

ANNUAL REPORT 2015

CZECH ENVIRONMENTAL INSPECTORATE



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FOREWORD

The year 2015 posed a new and unique challenge for the Czech Environmental Inspectorate (CEI). It was the full transformation of this organizational component of the State under the powers of the Public Service Act, with the necessity to maintain the quality and quantity of inspection activities in all the departments and powers of the Inspectorate.

It can be said that the challenge has been fulfilled and the Inspectorate has had a successful year. In this judgment, I start from the CEI's main mission: to be an efficient authority impartially supervising adherence to environmental law, as well as our main objective, which is to improve the state of the environment. Other attributes of our inspection work are predictability, transparency and justness in both the factual and territorial sense. For detailed and commented results of our activities, please see the following pages.

On the whole, it must be emphasised that both the intensity and quality of our inspection work increased in 2015, confirmed also by a comparison of selected indicators. We made almost 15,700 inspections, which is 1100 more than in 2014. Most of them (4300) were in the Air department, representing an increase by 350 compared to 2014. A large number (3600) of inspections were also made in the Waste department, an increase by 550 compared to 2014. The number of inspections in the Water department also increased significantly, by 200 to 3200. Conversely, we made 90 fewer inspections in the Forest department. The numbers of inspections in the Nature and Integrated Prevention remained practically at the level of the previous period.

In total, we awarded fines in legal force amounting to CZK 136 million; there was a substantial 10% increase in remedial measures in force (totalling 345) and mo-



tions to stop or restrict operations in force (totalling 44). Inspection work was done by 385 inspectors in 2015, which was 12 fewer than in 2014. The average number of inspections per inspector was 41 compared to 36 in 2014. We received 2700 suggestions in the course of the year, which was 80 more than in the previous year. We registered and investigated into 260 accidents, which was 50 more than in 2014. We filed 17 reports of crimes. The charge agenda was at approximately the same level and with the same parameters as in the previous year.

In conclusion, I would like to thank all the employees of the Czech Environmental Inspectorate for their professional performance, enthusiasm and excellent cooperation on the necessary changes that had to take place in 2015.

Erik Geuss
CEI Director

CONTENTS

Foreword 3

Contents 4

1 Description of activities 6

1.1 General information 6

1.2 Organizational structure 6

1.3 Inspection work intensity 7

2 Decisions in administrative proceedings 9

2.1 Fines 9

2.2 Other decisions 9

2.3 Work outside administrative proceedings 9

3 Cooperation with the public 11

3.1 Suggestions and complaints 11

3.2 Provision of information 13

4 CEI involvement in accident resolution 17

4.1 Central register of water accidents in 2015 17

4.2 Major accident cases 17

5 CEI work in 2015 by department 21

5.1 Air protection 21

5.2 Water protection and prevention of major industrial accidents 27

5.3 Water management, chemicals and biocidal preparations 39

5.4 Nature protection and CITES 53

5.5 Forest protection 65

6 Integrated agendas 76

6.1 Legal foundation of work on integrated agendas 76

6.2 Overview of performance of tasks in integrated agendas – supervision (inspections) 76

6.3 Non-supervisory CEI work on integrated agendas 80

6.4 Major cases from inspection work 82

6.5 Conclusion 84

7 International collaboration 86

8 Human resources 88

8.1 HR agenda 88

8.2 Training 89

9 Economics 90

9.1 Overview of transfers of budget fund savings to
unspent expense claim report 91

9.2 Use of reserve fund and other non-budgetary resources, CSNF 92

9.3 Overall income assessment 93

10 Overview of work of territorial inspectorates 95

11 Financial statement as of 31 Dec 2015 97

Contact details 110

Abbreviations and explanations 112

1 | DESCRIPTION OF ACTIVITIES

1.1 General information

The Czech Environmental Inspectorate (CEI) was established in 1991 by the Czech Environmental Inspectorate Act and its powers in forest protection. The other departments joined it gradually later on in 1991-1992. It is an autonomous organizational component of the State, established by the Ministry of the Environment.

It does its work in five areas:

- air protection,
- water protection,
- waste management,
- nature protection (including CITES),
- forest protection.

It also applies an integrated approach to protection of the environment based on the Integrated Prevention Act (IPPC), the Environmental Impact Assessment Act (EIA) and in its overall inspection work method.

OVERVIEW OF CEI WORK

- It supervises adherence to legal regulations on environmental protection,
- It carries out inspections and checks,
- It orders measures to remedy identified shortcomings and penalty measures for failure to adhere to environmental laws,
- It inspects trade in and handling of endangered animal and plant species and products made of them (seizes illicitly acquired individuals and items),
- It restricts or halts operations if they are significant threat to the environment,
- It sets charges for wastewater discharge and groundwater collection,

- It is involved in resolving historic environmental burdens and environmental accidents,
- It collaborates with inspection authorities of EU states and the EU inspection authority network (IMPEL),
- It elaborates position statements for other state authorities,
- It handles suggestions from citizens and legal entities,
- It provides information based on requests under laws in force,
- It informs the public, media and state authorities about environmental data obtained through its inspection work.

1.2 Organisational structure

The CEI is divided into 10 territorial inspectorates, two branch offices and the headquarters. As of 31 Dec 2015, it employed 538 persons, out of which 385 were inspectors.

Territorial inspectorates:

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



Overview of powers by environmental component

CEI powers		Environmental component				
		Air	Water	Waste	Nature	Fore
Supervision	Inspections, reviews, checks, investigations, etc.	•	•	•	•	•
Penalties	Fines to legal entities	•	•	•	•	•
	Fines to natural persons	•	•	•	•	•
	Restriction or halt of operations	•	•		•	•
Measures	Measures to remedy identified shortcomings	•	•	•	•	•
	Resolving of historic environmental burdens		•			
	Register of accidents and cooperation on resolving them	•	•	•		
	Seizing and confiscation of specimens of endangered animal or plant species				•	
	Seizing of illicitly held individuals, sampling	•			•	
Charges	Charges (wastewater discharge, groundwater collection)		•			
Position	Position statements, statements, approvals for other	•	•	•	•	•
Suggestions	Handling of suggestions	•	•	•	•	•

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

1.3 Intensity of inspection work

In 2015, the CEI carried out a total of 15,677 inspections and issued 10,337 decisions in force (including 2087 deci-

sions on charges and advances for wastewater discharge and 4940 decisions on charges for groundwater collection). Compared to 2014, the numbers of both inspections and decisions in force increased, namely by 1043 inspections and 38 decisions in force. The total number of CEI in 2015 was 385. Thus, one inspector made 41 inspections on average. In 2015, the CEI issued 9784 position statements and statements, including 1162 on EIA processes.



2 | DECISIONS IN ADMINISTRATIVE PROCEEDINGS

2.1 Fines

In 2015, the Inspectorate awarded 2941 fines (2808 entered into force in 2015). The total amount of the awarded fines in legal force was CZK 135,719,214. The average fine was CZK 48,333.

2.2 Other decisions

In 2015, we issued 44 decisions in force on halting or restriction of activities, operations or parts thereof, 107 decisions in force on seizing or confiscation of live or dead specimens, 345 decisions in force on remedial measures, 6 decisions in force on remedial measures to comply with emission limits, 2087 decisions on charges and advances for wastewater discharge and 4940 decisions on charges and advances for groundwater collection.

2.3 Work outside administrative proceedings

In 2015, the CEI issued 1162 EIA position statements and statements and 8622 other position statements and statements. The CEI collaborates with the MoE and departmental organizations, as well as the General Customs Directorate on CITES, GMO and transboundary movement of waste, the Czech Police, the Fire Rescue Service, the Czech Trade Inspection Authority, Occupational Safety Inspectorate, the Public Health Service, regional and local authorities and institutions, judicial authorities, etc.



3 | COOPERATION WITH THE PUBLIC

3.1 Suggestions and complaints

The Czech Environmental Inspectorate handles suggestions pointing at damaging or endangering of the environment and complaints about inappropriate conduct of officials or proceedings of administrative authorities, under

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

CEI and the citizen public

Suggestions, complaints and petitions are an important element in the CEI communication with the public. The citizens often point at violations of laws that would otherwise remain hidden. Suggestions and petitions are a start point for other CEI work – if CEI investigation finds ground to initiate an official proceeding, then it initiates a penalty proceeding or a proceeding on remedial meas-

ures. Some suggestions and petitions are forwarded to other public authorities of factual jurisdiction for investigation.

Complaints about inappropriate conduct of CEI inspectors or proceedings of territorial inspectorates constitute an important feedback that helps the organization improve its work. Another important purpose of handling suggestions, complaints and petitions is to improve the legal awareness of the public concerning environmental protection.

Numbers of suggestions received by CEI TIs in 2015

The numbers of suggestions received by CEI TIs in 2015 are shown in the table below. The numbers of suggestions shown were registered by the CEI (received by CEI filing room). However, not all the suggestions were completely handled in 2015. Some were forwarded to other public authorities.

Numbers of suggestions received by TIs in 2015

Territorial Inspectorate	Praha	České Budějovice	Plzeň	Ústí nad Labem	Hradec Králové	Havlíčkův Brod	Brno	Olomouc	Ostrava	Liberec	Ředitelství	Celkem
Env. component												
Air protection	87	35	18	35	42	35	71	34	56	39	9	461
Water protection	94	55	31	52	39	36	54	6	36	23	0	426
Waste management	103	65	49	60	49	21	93	38	87	32	0	597
Nature protection	285	83	66	94	82	99	113	58	88	58	0	1026
Forest protection	37	19	5	13	14	2	13	6	27	20	0	156
Integrated agendas	5	0	0	0	1	24	2	38	0	10	0	80
Total	611	257	169	254	227	217	346	180	294	182	9	2746

Numbers of complaints about inappropriate conduct of inspectors or proceedings of CEI TIs in 2015

The vast majority of the complaints are handled under Section 175, Para. 4 of Act no. 500/2004 Coll., Rules of Administrative Procedure. Factually speaking, these concerns complaints on proceedings of an authority that does not meet the complainer’s ideas from the original submission (suggestion). Only very few complaints concern “inappropriate conduct of officials”.

The CEI Headquarters carry out methodological and inspection jobs in the area of suggestion and complaint handling. Suggestions received by the Headquarters filing office are delivered to the respective territorial inspectorate or HQ expert office with a binding instruction on the matter handling method (unless the matter is forwarded to a different authority in factual or local jurisdiction in case the CEI is not in factual jurisdiction).

Toll free number

Effective as of 1 Sep 2008, the CEI has implemented a toll free telephone number (800 011 011). It is a direct and free telephone contact between the CEI and citizens. The number is primarily used for accepting suggestions and complaints from citizens, and it also informs citizens about the areas of legal powers of the CEI. The number is in operation daily between 8 am and 4 pm. Like in previous years, it registers two queries (suggestions) a day on average.

Conclusion

The suggestions, complaints and petitions agenda is an integral component of CEI work at all CEI inspectorate departments. This activity is embedded in both the CEI Statutes and CEI Organisational Rules. The CEI HQ Internal Audit department is the methodological control office for this agenda.

▼ Numbers of complaints about inappropriate conduct of inspectors or proceedings of CEI TI in 2015

Prague	31
České Budějovice	5
Plzeň	13
Ústí nad Labem	2
Hradec Králové	2
Havlíčkův Brod	9
Brno	0
Olomouc	0
Ostrava	5
Liberec	3
Total	70

Env. component	2010	2011	2012	2013	2014	2015
Air protection	391	300	313	361	366	461
Water protection	481	420	412	412	390	426
Waste management	526	490	502	532	599	597
Nature protection	1140	951	867	891	1020	1026
Forest protection	136	137	117	155	167	156
Integrated agendas	141	125	81	69	78	80

▲ Numbers of suggestions in 2010–2015 by environmental component

Numbers of suggestions in 2010–2015 by Territorial Inspectorate

Territorial Inspectorate	2010	2011	2012	2013	2014	2015
Prague	653	534	503	521	572	611
České Budějovice	240	223	184	211	240	257
Plzeň	261	157	138	196	214	169
Ústí nad Labem	257	297	305	230	247	254
Hradec Králové	266	163	188	204	196	227
Havlíčkův Brod	188	161	158	189	213	217
Brno	284	257	262	264	306	346
Olomouc	144	174	177	158	178	180
Ostrava	237	291	291	262	290	294
Liberec	179	167	161	190	161	182

3.2 Provision of information

In 2015, the Czech Environmental Inspectorate (CEI) handled 332 requests for information, including 59 pursuant to Act no. 106/1999 Coll. on Free Access to Information, and 273 pursuant to Act no. 123/1998 Coll. on Right to Environmental Information.

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

Pursuant to Section 18 of the Act, the CEI publishes its Annual Report for 2015 about its activity in the area of information provision: Most requests for information were addressed to the Forest Protection department (19 requests). The Water Protection department handled 6 requests; the Nature and Air Protection departments 5 requests each, and the Waste Management department handled 3 requests. In

addition, ion (economic operations). Two requests were postponed pursuant to Section 14, Para. 5, item c) of Act no. 106/1999 Coll., and a decision on refusal was issued for one request pursuant to Section 14, Para. 1 of the Act.

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

Pursuant to this Act, 276 requests were issued in 2015, including 6 instances of refusal due to incomplete administrative proceedings (partly in 2 cases). Most of the requests were addressed to the Nature Protection Department (73 requests). The Air Protection Department handled 63 requests, the Waste Management Department 56, the Water Protection Department 34, the Forest Protection Department 24, and the Integrated Agenda Department 7 requests. In total, 16 requests contained general queries.

Discussion forum

The Czech Environmental Inspectorate operates on its web site a discussion forum, through which citizens may ask various questions concerning the environment. These requests are included in the records pursuant to the above Acts. In 2015, the Czech Environmental Inspectorate received a total of 33 questions and comments. The most frequent questions concerned waste management and water protection, chiefly illegal dumps, wastewater disposal methods and handling of unwholesome substances (farm fertilisers).

Besides information provided by the CEI pursuant to the above Acts, it also informs the public in its own initiative in the form of press releases and annual reports, brochures, leaflets, etc.

Information provision helps establish a stronger public feedback for the CEI. The main objective is to maintain contact with the media and expert and general public, inform on results of CEI inspection work and, as far as possible, to give answers to questions concerning the CEI’s inspection and supervisory powers.

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

Requested information pursuant to Act no. 106/1999 Coll.	Number
No. of requests for information	59
No. of issued decisions on refusal	1
No. of appeals against the decision	0
Duplicate of substantial parts of each judgment on review of legitimacy of authority’s decision on refusal of request for information and overview of all expenditures by the authority in connection with judicial proceedings on rights and obligations hereunder, including costs of own employees and costs of legal representation	0
List of exclusive licences granted, including justification of necessity of granting of exclusive licence	0
No. of complaints filed pursuant to Section 16a, reasons for filing and brief description of their handling	9 - reason for complaint was disapproval with information request handling. A total of 7 complaint were forwarded to the MoE; the MoE affirmed the proceeding of CEI TI Prague for 6 of them, took over one proceeding and provided the information. Based on one complaint, the CEI additionally made the information available. One complaint was not filed within the legal period; the CEI informed the complainer that it would not deal with the
Other information relating to enforcement of this Act	0

Numbers of requests for information in 2009–2015

The public interest in provision of information pursuant to law increases year-on-year (except 2013). Compared to the previous year, we received 17 fewer requests under Act no. 106/1999 Coll. in 2015, but 87 more requests under Act no. 123/1998 Coll.

Numbers of requests for information in 2009–2015

Year	Total number of requests	No. of requests under Act no. 106/1999 Coll.	No. of requests under Act no. 123/1998 Coll.
2015	332	59	273
2014	262	76	186
2013	209	55	154
2012	229	63	166
2011	233	44	189
2010	181	36	145
2009	217	62	155



4 | CEI INVOLVEMENT IN ACCIDENT RESOLUTION

4.1 Central register of water accidents in 2015

The Czech Environmental Inspectorate has maintained a central accident register under the Waters Act since 2002.

In 2015, 221 accidents were registered as they factually met the definition of accident pursuant to Section 40 of Act no. 254/2001 Coll. on Waters. In the course of 2015, the CEI was informed about other accidents as well and investigated them, but did not include them in the central accident register due to their minimal extent without impact on water quality.

The most frequent accidents includes those caused as a consequence of traffic accidents. In 2015, we registered 56, representing 25% of the total number of cases. Fish deaths accompanied 42 cases in this year, representing 19% of the total number of accidents. Groundwater contamination occurred in 9 cases. The accident originator was known in 138 cases. The Fire Rescue Service intervened in 124 cases registered by the CEI. In 94 cases, the CEI investigated the accident or was involved in the investigation.

All the indicators showed a slight increase due to the greater number of accidents registered.

4.2 Major accident cases

ČESKÁ RAFINÉRSKÁ, a.s., Litvínov

In the second quarter of 2014, we made an unplanned check at ČESKÁ RAFINÉRSKÁ, a.s., and the investigation was concluded in 2015. The main reason for the inspection was the fact that a massive groundwater contamination with petroleum hydrocarbons occurred at the VISBREAKING (WSB) production technology. The case

was qualified as an accident pursuant to Section 40 of the Waters Act. In 2015,

a survey confirmed the original assumptions about the accident cause, i.e., that the damaged wastewater sewer from the production equipment was the cause of the layer of solid contaminants several cm thick on top of the groundwater table in several boreholes. Replacement of the whole pipeline and some adjacent structures was completed in the first half of 2015, thus eliminating the cause of the state. The current remediation works around the WSB are thus paid by the originator until further notice (originally a historic environmental burden). The CEI awarded a fine of CZK 500,000 on the polluter. The decision entered into force on 16 Jul 2015.

AQUA SERVIS, a.s., Rychnov nad Kněžnou

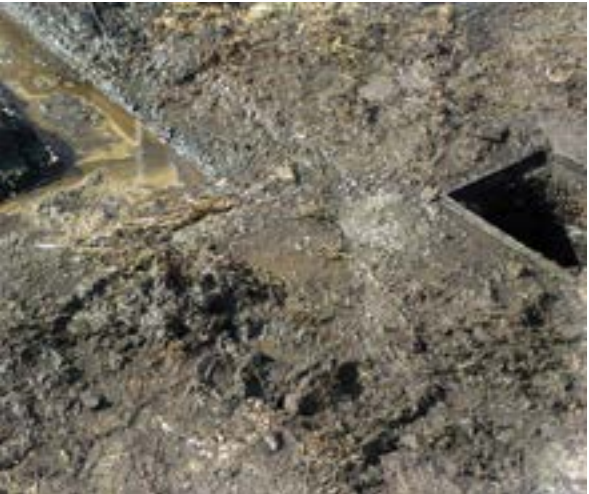
An accidental contamination of surface water of the Dědina on 31 August – 1 Sep 2015, when all the accumulated wastewater from Dobruška WWTP were released into the watercourse via the rain relief channel without treatment. This resulted in a surface water contamination followed by deaths of aquatic animals. It involved mostly deaths of small fish, including several individuals of the specially protected species brook lamprey. The reason for direct discharge of untreated wastewater into surface water was operational defects at the WWTP. The WWTP operator cooperated with the CEI in the course of the accident investigation and submitted required documents and information, and did not obscure its fault in any way. Following the accident, it took several measures helping eliminate the consequences of the accident and measures that will help prevent similar situations. Direct discharge of wastewater into surface water by the operator of Dobruška WWTP resulted in both a violation of Act no. 254/2001 Coll. on Waters and a harm-

ful interference with the natural development of the specially protected species brook lamprey pursuant to Act no. 114/1992 Coll. For the accident, AQUA SERVIS, a.s., Rychnov nad Kněžnou, was ordered a fine of CZK 240,000. The fine entered into force on 30 Oct 2015.

PARAMO, a.s., Pardubice

An accidental release of pollutants into the rock environment occurred on 22 Jul 2015, when 29.55 t of hydrochloric acid was spilled outside a storage tank in the course of decantation into the tank in the Energy facility of PARAMO, a.s., due to a defect on the decantation device of the railway tanker. The greater part of the acid was intercepted in the pit of the decantation point, and part in the Energy facility neutralisation pit and the WWTP retention pool. Approx. 900 litres of 31% hydrochloric acid was thus released into the rock environment near the decantation point.

The accident at PARAMO, a.s., Pardubice, was reported to the CEI on 22 Jul 2015. Based on the investigation re-



Wrongly secured storage of manure liquid



Death of fish caused by silage and manure liquid spills

sults, PARAMO, a.s., Pardubice was awarded a fine of CZK 240,000 for violation of obligations for handling potential pollutants. The fine entered into force on 30 Nov 2015.

AGRODRUŽSTVO MORKOVICE, družstvo

On 9 Jul 2015, a spill of silage and manure liquid occurred at an animal husbandry facility in Nítkovice. The spill of approx. ten cubic metres of a mixture of silage and manure liquid caused an accidental contamination of surface water in a local watercourse and then the Litěňický brook for some 4 km, including the Nemočovický fish pond covering 1.7 ha, where death of fish

was identified. The cause of the accidental spill was a ruptured plastic pipeline for discharging manure liquid from a manure store to a pit and its clogging with manure. Therefore, after a strong shower, the manure liquid flowed into the storm sewer discharging into the canalised Nítkovský brook, running through the facility. The pollutants reached four kilometres from the source and caused a strong organic contamination in the watercourses. As a consequence of the spill, 372 fish (568

kg of zander, white fish) died in Nemočovický fishpond farther downstream. The release of the pollutants was identified on 9 Jul 2015 in the evening. The accident originator initiated work to prevent further spills immediately after identifying the accident: removal or damaged clogged pipeline and clearing of the discharge channel. The accident originator was awarded a fine of CZK 300,000. The fine entered into force on 26 Aug 2015.

Classification of accidents by pollutant category in 2015

Pollutant category	Accidents	%
Petroleum products	108	48,9
Wastewater	34	15,4
Chemicals except heavy metals	19	8,6
Waste from animal husbandry	13	5,9
Sludge and solids	1	0,4
Food processing products	3	1,4
Oxygen deficit	3	1,4
Other pollutants	10	4,5
Unidentified	30	13,5
Total	221	100

Classification of accidents by main cause in 2015

Cause of accident	Accidents	%
Human error	75	33,9
Technical cause	64	29
Nature	12	5,4
Unidentified	70	31,7
Total	221	100



5 | CEI WORK IN 2015 BY DEPARTMENT

5.1 Air Protection

5.1.1 Inspection work in 2015

Inspection work in 2015 was carried out by the Air Protection Department inspectors in the full extent of powers in both air protection and ozone layer and climate protection. We inspected performance of obligations imposed by generally binding national legal regulations and EU regulations as well as performance of obligation specified in permits for operation of stationary sources of air pollution. In total we made 4252 inspections, including 40% scheduled and 60% unscheduled. The year 2015 saw the end of effect of the transitional provision of the Air Protection Act, under which operators of stationary sources of air pollution whose original permit for operation did not match the requirements of the Air Protection Act were required to ask for a new permit with up-to-date air protection requirements. The Inspectorate regarded the update of the operating permit, which was going to align the new legal requirements with the set operating requirements, as a important tool for prevention of air pollution. For this reason too, great attention was paid to adherence to obligations of operators of existing stationary sources applying for new permits.

