	5	1 181	226	207	179	28	8 483 500	273	249	230	19	1 477 400	67	68	37	1 252	69	20

OVERVIEW OF ACTIVITY OF REGIONAL INSPECTORATE IN THE YEARS 2009 - Forest department protection

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Regional inspectorate	Number of inspectors	Number of inspections	Issued standpoints and statements		Decisions in administrative procedures											Number of handled motions and petitions	Number of filed notifications of crime	
			SEI	Other	Fines						Remedial measures				Number of issued preliminary measures			Number of final decisions - stopping or restriction of activities
					All decisions on fines issued in the period observed	All decisions that came to force in the period observed	Out of that		Total amount (CZK)	All decisions on remedial measures issued in the period observed	All decisions on remedial measures came to force in the period observed	Out of that						
							Final decisions on fines issued in the period observed	Final decisions on fines issued from previous periods				Final decisions on remedial measures issued in the period observed	Final decisions on remedial measures from previous periods					
PH	6	164	0	39	6	5	5	0	148 000	45	42	41	1	0	0	27	0	
ČB	7	186	0	65	41	46	38	8	885 000	35	34	32	2	0	0	14	0	
PL	6	167	0	0	8	6	4	2	309 000	13	12	12	0	0	0	12	0	
UL	4	214	0	3	14	15	14	1	116 000	8	7	7	0	0	0	10	0	
HK	4	175	0	3	16	13	12	1	1 453 000	10	10	10	0	0	0	8	0	
HB	5	180	0	98	40	41	35	6	983 100	40	35	30	5	0	0	2	1	
BR	7	98	0	2	13	13	12	1	440 500	14	14	14	0	0	0	19	0	
OL	5	196	0	5	20	17	11	6	437 000	22	16	16	0	0	0	14	0	
OV	5	191	0	1	6	3	3	0	325 000	27	26	0	0	0	0	6	0	
LI	4	192	0	0	12	12	11	1	328 000	29	26	26	0	0	0	13	0	
RDT	5	2	0	6	0	0	0	0	0	0	0	0	0	0	0	0	0	
Total	58	1 765	0	222	176	171	145	26	5 424 600	243	222	188	8	0	0	125	1	



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CZECH ENVIRONMENTAL INSPECTORATE
Na Břehu 267
190 00 Praha 9
Tel.: 00420 222 860 111
Fax: 00420 283 892 662
public@cizp.cz

www.cizp.cz