The numbers and distribution of inspections carried out in 2015 among the areas of jurisdiction corresponded to the seriousness of the activities operated and their environmental impact. Most of the inspections concerned facilities with stationary sources of air pollution (3599 inspections) and the related activities of persons authorised to measure emissions (252); we made fewer inspections of adherence to requirements on climate protection (294) and

the ozone layer protection (65 inspections). In connection with inspections of adherence to requirements when handling controlled substances and fluorinated greenhouse gases, we inspected 16 entities doing activities requiring certification by the Ministry of the Environment and one case involved inspection of activity of a certification authority.

The results of the inspections were the initiation of 589 administrative proceedings for violation of obligations in air protection pursuant to the Air Protection, Ozone Layer and Climate Protection Act. In 2015, a total of 557 decisions on fines entered into force, including 509 initiated in 2015 and 48 initiated in the previous year, totalling CZK 16,928,000. The penalty decisions in force dealt with 701 delicts. Pursuant to the Integrated Prevention Act, air protection inspectors issued 5 decisions on fines to operators of air pollution sources for violation of requirements of integrated permits, totalling CZK 1,100,000, dealing with 7 administrative delicts.

Besides separate inspections on adherence to obligations of operators of stationary sources of air pollution, the department inspectors were involved in 312 inspections of facilities with integrated permits, inspecting adherence to all environmental protection requirements. In 17 cases, fines for violation of air protection requirements were awarded, totalling CZK 1,125,000.

The total amount of fines awarded by the air protection inspectors for violation of air protection requirements under both the Air Protection Act and the Integrated Prevention Act was CZK 18,095,000; and for violation of requirements when handling controlled substances and fluorinated greenhouse gases was CZK 954,000, and for violation of obligations of operators of facilities includ-

Overview of activities of CEI Air Protection Department in 2015

Territorial Inspectorate	No. of inspectors	No. of inspections			Act no. 76/2002 Coll.			Position statements, statements and information provided				Fines						Measures					
		Total	Scheduled inspections	Unscheduled inspections	Involvement in inspections pursuant to Act no. 76/2002 Coll.	Collaboration on administrative proceedings on fines	Amount of fines for air protection issues that entered into force in study period	Information pursuant to Act no. 106/1999 Coll.	Information pursuant to Act no. 123/1998 Coll.	Regional authorities	Others	Administrative proceedings				Total (CZK)	Administrative Proceedings						
												All decisions issued in study period	All decisions that entered into force in study period	Decisions on fines in force issued in study period			Decisions on fines in force from previous periods	Misdemeanours	Adherence to emission limits	Halting or restriction to operations			
Pha	9	346	139	207	49	1	0	0	3	985	129	18	11	9	2	0	425 000	0	0	0	0	0	97
ČB	6	265	50	215	49	6	315 000	2	8	139	90	70	70	61	9	0	2 538 000	0	1	0	0	0	35
Pl	6	424	202	222	17	3	320 000	0	7	275	76	40	39	37	2	0	1 020 000	1	0	0	0	0	18
UL	10	387	134	253	51	1	25 000	1	1	404	40	66	66	65	1	0	1 275 000	0	0	0	0	0	35
HK	8	566	326	240	38	0	0	7	9	29	30	81	79	74	5	0	1 641 000	1	0	0	0	0	43
HB	5	246	66	180	25	0	0	1	5	193	147	43	42	39	3	0	996 000	0	1	0	0	0	39
Br	10	767	367	400	12	2	230 000	0	3	718	366	75	71	59	12	0	4 090 000	2	0	0	0	0	80
Ol	6	453	144	309	33	1	60 000	0	2	102	26	54	53	43	10	0	1 911 000	2	0	0	0	0	34
Ov	9	419	216	203	16	0	0	3	5	327	721	107	96	94	2	0	2 482 000	0	2	1	0	0	47
Li	5	191	77	114	22	3	175 000	0	4	119	4	25	20	18	2	0	362 000	0	1	1	0	0	33
rdt	9	188	0	188	0	0	0	0	1	1	11	10	10	10	0	0	188 000	0	0	0	21	2	9
celkem	83	4252	1721	2531	312	17	1 125 000	14	48	3292	1640	589	557	509	48	0	16 928 000	6	5	2	21	2	470

ed in the carbon dioxide emission permit trading system was CZK 104,000.

5.1.2 Overview of fulfilment of departmental tasks

Four areas of departmental tasks were defined for the **air protection area**, namely inspection of operation of sources based on permits from air protection authorities and, in line with these permits, adherence to set air pollution limits (emission limits, emission ceilings), identification of air protection levels, recording and reporting obligation. In 342 cases, the inspections found out that operators or stationary sources of air pollution listed in Annex 2 to the Air Protection Act had not requested, within the set period, the **issuance of new permits or operated the facilities without a permit**. Fines totalling CZK 9,473,500 were awarded for the proven violations.

In 5 cases, the Inspectorate proceeded to halt operation of facilities: those operated by KOMAXO BIOENERGO s.r.o. (processing of wood chips before combustion), KRIJK Invest s.r.o., renamed to CONSCRIPT Trade s.r.o. (industrial processing of wood and a wood waste boiler), UPIA International s.r.o. ("treatment facility" – thermal degradation of polymers), FEREX ŽSO spol. s r.o. (grey iron foundry) and ANCHOR Group s.r.o. (processing of polymers – granulation of plastic waste). These facilities were operated without permits from air protection authorities, their operation caused intolerable air pollution and were the object of repeated suggestions.

Requirements specified in their permits, notably **technical operating conditions**, were not adhered to by the inspected operators in 41 cases, and fines totalling CZK 1,709,000 were awarded for these violations. In 6 cases, we identified combustion of unpermitted fuels in stationary combustion sources and in one case, combustion of waste in an open fireplace. Fines totalling CZK 115,000

were awarded for these violations. The unpermitted fuels combusted in contravention of requirements of manufacturers of the combustion equipment and permit requirements were waste oils.

The operating permit also includes **conditions for operation of facilities when exceeding threshold values for air pollutants** ("smog situations"). In 2015, smog situations were declared for the Ostrava-Karviná-Frýdek-Místek agglomeration excluding Třinec (3 x PM10, 2 x O3), the Hradec Králové Region (1 x PM10, 1 x O3) and the Ústí nad Labem Region (1 x PM10, 1 x SO2, 2 x O3). In none of the smog episodes was there any exceedance of the regulating threshold, which is why no regulation was ordered for any of the facilities included in the Regulation Plan.

Fines totalling CZK 1,450,000 were awarded for 32 cases of **exceedance of emission limits for pollutants** and 1 case of exceedance of an emission ceiling. Exceedance of concentration emission limits was documented with results of emission measurements carried out by authorised entities. Fugitive emissions of organic substances were determined differentially based on consumption of volatile organic compounds and emissions of these substances transported from the facilities by defined exhaust channels. The most numerous category with exceedance of emission limits was carbon monoxide (12 cases), followed by volatile organic compounds (5 cases) – 2x concentration limit, 3x fugitive emission limit), nitrogen oxides (2 cases) and particulate matter (9 cases) and one case each of hydrogen chloride, hydrogen fluoride, heavy metals and methane. Sorted by type of facility, they included combustion processes, surface treatment, metallurgy, landfill, crematorium, and asphalt coating plant. There was 1 case of exceedance of the emission threshold for particulate matter.

We inspected **adherence to the obligation to identify and evaluate air pollution levels** by direct measurement

by way of authorised entities in single measurements or continuous measurement arranged by the operator. It was an obligation of facility operators to submit reports with measurement results to the Inspectorate within the set period. In 59 cases, we identified violation of the obligation to carry out single emission measurement. Fines totalling CZK 1,368,500 were awarded for these delicts. In 54 cases, operators of facilities did not adhere to the obligation to submit the report with measurement results to the Inspectorate, for which we awarded fines totalling CZK 402,000.

Failure to adhere to the obligation to **keep operating records or submit summary operating records** and report to the IPR was proven to operators of stationary sources of air pollution in 106 cases. Fines totalling CZK 1,192,000 were awarded for these violations. Among the cases of failure to adhere to the recording and reporting obligations were 2 cases of failure to report to the IPR releases of gaseous substances to the air.

A tool for climate protection – prevention of releases of greenhouse gases, gases absorbing radiation in the infrared area that are present in the atmosphere – is inspection of adherence to requirements for handling fluorinated greenhouse gases and requirements set for facilities included in the carbon dioxide permit trading system.

The result of the 244 inspections of operators of facilities containing fluorinated greenhouse gases was 26 proven administrative violations, for which we awarded fines totalling CZK 403,000. The violations consisted in failure to arrange inspections of facility tightness (16 violations), violation of recording obligation (6), negligence of obligations in operating continuous coolant release detection (2) and failure to label products (2 violations). In 2015, we made 50 inspections of stationary facilities included in the greenhouse gas (carbon dioxide) emission permit trading system. The inspected operators of these facilities committed seven violations, mostly mistakes in report-

ing carbon dioxide emissions, submission of verified data to the Ministry of the Environment and failure to report changes in operated facilities, which yielded fines totalling CZK 104,000.

Ozone layer protection (stratospheric ozone) from effects of substances that deplete it (“controlled substances”) represents prevention of release of controlled substances from facilities containing them, typically as coolants. Since controlled substances as coolants are gradually replaced by substances with lower ozone layer depletion potential (ODP) and numbers of operated facilities containing them are decreasing, relatively fewer inspections were carried out in this area compared to facilities containing fluorinated greenhouse gases. The result of 65 inspections was 21 cases of identified violation of some of the obligations, for which we awarded fines totalling CZK 271,000. The most common violation was failure to inspect facility tightness (10 cases, fines CZK 185,000), as well as importation of controlled substances (halons) without an European Commission licence (5 cases, fines CZK 43,000), negligence of the record obligation (4 cases, fines CZK 35,000) and failure to submit reports (2 cases, fines CZK 8,000).

We also inspected entities doing **activities requiring certification from the Ministry of the Environment**, primarily tightness inspections, servicing and maintenance of facilities containing coolants based on controlled substances and fluorinated greenhouse gases and entities involved in training and testing of theoretical knowledge and practical skills of servicing technicians. In 1 case, we found out that the certificate holder, HOKOV spol. s r.o. failed to adhere to binding procedures in recovery or controlled substances when processing discarded cooling equipment, yielding a fine of CZK 250,000. In addition, when inspecting adherence to procedures of certification and evaluation entities for selected activities in the areas of firefighting and air-conditioning equip-

ment, in 1 case this activity was done without a valid certificate issued by the Ministry of the Environment. For this violation, we awarded a fine of CZK 30,000.

5.1.3 Fulfilment of specific tasks

Only one specific task was defined in the air protection area in 2015: inspection of identification of air pollution levels by single measurements (“single emission measurements”). Under the Air Protection Act, identification of pollution levels using single measurements requires authorisation, issued by the Ministry of the Environment.

In 2015, the Czech Environmental Inspectorate was involved in assuring the required emission measurement level in three dimensions. The first was involvement of a Czech Environmental Inspectorate employee in a board verifying knowledge of applicants for the authorisation, the other was verification of applicants’ measurement equipment (“interlaboratory comparison of tests”), and the third was actual inspection of authorised entities carrying out emission measurements in stationary pollution sources, including inspection of reports. The first two activities were done by inspectors of the air protection department of the Czech Environmental Inspectorate Headquarters, the third one by inspectors of territorial inspectorates in cooperation with inspectors of the air protection department of the Headquarters.

The process of emission measurement by authorised entities was inspected in 252 cases at 72 authorised entities. Only in one case was the measurement process found faulty and the measurement was repeated based on the inspector’s instruction. The repeated measurement did not show any errors anymore.

The results of the emission measurements were inspected based on reports that facility operators are to submit to the Inspectorate within the set period. The authors were

informed about any defects in the reports, which were sporadic, and if necessary, the report was corrected.

The inspections frequently found out that due to the facility layout or transport of waste gases from the facility to the air does, it is not possible to adhere to the sampling requirements set by the standard for the emission measurement (insufficient distance of sampling points in a straight pipeline section from obstacles, such as flap valves, fans and bends). These conditions occur primarily in facilities built before the effective date of the standards.

5.1.4 Major cases

Processing of organic materials and production of biogas (“biogas stations”) in which we identified failure to adhere to requirements, that had an impact on emissions of odorous substances **ODAS ODPADY s.r.o.**, operation of a biogas station with reduction of emissions of odorous substances in contravention with the operating rules. Fine of CZK 80,000.

WEKUS spol. s r.o., processing of raw materials beyond the extent specified in operating rules. Fine of CZK 130,000.

Neglect of obligation to reduce pollutant emissions according to operating rules:

International automotive Components Group s.r.o., production of car roof panels – facility operation during a filter repair. Fine of CZK 220,000.

KOVO Kasejovice MONT s.r.o., surface treatment – paint shop – operation of facility without emission reduction. Fine of CZK 100,000.

KOMAXO BIOENERGO s.r.o., operation of facility – wood chip processing – without permit and despite a ban on operation. Fine of CZK 250,000.

HOKOV spol. s r.o., violation of obligation to recover controlled substances when processing discarded cooling equipment. Fine of CZK 250,000.

ELRON CZ s.r.o., production of land reclamation compost – operation of facility without permit, annoying odour. Fine of CZK 100,000.

Accident of facility at UNIPETROL RPA s.r.o. in Záluží u Mostu with a fire in the facility (“ethylene unit”)

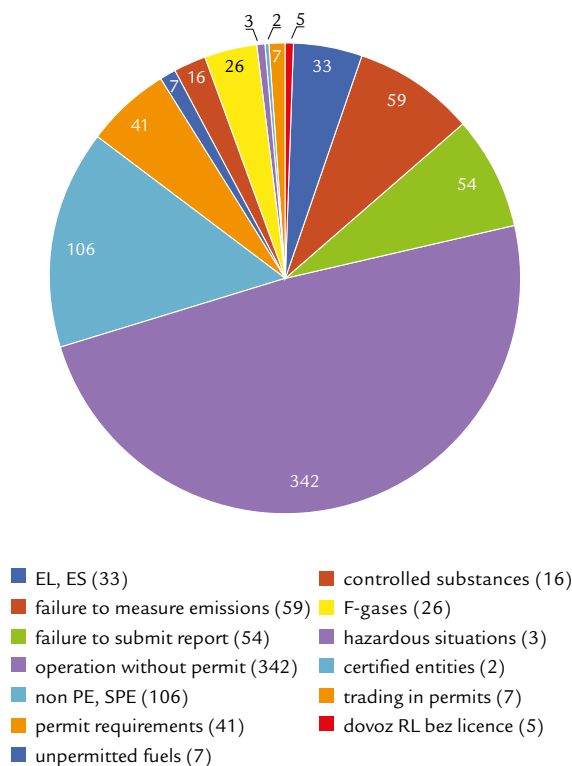
In the first half of August, there was an accident on several pyrolysis furnaces, forming part of the so-called “ethylene unit” in the facility of UNIPETROL RPA s.r.o., followed by a fire with intense dark smoke development. The causes of the accident, being dealt with by the

operator’s investigating committee, the Czech Police and the rescue service departments, have not been reported to the Czech Environmental Inspectorate yet.

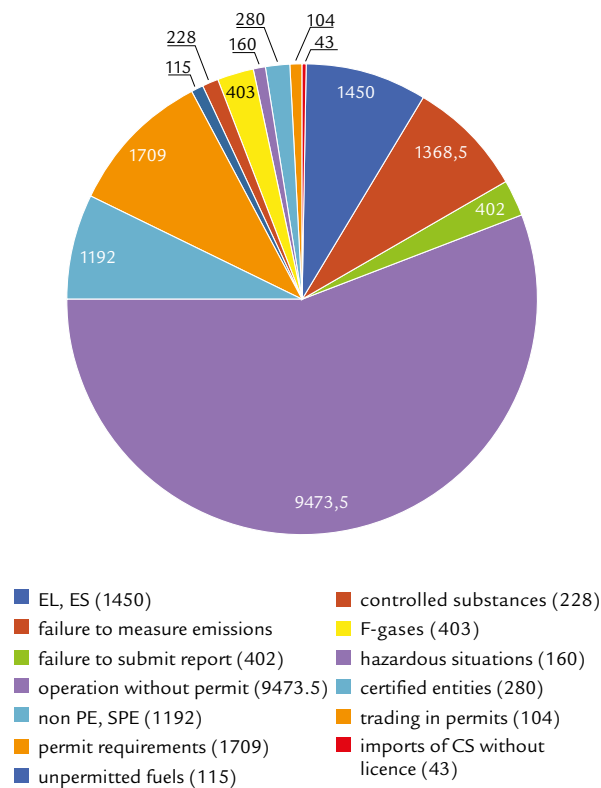
5.1.5 Conclusions from inspection work

With the inspections, the Czech Environmental Inspectorate covered the whole range of its jurisdiction in the areas of air protection, ozone layer and climate protection. set in both national generally binding legal regulations in force and EU regulations and in permits from

Numbers of violations dealt with in 2015
by type



Fines awarded in 2015
by violation type



respective public authorities. A difficult area was air pollution by those substances that are directly perceptible by normal senses, odours and emissions of particulate matter. These situations occurred primarily in processing organic raw materials into biofuels or recoverable materials – production of biogas, energy gas, compost and modification of wood chip as fuel – as well as other handling of bulk materials. Lingering and situations difficult to resolve were alerts to citizens’ annoyance with odours, or odours and smoke from local fireplaces, often in the form of repeated suggestions.

5.1.6 Charts

Numbers of violations dealt with in 2015 pursuant to Act no. 201/2012 Coll. on Air Protection, Act no. 73/2012 Coll. on Ozone Layer Depleting Substances, and on Fluorinated Greenhouse Gases and Act no. 383/2012 Coll. on Conditions for Greenhouse Gas Emission Trading Permits, by types.

5.2 Water protection and prevention of major industrial accidents

5.2.1 Overview of inspection work in 2015

Inspectors of the Water Protection Department focus on inspecting obligations under Act no. 254/2001 Coll. on waters and on amendment of certain acts (Waters Act), Act no. 59/2006 Coll. (newly 224/2015 Coll.) on Prevention of Major Accidents Caused by Selected Hazardous Chemicals or Chemical Mixtures and on amendment of Act no. 634/2004 Coll. on Administrative Fees, as amended (Major Accident Prevention Act) and Act no. 76/2002 Coll. on Integrated Prevention and Pollution Reduction,

the Integrated Pollution Register and on amendment of certain acts (Integrated Prevention Act).

The foundation of work of the Water Protection Department (WPD) of the CEI territorial inspectorates (TI) is inspections made as part of scheduled main and departmental tasks, which focus on priority problems in water protection nationwide. They are inspections primarily of larger environmental polluters such as major wastewater treatment plants (WWTP), industrial facilities and sites featuring historic environmental burdens (HEB). One main task and 7 departmental tasks were defined for the inspection work in 2015. As part of specific tasks, the inspectors focused on problems in their respective regions. A significant part of activities are unscheduled inspections, made based on suggestions, as part of collaboration with other authorities, resolution of accidents or current problems within the jurisdiction of the respective territorial inspectorates. In 2015, the Water Protection Department carried out a total of 3283 inspections pursuant to the Waters Act and Act on Prevention of Major Accidents (scheduled and unscheduled inspections, investigation of accidents and suggestions). Another 384 inspections were made by WPD inspectors in cooperation with other departments when inspecting facilities with integrated permits.

An integral part of inspection work is administrative proceedings, performed when violating conduct is identified. Based on inspection work, we issued 553 decisions on penalties for violations of the Waters Act or Major Accident Prevention Act in the study period. Moreover, we issued 29 decisions for businesses or facilities with integrated permits. A significant part of the penalties was awarded based on unscheduled inspections, i.e., inspections at entities not included in departmental or specific tasks for 2015. In 2015, a total of 528 decisions on fines entered into force, totalling CZK 28.2 million. To eliminate shortcomings and defects identified, we issued 86

decisions on remedial measures, out of which 82 entered into force in 2015.

In the study period, TI WPD received 426 suggestions, and handled 134 more in cooperation with other departments; the greater part of them were assessed as unjustified.

Charges for wastewater discharge into surface water

In 2015, we issued 1063 decisions on charges for 2014, setting charges for wastewater discharge into surface waters, totalling CZK 180.0 million. For payment of advances in 2016, we issued 1017 decisions on charges totalling CZK 208.8 million. In 2015, the CEI also issued several decisions on postponing payment of charges. As part of inspection of the charge obligation, 2804 samplings were made by inspection laboratories and wastewater discharge flow rate measurement was inspected at 96 sources.

Charges for groundwater collection

In 2015, we issued 4494 decisions setting charges for groundwater collection for 2014 of CZK 662.9 million. For payment of advances in 2016, we issued 4774 advance assessments totalling CZK 1153.5 million. In addition, we issued 446 decisions in connection with new consumers or changes or revocation of advance assessments. In 2015, we issued 4 charge assessments (additional charges) for the years 2011, 2012, 2013 totalling CZK 134,451.

As part of the charge agenda, the CEI inspection work continues to find violations of annual and monthly limits set in water management authority permits or even ground-water collections without permit. For these violations, we awarded fines in excess of CZK 3 million in 2015. Besides inspection work, Water Protection Department inspectors made 2373 position statements and statements, e.g., for requests for subsidies from the State Environment Fund (SEF CR), for water management

authorities, etc.; the largest part of position statements are those issued as part of environmental impact assessment (EIA) and statements WPD inspectors cooperate with other state authorities and institutions (water management authorities at all levels, SEF CR, Ministry of Finance, Povodí enterprises, Fire Rescue Service, Water Management Research Institute, regional authorities, etc.) and as part of international collaboration they meet with environmental protection authorities of neighbouring countries and participate in meetings of international commissions on protection of boundary waters.

5.2.2 Overview of fulfilment of main and departmental tasks

Inspections of pollution sources with integrated permits

WPD inspectors made inspections or cooperated with other CEI environmental protection departments in comprehensive inspections of selected facilities with integrated permits (IP), i.e., facilities falling under the Integrated Prevention Act. These inspections involve manufacturing and other entities that are most significant environmentally. Inspections of facilities with IP were included in the WPD work schedule based on inspections scheduled by the CEI Integration Department for 2015 in order to meet the requirements on frequency of inspections of specific businesses or facilities pursuant to the Integrated Prevention Act. Besides, beyond the scope of scheduled inspections, we checked facilities on which the CEI had received a suggestion for inspection, and made repeated inspections of facilities where violations of IP conditions were identified in previous periods. The extent of inspections, their focus and inspection period were chosen based on specific conditions of facilities with IP.

WPD inspections focused on meeting of requirements of the water management part of the IP, primarily ad-

herence to permits for groundwater and surface water collection, wastewater discharge, handling of potential pollutants, verification of IP validity, inspection of operating rules and keeping of operating logs, currency of accident plans and their elaboration pursuant to Decree no. 450/2005 Coll.

WPD inspectors in cooperation with other departments made 384 integrated inspections, and made 106 inspections of facilities with IP on their own. Based on inspection results, we initiated 51 administrative proceedings on fines or remedial measures. A total of 39 fines totalling more than CZK 2.759 million have entered force. In some cases, the investigation has not yet been completed.

Inspections of adherence to the Integrated Prevention Act were made, for example, at: UNEX a.s. – foundry 2, VELOSTEEL TRADING, a.s., Loučná nad Desnou, Madeta a.s. – Jindřichův Hradec facility, ŽDAS a.s., CRYSTALITE BOHEMIA s.r.o., ŠKO-ENERGO, s.r.o., and Motol University Hospital.

Detailed information on inspections made pursuant to the Integrated Prevention Act are shown in Integrated Agendas below.

Inspection of most important municipal WWTP for over 10,000 equivalent inhabitants (EI)

Checks of the most important municipal WWTP focused on adherence to water management authority permits, meeting of Council Directive no. 91/271/EEC on municipal wastewater treatment, inspection of documents on hydraulic structures and their operation in accordance with approved operating rules.

In 2015, we inspected 129 municipal WWTP for more than 10,000 EI. Based on the results of these inspections, we awarded 4 fines in force totalling CZK 165,000. In a significant majority of the cases, we did not find any violation of requirements of water management authority decisions, unpermitted exceedance of emission limits,

exceedance of amounts of pollution discharged, or significant defects in WWTP documentation or operation. Intensification and renovation of treatment plants made in order to meet requirements of Council Directive no. 91/271/EEC on wastewater treatment contributes to a significant reduction in pollution discharged to surface waters. This statement is based on the observable trend of increasing efficiency of wastewater treatment, particularly as concerns N (more than 5% in the past 5 years). For all municipal WWTP in this category, we inspected the balance data for 2014. Based on balance data for 2014, municipal WWTP studied in 2015 treated 560 million m³ of wastewater. The efficiency of wastewater treatment at the registered WWTP was 98.4% for BOD₅, 94.8% for COD_{Cr}, 97.7% for solids, 77.3% for N_{total} and 83.2% for P_{total}.

Requirements of Council Directive no 91/271/EEC are met by the majority of significant pollution sources, or measures to meet them are in progress.

In 2015, the construction of the new water plant at the Central Wastewater Treatment Plant (CWWTP) in Prague. Wastewater introduced by the sewerage will be divided between the new water plant and the existing WWTP. The new water plant is designed as a cascaded activation plant with a return sludge recovery tank. Mechanical pretreatment of wastewater is designed using slat settlement tanks, where part of the rainwater flow is also treated. Discharge from the final settling tanks will be transported to the third treatment stage, where phosphorus will be removed chemically. The produced primary, excess activated sludge and sludge from the third treatment stage will be pumped to the existing CWWTP sludge plant, to be shared by both the water plants.

An interesting case of successful application of an innovative operating solution was investigated during a reported accident at Vlašim WWTP. The core of the accidental situation in May 2015 was distension of activated sludge as a consequence of long-term overpopulation of the fibrous bacterium *Microthrix parvicella*, resulting in

worse sedimentation properties of the sludge and release of flakes of activated sludge into the watercourse. The operator tackled the situation in cooperation with the company Kemira and a decision was made to dose the polyfloculant PIX XL2A, replacing ferric sulphate. The newly dosed product contains iron and aluminium ions and an organic polymer. The dosage of the chemical significantly improved the situation at the WWTP.

The WWTP inspections also included checks of rainwater separators in single sewerage. It was the first inspection of its kind, arising from requirement of the MoE. Pursuant to the Waters Act (Section 38, Para. 2) wastewater does not include rainwater discharged from rainwater separators as long as the separators meet requirements set in the water management authority permit. The legislation does not say what these requirements should be. In 2015, the CEI inspected rainwater separators, finding out that there are 1875 rainwater separators in the 111 checked agglomerations that have single or mixed sewerage. Physical inspections were made in randomly selected 319 separators. The check of the rainwater separators found the primarily following shortcomings:

- The structure owner frequently does not have a permit, so that the permit conditions cannot be checked. These are primarily separators built decades to 120 years ago.
- The owner frequently does not have project documentation, although under Section 125 of the Building Act, they should have at least a structure passport, specifying basic capacity and balance data and environmental impact of the structure.
- The inspection can thus only determine whether the separator is functional or not, or its technical condition can be determined visually. It cannot be determined at what dilution ratio it works, or how frequently, or how much wastewater is discharged untreated and its impact on the water quality in the watercourse.
- Separators are designed for an expected amount of

wastewater produced at the time of making the project documentation. In many cases over time the sewerage network expanded significantly, resulting in significantly higher wastewater flow rates, primarily during rain.

- The check indicated the necessity to adjust the legislation. At least, it is necessary to make a decree specifying requirements that the separators have to meet.

Inspection of municipal wastewater treatment plants for 500 – 10,000 EI

In 2015, we inspected 325 WWTP. Based on the inspections, we initiated 43 administrative proceedings and 28 decisions on fines entered into force, totalling CZK 1,113,000; 15 of the administrative proceedings on fines have not been concluded yet. The most frequent violation is non-adherence to limits set in water management authority permits (exceedance of permitted pollution conditions, exceedance of amounts of wastewater discharged, non-adherence to frequency of inspection sampling) or wastewater discharge without permit from a water management authority. Additional penalties were awarded for WWTP operation in contravention of operating rules, unpermitted groundwater collection for WWTP operation, or spills of sludge from WWTP to surface water. In many cases, administrative proceedings are performed for uneven time distribution of sampling of discharged pre-treated wastewater. One case was an administrative violation committed out of neglect (exceedance of limit for total phosphorus – the WWTP operator did not notice that the ferric sulphate dosing had stopped working).

The greatest shortcomings remain at WWTP operated by municipalities. The CEI repeatedly awarded a fine on one municipality for wastewater discharge without a permit for water handling. This WWTP serves several hundred EI and a substantial amount of wastewater is brought to it from neighbouring municipalities. It is obvious that wastewater handling in smaller municipalities

may pose a significant future environmental risk and requires specific supervision.

Inspection of major industrial WWTP discharging wastewater into watercourses and discharging wastewater containing particularly hazardous substances into sewerage

Significant industrial WWTP include plants discharging wastewater containing particularly hazardous substances into surface water and sewerage. Besides, they discharge into surface water wastewater containing larger amounts of hazardous substances and general potential pollutants in such quantities that significantly affect quality of surface water in the watercourse.

As part of the departmental task, we inspected 83 entities. They were mostly larger entities working in mechanical engineering, petrochemical industry, processing and food processing industry. The inspections focused notably on adherence to legal obligations when handling waters and meeting of requirements of permits to discharge wastewater into surface water and sewerage.

At some entities, we identified the method and quality of storage and handling of unwholesome substances in accordance with Decree no. 450/2005 Coll. It can be said that the quality of handling of unwholesome substances is gradually improving, primarily at larger entities.

The inspections identified violations of legal regulations in 27 cases, i.e., 30% of cases; administrative proceedings on fines were initiated in 24 cases and remedial measures ordered on 3 cases. Most frequent cases were exceedance of emission limits in wastewater discharged, we also identified absence of accident plans in entities handling larger quantities of unwholesome substances, or where their handling poses an increased risk for water protection. In three cases, we awarded a disciplinary fine for not enabling an inspection. By the end of 2015,

19 decisions on fines entered into force, totalling CZK 1,460,000, as did three decisions on remedial measures. In 5 cases, decisions did not in 2015 enter into force. The highest fines in force were awarded to Mondi Štětí a.s., amounting to CZK 450,000 for violation of conditions of integrated permit, and Kofola, a.s., amounting to CZK 200,000 for exceedance of set emission limits in discharged wastewater.

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

In 2015, we continued our periodic supervision of factual and potential sources of pollution in the saturated and unsaturated zones on historic environmental burden sites and long-term accidents. At the same time, the CEI paid attention to sites where contamination was caused by activities of the Soviet Army, primarily tackled by the MoE and funded by the State. Significant assistance in funding of long-term accidents is EU subsidy programmes, which make it possible to eliminate defects on sites where the Inspectorate cannot order remedial measures due to the absence of the polluter. In the case of historic environmental burdens, i.e., sites whose remediation is paid from state funds based on an “environmental” contract, inspections are made as part of inspection days, typically every three months, in the presence of representatives of the MoF and MoE. The role of the Inspectorate consists in administrative operations, inspection of remediation progress performing remedial measures ordered by it. In recent years, we have seen a decrease in remediation works on some sites, caused by delays in announcement of tenders, or lack of funds from guarantees intended for remediation. This fact is manifested as a negative factor of continuous handling of defects and influences the risk of backwards contamination of remediated areas. In some cases, not performing or interrupting remediation leads to spreading of contamination towards drinking water sources.

In 2015, inspectors carried out 486 inspections under this departmental task. In total, we issued 26 new decisions on remedial measures. Mostly they were decisions issued on request of acquirers due to postponement of the deadline for completion of remediation works.

In the study period, inspection work primarily focused on actions that represent significant risks for the environment and the population. Major cases, mostly with problematic performance, include UNIPETROL, a.s. – Nelahozeves landfill, SAP Mimoň spol. s r.o., Kastor Eko s.r.o. – Rohatec – Kolonie, ICEC ŠLAPANICE, s.r.o., MAGNETON a.s., Halla Visteon Autopal Services s.r.o., Hluk, VÍTKOVICE a.s., OKK Koksovny a.s. – Jan Šverma coking plant, BENZINA s.r.o. – DS Nový Bohumín, Arcelor Mittal Ostrava a.s., DIAMO – Ostramo lagoons, SVA Holýšov, a.s., FARMAK, a.s., JIHOSTROJ VELEŠÍN a.s., PARAMO a.s., Tlaková plynárna Ústí nad Labem a.s., Labyrint CZ s.r.o., MOIS s.r.o., and others. In 2015, remediation was formally completed at WALTER a.s. – Praha-Jinonice site, BENZINA s.r.o. – Nová Ves and Tachov filling stations, POLYGON s.r.o. SPOLANA a.s. – old amalgam electrolysis site, HARFA s.r.o., Jihočeské dřevařské závody a.s. – Nové Vrátno site, Alfatex Móda, spol. s r.o., and LABIT, a.s.

Another important event in 2015 was the completion of remediation of the old amalgam electrolysis (SAE) subsite at SPOLANA. The remediation made maximum possible use of passive remediation means – demolitions of structures and excavation of contaminated earth. Materials with high Hg content were sealed in eco-containment. The demolition waste and excavated earth with above-limit contents of POPs were submitted for disposal to the SPOVO incinerator. An underground sealing wall enclosing the contaminated earth in the unsaturated zone of the SEA bedrock was built. The eco-containment thus formed was filled with sorted demolition material from

the SAE building and excavated earth outside the underground sealing wall contaminated only with Hg.

Main remediation works were completed in 2012 and trial operation commenced in January 2013, which was completed successfully. The action could be concluded in 2015.

Problematic actions include the media-covered case of the Ostramo lagoons, which have faced numerous problems for many years. Only limited groundwater remediation is in progress; a tender for removal of above-limit sludge as part of remediation stage II has been completed. Remediation of earth and leachates is not part of this stage.

Inspection of industrial entities handling potential pollutants

The inspections focused on checking the current state of hydraulic security of storage and handling potential pollutants, particularly in large-scale petroleum product warehouses, civilian airports, petroleum refineries, black oil and heating oil stores. Each of the inspections checked storage and handling of potential pollutants as well as the method and quality of discharged wastewater and rain water from handling areas and parking areas, including inspection respective documentation (decision on handling waters, final approval decision, reports on tightness tests of reservoirs and pipelines, adherence to and completeness of the operating rules and accident plan and other documents as needed).

The most frequent violations identified by the inspection include violations of obligations for handling potential pollutants (e.g., absence of accident plans, unpermitted storage and handling of potential pollutants, etc.) and unpermitted handling of surface waters and groundwater, namely discharge of wastewater without a valid permit or exceedance of emission limits for defined pollution indicators.

We checked 215 entities as part of the task. In 36 cases, i.e., 16.7%, the inspections identified serious shortcomings justifying the commencement of administrative proceedings. The Inspectorate issued 21 decisions on fines in force, totalling CZK 944,160. In other cases, decisions on fines did not enter into force due to appeals or periods in progress. In six entities, the administrative proceedings ordered remedial measures to eliminate the defect.

The greatest fines were ordered for Atomic Capital s.r.o. – Dětmovice facility, amounting to CZK 200,000 for unpermitted handling of a potential pollutant (rapeseed oil) and for Lesydí, s.r.o. – Orlová-Lazy facility, amounting to CZK 150,000 for unpermitted discharge of wastewater into surface waters without permit of a water management authority and for unpermitted handling of a potential pollutant (rapeseed oil).

Inspection of agricultural businesses, fisheries and biogas stations for compliance with the Waters Act

In selected entities, we inspected hydraulic security in stores of mineral and farm fertilisers, bulk fodders, petroleum products, including operation of internal fuel filling stations, stores for plant protection preparations, field deposits, stable areas, dung depots and operations of biogas stations. In addition, we inspected handling of waters in grazing areas, groundwater consumption, operating rules and accident plans.

In total, the water management supervision involved 183 agricultural entities (including 28 biogas stations and 12 fishponds. Based on inspection results, we ordered 43 penalties, out of which 37 totalling CZK 3.4 million are conclusive. In addition, we ordered 60 remedial measures. Administrative proceedings against some of the agricultural entities will start in 2016. Decisions on fines based on results of inspections made in 2014 were also issued in 2015. In many cases, inspections of agricultural businesses were made based on suggestions.

The main shortcomings identified were unpermitted

handling of potential pollutants, operation of a hydraulic structure in contravention of provisions of Section 59 of the Waters Act, and unpermitted groundwater consumption. These inspections also identified other violations of the Waters Act, such as unpermitted discharge of wastewater from WWTP into a fishpond.

The level of knowledge of legal regulations on water protection and the resulting obligations were traditionally better among agricultural businesses than farmers. For more information, the inspections include familiarisation of the inspected entities with the most important obligations under the Waters Act and its executive decrees (Decree no. 450/2005 Coll. and Government Regulation no. 262/2012 Coll.). The CEI will continue inspecting agricultural businesses, fisheries and biogas stations in 2016, and thus preventively eliminate potential negative environmental impacts of agricultural production.

Musík fishpond:

In the close of 2015, there was an accident at Dublovice WWTP and the Musík fishpond, which is the second largest fishpond in the Central Bohemian Region. The accident situation occurred as a consequence of a fire of a car repair shop in Dublovice, from where about 1000 litres of oil leaked into the storm sewer.

This case is shown here as an example of the ideal procedure for tackling an accident, as the quick action of the integrated rescue system as well as the WWTP operator minimised the threat to the fishpond and damage to the fish. Based on CEI recommendation, the stirring turbine at the WWTP was switched off periodically for a short time, the scum from activation to which the oil was bound was removed manually after the level stabilised and stored in receptacles, and the remaining quantity of oil that reached the final settling tank and was able to flow out into the receiving watercourse was intercepted at a makeshift barrier. Twelve flow barriers with a sorbent were installed at the inlet to the fishpond, the in-

tercepted oil was removed and the sorbent was replaced and removed as needed.

Inspection of adherence to Act no. 59/2006 Coll. on Major Accident Prevention

The goal of the check was to inspect all the 117 structures included in category B and 34 selected structures included in category A. The inspections were made in cooperation with integrated inspection authorities in accordance with the inspection plan for 2015 approved by the Ministry of the Environment. In addition in this year, we also made 14 unscheduled inspections at entities not classified, focusing primarily on determining the quantity of selected hazardous chemicals stored and used in operation. Six entities were newly classified, including those that were inspected as unscheduled. Five entities were removed from classification.

The inspections of classified entities focused on primarily on checking whether the primarily data in safety documentation are up to date and its status as of the date of inspection, whether internal accident plans are correct and up to date, whether sources of information for development of external accident plans are correct and up to date, and performance of measures adopted for prevention of major accidents; compliance with requirements specified in MoE statements on safety documentation, decisions of the regional authority on safety documentation; performance of measures to remedy shortcomings identified in the inspection.

Particularly in the second half of the year, entities were informed about the necessity of making reviews of their safety documentations, including updates to Lists of dangerous chemicals in accordance with the new legislation on prevention of major accidents.

Less serious shortcomings were eliminated during the inspections or have been corrected by dates set in inspection reports or resulting reports.

In several cases, the inspection work identified serious violations of obligations set by the Act on Prevention of Major Accidents and the CEI initiated administrative proceedings on fines. An example of violation identified is the violation of the Act on Prevention of Major Accidents at DoorHan s.r.o. by the company not following its approved safety programme in its operation. The CEI awarded a fine of CZK 60,000; the fine entered into force in 2015.

Six major accidents pursuant to the Act on Prevention of Major Accidents occurred in 2015.

Examples of major accidents:

On 15 Jun 2015, the Rataje manufacturing plant of **STV GROUP a.s.** experienced a fire in the technically separate part of production building 16, where solid fuels are processed. The integrated rescue system bodies and the respective regional authority were informed. The fire did not spread into other parts of the building, it was extinguished and then monitoring was ordered for 24 hours. One employee was injured during the accident.

On 13 Aug 2015, the ethylene unit of **UNIPETROL RPA s.r.o.** experienced an explosion followed by fire. Currently, works are in progress on its restoration, it should be back in operation approximately in July 2016. The Ústí nad Labem Regional Authority has been presented with the draft "Final report on the emergence and consequences of a major accident", which will be updated after the completion of investigation by the Czech Police and submitted for approval.

On 9 Sep 2015, the premises of **Poličské strojírny a.s.** witnessed a fire of smoke-free dust in the loading dock of an explosive store. The fire spread to the whole building and the properties of the smoke-free dust caused the whole building to burn down. The cause of the major accident is subject to investigation in progress by Czech Police, Territorial Mining Authorities for the Hradec Králové and

Pardubice Regions, and a Committee on Investigation of the Store Fire Event, appointed based on the General Director's order of 9 Sep 2015. The notification of the accident was made in accordance with the Act on Prevention of Major Accidents. Performance of remedial measures arising from the accident situation, which will be part of the final report from the accident investigation, will be inspected during periodic inspection pursuant to the Act on Prevention of Major Accidents in the following year.

In 2015, Act no. 59/2006 Coll. on Prevention of Major Accidents was amended. Effective as of 1 Oct 2015, the Act was superseded by Act no. 224/2015 Coll. on Prevention of major accidents caused by selected hazardous chemicals or chemical mixtures and on amendment of Act no. 634/2004 Coll. on Administrative Fees, as amended. The new Act implements current European regulations, particularly Directive 2012/18/EU of the European Parliament and of the Council on the control of major-accident hazards involving dangerous substances. The Act introduces development of safety documents and their approval process, and defines public access to information on risks associated with dangerous substances located in buildings. Along with the new Act, the Collection of Acts of the CR also published five new related decrees which also entered in effect on 1 Oct 2015. It was confirmed in the course of inspections and performance of the agenda under the Act on Prevention of Major Accidents that the inspection work under this task has a positive impact on prevention of accident and extraordinary situations.

5.2.3 Fulfilment of specific tasks

The inspection work of territorial inspectorates under specific tasks focuses on problematic areas and activities under the territorial jurisdiction of respective TI. In 2015, we made 581 inspections under 33 specific tasks. Almost 68% of the tasks followed from inspection work in the

last year. We made repeated inspections of public fuel filling stations, industrial estates and chemical facilities, recreational and spa facilities. The results of the inspection work indicate that the most frequent violations of the Waters Act occurred in inspections of recreational facilities and smaller municipalities, where the biggest problem was unpermitted handling of wastewater, that is, its transport and treatment. Based on findings from inspections as part of specific tasks, we issued 98 conclusive administrative decisions on fines and 6 decisions on remedial measures. The amount of fines awarded in the study period was more than CZK 3.240 million. Additional administrative proceedings will start in early in the year based on findings made in 2015.

Particularly the following most important specific tasks were tackled in 2015:

1. Inspection of operation of small hydropower plants

The inspection work focused on inspection of compliance of water management permits for construction and operation of small hydropower plants (SHPP) with real-world SHPP operation in terms of impacts on watercourses, particularly as concerns adherence to minimum residual flow rates and other provisions of the Waters Act. Due to low total precipitations resulted in a significant decrease in water levels in watercourses. Indiscipline of some operators resulted, particularly in derivation power plants, in non-compliance with minimum flow rates across weirs. It happened that all the river's water was taken out of the weir by the SHPP raceway. The Inspectorate received more than forty suggestions in the study period.

The WPD inspectors made inspections of SHPP operation in cooperation with the Nature Protection Department. In the study period, were made 217 inspection investigations at 144 SHPP. Based on the findings, we initiated 27 administrative proceedings on fines. In 2015,

twenty decisions on fines totalling CZK 630,000 entered into force. Due to some administrative proceedings being incomplete, other fines ordered will enter into force in 2016. The inspections found out that the most frequent violation was non-compliance with minimum residual flow rates, non-performance of handling rules revisions, and non-installation of metering devices in hydraulic structures. With respect to the findings, the supervision over adherence to legal obligations of SHPP owners (operators) will continue in 2016.

The greatest fine, amounting to CZK 70,000, for non-compliance with minimum residual flow rates was awarded to DOTEX Dobrá n. S. s.r.o. for its SHPP operation at Dobrá nad Sázavou. The decision entered into force on 6 Jun 2015.

2. Inspection of recreational facilities and hotels

In 2015, we carried out checks of adherence to obligations under the Waters Act among operators of recreational facilities and hotels at almost one half of the territorial inspectorates. We checked 24 facilities. In the study period, we initiated 12 administrative proceedings on fines based on inspections. Eleven of the decisions on fines, totalling CZK 164,410, entered into force in 2015. Based on the findings, additional administrative proceedings will be initiated in early 2016.

The most frequent violations of the Waters Act included exceedance of emission limits in wastewater discharged from household WWTP or consumption of groundwater without permits from water management authorities or above the permits.

3. Inspections in PHO of drinking water collection from Švihov reservoir on the Želivka

With respect to its size and the number of inhabitants supplied with the drinking water, the drinking water col-

lection from Švihov reservoir on the Želivka is the most important in Bohemia. For this reason, the CEI has paid particular attention to this task for several years.

In 2015, we made inspections of municipal WWTP, e.g., in Blažejovice, Dolní Kralovice, Chmelná and Snět. Inspections were also made at agricultural business, such as ZD Keblov, a.s., ZD Čechtice. For the identified unpermitted wastewater discharge, the municipality of Snět was awarded two fines in force in 2015, amounting to CZK 100,000 and CZK 150,000.

Due to the continuing problems with contamination with total phosphorus and nitrogenous substances, which cause eutrophication of water in reservoirs, and presence of pesticides in treated water and in the reservoir inlets, the systemic checks of sources of contamination of the Švihov drinking water reservoir will continue in 2016.

5.2.4 Major cases

Břežanský vodovod, s.r.o.

We have again identified cases of groundwater consumption without respective permits from water management authorities. One of them was that of Břežanský vodovod, s.r.o., which was found to make unpermitted consumption totalling 59,027 m³ without a water management authority permit. For this violation of the law, following the appeal, the CEI awarded a conclusive fine, the amount of which by calculation according to the Waters Act was CZK 1,475,675.

ZEVO, spol. s r.o

Based on findings from previous years, we again inspected in 2015 the Velký Karlov biogas station, operated by ZEVO spol. s r.o.; one of the inspections was made based on a suggestion received. In both cases, the CEI awarded large fines due to long-term violating behaviour. On 28 Oct 2015, the fine of CZK 900,000 entered into force;

it was awarded for violation of obligations when handling with potential pollutants, resulting in a demonstrable endangerment of quality of groundwater used as a source of drinking water for animal husbandry.

Simultaneously, 9 Nov 2015 is the date of legal force of the decision by MoE confirming the CEI decision on a fine of CZK 500,000, awarded based on a finding from 15 Apr 2013, against which the proceeding party appealed. The fine was awarded for the same administrative violation, i.e., violation of obligations set by the Waters Act for handling of potential pollutants.

ZS Vilémov, a.s.

In connection with investigation of causes of the accident reported on 30 Mar 2014 on the Doubravka near Zvěstovice, the CEI made an inspection of handling of potential pollutants at ZS Vilémov, a.s., focused on application of the pesticide NURELLE, containing chlorpyrifos. Water analyses carried out identified considerable contamination of surface water with this pollutant, which shows high acute toxicity for aquatic crustaceans and vertebrates. For the leak of this pollutant into surface waters, the CEI awarded a fine of CZK 500,000. Following an appeal, the MoE confirmed the amount and the decision entered into force on 29. Apr 2015.

In the study period, the Inspectorate made a wide range of inspections arising under respective legal standards. Comparing the results with 2014, the development can be described as stable. There was an increase, in both facilities inspected and statements for issuance of integrated permits, following the amendment of the Integrated Prevention Act (Act no. 69/2013 Coll.); integrated inspections tend to be quite time-consuming. The overall results of WPD inspection work in 2015 showed that the most administrative violations were unpermitted groundwater consumption and wastewater

discharge into surface waters from small WWTP, mostly operated by municipalities. The inspection results indicate that there is a need to supervise proper wastewater handling even in relatively small WWTP (above 50 EI), which often receive the contents of dead-end cesspits from their “commute” territory and more or less historically partly also process wastewater from local facilities (recreational, hotels, industrial and agricultural small-scale production, services – haulage, etc.). Long-term problems include insufficient sewerage in villages and methods of wastewater disposal, particularly by holiday resorts in mountain and submountain areas.

Renovations of WWTP structures and equipment and implementation of best available techniques have resulted in a significant reduction in pollution discharged into surface waters from plants sized over 10,000 EI. Due to the importance of large WWTP and notably the quantity of wastewater discharged, supervision over these WWTP is also necessary, but the inspection frequency can be reduced.

Serious shortcomings in industrial and agricultural businesses continued in 2015 as well; they were mainly unsecured storage and handling of potential pollutants, farm fertilisers and their liquid

5.2.5 Conclusions from inspection work

In the study period, the Inspectorate made a wide range of inspections arising under respective legal standards. Comparing the results with 2014, the development can be described as stable. There was an increase, in both facilities inspected and statements for issuance of integrated permits, following the amendment of the Integrated Prevention Act (Act no. 69/2013 Coll.); integrated inspections tend to be quite time-consuming. The overall results of WPD inspection work in 2015 showed that the most administrative violations were un-

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Serious shortcomings in industrial and agricultural businesses continued in 2015 as well; they were mainly unsecured storage and handling of potential pollutants, farm fertilisers and their liquid components, petroleum products or chemicals. We also identified shortcomings in preventive inspections of stores made by operators (absence of tightness tests) and development of accident plans. Inspections also identified several problematic agricultural facilities, notably biogas stations. Based on experience from inspections of biogas stations made in recent years, it is obvious that supervision over biogas stations has to increase. It followed from the inspection findings that major pollution sources do not have difficulty adhering to legislation. It can be concluded that higher fines awarded in previous years doubtlessly had a positive effect and educating influence on both the

entities fined and nearby entities. The decrease in violations identified is exactly the result of consistent and long-term inspection work. However, the CEI should not stagnate supervising larger and more significant sources of pollution but continue searching for new sources. In the area of handling of potential pollutants, shortcomings were identified particularly among small operators.

Another problematic issue is tacking defects on sites without a known polluter, where no legal entity that could be ordered remedial measures is known, including sites with historic environmental burdens which lack funds for completion of remediation.

In the area of supervision and legal violations leading to fines, there is a continuing trend of more cases of identified violations in unscheduled inspection compared to scheduled ones. However, investigation, acquisition of evidence and information in these unscheduled inspections is always more time-consuming and administratively complex than in scheduled inspections and larger pollution sources. Another continuing trend is frequent appeals of inspected entities against our decisions, which makes the administrative proceedings much more time-consuming.

From the legislation point of view, a continuing problem is the variability, changes and legally unbinding nature of interpretation of provisions of laws and their application in practice. Agreement on the legal interpretation between the WPD and the MoE is mostly based on mutual communication and personal contact. However, this approach is inconsistent and non-systemic. This inconsistency then complicates the inspectors’ job.

Another problem is the insufficient quality and variability of decisions (primarily permit by water management authorities) the adherence to which the WPD inspects. In many cases, final approval decisions are not issued in accordance with water management permits or vice versa, or the requirements for monitoring of wastewater discharged in the final approval decision contravene

those defined by the water management permit (frequency, sample type, number of pollution indicators, etc.). Sometimes the permit requirements are such that adherence to them cannot be determined (e.g., residual flow rate where no metering point exists). There are also increasing numbers of cases where the WPD handles contamination or endangerment of waters caused by fundamentally wrong decisions by other authorities, not only water management, but chiefly building authorities, insufficient development of land use plans and their purposeful modification (stores of potential pollutants, waste management, commercial and industrial estates, development of suburbs, cesspits and boreholes for heat pumps), etc. Here, we must point out the significant variability in decision-making of water management authorities of municipalities with extended powers concerning water discharge from oil traps or rain settling tanks (need for water management permit) and approving of accident plans of WWTP (inclusion of activated sludge among potential pollutants).

We have registered an increase in suggestions received, but only an insignificant percentage were justified. Handling suggestions against natural person represents a relatively large amount of inspection and related activity with a marginal environmental impact. However, the investigation, acquisition of evidence and information is always more time-consuming and administratively complex than in scheduled inspections and larger sources of pollution, which consumes time that could otherwise be spent inspecting entities whose impact on quality of surface water or groundwater is many times greater.

Also in the years to come, our inspectors will cooperate with other environmental protection authorities and, as part of prevention, teach and inform business entities and the general public about obligations arising under legislation so that the inspected entities have the opportunity to protect the environment by themselves.

5.3 Waste management, chemicals and biocidal preparations

5.3.1 Overview of inspection work in 2015

In 2015, inspectors of the Waste Management Department (WMD) made 3643 inspections in the areas of waste management, packaging, and chemicals. Out of that, 1330 were scheduled inspections and 2313 unscheduled (e.g., based on suggestions, etc.). In the same period, 545 suggestions were handled across territorial inspectorates and their waste management departments; it was 54 more in the previous year. In terms of adherence to obligations under Act no. 76/2002 Coll. on Integrated Prevention, waste management department inspectors made 321 inspections. Based on conclusions and findings from inspections, 2 crime reports were submitted for suspected commitment of crimes in waste management or other crimes. In 2015, WMD inspectors worked on investigation of 18 accidents.

For violations of legal regulations identified by the WMD in 2015, a total of 1042 administrative proceedings were initiated and 1060 decisions on fines issued as well as 26 decisions on remedial measures. Within that, 1024 decisions on fines totalling CZK 59,774,000 entered into force.

An integral component of waste management inspectors’ work is development of statements and position statements for other public authorities, such as regional authorities, the Ministry of the Environment and the State Environmental Fund. Specifically in 2015, the waste management department issued 414 position statements and statements.

In the course of the year, employees of territorial inspectorates and CEI headquarters also make statements on projects under EIA and SEA processes, requests for issuance or change of integrated permits; they are represented in departmental working groups of the MoE, established primarily to develop legislation changes, and in technical working groups on revision of documents on best available techniques (BREF), etc.

In 2015, CEI WMD forwarded 137 suggestions to other public authorities for investigation. Mutual cooperation with other public authorities is crucial particularly in especially important cases, which frequently cannot be handled by CEI alone. Cooperation with other institutions was utilised in 2015, among other things, in the nation-wide action Blue 24, which together with Czech Police inspected collection and repurchase facilities for metal waste and searched for waste that operators of waste collection and repurchase facilities are not permitted to purchase from natural persons.

5.3.2 Fulfilment of departmental tasks

Waste disposal and treatment facilities

In 2015, we made under this departmental task 372 inspections at 317 entities operating waste disposal facilities. These inspections identified violations of legal obligations in 78 cases. By the end of the year, the total amount of conclusive fines was CZK 4,545,000. A total of 147 inspections were made based on suggestions.

In the area of landfills, our inspection work focused primarily on inspection of landfills that are actively operated (so-called first phase of operation).

In the last year, inspections at landfills paid attention to any use of structural elements, their reporting in the records, and reporting of waste used for landfill technical security, as a consequence of both legislation changes in



**Non-compliance with maximum active landfill area
– Slavičín landfill body (Brno TI)**

economic tools defined by the Waste Act, and the related effort of operators to exclude waste admitted from the charge obligation.

The most frequently identified violation when operating landfills is non-performance or non-adherence to requirements of the facility operating rules. Specifically, this concerns errors where waste is admitted without a basic waste description or, if the description is completed, it is done only formally, i.e., the properties of admitted waste are not described sufficiently with reference to suitability of admission of such waste to the facility. In addition, waste not permitted by approved operating rules were admitted to landfills in contravention of legal standards.

In some inspections the CEI commissioned sampling of groundwater from landfill monitoring boreholes; in addition, we commissioned geodetic surveys of the extent of waste deposited in landfills, and development of expert opinions.

As part of the departmental task “Waste disposal and adjustment facilities”, the CEI also inspected municipal waste incinerators and hazardous waste incinerators.

Shortcomings identified in operation of waste incinerators consisted, for example, in concentration of infectious medical waste that was not incinerated within 72 hours of admission as prescribed by approved operating rules, as well as presence of medical waste outside specified containers, exceedance of daily capacity of the incinerator unit permitted by operating rules and failure to keep continuous waste records.

During incinerator inspections, the CEI collected samples in order to carry out qualitative analyses of waste produced (fly ash, ash, cinders). The analyses were made to the extent of the executive decree for the Waste Act (pollutants in dry matter, ecotoxicological tests) and the European regulation on persistent organic pollutants was used to determine the polychlorinated di-benzo-p-dioxins and dibenzofurans (PCDD/PCDF) and hexachlorbenzene.

The departmental task “Waste disposal and treatment facilities” also includes inspection of facilities intended for waste treatment, such as disposal of liquid waste (neutralisation and deemulsification plants), waste decontamination (biodegradation areas and stabilisation units), in which physical and chemical processes are used to eliminate dangerous properties of waste. Inspections in these facilities identified shortcomings related to non-adherence to obligations defined in approved facility operating rules, such as failure to make defined entries in the operating log, to enter information on activities carried out in the different treatment processes (waste type and quantity, process time), to quote parameter values or quantities of chemicals used that require monitoring in treatment procedures, to follow work procedures; leaks of pre-treated wastewater into unsecured exteriors when decanting into tank trucks, failure to follow prescribed recipes for treatment of waste, failure to secure part of hazardous waste from undesirable degradation or release, failure to document analysis of waste admitted to the facility for biodegradation and to monitor se-

lected waste parameters in the course of the decontamination process.

There is an obvious continuing trend of decreasing quantity of hazardous waste in biodegradation facilities; the causes of decreasing amounts of category N waste processed may include decreasing amounts of remediation works, minimisation of hazardous waste produced, as well purposeful wrong categorisation of waste and insufficient verification of waste quality, or insufficient verification of the hazardous properties of waste.

In addition, this task included cases of illegal waste disposal consisting in depositing waste in places not intended for it. The overwhelming majority of suggestions for inspection received concerned illegal disposal of mostly construction and demolition waste by depositing them on unsecured ground. This included notably piling of waste on the ground with the intention of leaving it permanently in unsecured areas; in many cases, this illegal action is motivated by monetary savings.

The Inspectorate handled cases of unpermitted deposits of waste produced by road or railway renovation, which are contaminated earth and waste, and even recycled materials. In addition, there were cases of deposits of construction waste and excavated earth with additions of asphalt layers, parts of concrete sewer piping, parts of plastic piping and ceramic tiling, as well fragments of asbestos, etc.

In the long run, highly problematic are the cases of illegal dumps, where the originator of the waste cannot be identified. The problem is that there is no effective way of dealing with these situations under the current legislation.

Waste reuse facilities

The Inspectorate made inspections of facilities intended for reusing waste, including land reclamation, landscap-

ing and recycling plants for construction waste, facilities performing various waste adjustment (plastics, paper, wood and other waste), as well as composting plants and biogas stations (BGS).

In total, we made 350 inspections at 309 entities in 2015. For the violations identified, we carried out 106 administrative proceedings and decisions on fines totalling CZK 3,170,000 entered into force by the end of the year. We made 130 inspections based on suggestions. Some of the facilities were inspected as part of issuance of position statements on projects for which applications for support under programmes administered by the SEF had been made.

Generally, it can be concluded that operators of waste reuse facilities were most frequently found to violate legal standards consisting in waste management in facilities not intended for it (unauthorised reuse of waste in places not intended for it) or operation of facilities in contravention of approved operating rules.

Additional errors were identified as non-adherence to recording and reporting duties. Specifically, operators did not submit annual reports on waste production and management via the ISPOP, or the reports did not include all the waste types reused. A very serious situation



Illustration photo, composting plant (Olomouc TI)

is where entities do not allow the Inspectorate to make an inspection or fail to cooperate in the inspection. In such cases, the Inspectorate has to penalise the entity under the Inspection Act.

As regards suggestions received, it can be concluded that the most frequent subject of suggestions in the area of waste reuse facilities is large-scale depositing of excavated earth and construction waste as part of unpermitted landscaping, and treatment of waste (operation of recycling plants) produced by construction activity. Handling of some suggestions is very demanding and requires very careful and time-consuming work, because that is the only way to find out who is liable for the unpermitted waste management.

Some inspection investigations included waste sampling for chemical analysis, and a few cases involved surveying of unpermitted landscaping in order to determine the quantity of waste deposited.

In connection with construction and demolition waste, the key role of building authorities has to be mentioned. The reason is that wrongly done demolitions are a very risky phenomenon, and moreover they involve depositing of contaminated waste in unsecured areas. The inspections focused on reuse of waste earth or construction waste on the ground (landscaping) also showed that there are continuing problems of misuse of the institution of by-product.

For instance, many entities regard excavated earth and construction waste as materials, not waste, and argue earth or construction waste on the ground proving that fact with relevant documents.

In 2015, the CEI inspected 73 facilities for reuse of biodegradable waste. For example, we inspected 42 composting plants and 7 biogas stations.

Among other things, the inspections of these facilities involved cooperation between waste management department inspectors with other departments, such as water protection and air protection. The essential component of inspecting facilities for treatment of biodegradable waste is checking adherence to requirements of the facility operating rules, which should include rules for operation of the chosen process. CEI inspections identified violations of proper composting plant operation in about 1/3 of the cases. Specifically, we found composting outside the permitted hydraulically secured areas, admission of waste to facilities in contravention of operating rules, poor operating records, wrong composition of liner layers and insufficient inspection of outputs. Fundamental violations are such that cause the composting plant (biogas station) processes to be non-functional and thus produce outputs non-conforming to the quality requirements. The objective of CEI inspections is to remedy this state.

In several cases, the Inspectorate dealt with treatment of biodegradable waste in places not intended for it; they were primarily WWTP sludge and fly ash from biomass combustion; the inspections were made based on suggestions.

Waste collection and repurchase facilities

Based on a requirement of the MoE, waste collection and repurchase facilities were one of the CEI's priority inspection areas in 2015. In the course of normal scheduled inspections and two extraordinary inspection actions made in cooperation with the Czech Police in 2015, we inspected 665 facilities, almost double the number compared to 2014.

The identified violations of law led to 139 administrative proceedings and 271 fines. A total of 252 decisions entered into force in 2015, awarding fines totalling CZK 10,832,000.



Repurchased public-use equipment:
traffic signs found during Blue 24 (Plzeň TI)

As for the cooperation with the Czech Police, the CEI was involved in an international police security action focused primarily on crime in railway transport (Blue 24). These extraordinary inspection actions took place in March and October 2015.

The extraordinary inspections focused notably on the ban on repurchase of defined waste from natural persons, adherence to the ban on paying cash for repurchases of defined waste, and adherence to recording duties of operators of metal waste repurchase facilities.

Almost every territorial inspectorate found cases where the bringer of waste for repurchase was not properly identified or violations of the ban on admission of objects of an art or pious nature, machinery parts or components and objects of the nature of public-use equipment from natural persons. Most of the inspections found violations of the no-cash obligation.

Car wreck collection, repurchase and processing facilities

In 2015, WMD inspectors made 85 inspections in car wreck collection, repurchase and processing facilities.



Storage of car wrecks in contravention of legal regulations (Hradec Králové TI)

Violations identified resulted in 14 administrative proceedings and 33 penalties in 2015. A total of 41 decisions entered into force in 2015, awarding fines totalling CZK 1,304,500.

The most frequent violation in the area of car wrecks identified by the inspectors was operation of facilities in contravention of their approved operating rules; we again dealt with cases of citizens disassembling car wrecks inexpertly in unsecured areas. They sold car wreck parts obtained in this way as waste ferrous metals to collection yards. There is no doubt that this illegal activity may involve risks to the environment by leaking operating fluids from car wrecks. Moreover, handing of car wreck parts to collection facilities that are not part of the chain of authorised car wreck processors resulted in a distortion in records on the monitored flow of waste from car wrecks.

Recollection of used products

The inspection plan for this departmental task for 2015 consisted of checks of obligations relating to the recollection system as such (e.g., manufacturers, importers,

vendors, collective systems) and those relating to the handling of recollected products (e.g., collection, processing).

In the area of recollection of used products, the CEI initiated 51 administrative proceedings, and 44 decisions were issued in 2015. Forty decisions totalling CZK 703,000 entered into force in 2015. Generally, the result of inspections in this area is typically the finding of a short-term disagreement with the waste legislation, followed by instruction to the entities on their legal obligations and remedy by the entities inspected. For this reason, the penalties for the first violation in this area are usually at the lower bound of the legal range. The CEI only exceptionally comes across serious violations in this area. In spite of that, several major cases of illegal conduct were identified in 2015, resulting in greater penalties (in the range of hundreds of thousands of CZK), which have not entered into force yet.

In the area of recollection of used tyres, the inspections followed on findings from 2014. They continued to focus primarily on the registration obligation for listed entities and, newly, on the mandatory recollection quantity. There were repeated shortcomings relating to the new legal obligations for listed persons on tyres: the obligation to register in the MoE list, elaboration and submission of annual reports on recollection of tyres and, newly, failure to meet the set tyre recollection quantity. These findings follow on inspections in 2014. Based on these inspections, we awarded 11 penalties for not complying with the obligation to register in the List of Tyre Manufacturers, totalling CZK 138,000. Moreover, the CEI, authorised by the MoE, has been examining several dozen entities that did not meet the required recollection quantities in 2014; the CEI also awarded penalties in force for this violation in 2015.

Inspections of industrial businesses and other waste producers

In the inspections focused on waste producers' compli-

Brief overview of numbers of inspections in 2015 by subject area

Total inspections	Electrical equipment (manufacturers, incl. vendors)	Tyres (listed entities, vendors)	Batteries (manufacturers, incl. vendors)	End vendors and their obligations	Operators of collective systems	Others*
184	51	58	23	45	5	59

* checks of electric waste processors, solar power plant operators, collection points, handling of used products, etc.

ance with obligations, the CEI checked 887 entities in 2015, including 198 based on suggestions received.

In 2015, this area involved 179 administrative proceedings on fines and the total amount of fines awarded under this departmental task was CZK 4,513,000.

We repeatedly confirmed the fact that larger waste producers more frequently adhere to legal requirements on waste management than producers of smaller quantities



Unsorted waste at a waste producer – industrial manufacturer in Liberec (Liberec TI)

of waste. Generally, it can be concluded that if a manufacturing business employs an environmental officer, the waste management issues are handled better. As for shortcomings identified, a recurring trend is wrong waste sorting. When inspected, companies explain the situation by lack of work discipline among employees. Other errors identified in the inspections include underestimation of properties of hazardous waste affecting its physical behaviour or chemical reactivity. Avoiding potential risks means complying with not only the specified classification, but also identification, storage, transport, security measures, etc. Frequently, failure to meet one of the requirements poses a future risk to human health and the environment to various extent. Handing of waste to unauthorised entities closes the list of the most frequent violations of the Waste Act by waste producers.

Inspection of compliance with Packaging Act

In 2015, the CEI made 110 inspections of compliance with Act no. 477/2001 Coll. on Packaging. In the same year, we initiated 67 administrative proceedings and 56 decisions entered into force, awarding fines totalling CZK 4,548,000.

Identically to previous years, we primarily checked entities that were registered in the MoE List of Entities and those that did not meet their requirements at all. In some cases, the entities did not allow the CEI to inspect when invited to, followed by a fine under the Inspection Act.



Positive example: properly identified waste sorting bins at a waste producer (Liberec TI)

The greatest fines were awarded to a major Internet shop selling consumer electronics. The entity did not meet its obligations at all, but remedied that after the inspection.

Another entity that was awarded a great penalty was a chain selling sports products to consumers in stores around the CR: an entity registered in the MoE List without a properly set system for recollection and reuse of waste from packaging. It can be concluded that the CEI repeatedly comes across ignorance of the Packaging Act among listed entities.

Inspections of adherence to the Chemicals Act

In 2015, inspectors of the chemical agenda made 891 inspections focused on obligations under the Chemicals Act no. 350/2011 Coll. and related European regulations: no. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), no. 1272/2008 on classification, labelling and packaging of substances (CLP) and no. 648/2004 on detergents. The inspections focused primarily on obligations when marketing chemical substances and mixtures (registration, classification, packaging, labelling, MSDS, notifications, risk reducing measures, etc.) and on suppliers of items containing restricted chemicals. Part of

the inspections focused on the REACH (326 checks), some on obligations under the CLP (218) and a smaller part on the Detergents Regulation (25 checks). A total of 62% of chemical substances or mixtures inspected in 2015 originated from countries outside the CR. Besides, more violations of chemical regulations were found in imported products and products from other EU than in domestic products (the ratio of non-compliant substances and mixtures to compliant was 2:1 in these products). Conversely, the majority of mixtures originating from the CR complied with requirements of chemical regulations.

In 2015, the CEI made 148 inspections based on 196 notifications received from the RAPEX (EU rapid warning information system on dangerous non-food consumer products). The number of RAPEX notifications received increased 18 times compared to 2014. At the same time, the CEI notified the RAPEX of 13 dangerous consumer products in 2015; most of them were costume jewellery containing above-limit quantities of heavy metals. The year 2015 was the second year of the CEI's highly rewarding cooperation with the Toxicology Information Centre (TIC), which provides information for physicians and the public in the event of acute poisoning. The CEI was informed about 122 chemical mixtures that had produced an accident or poisoning but for which TIC employees had not found information in the Register of Chemical Mixtures kept by the Ministry of Health of the CR (an 88% increase compared to last year).

In 2015, 186 fines for violations of the Chemicals Act entered into force, totalling CZK 6,506,500, and 174 administrative proceedings were initiated. The majority of the violations concerned classification of chemical mixtures and their improper labelling, notification and MSDS. Besides the fines, the CEI ordered 15 remedial measures consisting in removal of non-compliant products from the market.

Colleagues from inspectorates abroad (e.g., Slovakia, the United Kingdom, Germany) were handed 7 cases (concerning, e.g., wrong classification of mixtures marketed in the CR, MSDS or unclarity concerning substance registration). In the same period, the CEI received 3 suggestions from abroad, relating e.g. to production of non-registered or restricted chemicals in items.

In 2015, the inspectors focused, among other things, on sales of chemical substances and mixtures in Internet shops and, above all, on advertising issues. According to the CLP Regulation, Internet advertising for dangerous mixtures have to show their dangerousness. In this inspection action, we checked 17 e-shops and found violations in 15 cases, of which 13 were related to advertising. So far, the CEI awarded 7 fines based on these inspections, totalling CZK 149,000.

Another thematic inspection action was detailed inspections of material safety data sheets using a single inspection form. We used this method to check 68 MSDS. The requirements of legal regulations were not met by 57% of the MSDS. The most frequent errors related to sections of the MSDS related to handling and storage, limiting exposure and disposal.

The CEI also participated in the European pilot project focused on child-proof closures, tactile warnings for the blind and whether packaging on chemical substances and mixtures confuses consumers. Under this inspection action, we checked 25 chemical substances and mixtures marketed in the CR intended for consumers (e.g., swimming pool chemicals, detergents, hardeners, etc.). Violations were found in five of the inspected products.

The most important inspection action in 2015 focused on inspection of dangerous substances contained in items and entities supplying or importing items contain-

ing substances restricted by Annex XVII to the REACH, such as cadmium, nickel, lead, dimethyl fumarate, azo dyes and hexavalent chromium. The contents of heavy metals in jewellery (nickel, cadmium and lead) was checked in 119 jewellery and costume jewellery items. Requirements of Annex XVII to the REACH Regulation were not met by 41 of them (34.5%); in some cases, the heavy metal contents exceeded the limits by three orders of magnitude (up to 6580 times). Specifically, there were 23 exceedances of the limit for cadmium, 14 of the nickel migration limit, and 5 of the lead limit. Violations were found in 16 out of the 21 inspected companies importing and marketing these jewels. The CEI awarded 16 fines totalling CZK 506,000 for these violations and ordered removal of these products from the market.

We tested 20 fabric samples for the presence of azo dyes, which may release one or more aromatic amines (carcinogenic and genotoxic substances) through reductive splitting of one or more azo groups. Five leather products were tested for presence of carcinogenic and sensitising hexavalent chromium. None of the cases led to detection of above-limit contents of the restricted chemical.

The market also has to be protected from items treated with sensitising dimethyl fumarate (DMF cannot be contained at more than 0.1 mg/kg). Twelve pairs of imported shoes were checked for presence of this chemical. Exceedance of limits was found in two pairs of shoes; the importer was awarded a fine of CZK 200,000.

5.3.3 Overview of fulfilment of specific tasks – priorities

In 2015, territorial inspectorates set the following priority topics in the area of waste management: inspection of adherence to the Waste Act in municipalities, handling of medical waste, mobile waste collection and repurchase facilities, railway corridor construction, and waste ma-

nagement within specific entities. These are topics where ordinary inspection practice or other circumstances led to the requirement for more detailed monitoring of the selected issues in the inspectorate's territory. Moreover, they are typically professionally and socially important issues, the more detailed monitoring of which can be then expected in other areas of the CR.

5.3.4 Conclusions from inspection work

The CEI waste management departments worked in the standard way in 2015, i.e., the CEI again focused across all the issues that are handled by respective legal regulations concerning waste, packaging and chemicals. A special emphasis was put in 2015 on inspection work in the area of collection and repurchase of metal waste, which is one of the priorities of the Ministry of the Environment. Based on the inspection work results, it can be concluded that compared to the previous periods there has been no major change in businesses' attitude to adherence to legal standards supervised by waste management departments. In most of the inspected businesses (approx. 2/3), we found no violation of legal standards, which corresponds to previous periods. Nevertheless, in the remaining cases, approx. 1/3, we found violations of law, but they were not very serious with a few exceptions. In this connection, it has to be pointed out that although some of the errors identified may appear to have minimal environmental impact (e.g., wrong waste sorting by waste producers), they may ultimately, due to their high frequency, be a significant problem preventing the setting of a new European trend, so-called circulating economy. Another barrier to circulating economy that can be currently identified based on the CEI's inspection work is either erroneous or, frequently, purely purpose-driven interpretations of legal standards by businesses with the objective to achieve significant monetary savings regardless of environmental protection.

such as reuse of waste in landfill operations and some types of landscaping. A very problematic approach is to the practical interpretations of the term "by-product" and situations where waste is taken out of the powers of the Waste Act. Ultimately, this leads to a diversion of waste (materials) from a direction in which it could actually attain value while having a positive environmental impact.

It follows from the above that in 2016 the CEI will, besides inspection work itself, strive to provide the Ministry of the Environment with its findings in order to enable adjustments to legal regulations that will minimise circumvention of legal standards.

A negative trend, which unfortunately has had an increasing tendency, is inspected entities not allowing CEI inspection. Failure to allow inspection work consists, e.g., in not providing required documents that the inspected entities are required to keep, failure to provide required information or, in some cases, inspected entities refuse to allow the CEI to make an on-site examination in buildings or on land where waste is or may be handled. In such cases, the CEI is forced to award the entity with a penalty under the Inspection Act. In 2014, inspectors of the CEI waste management departments awarded 40 fines under the Inspection Act, totalling CZK 2,785,000; in 2015, it was 53 fines totalling CZK 3,545,000.

The year 2015 was very beneficial in terms of collaboration with other authorities in the areas of both waste management and chemicals. It involved notably the CEI's participation in actions of the Czech Police titled Blue 24 as well as joint inspections with other state authorities such as the CTIA. Doubtlessly a very beneficial collaboration is that of inspectors dealing with the chemicals agenda with the Toxicology Information Centre, which provides the CEI with numerous suggestions relating to cases of acute poisoning by chemicals where, e.g., physi-

cians dealing with them did not have information on the chemicals available.

5.3.5 Major cases

AVE CZ odpadové hospodářství s.r.o.

The company wrongly reported, in its continuous records and the annual report on waste for the hazardous waste landfills in Čáslav and Benátky nad Jizerou in the first phase of operation, the legally defined code of the waste management method for a part of the waste admitted. Specifically, the inspected company wrongly entered the waste management code N1 instead of the correct D1. As for the waste reuse, the waste was reportedly used for so-called "structural elements" and thus, according to the company, the waste was not disposed of (deposited) in the landfill but reused.

In the case of the Čáslav landfill, this error concerned about 72,864 t of other waste (20 types) and 49,276 t of hazardous waste (6 types). In the case of Benátky nad Jizerou, the error concerned 148,533 t of other waste that was wrongly reported in the annual report, and 73,085 t of waste for which handling code N1 was used wrongly instead of D1 (42,981 t of other/3 types, and 30,104 t of hazardous/4 types). The wrong use of the codes ultimately has a great impact as the company thus did not collect from suppliers – and did not pay to the municipality and the state budget (the beneficiary being the SEF CR) monetary amounts of hundreds of millions of CZK. Collection and payment of charges for waste landfilling is an important economic instruments to attain higher levels in the waste management hierarchy (e.g., recycling). Moreover, the funds from the charges are then utilised for environmental protection. It must also be noted that the illicit conduct gave the company an illegitimate market advantage compared to other similar facilities. The fine was awarded for a violation of Section 66, Para. 2, item a) at its maxi-

mum amount of CZK 1,000,000. The fine is in legal force.

AMT SERVIS s.r.o., Vılanec

The inspection was made based on the CEI findings from its administrative work. On land owned by the inspected entity, we found a large quantity of dumped construction waste and excavated earth; part of the waste had already been deposited on the ground surface on a total area of approx. 100 x 100 m at a maximum thickness of 4 m. According to the documentation presented, 1570 tonnes of waste had been dumped; moreover, the waste was not analysed for suitability for use on the ground surface. At the same time, the responsible entity had not made a risk assessment for the site requested under Decree no. 294/2005 Coll. At the time of dumping the waste on the site (2015), the inspected entity did not have any approving position statement from the respective authority, i.e., it was not the operator of a facility under Section 14, Para. 1 or 2 of the Waste Act. By said



AMT SERVIS s.r.o., Vılanec u Jihlavy – Dumping of construction waste and excavated earth without an approval for operation of a waste disposal, reuse, collection or repurchase facility (Havlíčkův Brod TI)

conduct, the company AMT SERVIS s.r.o. violated Section 12, Para. 2 of the Waste Act and was awarded a conclusive fine of CZK 200,000.

EKOTREND AG, s.r.o.

In 2015, the body of appeals confirmed a fine of CZK 400,000 awarded under Section 66, Para. 3, item d) of the Waste Act to an operator of a facility for reusing (treatment) of waste – developers and fixatives. Our inspection found out that the operator did not identify the hazardous liquid waste admitted or produced in any way; it was handling hundreds of litres of solutions of fixatives and developers and about 20,000 litres of waste containing dangerous sulphides. The above penalty was also awarded to the operator for an identified violation of Act no. 254/2001 Coll. on Waters, because the operator had an inadmissible connection between the liquid hazardous waste piping and the sewer in its basement, enabling direct discharge into the storm sewer.

Moreover, the Inspectorate made a comparison (balance) of consumed energies for the process equipment in 2012 and 2013 in relationship to the quantity of waste admitted, which showed that the liquid waste handling had not agreed with the submitted reports on waste production and management and that a substantial part of the hazardous waste (either admitted or produced) had been disposed of either by discharge into the sewerage or in another undeclared way. At the same time, the operator did not have an accident plan in place.

Autodoprava Matějka, s.r.o.

The CEI awarded the company a fine of CZK 150,000 for violation of Section 12, Para. 2 of the Waste Act, consisting in having dumped in a former farming cooperative in Přibice waste consisting of a mixture of demolition and construction waste as well as mixed and oversized municipal waste at a quantity of 9 lorry loads. The investigation was complicated by the fact that the waste

had already been dumped in May 2013, as well people's reluctance to witness about the waste producer, misleading information from actors of the unpermitted waste dumping, and the suspects' failure to accept mail. Only assistance by Czech Police provided statements by some persons not present in the Czech Republic who had not responded to the CEI's letters. Based on additional investigation in 2015, the CEI proved that the waste had been dumped by the company Autodoprava Matějka, s.r.o. The company appealed against the decision on the fine. The Ministry of the Environment rejected the appeal and confirmed the CEI's decision, which entered into force on 7 Oct 2015.

The Inspectorate then ordered Autodoprava Matějka, s.r.o., to take remedial measures consisting in removal of the waste, illegally concentrated in piles up to 1.1 m high and 10.1 m wide in the narrowest place and 14.1 m in the widest place, 54 metres long. Information about the implementation of the remedial measures was received on 23 Dec 2015.

Polydům – MB s.r.o.

The company Polydům – MB s.r.o. handled, in 2012–2014 on a land plot in the Čeperka cadastral area, approx. 350 tonnes of waste excavated earth although the plot (arable land) was not intended for waste management under the Waste Act. The quality of the waste, which was concentrated on the plot in order to build a noise-reducing mound barrier, was not identified by the inspected entity, and the mound barrier was built against the will of the plot owner. For this violation of the Waste Act, Polydům – MB s.r.o. was awarded a conclusive fine of CZK 100,000.

Pozemní stavby MENŽET s.r.o.

In contravention of the Waste Act, Pozemní stavby MENŽET s.r.o. dumped on an agricultural land plot in the Choltice cadastral area waste from the construction project "Production expansion of KIEKERT CS,

Přelouč". For this administrative violation, the company was awarded a conclusive fine of CZK 480,000 and ordered to restore the land plot to its original condition. The remedial measures involved the removal of 2500 m³ of waste excavated earth with additions. Since Pozemní stavby MENŽET s.r.o., did not meet the conditions and terms for the remedy set by the CEI decision, the CEI awarded the company a conclusive fine of CZK 800,000 in 2015.

VITKA premises, Brněnec

In 2011, the CEI found out that EURO DEMOLICE s.r.o., while demolishing the former textile factory VLNĚNA in Brněnec, had violated the Waste Act by not emptying, or only partly emptying the buildings before the demolition and only relocating process chemicals and preparations stored to open areas outside the buildings or leaving them in the original places. This hazardous waste was not submitted to authorised entities and remained unsecured against undesirable degradation, theft or release into the environment (e.g., leaks of dangerous substances into the sewer inlets in rainy weather and, from there, to the nearby Svitava river). At the same time, the demolition method resulted in not ensuring a collection of the waste separated by type and category. In spite of written invitations, representatives of the premises owner or the company doing the demolition works failed to participate in any of the inspections.

Based on all the findings, the CEI awarded EURO DEMOLICE s.r.o. in 2012 a conclusive fine of CZK 480,000 for violation of Act no. 185/2001 Coll. on Waste, and ordered remedial measures and deadlines for implementing them. For failing to implement the remedial measures, EURO DEMOLICE s.r.o. was afterwards awarded a fine of CZK 1,000,000, i.e., the maximum possible amount for the administrative violation in question.

Since the unsecured chemicals and preparations located

on the premises posed a direct threat to the environment and human health, the decision was made that it was necessary to remove these dangerous substances from the premises. Under the subsidy programme, the Pardubice Regional Authority applied for a subsidy for implementation of the necessary measures. In order to have the subsidy approved and to monitor the state of the premises, the CEI made numerous investigations in 2015 and issued expert position statement to acquire the subsidy. Based on the approved subsidy from the SEF CR operational programme, a professional company removed the most hazardous chemicals from the premises in November 2015 to prevent their potential negative impact on the environment and human health.

KTI – provádění staveb, s.r.o.

A fine of CZK 950,000 was awarded to the company KTI – provádění staveb, s.r.o. The proceeding party handled, on a plot in the Malešice cadastral area, waste earth and waste in category 17 Construction and demolition waste (including excavated earth from contaminated areas). With this waste, it was landscaping a chateau park on an area of about 7371 m² at between 0.5 and 3.5 m thick. The CEI's educated estimate determined about 20,000 tonnes of waste. The appeal body, the MoE, adjusted the Inspectorate's fine to CZK 800,000, and it entered into force on 10 Mar 2015.

Ostravská Invest společnost s.r.o.

Based on a suggestion received at the end of 2014, the CEI made an investigation wherein it found out that some plots in the Místek cadastral area contained 3 piles of construction waste such as concrete debris, brick with tiling, timber, iron, concrete, and patches of scrap oily bricks; the investigation found out that there were 19,323 tonnes of hazardous waste under category 17 09 03* Other construction waste and demolition waste (including mixed construction and demolition waste) containing hazardous substances.



The case of Ostravská Invest společnost s.r.o.
(Ostrava T1)

Afterwards, on 10 Mar 2015, the CEI received Expert Review no. 059-02/2015. It followed from the expert review that, according to results of chemical analyses of the mixed demolition waste sample collected from the main demolition waste pile with an increased contents of visually contaminated bricks, this waste is ecotoxic and can only be deposited in a hazardous waste landfill. The source of the contamination was petroleum hydrocarbons, massively contaminating a part of the demolition waste (brick masonry). The visually contaminated parts of the demolition waste reviewed could be classified, based on the identified properties, under Waste Catalogue no. 17 09 03* Other construction waste and demolition waste (including mixed construction and demolition waste) containing hazardous substances. Since it was virtually impossible to sort the contaminated parts out of the demolition waste reviewed, with reference to Section 6, Para. 1, item c) of the Waste Act, it was necessary to regard the entire quantity of both the demolition waste piles with an increased proportion of brick masonry as hazardous waste. In addition, the expert opinion concluded that short-term disposal of demolition waste on the plots did not pose any acute threat to groundwater based on the geological and hydrogeological condi-

tions identified on the site. If the demolition waste piles had been left on the plots for a longer time (approx. 1 year and more), it was no longer possible to rule out a negative impact on the groundwater in the shallow Quaternary aquifer in the layer of glacial and fluvial sediments, which is probably used by household water wells in the surrounding low-density residential development for other than drinking purposes. Contamination of the upper soil layer could not be ruled out either.

The CEI initiated an administrative proceeding on a fine with Ostravská Invest společnost s.r.o. For not having removed the dumped demolition waste from the plots, the legal entity Ostravská Invest společnost s.r.o. was also the subject of an administrative proceeding on remedial measures under Section 76, Para. 1, item c) of the Waste Act. The decision on a fine of CZK 2 million, as well as the remedial measure order consisting in removal of the waste from the plots, entered into force.

Interesting case for the chemicals agenda – Beads 4U, s.r.o.

The company Beads 4U, s.r.o., committed a violation of the REACH regulation as an importer of components for manufacturing of costume jewellery containing dangerous (restricted) chemicals. The company purchased the components from a Chinese supplier using the name Milky Way Jewellery Co. Ltd. Out of the eleven samples inspected, six failed to comply with the regulations. The components exceeded limits for cadmium, or released more nickel than is permitted by REACH. For example, a feather-shaped pendant released nickel at a rate of $48.1 \mu\text{g}/\text{cm}^2/\text{week}$ (the limit being $0.5 \mu\text{g}/\text{cm}^2/\text{week}$). The cast-iron “Anchor” pendant contained 48.4 weight % of cadmium (the permitted limit is 0.01 weight % of cadmium). For violation of the REACH regulation, the company was awarded a fine of CZK 100,000 and ordered remove these dangerous products from the market.



One of the samples in the Beads 4U, s.r.o., case

5.4 Nature Protection and CITES

5.4.1 Overview of inspection work in 2015

In 2015, nature protection inspectors made 2902 inspection investigations, out of which 1025 were scheduled inspections as part of departmental and specific tasks. In 2015, NPD issued 633 administrative decisions in force, including 473 on penalties, 24 on remedial measures and 29 on restriction or halt of operations. The total amount of fines was CZK 11,813,600, including CZK 10,500,800 for legal entities and entrepreneurs and CZK 1,312,800 for natural persons. The total amount of fines in force decreased year on year, the difference being around CZK 200 thousand. In addition, we issued 107 decisions on confiscation of illegitimately held individuals and 24 remedial measures. The number of crime reports filed decreased by one (to 13) compared to 2014.

For the first time in several years, there was no major year-on-year increase in the number of suggestions

handled. Whereas in the previous years we handled 867 (2012), 891 (2013) and 1020 (2014) suggestions, in 2015 the Nature Protection Department dealt with third-party submissions in 1023 cases. Investigation of received suggestions continues to represent a very extensive agenda, which at least in some parts of the year makes up the largest portion of the Nature Protection Departments' work. Statistically the largest part of the submissions concerns protection of trees outside forest, but there are also numerous suggestions relating to specially protected plant and animal species, specially protected areas, prominent landscape features, European bird species, and other nature protection interests. A non-negligible part of the suggestions are justified and lead to misdemeanour or administrative proceedings on fines or restriction of operations.

The greater part of the inspection work of the nature protection department concerns enforcement of Act no. 114/1992 Coll. on Nature and Landscape Protection. To a lesser extent, the inspection work follows other departmental acts, notably Act no. 78/2004 Coll. on Handling of Genetically Modified Organisms and Genetic Products, Act no. 162/2003 Coll. on Conditions for Operation of Zoological Gardens, and since 2015, also Act no. 334/1992 Coll. on the Protection of the Agricultural Land Fund.

A separate chapter is inspection work done based on Act no. 100/2004 Coll. on Protection of Wild Animal and Plant Species by Regulating Trade in Them, the coordination of which belongs to the separate CITES department. However, some of the inspection work under this Act is done by some inspectors of nature protection departments of the CEI territorial inspectorates.

Genetically modified organisms

In 2015, inspectors focused on the issues of genetically modified organisms made 41 inspections. In 30 ca-

ses, they checked entities handling GMOs in the closed handling regime in risk categories 1 and 2; another 5 investigations focused on introducing GMOs into the environment in field experiments, and the remaining 6 inspections were related to monitoring of a site with a GMLP – the “Amflora” potato – in the course of its vegetation. Closed handling inspections focused primarily on entities checked more than 3 years before as well as newly reporting GMO handlers. All the field experiments permitted by the MoE for 2015 were inspected. Specifically, they included inspection of adherence to requirements of issued decisions and legal provisions in field experiments with a transgenic plum tree (clone C5), transgenic flax and transgenic barley on two sites.

In 2015, the CEI dealt with two suggestions made by supervisory public authorities. The first suggestion was a suspicion about the presence of GM soya addition (GTS-40-3-2) in mercantile soya seed. An investigation and analysis of 3000 collected samples of soya leaves did not prove the presence of any GM soya. The presence of GMO additions in seeds has had a slightly increasing tendency in the recent years, and attention to this topic is required.

The other suggestion – its continuation from 2014 – is related to verification of the presence of weed plants of the “Amflora” GM potato (ID EH 92-527-1) on 3 sites where they were grown in the past (until 2010). In cooperation with BASF, spol. s r.o., we carried out monitoring there and, based on its results, we recommended continuous destruction of grown plants (from June to October). The set measures ought to minimise the production of new plants from micro-bulbs, which may persist in soil for up to several years according to findings. Conventional potatoes cannot be grown on the concerned sites. for 2 years from the last finding of GM potatoes. The monitoring will continue in 2016.

Inspections at the entities, both scheduled and unscheduled, did not identify any cases of environmental danger or significant violations of Act no. 78/2004 Coll. on Handling of Genetically Modified Organisms and Genetic Products. Any minor shortcomings, largely of an administrative nature, were eliminated by the inspected entities immediately after the notification or within the period set by the CEI.

In June 2015, a CEI representative participated in the conference EEP (*European Enforcement Project on Contained Use and Deliberate release of GMO's*), of the association of GMO inspectorates in EU countries, in Vienna. Every year, these conferences deal with GMO issues in the EU and the world. Active participation at these conferences is advantageous from the point of view of acquisition of necessary new information for this issue.

Zoological gardens

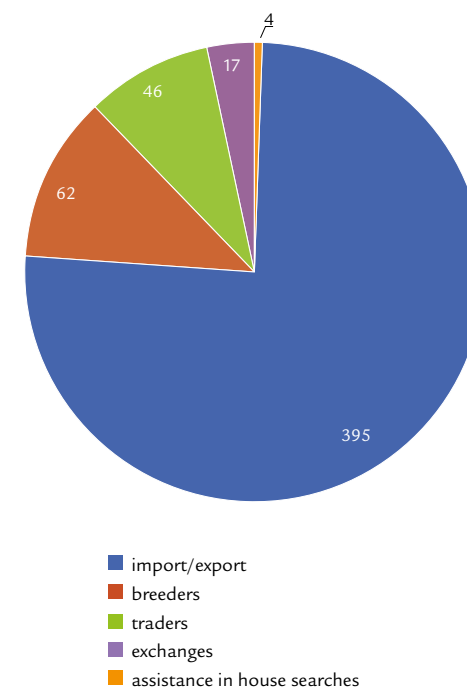
Like in previous years, the CEI inspected holders of zoo licences in connection with the periodic inspection organised by the Species Protection and International Commitment Implementation Department of the MoE. In the course of 2015, we inspected in this way 12 existing zoos; three other facilities (ZOO Tábor, a.s., Galerie Krokodýl, Terárium Praha) were inspected as part of proceedings on zoo licence awarding.

The zoo inspections did not find any shortcomings that would be in contravention of Act no. 162/2003 Coll. or conditions of zoo operation licences awarded. In addition, zoo operators were examined from the point of view of adherence to Act no. 114/1992 Coll. and Act no. 100/2004 Coll. The errors identified concerned mostly issuance of exemptions from bans in connection with breeding specially protected species, which was a topic handled by a separate departmental task.

Trade in endangered species – CITES

In 2015, CEI inspectors made 505 inspections under Act no. 100/2004 Coll. (CITES). Out of that, 78% concerned importation and exportation via international airports, domestic customs authorities and customs mail, i.e., international trade in endangered species, and only 22% concerned internal EU trade in CITES specimens. It follows from the above that the majority of the CITES inspection work focuses on international trade (imports, exports), which can *a priori* not be planned beforehand but follows from the current situation (only 10% of inspections in the CITES area at the CEI falls under scheduled activities). At present, 80% of the CITES inspection work is done by the International Biodiversity Protection

CEI inspection work – CITES 2015



and CITES Department of the CEI Headquarters, which deals primarily with international issues of the CITES treaty (inspection of imports and exports, international cooperation), investigation of serious cases of violation of laws and cooperation with authorities of criminal proceedings, and provides professional services for other CEI inspectorates and state authorities.

In inspections of imported and exported CITES specimens, 17% found violations of laws, i.e., almost every fifth inspected shipment was not in order. The largest quantities of shipments of animals, plants and products from them come from Asia. A very serious trend is an increasing contribution of Vietnamese nationals to violation of laws in the CITES and wildlife area. In 2015, perpetrators of Vietnamese nationality were found behind 50% of the violations of CITES legislation (53% of fines awarded, 45% of proceedings on specimen confiscation). They included products traditional medicine, but often also very serious crimes, such as trade in ivory, tiger bones, rhinoceros horns, etc. The CR is currently regarded as one of 4 countries that have the most serious problems with illegal trade in rhinoceros horns. Due to this situation, the CEI participated in 2015 in an expert and ministerial meeting in Geneva focused on combating this crime.

The CEI carried out 120 fine proceedings; fines totalling CZK 352,300 were awarded in the CITES area (decision in force); serious cases are forwarded to authorities of criminal prosecution and the CEI does not run penalty proceedings. Specimens were confiscated in 106 cases; we confiscated 1355 live specimens of endangered animals and plants and 1095 non-live specimens (products). Under the stand-by duty, the CITES inspectors handled 104 telephone activations from the Customs Administration and the Czech Police. Most of them were resolved via telephone and e-mail (thanks to the possibility of electronic transmission of photographs and data) and agreement of next steps.

The CEI assisted in 4 house searches and implementations of authorities of criminal prosecution; CEI inspectors participated in the actions as expert consultants. In 2015, we continued the cooperation with the Customs Administration and the Czech Police on serious cases of illegal trade in rhinoceros horns, ivory and tiger bones. Based on findings from jointly investigated cases, the CEI followed a departmental task “Inspection of tigers in private breeds” in 2015. The results of this departmental task are described in the chapter Nature Protection, because TI inspectors were involved in it as well.

In 2015, the eighth annual three-day seminar Wildlife Crime was organised in the CR, intended for inspectors, police, customs administration, public prosecutors and judges, attended by 130 participants. The seminar presented current cases, methods of illegal trade, use of forensic methods in investigation of crimes and misdemeanours in the area of wildlife, handling of animals, cooperation with zoological gardens, new trends in protection of endangered species, etc.

Statements, position statements and suggestions for other public authorities

In the long term, there is a gradual increase in the number of statements and position statements developed, particularly concerning plans in all the phases of EIA and SEA processes. In 2015, we commented on 724 documentations, notifications and reviews in this way; in many cases, we applied specific reservations and comments on documentations and plans submitted. As traditionally, there were significant numbers of plans to build and adjust recreational facilities (cableways, ski slopes and other sporting facilities), often situated in large-scale specially protected areas or their buffer zones.

All such plans require an emphasis on good quality of submitted notifications and documentations, not only in chapters assessing impacts on fauna and flora but

also on comprehensive assessment of impacts of plans on SCI, SAC and landscape character. However, a number of submitted plans still do not adequately assess impacts on nature and landscape protection interests or cumulative impacts with other plans in the area. In some cases, necessary information is missing, such as detailed data on the state of the area or sufficient indicative biological surveys. In spite of quite clear shortcomings of some notifications, however, the CEI’s requirements are frequently not accepted by the respective authority, frequently with the reference that the local nature protection authority does not have any comments on the plan.

In 2015 as well, we held rather intensive cooperation with authorities of criminal prosecution. The CEI provides consultations and expert assessments in this area and participates in implementations by authorities of criminal prosecution as an expert consultant. On the other hand, it develops and send to respective authorities notifications of suspicion about the commitment of a crime.

Last but not least, the CEI has long-term cooperation with other nature protection authorities at the level of municipalities, regional authorities or the MoE. Some TIs maintain intensive cooperation with expert non-governmental organisations such as the Czech Society for Ornithology and the Czech Bat Conservation Society. Quite natural is the communication with the Nature Conservation Agency of the Czech Republic, including the former administrations of the protected landscape areas, where the CEI makes use of the NCA’s expert knowledge and experience in commissioning expert reviews.

5.4.2 Fulfilment of departmental tasks

1. Inspections of farming entities as part of the Cross Compliance (CC) process with a focus on defined inspection requirements

In the past year, the CEI examined 314 businesses in connection with disbursement of agricultural subsidies. In 240 cases, we assessed adherence to statutory management requirements (PPH) arising from Council Directive no. 79/409/EEC on the protection of wild birds; and in 87 cases, adherence to the requirement arising from Council Directive no. 92/43/EEC on habitat protection. The inspection work itself concerned mostly sites that are potentially risky for nature and landscape protection. We supervised farming methods on sections of soil blocks (DPB) which contained woody plants, bosks, watercourses and bottomland, and DPB on which farm animals grazed. As traditionally, increased attention was paid to land plots interfering with Natura 2000 sites or specially protected areas. We also considered DPB included under the newly established subsidy brackets “lapwing” and “blue butterfly”.

Violations of PPH and respective provisions of the law were found in three of the inspected entities in 2015. When inspecting a legal entity under the jurisdiction of Brno TI, we found a serious damage of a larger quantity of woody plants at the edges of farmed plots. The investigation was made based on a suggestion and resulted in a motion to reduce the subsidy in connection with violation of requirement PPH 2/2 as well as awarding of a conclusive fine for damage to woody plants of CZK 140,000. A less serious case was registered by the Havlíčkův Brod TI, which awarded a legal entity a fine of CZK 10,000 for damage to several woody plants by wrong pruning, but did not make a motion to cut the subsidy due to the circumstances.

Violations of mandatory management requirements also included two unpermitted interventions with prominent landscape features – watercourses, in both cases in connection with wrongly done cattle grazing, resulting in damage to the watercourse banks and bed. Natural persons doing business under the jurisdiction of the Havlíčkův Brod TI were liable for the damage, which was also violation of requirement PPH 2/1 under the CC.

With one of the applicants, we initiated an administrative proceeding on a fine for prohibited activity in a specially protected area, because the intervention had been in a PLA core zone.

With the other applicant, there was a combined violation of requirements PPH 2/1 and PPH 3/1, because the damaged watercourse was located in a Site of Community Importance protecting the European otter and from the point of view of CC, the intervention was classified as damage to the object of protection in the SCI. For a violation of the protection requirements for PLF and SCI, the farm business was awarded a fine of CZK 12,000, not in force yet.

Less serious errors were handled by way of agreement on the spot or under a report on inspection findings, which determined the method and dates for elimination of the shortcomings identified. Last but not least, the CEI continuously alerts to all potentially dangerous activities the consequences of which might be interpreted as violations of the Nature and Landscape Protection Act, or might lead to a motion to cut the subsidy.

In terms of the number of inspections, this is the most extensive departmental task, carried out based on an interdepartmental commitment and obligation towards the EU. Each year, it is necessary to check 1% of applicants for agricultural subsidies, representing about 1/3 of all the scheduled inspections. That said, the yield rate of these inspections in terms of penalty proceedings is very low, and preventive impacts of inspection work prevail.

2. Inspectorate-wide check in Český les PLA

In the second quarter of 2015, 27 inspectors from all over the country participated in a joint inspection action in the Český les PLA. The first part of the investigation consisted of an inspection of public authority performance of the Nature Conservation Agency of the Czech

Republic (NCA) in the area of nature protection in the Český les PLA, under which we checked selected decisions, marking of SPA and the procedure for developing management plans. The NCA corrected the two errors identified (failure to inform a citizens' association about the start of proceedings concerning felling of trees) by holding an additional meeting with the respective citizens' association (CSO).

The other part of the check consisted in an inspection of adherence to legal regulations and decisions relating to nature and landscape protection by owners or managers of protected areas in connection with forestry in SPA. The following entities were inspected: Lesy ČR, s.p., Domažlické lesy, spol. s r.o., Franceska Dominika Kolowrat-Krakowská a Maximilian Kolowrat-Krakowský (hereinafter, the "Kolowrat forests"). The action included another 5 partial inspections of Lesy ČR, s.p. The inspection of foresters started early in the year and continued in the course of the growing season, specifically as part of the specific task "Inspection of Sites of Community Importance with a focus on forest ecosystems. Besides, we made one inspection of Domažlické lesy, spol. s r.o. in NNR Čerchovské hvozdy and one of the Kolowrat forests in NR Diana. None of the inspections identified any violations of Act no. 114/1992 Coll.

The final part of the action was identification of cases of nature endangerment and damage, their cases and entities liable for them on sites with the strictest protection regime, i.e., national nature reserves and monuments, nature reserves and monuments and Site of Community Importance (SCI). The investigation was made in 9 SPA and 4 separate SCI. No specific violations of laws were found, but the CEI will deal with the potential endangerment of the object of SCI protection by a land owner, in connection with investigation in the SCI Niva Nemanického potoka, where trees were cut and parts of the land were ploughed up.

3. Supervision over adherence to NLPA when removing trees at railways

Based on 2014 findings, we continued our inspection work focused on adherence to provisions of legal regulations and decisions when cutting trees by railway lines managed by the RIA. The subject of the inspection was adherence to Section 8, Para. 1 of Act no. 114/1992 Coll. on Nature and Landscape Protection, as amended, according to which cutting of trees outside forests require a permit of a nature protection authority, unless the Act specifies otherwise, and respecting of the CEI's 2014 conclusive decision on restriction of operations (issued under Section 66, Para. 1 of the Act).

Given the blanket nature of the problem at hand, the CEI Headquarters informed the railway line manager (RIA) about the start of the inspection with a territorial extent covering the whole of the Czech Republic. The task of the CEI TI was to make component inspections in selected sections of railway lines within their respective jurisdictions. The findings from the component inspections will become the foundation for a final inspection report, which will be, depending on its conclusions, followed by administrative proceedings on fines or other legal actions. The inspections and the administrative proceedings against cutting contractors in cases where they are entities different from the client (RIA) will be managed by the TIs.

The NPD gathered information on cutting of trees by railway lines in the 2014-2015 season on sites in the Czech Republic shortlisted based on external suggestions and own findings. By the end of 2015, we made 57 component inspections.

4. Inspection of keeping of tigers in private breeds

In the course of 2013 and 2014, the CEI in cooperation with authorities of criminal prosecution registered an in-

creased number of cases of illegal trade in non-live tiger specimens. They involved illegal exports of entire tiger skeletons and tiger teeth and claws, trade in broth made from tiger cadavers, tiger whiskers, etc. These activities show signs of organised crime and have been the subject of long-term investigation. A closer analysis of the CITES Register showed that approx. 130 live tigers are kept in private breeds in the CR (another 34 are bred in zoological gardens); there were 155 records on exports and deaths. The purpose of the departmental task was a detailed inspection and verification of legitimacy of the keeping of all the tigers in private breeds in the CR, connected with sampling for DNA analysis as well as a verification of circumstances of deaths and exports. The task was coordinated by the International Biodiversity Protection and CITES Department of the CEI Headquarters and involved inspectors of territorial inspectorates and the CITES Department. In 2015, we inspected 16 entities breeding tigers. In total, we inspected 77 tigers and 2 tiger/lion crossbreeds. For the genetic analysis, we collected 74 samples of hairs (from 70 individuals) and samples of excrements (from 14 individuals). The departmental task will continue in 2016 as well, when the inspections of private entities should be completed, and we will also inspect tigers bred in zoological gardens.

5. Inspections of zoos with a focus on keeping of SPS of animals

The purpose of the departmental task was to verify legitimacy of keeping of individuals of specially protected species (SPS) of animals in zoological gardens, i.e., collection and authentication of validity of all existing exemptions for SPS breeding and comparison with the actual state. It was to be followed by remedy of any shortcomings or illicit situations. The inspections followed from periodic inspections of zoos licensed by the MoE, or TIs made separate investigations for the purpose. In 2015, we made a more detailed examination of the Ostrava zoo,

the Podkrušnohorský park Chomutov, Děčín zoo, Liberec zoo, Ohrada zoo in Hluboká nad Vltavou, Brno zoo, Lešná zoo, Dvůrec zoo, Tábor zoo and zoological gardens in Central Bohemia. In the overwhelming majority of the zoos, we found no more serious shortcomings and violations of respective provisions and conditions of exemptions under Section 56 of Act no. 114/1992 Coll. The on-site investigation usually involved a random selection of several individuals on which we inspected the unique identification and compared it with the documentation. Any short-comings were then handled with the breeders and relevant authorities. Most frequently they included absence of mandatory identification of individuals, usually due to postponed identification of young cubs, failure to report changes, late registration after importation or absence of a valid exemption for breeding. The most serious errors were found at ZOO Tábor; we will initiate a proceeding on a fine based on the inspection findings for keeping 8 individuals of SPS without a valid exemption from the law.

It also followed from the investigations that even the complete list of existing exemptions from Act no. 114/1992 Coll. does not include all the individuals of SPS bred in zoological gardens, because many of these species also fall under Act no. 100/2004 Coll. (the CITES Act). For these species, various regimes of holding are permissible and documents issued under these laws may represent for one another to various extent; e.g., an exemption from the ban on trade issued under the CITES Act replaces the "certificate" issued under Act no. 114/1992 Coll., thus ultimately the exemption issued for SPS under the Act.

Last but not least, the zoo inspections found out an error of the South Bohemian Regional Authority. It had issued surplus registration sheets even for species that are both CITES and SPS (bear, wolf, lynx) for whose holding registration sheets are not issued. The inspected entity thus

gained the impression that it had all the paperwork done and failed to apply for exemptions for wolf breeding (5 individuals).

The blanket zoo inspection helped expose and remedy at least some shortcomings in the legal state and records on SPS individuals bred, and thus fulfil one of the legal obligations of licensed zoological gardens. Similar inspections will be made in the years to come, as they are preventive to some extent.

6. Fish restocking obligation and proliferation of introduced species

As part of this departmental task, we made pilot investigations on several predefined sites in the South Bohemian, Central Bohemian, South Moravian, Zlín and Hradec Králové Regions. Their purpose was to identify conditions under which the fish restocking obligation is met, or to identify any conflicts with nature protection interests in connection with proliferation of introduced species. The situation was checked in fishery areas that are part of small-scale specially protected areas and where conflicts between nature protection interests and fisheries cannot be ruled out.

The CEI made an investigation in fishery area 453 046 Metuje, which interferes with NNR Adršpašsko-teplické skály. According to the documents presented, the East Bohemian ČRS association only stocks the rainbow trout and the brook trout only in lower and deeper parts of the area outside the NNR. The reason is the effort to reduce the risk of illegal fishing and avoid high predation by otters in the upper reaches of the Metuje. No violation of the NLPA was identified.

We made a detailed examination of 6 South Bohemian sites (NNR Stará a Nová řeka, NNR Brouskův mlýn, NNM Blanice, NNM Lužní potok, NNM Zlatý potok, and NM Horní Malše). Most of them are managed by

the South Bohemian ČRS association, which provided the necessary documents. Among species generally regarded as introduced, only the grass carp was found, stocked together with the common carp in the Stropnice in NNR Brouskův mlýn. Another problematic species is the rainbow trout, stocked in NM Horní Malše as well as lower sections of the Blanice and Zlatý potok (outside the SPA). Impact on the subject

of protection (freshwater pearl mussel and its biotope) cannot be regarded as very likely with respect to the selection of discharge points lower downstream. The population deployed typically proliferates farther downstream and is gradually caught. For further steps, it is crucial to define the term introduced species, or a list of species that can be regarded as introduced in the sense of the Nature and Landscape Protection Act. So far, there is no clear answer to that question, as nature protection and fisheries have very different views. This concerns particularly long-term bred species such as the common carp and the rainbow trout.

The fish restocking method was also identified at two fisheries active in the Moravian Karst PLA and the Podyjí NP. The inspection of documents did not prove any stocking of introduced species in the SPA. The presence of any introduced species individuals is usually explained by the possibility of accidental addition of a negligible quantity of these fish in the stock, in which they are difficult to discern. A similar situation exists in fishery area Olšava 3 inside Bílé Karpaty PLA. The catch records did indeed register introduced species of fish, but according to the restocking records, they had not been stocked by the fishery.

The investigations clearly showed contradictions arising from legislation in force, specifically Act no. 114/1992 Coll. on Nature and Landscape Protection (Section 5, Para. Practical enforcement of provisions on the ban of proliferation of introduced species clashes against other

factual problems, including the non-existence of migration barriers between protected and unprotected sections of watercourses and insufficient specification and records on fish restocking.

5.4.3 Overview of fulfilment of specific tasks

Protection of trees and prominent landscape features

Protection of trees growing outside forest is still a very frequent task of the nature protection departments, including as part of inspections of managers of watercourses, the power grid, roads and currently also railway lines, which were the object of a separate departmental task in 2015. As traditionally, we investigated cases of extensive damage or cutting of trees when implementing regionally significant investments, infrastructure construction or renovation, or maintenance of farmland.

A relatively new phenomenon is large-scale cutting of trees on long unmanaged plots, including old orchards, which may be important for landscape character or specially protected species. This illicit activity is usually motivated by one-off profit. By cutting clear, the plots are put into a state for which agricultural subsidies can be drawn; the material produced (e.g., as wood chip) can be an additional source of income. Moreover, there was an increase in the handled cases of non-reporting cutting of trees under Section 8, Para. 2 and 4, or misuse of the institute of emergency cutting. This type of error has resulted in several penalty proceedings.

We made numerous inspections of implementation of substitute planting ordered by the CEI or local nature protection authorities. The most frequent problems identified were non-adherence to requirements for substitute planting, particularly non-matching quantities and types of trees and no growing care of the plantings. The failure to make substitute planting as ordered has re-

sulted in administrative proceedings on fines in progress against several entities.

We also made supervision of public authority work connected with substitute planting orders; municipal authorities continue to make serious errors consisting in ordering legally unenforceable obligations. Usually there is no specification of the trees or dates of planting, or the substitute planting is ordered in places where it can practically not be made. It is no exception that a nature protection authority and the proceeding party make a wholly informal agreement on changing the substitute planting conditions ordered by a decision in force, without such agreement reflected in the administrative proceeding documents.

The CEI pursued targeted enforcement of protection of memorial trees; there was a noteworthy case of a conclusive fine of CZK 50,000 for a harmful intervention with a buffer zone when doing unpermitted landscaping. In another case, we penalised damage to the buffer zone of a memorial tree by ploughing.

There were numerous inspections and ensuing administrative proceedings in protection of prominent landscape features, followed by a nation-wide coordinated inspection action at “dry weirs in the dry summer due to adverse climate”. Based on one of the inspections, the NPD initiated an administrative proceeding with the operator of SHPP Říkov for a harmful interference with a watercourse and the biotope of the SPS European bullhead and common minnow.

Several TIs made inspections of the state of registered prominent landscape features, most frequently groups of trees growing outside forest. We found repeating shortcomings relating to the promulgation (outdated or incomplete decisions on registration, insufficient definition, absence of identification) or insufficient protection. Many of them lacked appropriate management,

often there was no general knowledge of the existence of the RPLF, resulting in damage or destruction.

The inspections found dumping of waste in RPLF, presence of invasive species, damage or cutting of trees comprising the RPLF, or gradual destruction resulting from insufficient maintenance. For many of the violations, we failed to identify the liable entity or the liability had ceased after the expiry of the preclusion period. In one case, we awarded a fine of CZK 20,000 for damage to trees and defined conditions for activity (fencing around trees outside a grazing area) under Section 66 of the Act on Nature and Landscape Protection. Shortcomings were usually discussed with nature protection authorities promulgating the RPLF. Problems are also caused by the fact the promulgating authority may not be the authority permitting tree cutting, which may lack knowledge of the existence of the RPLF.

Inspections of operators of SHPP

Several territorial inspectorates carried out inspections among operators of small hydropower plants the existence of which poses a long-term potential risk for some environmental components. The investigations followed on a 2014 departmental task and then turned out to be very topical in connection with long-term low water levels on most watercourses in the second half of 2015.

Many investigations involved employees of water protection departments and the CHMI, which made measurements of the minimum residual flow rates. Although many operators shut down their SHPP due to adverse hydrological conditions, violations of law were found in at least five cases, which led or will lead to penalty proceedings. In connection with failure to observe minimum residual flow rates, one entrepreneur and one legal entity have been awarded conclusive fines of **CZK 50,000** and **CZK 25,000**; penalty proceedings are in progress with two other entities. Operation of SHPP is also related to

the conclusive fine of **CZK 80,000** for unpermitted intervention (bed dredging) done by **GENOVA spol. s.r.o.**

Not observing the determined flow rate and excessive water level decrease in the river bed have negative impacts on aquatic life and frequently lead to massive death of animals in the aquatic environment. That can be qualified as unpermitted intervention in a watercourse prominent landscape feature, resulting in a significant reduction in its eco-stabilising function, disruption of general protection of wild animals and even unpermitted intervention in natural evolution and biotope of a specially protected species, if the water level decrease affects the population of a specially protected species.

Species protection and protection of wild birds

Inspection of adherence to protection of specially protected plant and animal species is an integral component of the work of nature protection departments and this type of cases is ever more frequent in suggestions made by the public. There was an even number of enforcements of legal protection of SPS individuals, populations and biotopes.

The CEI has long made inspections focused on endangerment of nesting places and biotopes of specially protected species and wild birds in human settlements, consisting particularly in adjustments and renovations of apartment or public buildings and infrastructure. An example is the case of non-adherence to requirements of an exemption from the bans for thermal insulation of an apartment building in Břeclav, where **STAKOV Cadca s.r.o.** and **REVITAG a.s.** were awarded fines of **CZK 90,000** and **CZK 30,000** for not respecting the presence of the common noctule bats and covered the shelters of this specially protected species with polystyrene slabs. For a similar intervention with the natural evolution of the common swift, a fine was awarded to **Správa a údržba silnic Zlínska, s.r.o.**, amounting to **CZK 70,000**.

The protection requirements for SPS and wild birds are also not respected during construction, renovation or maintenance of hydraulic works, watercourses and fishponds, construction of infrastructure, some sporting grounds or alternative power sources. Very serious cases of harmful interventions in populations and biotopes of specially protected species were registered in connection with leaks of foreign substances into watercourses, some of which are shown among the major cases.

The CEI made detailed inspections of adherence to requirements of exemptions issued in connection with selected investment projects. Most frequently they were construction or landscaping, including infrastructure construction, wind and photovoltaic power plants, skiing resorts, mud removal and structural adjustments to fishponds. We also examined exemptions and approvals for use of chemicals for eradication of rodents in connection with protection of the specially protected species boreal owl.

Based on a suggestion, we handled the plan to organise a car rally within the Central Bohemian Uplands PLA. Already in the previous year, the race organised had been informed that the race could not take place in the same extent in 2015, which was not respected. Two weeks before the race was due to take place, the organiser applied for an exemption from the basic protection conditions of the PLA. The Administration did not grant the exemption and the organiser appealed the decision. Based on the above, the CEI invited the Czech Police to prevent the unpermitted event from taking place, which the Police did and the race did not take place.

5.4.4 Major cases

The most important cases investigated in 2015 clearly include the destruction of a population of several thousand **noble crayfish**, a critically endangered species under the NLPA, as a consequence of a pesticide leak into a water-

course caused by improper handling. This event already occurred at the turn of March 2014, but the Czech Police forwarded the case only in early 2015, when the CEI initiated the penalty proceeding with the farming business. Following the complex evidence procedure, the CEI issued a decision on a fine for causing the death of specially protected animals and serious damage to a watercourse prominent landscape feature. The liable entity appealed against the decision on a fine of **CZK 1,700,000**, but the appeal had not been settled by the end of 2015.

Two other cases of leaks of foreign substances into watercourses, already concluded, are of a similar nature. The company **Lactoenergo s.r.o.** was awarded a fine of CZK 140,000 for seriously damaging prominent landscape features (watercourses of Železný potok and Kamenička and two fishponds) in connection with a leak of 50 m³ of digested matter from a biogas station.

As a result of that, the entire biota died in the affected sections of both the watercourses to the confluence of the Kamenička and Jihlava. The decision was appealed and the fine entered into force.

The company **Agropodnik Košetice, a.s.** was awarded a conclusive fine of **CZK 120,000** for a leak of water with silage juices into a storm sewer and then the Martinický brook, which is part of a Site of Community Importance in the concerned area. The object of protection is the European bullhead, also a specially protected species under the NLPA. This decision was not appealed either, and the fine entered into force.

A long-standing problematic entity is **SKLÁDKA ELZET s.r.o.**, awarded a fine of **CZK 1,500,000** in 2015 for not adhering to requirements of a Ministry of the Environment decision permitting an exemption from the basic protection requirements for specially protected animals. The operator dumped various materials (primarily construction and demolition waste, recycled matter and earth) on a

part of a plot and water body in Blato near Mikulovice in Pardubice District, containing a biotope for the specially protected species lake frog, edible frog, agile frog, smooth newt, and sand lizard. The NPD decision was confirmed by an MoE decision in force and is currently being reviewed by the Municipal Court in Prague.

The CEI also acted on the previously repeatedly handled case of violation of law when constructing a golf course near, for which **CZ GOLF INVESTMENT, a.s.** was ordered a substitute remedial measure, consisting in renovating the fishpond in Ludvíkovice. Since the entity failed to implement the measure and did not take any action to start renovating the fishpond, the CEI awarded the company a fine of **CZK 2,000,000** for not implementing the substitute remedial measure as ordered under Section 86 of the Nature and Landscape Protection Act.

The aquatic environment is related to the conclusive fine of **CZK 450,000** awarded to an entrepreneur for dredging the bed of the Vltava river in connection with the construction of a small hydropower plant. The intervention resulted in a serious damage to a watercourse prominent landscape feature and unpermitted infringement on the natural evolution of specially protected species of fish. Moreover, the CEI ordered the actor to restore the damaged section of the watercourse to the original condition and informed the SEF CR, because it had granted a subsidy for the SHPP construction.

5.4.5 Conclusions from inspection work

Thematically, the supervision work of the nature protection department is very diverse, resulting from the wide range of protected interests and potentially harmful activities. The factual implementation of the inspection powers is limited by the number of nature protection inspectors; a significant part of the capacity is occupied by investigating suggestions and inspections carried out under interdepartmental commitments (Cross Compli-

ance) and regardless of their yield rate for nature protection. The room for systemic planning of inspection work that would reflect actual needs following from previous findings is therefore very limited.

The high load factor of the employees is also due to the great number of formal tasks defined by the administrative and inspection rules in force, which significantly increase the time and administrative intensity of the inspection and administrative work. A positive change was the legislative amendment concerning misdemeanours: effective as of 1 Oct 2015, it increased the maximum amount of fine that can be awarded on the spot or by order. It also made an important adjustment to periods.

The inspection work indicates consistent disrespect of legal regulations in certain areas of nature protection. An example is the results of the extensive inspection action focused on protection of trees by railway lines and similar findings among managers of roads, watercourses and in investment projects. Very serious violations comprise harm to nature protection interests in connection with interference with aquatic environments, where legal regulations are repeatedly disrespected by watercourse managers, operators of small hydropower plants, building contractors as well as others, including polluters, with massive consequences for aquatic ecosystems. Traditionally problematic plans from the point of view of nature protection have included construction of some types of sporting grounds and facilities producing electricity from alternative sources.

A constant issue is systemic inspection of municipal authorities at all levels, where the CEI has long come across very insufficient or even counterproductive performance of public administration in the area of nature protection, which seriously complicates subsequent law enforcement. A totally dismal situation exists in permitting cutting of trees, where a municipal authority decides about

its own application. The situation is not improved by the statement about bias of a municipal mayor or deputy mayor in case where the municipality is a proceeding party, issued by the advisory board of the Minister of the Interior under ref. no. 133/2014. The CEI has not seen any application of this statement in practice so far, and it was not considered by the regional authority to which the CEI applied for reviewing a decision.

In one case in 2015, the CEI made a crime report concerning suspicion about misuse of official powers, where a municipal authority stated in an inspection report that it had not issued a permit for an extensive tree cutting, but the person accused of a misdemeanour then furnished the issued permit at a meeting. However, authorities of criminal prosecution did not see a reason to initiate criminal prosecution.

5.5 Forest protection

5.5.1 Inspection work in 2015

In the forest protection departments of TIs, 42 inspectors did inspection work in 2015. This was 1 inspector fewer than in 2014. Thus, there was 63,748 ha of forest on average per inspector in 2015.

The powers in forest protection were defined by an unchanged legal framework. It comprised primarily Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and its powers in forest protection, Act no. 289/1995 Coll. on Forests and on amendment of certain acts (Forest Act), Act no. 149/2003 Coll. on Circulation of reproductive material of tree species and artificial crossbreeds important to forestry intended for forest restoration and afforestation, and on amendment of certain acts (Forest Tree Reproductive Material Trade Act), Act no. 114/1992 Coll. on Nature and Landscape Protection, Act no. 255/2012 Coll. on Inspection (Inspection Rules), Act no. 500/2004 Coll., the Rules of Administrative Procedure

as amended by Act no. 413/2005 Coll., and CEI internal regulations.

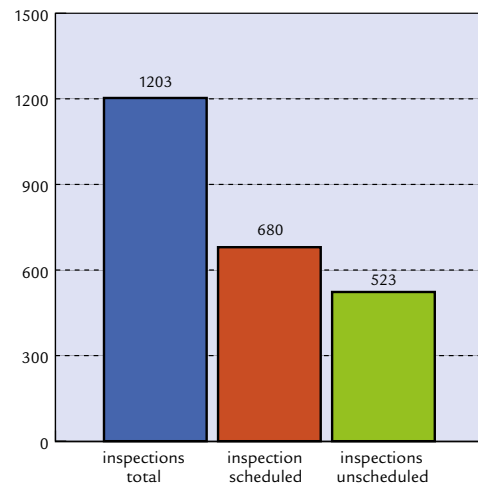
CEI TI inspectors made 1203 inspections, including 680 scheduled and 523 outside the schedule. The frequency of the scheduled inspections implemented is 51 above the schedule due to the examined properties of small forest owners in territories of municipalities with extended powers. There were 60 interdepartmental tasks, involving the majority of the inspectorates. They included primarily inspections in cooperation with nature protection authorities (e.g., FPD of TI Praha, Č. Budějovice, Plzeň, Ústí nad Labem, Hradec Králové, Brno, Olomouc, Ostrava and Liberec), waste management authorities (FPD of TI Č. Budějovice, Havlíčkův Brod, Brno, Olomouc, Ostrava) and the water protection department (FPD of TI Č. Budějovice, Olomouc and Ostrava). As in the past, most of these inspections were motivated by suggestions and often aimed at areas with increased protection.

The total number of inspections was 87 lower compared to 2014. We inspected all types of ownership of forest properties. The lower number of inspections of state-owned properties resulted from the good forestry in them. In the course of the year, we issued 691 other statements, including 410 on EIA processes and 5 reviews.

In 2015, territorial inspectorates issued 178 decisions on fines for administrative violations in forests. Out of that, 167 decisions entered into force, including 22 concerning previous periods. The total amount of the fines was CZK 15,632,900, which is CZK 114,900 more than the year before.

The TI FPD contributed to the fines as follows: Praha CZK 4,528,500 ; České Budějovice CZK 1,569,000; Plzeň CZK 331,000; Ústí nad Labem CZK 680,000; Hradec Králové CZK 1,069,000; Havlíčkův Brod CZK 865,000; Brno CZK 956,400; Olomouc CZK 927,000; Ostrava CZK 4,110,000; Liberec CZK 597,000.

Numbers of inspections in 2015

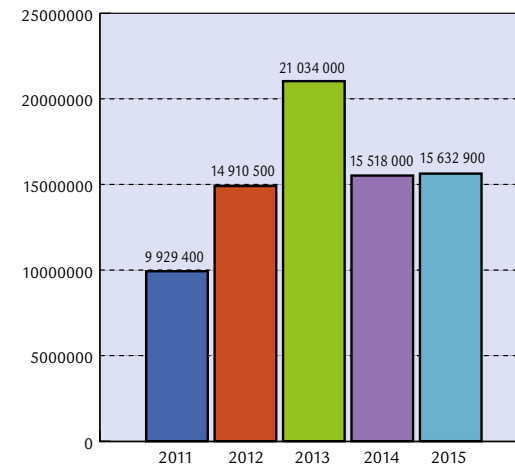


The total amount of fines in 2012-2015 oscillates (with the exception of 2013) around CZK 15 million a year. This number significantly exceeds the average amounts of fines for the past twenty years. A frequent cause of administrative violations, occurring minimally in the past, is organisation of illicit logging and non-observance of legal obligations in forest restoration, including sales of logged-out properties in order to pass the reforestation obligation to the new owner.

We issued 214 administrative decisions on remedial measures, 210 decisions entered into force, 9 of them relating to previous periods. In 2015 as well, the remedial measures played a unique preventive and educational role in achieving a desirable condition of forests as an environmental component.

Under appeals against decisions on fines (178 issued), bodies of appeal discussed 44 administrative decisions, the majority of which bodies of appeal of the MoE con-

Conclusive fines in CZK for 2011–2015



firmed. Some of the cases were returned for new discussion; in exceptional cases, the fines were reduced and sporadically revoked. In 2015 as well, the success rate of first-instance administrative decisions and the overall confirmation of administrative decisions in appeal proceedings can be interpreted as proof of good quality of the CEI TI FPD administrative work.

Eleven cases under Prague TI FPD were handled by courts in the past year. No preliminary measures were ordered in 2015.

Operations were halted or restricted in 6 cases by conclusive decisions: 4 cases of České Budějovice TI (mining for moldavites on forest land), 1 case of Olomouc TI (unpermitted storage of bark beetle logs in the forest), and 1 case of Ostrava TI (unauthorised forest felling in a SCI without permitted exemption and permit of a nature protection authority).

The forest protection departments handled 157 sugges-

tions and petitions (10 fewer compared to 2014), mostly concerning timber logging, soil cover damage, tree damage resulting from log skidding, development of insect pests, use of LIFF for purposes other than forest functions, non-observance of mandatory periods for forest restoration, and waste in forests. Internal inspections of the Headquarters FPD bodies indicated that suggestions were handled within the set terms. Most of the suggestions were unjustified. Justified submissions were followed by administrative proceedings on fines or remedial measures.

In the past year, we filed 1 crime report from Ústí nad Labem TI, concerning notching of trees in a forest. Similarly to previous years, the frequency of requests for information can be interpreted as not high. Pursuant to Act no. 123/1998 Coll. the Prague TI FPD received 10 requests, Plzeň TI 3 requests, and Ústí nad Labem TI 1 request) and pursuant to Act no. 106/1999 Coll. Prague TI FPD received 19 requests, Brno 4 requests, and Ostrava 4 requests. Here, particularly the 29 requests for Prague TI FPD, often of petty importance, filed by a single natural



Suggestion on discharge (leak) of wastewater onto forest land in the bottomland of the Morava river, Dub nad Moravou

person, caused the business at the expense of inspection work. The requests were handled within set terms.

5.5.2 Fulfilment of departmental tasks

Following a negotiation with the MoE, the TI WPD were given a repeated departmental task for 2015: damage to age class I and II forest stands by game.

The purpose was to find out objective information about the extent of damage to age class I and II forest stands by cloven-hoofed game (notably the sika deer and fallow deer) and their pressure on forest restoration and young forest stands. The trend of increasing numbers or catches of some species of cloven-hoofed game is officially reported by the Hunting Statistics, issued annually by the Czech Statistical Office.

The inspection work took place at all the TI FPD and followed these principles:

- for unified assessment of forest damage by game, a methodological instruction published a binding internal CEI rule;
- inspections were made in forest properties under all types of ownership;
- the selection of entities was focused on upper, middle and lower sections of the properties, types of forest stands (coniferous, broadleaved, artificially and naturally restored) and hunting ground types (overhead, rented and societal);
- damage by game was distinguished as summer and winter gnaw, terminal and lateral gnaw, nibble, peeling and antler hitting.

In total, 211 inspections were made. In administrative proceedings, we issued 8 decisions on remedial measures (2 by České Budějovice TI, 1 by Ústí nad Labem TI, 4 by Hradec Králové TI and 1 by Olomouc TI) along with 4 fines (4 by Hradec Králové TI) for damage to forest envi-

ronment. All the remedial measures were ordered on private owners, for insufficient measures to prevent forest tree damage by game. The fines were awarded by Hradec Králové TI in connection with operation of 3 farm breeds on forest land, totalling CZK 115,000.

It can be summarised from the inspection outcomes that damage by game is a regional problem and the damage to forest stands does not match the levels 20-40 years ago. The owners mostly take measures against damage by game, thus meeting legal obligations (fencing of amelioration and reinforcement trees, coating with chemical repellents against gnaw and nibble). Some sites near the Polish border are problematic; the hunting pressure in Poland drives game to the CR to find rest during close season. The situation with farm breeds on forest land requires solution. Likewise, the increase in numbers of the sika and fallow deer and the frequently inefficient performance of public administration in hunting lead to constant proliferation of these game species, resulting in damage to forests.

5.5.3 Interdepartmental inspections

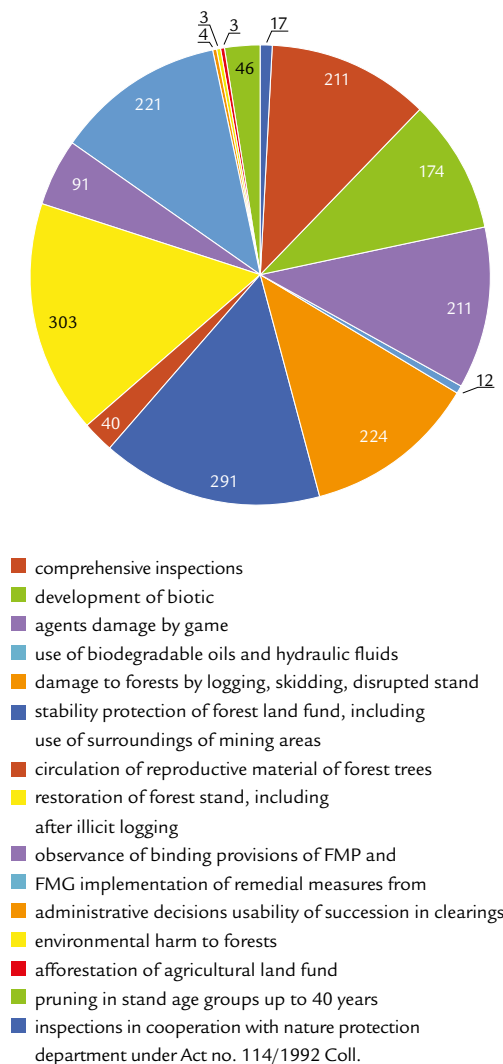
In the study year, all the TI FPD participated in interdepartmental inspections, of which we made 60. They were mostly joint actions with the nature protection, water protection and waste management departments.

5.5.4 Fulfilment of specific tasks

In 2015, the TI FPD inspected 15 inspection topics, namely:

- comprehensive inspections – we carried out 211 comprehensive inspections;
- development of biotic agents damage by game – we made 174 inspection;
- damage by game – 211 inspections;
- use of biodegradable oils and hydraulic fluids – 12;

Numbers and topics of specific inspections made in 2015



- damage to forests by logging, skidding, disrupted stand stability – 224;
- protection of forest land fund, including use of surroundings of mining areas – 291,
- circulation of reproductive material of forest trees – 40;
- forest stand restoration, including stands after illicit logging – 303;
- adherence to binding provisions of FMP and FMG – 91;
- implementation of remedial measures from administrative decisions – 221;
- usability of succession in clearings – 4;
- environmental harm to forests – 3 calculations;
- afforestation of agricultural land fund – 3;
- pruning in stand age groups up to 40 years – 46;
- inspections in cooperation with nature protection department under Act no. 114/1992 Coll. – 17.

These inspection topics were the subject of both comprehensive inspections and special inspection actions focused on one or more topics. In total, we made 1203 both scheduled and unscheduled inspections, involving 851 cases of inspection of the above topics.



A site of repeated stand restoration, gnawed mostly by sika deer, Kladky (formerly LČR LS Svitavy, now Archbishopric of Olomouc)

5.5.5 Principal topics in 2015

The principal topics handled by the CEI were:

- damage by game;
- violations of law when restoring and securing forest stands;
- forest protection – insect pests;
- illicit logging;
- forest land fund protection;
- reproductive material of forest trees circulated.

5.5.6 Major inspection findings

Major inspection findings in 2015 related to the following activities in forests:

- damage by game;
- illicit logging;
- non-afforestation of clearings after illicit logging;
- non-afforestation of clearings older than 2 years;
- illegal alignment of clear cuts to unsecured young forest stands
- damage to forest land by logging and skidding;
- forest pollution with waste and litter;
- illegal occupation of forest land;
- development of bark beetle and the honey fungus (situation serious in ORP Hranice, Lipník nad Bečvou, Litovel, Uničov, Olomouc, Šternberk and Zábřeh in Olomouc Region);
- positive situation of insect pests in NP Šumava, which is more favourable compared to previous years, but an increase in bark beetle logs can be expected as a consequence of the extreme drought last year;
- notching of trees in order to legalise their logging;
- devastation of forest soil by moldavite mining at Nové Hradý;
- non-observance of Act no. 149/2003 Coll. on Trade in reproductive material of forest trees;
- violation of the Forest Act in afforestation of agricultural land.

Trend in bark beetle logging in National Park Šumava (m³)

Year	2008	2009	2010	2011	2012	2013	2014	2015
Quantity (m ³)	119.603	199.000	343.000	235.000	75.500	40.770	22.900	21.050



Moldavite mining at Nové Hradky forest



Targeted dumping of excavated earth and construction debris in the forest at Zábeštní Lhota

The above basic list of problems in forests led to frequently problematic and professionally complex administrative proceedings, devouring a considerable part of the inspector's capacities. The increase in offenders' qualified resistance results in reduced time allowance necessary for inspection work in the field. We must repeatedly state problems with functioning of some professional foresters and forest public authorities; we see their solution primarily in a necessary amendment to the Forest Act.

5.5.7 Major cases of administrative violations in 2015

- A fine for TEMPONAUT s. r. o. for unpermitted landscaping at Brnky amounting to CZK 394,000 (Prague TI FPD).
- A fine for a natural person for unauthorised use of LIFFF for purposes other than forest functions at Podolí u Rožďalovic amounting to CZK 1,073,000 (Prague TI).
- A fine for INSETA s. r. o. for illicit logging at Dneboh amounting to CZK 1,500,000 (Prague TI).
- In 2015 as well, a natural person in ORP Rakovník filed 14 complaints about the procedure of an administrative authority under Section 175 of Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended, and 6 complaints about the procedure of handling requests for information under Act no. 106/1999 Coll., as amended. This same person is also subject to 2 administrative proceedings on fines (a disciplinary fine, damage by game) and 2 administrative proceedings

on remedial measures (afforestation). The whole case has been time-consuming and professionally demanding for the past 3 years and has significantly bound a considerable part of available time allowance of the Prague TI forest protection department.

- Illicit logging in privately owned forests at Šebířov and at Skály, with a fine of CZK 450,000 for NEMO 99 s. r. o. and a fine of CZK 250,000 for a natural person commissioning and organising the illicit logging (České Budějovice TI FPD).
- A fine of CZK 300,000 for Wood-Steel a. s. in liquidation at Vnorovice, Rankov u Trhových Svinů for not implementing remedial measures on 1.57 ha (Č. Budějovice TI FPD).
- Illicit logging in privately owned forests at Zábrdí u Lazišť of 3742 m³ is being handled by the Czech Police as a crime, and České Budějovice TI FPD simultaneously handles it as an administrative violation with a fine.
- A case continuing from 2014 was that at Lužice u Mostu, concerning the notching of all trees on approx. 5 ha owned by Nemo 99, handed over to the Czech Police and then adjourned in April 2015 as "perpetrator unknown".



Illicit logging in privately owned forests at Zábrdí u Lazišť

- Environmental damage quantified as CZK 24.7 million and CZK 1 million to the neighbouring property. The property was sold to a new owner, BRECANÁ, and the case will continue in 2016. The case is handled by Ústí nad Labem TI FPD.
- Fines awarded by Hradec Králové TI FPD for not implementing remedial measures, consisting in afforestation of clearings after illicit logging for Wood-Steel, a.s. (CZK 240,000), I.L.C., a.s. (CZK 200,000) and again I.L.C. a.s. (CZK 200,000). The above companies' failure to act led to endangerment to forest functions, namely soil protection, water protection, landscape character and ecological stabilisation.
- A fine of CZK 50,000 awarded by Hradec Králové TI FPD for illicit logging by the owner JHV doprava s.r.o. Besides the above administrative violation, the owner speculatively sold the property shortly after the logging, thus passing the clearing afforestation obligation to the next entity.
- A fine of CZK 189,000 awarded by Havlíčkův Brod TI FPD for GMI iNEX s. r. o., for long-term failure to restore forest areas totalling 1.89 ha at Podmoklany.
- A fine for Lesní společnost Třebíč, s. r. o., amounting



Failure to properly restore forest at Svatoslav u Tišnova

to CZK 94,000 for failure to afforest clearings on 0.94 ha at Trnava u Třebíče (Havlíčkův Brod TI FPD).

- A fine of CZK 230,000 for a natural person for failing to timely afforest stand areas of 1.03 ha at Grešlové Mýto (Brno TI FPD).
- Illicit logging and damage to LIFFF at Dolany u Olomouce at a fine of CZK 500,000 for Sport4you s. r. o., still in appeal proceeding (Olomouc TI FPD).
- Logging in forest complex Peklisko at Skotnice with illegal alignment of deliberate clear cuts and a summary fine of CZK 585,000 for natural persons and legal entities (Ostrava TI FPD).
- A fine for exceedance of clear cut width, inadequate damage to soil cover and damage to trees by skidding at Morávka, amounting to CZK 390,000, for a natural person and legal entity VK Timber s. r. o. (Ostrava TI FPD).
- Complicated case at Armáda skiing resort at Dolní Lomná for illegal deliberate underage and cutting age logging and landscaping in a majority 2nd zone of Beskydy PLA, with a fine decision issued amounting to CZK 3,200,000, currently at court (Ostrava TI FPD).



Failure to afforest forest land at Grešlové Mýto



Illegal logging, thinning stands younger than 80 years, made by Sport4you s.r.o. at Dolany u Olomouce

- A fine for a natural person for not implementing remedial measures in restoring forest at Hodkovice nad Mohelkou and Petrašovice amounting to CZK 245,000 (Liberec TI FPD).
- A fine of CZK 90,000 for ŠM-TRADING s. r. o. for not implementing measures for afforesting with suitable tree species, including consistent forest protection at Smržovka (Liberec TI FPD).

It is clear from the overview of major cases that the CEI identifies mostly shortcomings in forest restoration, damage to forest soil and illicit logging. This logging, particularly by small forest owners and also done under the header of various legal entities or natural persons, often lead to difficult administrative violations in forest restoration. Thus, inspection work will also focus in future on forest properties where illicit logging or forest ownership changes have taken place.

5.5.8 Cooperation with other authorities, problems in inspection work, inspection work outcomes and its direction in 2016

Cooperation between forest public authorities and TI FPD is mostly regarded as functional. However, there have been reservations, particularly concerning their personnel insufficiency, the CEI often handling cases under their jurisdiction. Problems are also caused by legislative insufficiency in cases of authentication of forestry records furnished by owners, where we lack enforcement of Section 40 of the Forest Act by forest public administration. The legislative insufficiency results in cases where foresters propose logging interventions, the forest public administration approves them, and afterwards we find out that the result endangers the forest environment.

The inspection work is complicated by searching for current forest owners (sales, inheritance) as they do not report to forest public authorities. Public hunting authorities' inaction and tolerance to proliferation of non-standard game species on hunting grounds have resulted in increased damage to both forests and farmland. A solution should be an amendment to the Hunting Act.

The share of identified changes in forest owners in order to avoid the afforestation obligation after logging has been increasing. We have had positive cooperation with ÚHÚL branch offices in inspection of reproductive material of forest trees, which in the long run will lead to improvement in forest stand quality. The presence of inspectors in the field, communication with owners and direct handling of shortcomings help increase knowledge about the CEI's work.

It would be beneficial for inspection scheduling and implementation if the inspectors had access to the secure

part of the map server of the ÚHÚL, as well as provision of access to the non-public ERMA II database (supplier records submitted to authorised entity) in order to deepen the knowledge of inspection authorities. We repeatedly consider it sensible to issue an Act on Administrative Violations, amendment of Act no. 282/1991 Coll. and Act no. 289/1995 Coll. (powers and responsibility of foresters, terms for afforestation of land newly declared as LIFFF, specification of FMR keeping and defining the continuity of remedial measures for forest properties transferred to legal successors of proceeding parties which were ordered the measures). Enforcement of legal state in forests is complicated by deliberate transfers of forest properties and selection of foresters. We will continue intensifying our cooperation with the Czech Police, notably concerning illegal logging, information on whereabouts of persons and delivery of letters. We find it important and sensible to establish cooperation with distrainers (in the case of neglected forest properties, failure to restore forest) and customs authorities (sales of forest properties). There are problems with acquisition of necessary information in inspection of entities doing logging in forests. In cases of illicit logging, there is a very low rate of resolution of these violations by the Czech Police, which together with enforceability of fines reduces the effectiveness of the TI FPD work and the CEI's prestige. It appears beneficial to develop our own inspection records and gradually compile an information database unifying information about the supervised area. It is sensible to continue unifying procedures of FPD authorities so that their steps are transparent and predictable across the country.

As a consequence of the extreme drought in 2015, we can expect an increase in random logging and escalation of calamity pests, particularly bark beetles. Attention will be paid to large-scale stand damage by summit fractures in the west and central parts of the Ore Mountains, as well as drying of broadleaved stands in the Central Up-

lands. The increase in numbers of fallow deer and mouflon in the Central Bohemian Uplands and expansion of the sika deer from western Karlovy Vary Region will be illicit logging, there is a very low rate of resolution of these violations by the Czech Police, which together with enforceability of fines reduces the effectiveness of the TI FPD work and the CEI's prestige. It appears beneficial to develop our own inspection records and gradually compile an information database unifying information about the supervised area. It is sensible to continue unifying procedures of FPD authorities so that their steps are transparent and predictable across the country.

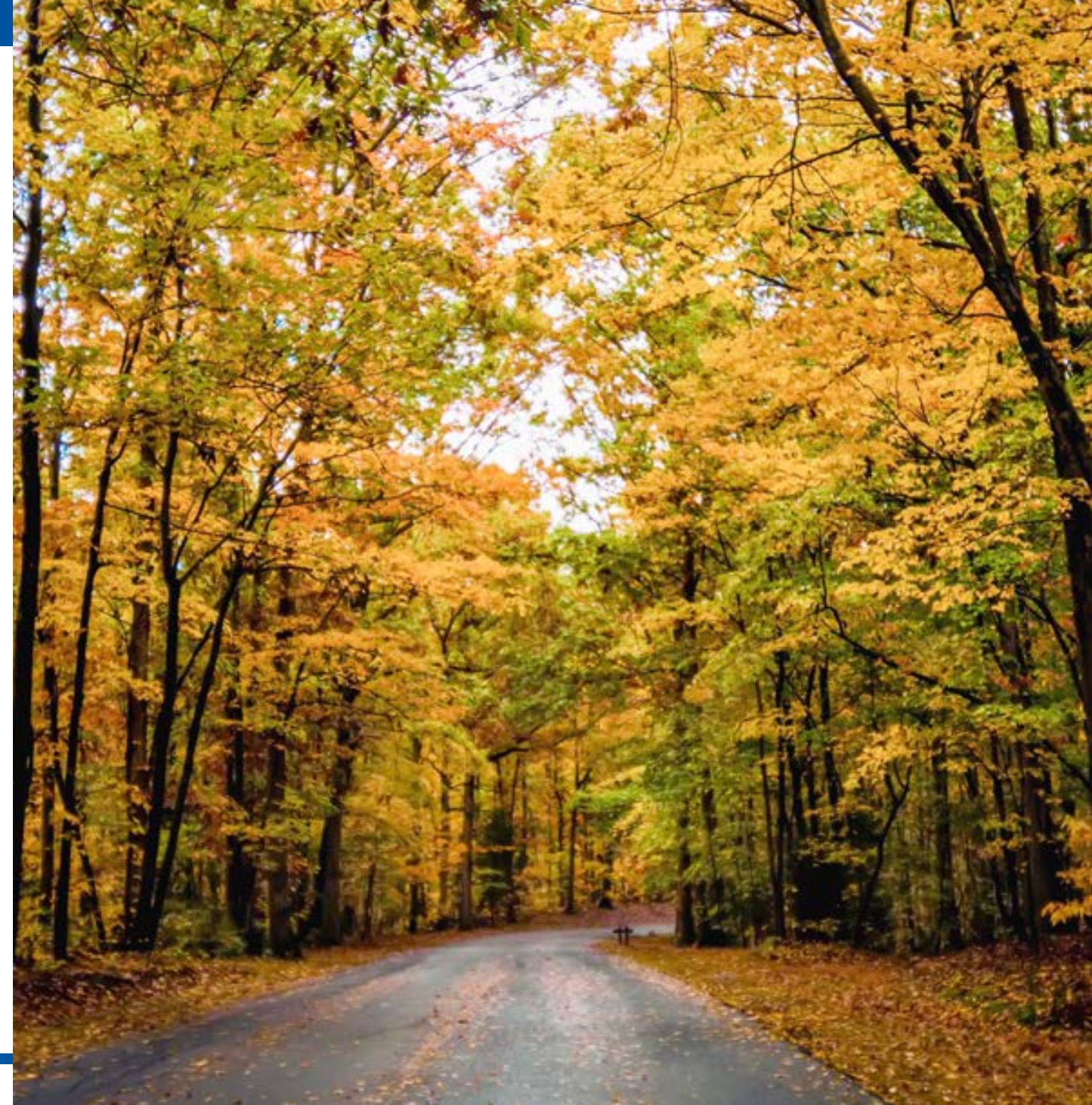
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The increase in numbers of fallow deer and mouflon in the Central Bohemian Uplands and expansion of the sika deer from western Karlovy Vary Region will be one of the inspection work topics, as well as game migrating to home areas during close season. There are continuing problems with territorial forest damage by excessively breeding cloven-hoofed game, the planning of which is formally almost perfect but factually impossible to check, leading to doubt about its correctness. Attention is also paid to farm breeds and damage to LIFFF by individuals kept as farm animals.

We will continue the 2015 task of assessing the condition of forest amelioration in order to retain water in forests. The intolerable state of moldavite mining in LIFFF at Nové Hradky will require a solution at the level of the MoE, MoA and MoI. Adequate attention will be paid to ORP Hranice, Lipník n./B., Litovel, Uničov, Olomouc,

Šternberk and Zábřeh, where there is a serious threat to spruces by bark beetles and honey fungus. The stand infection is expanding to the north and west of Olomouc Region. The current capacity of the TI FPD do not permit adequate blanket response.

Illicit logging and forest restoration will continue as one of the central topics of TI FPD inspections in 2016. In cooperation with nature protection authorities, we will supervise management of non-forest land. In 2016 as well, the TI FPD will work as an information and advisory body for natural persons – forest owners. Penalties will be applied primarily to gross, deliberate and repeated violations of laws.



6 | INTEGRATED AGENDAS

An integrated approach to environmental protection is ensured by the CEI's expert departments under coordination and collaboration of experienced inspectors specialised in these agendas, i.e., coordinators of integrated agendas (CIA). The fundamental job in the area of integrated agendas is supervision (inspection), followed by important largely preventive work, such as issuance of statements (on EIA, IPPC, etc.).

6.1 Legal foundation of work on integrated agendas

In this area as well, the public administration (obligations and authorisations) is delegated to the CEI by legal amended and effective, and directly applicable EC regulations, i.e., notably the following Acts:

- no. 76/2002 Coll., on Integrated Prevention and Pollution Reduction (IPPC), the integrated pollution register and on amendment of certain acts (the Integrated Prevention Act). The purpose of this central Act for the integrated agendas area is to achieve maximum possible prevention of industrial pollution to all environmental components and its protection as a whole,
- no. 100/2001 Coll. on Environmental Impact Assessment and on amendment of certain acts,
- no. 167/2008 Coll. on Prevention of Environmental Harm and its Remedy and on amendment of certain acts,
- no. 25/2008 Coll. on the Integrated Environmental Pollution Register, the integrated system of reporting obligations on the environment, and on amendment of certain acts (the IPR Act), in connection with
- Regulation of the European Parliament and Council

(EC) no. 166/2006, establishing the European Pollutant Release and Transfer Register (E-PRTR).

6.2 Overview of performance of tasks in integrated agendas – supervision (inspections)

6.2.1 Summary data for CEI – integrated agendas

The work related to integrated agendas itself, done by CEI expert departments, is contained in Section 5 – CEI Work in 2015 by departments.

In total, the CEI integrated agenda work involved 1256 inspections in 2015; we initiated 158 administrative proceedings, issued 140 decisions on fines and orders, and based on 153 decisions (incl. from previous periods) we awarded fines totalling CZK 9,559,000 in force.

The range of conclusive fines relating to integrated agendas was from CZK 3 thousand (order for DF-PACOV s.r.o. – not submitting reports on meeting requirements of integrated permit) to CZK 530 thousand (D+P RE-KONT s.r.o. – primarily violation of binding requirements of integrated permit (IP) in operation of the Doubrava Decontamination Area facility). The average amount of fine per decision (order) in force in this period was thus approx. CZK 62.5 thousand.

The schedule and programme of ordinary inspections (658) at IPPC facilities in 2015 was thus met with superiority (1256) and we expect that the inspection schedule for the period 2014-2016, with reference to Section 20b

of the Integrated Prevention Act, will be completed at the end of 2016. It is also quite realistic to expect inspections based on suggestions as well as, e.g., accidents, or repeated inspections as necessary in cases of serious violations of binding conditions of IP.

6.2.2 Integrated Agenda Department – CIA

Specialised integrated agenda coordinators of the CEI Integrated Agenda Department, in close collaboration with the expert departments, were involved in, cooperated on or coordinated 518 inspections at 397 facilities. This number includes both inspections under the Integrated Prevention Act and the IPR Act as well as the Act on Prevention of Environmental Harm. In the study period, the CIA themselves initiated 62 administrative proceedings. The number of decisions on fines (incl. orders) that entered into force in 2015 was 59, while the total amount of fines in force was CZK 3,365,000.

The range of the fines in force was also from CZK 3 thousand to CZK 530 thousand. The average amount of fine per decision (order) in force in the period was about CZK 57 thousand.

Specific tasks

In a MoE letter re *Schedule of activities of the Czech Environmental Inspectorate for 2015 – thematic requirements and suggestions* by Ing. Vladimír Mana, Deputy Minister – Head of Public Administration Section, dated 12 Nov 2014, ref. no. 78263/ENV/14, the following was stated for integrated prevention: *We invite you to consider including comprehensive inspections of companies subject to IPPC, including large operations (Syntesia, Paramo, Marius Pedersen, large agricultural operations, biogas stations, etc.).*

The CEI accepted that in its schedule and programme for inspections and unscheduled (extraordinary) inspections in 2015, followed by a number of inspections at

large industrial entities, particularly in facilities operated by, e.g., Synthesia a.s., Paramo, a.s., Explosia, a.s., Výzkumný ústav organických syntéz a.s., ŠKODA AUTO a.s., as well as P-D Refractories CZ a.s., Saint Gobain Construction Products CZ a.s., Tereos TTD, a.s., Norbrook s.r.o., Veba, textilní závody, a.s., ESAB CZ, s.r.o., member of ASSA ABLOY Czech & Slovakia s.r.o., IVECO Czech Republic a.s., SAINT-GOBAIN ADFORS CZ s.r.o. and KYB Manufacturing Czech s.r.o. Additional inspections were made in facilities of large agricultural producers, such as MACH DRŮBEŽ, a.s., Vodňanské kuře s.r.o., Moras a.s., RÝCHOLKA s.r.o., Drupek Svitavy, a.s., DUMAN s.r.o., VEMAS a.s., MAVÉ Jičín a.s., VEMA a.s., AGROSPOL HOSTOVICE a.s., DŽV Rychnov nad Kněžnou a.s.

In addition, we inspected facilities with significant stationary sources of air pollution (power plants, heating plants, foundries, etc.) and in waste management facilities (landfills, hazardous waste treatment facilities).

Specific inspections also included checks whether an operation falls under the Integrated Prevention Act. In 2015, we made 14 such inspections; two thirds concluded that the operation in question does fall under the Act (e.g., Contipro Biotech, s.r.o. – category 4.1.b, and Contipro Group s.r.o. – cat. 6.11, etc.).

In addition, in accordance with requirements of the MoE, we made inspections in facilities with revoked IP. If facility operators were subject to obligations under Act no. 59/2006 Coll. on Prevention of Major Accidents in 2015, some of the integrated inspections were coordinated with inspections under that Act.

The CEI inspections identified violations of legal regulations on environmental protection, particularly non-observance of binding operating requirements of IP, such as:

- emissions of pollutants (e.g., carbon monoxide),
- when handling waters (consumption limits, han-



Contaminated IBC containers located in a hydraulically unsecured area

- dling of dangerous chemicals, e.g. distribution plans for fugates) or waste,
- operating rules (technical operating conditions, etc.),
 - storage in the landfill of waste other than permitted, insufficient completion of basic descriptions of admitted waste, not measuring dust levels,
 - containers with potential pollutants located in hydraulically unsecured areas, etc.

Moreover, failure to perform the reporting obligation under the Integrated Prevention Act, i.e., failure to report:

- data on performance of binding requirements of IP,
- summary operating records of air pollution sources,
- transfers (above-threshold) or releases of substances, such as ammonia,
- emergencies,
- changes to integrated permits, etc.

Additional violations were not meeting requirements defined for liquidating facilities or even operation without IP. A separate chapter continues to be the changes of departmental laws and their reflection in IP.

For violations of Act no. 201/2012 Coll. on Air Protection, identified, e.g., in inspections under the Integrated Prevention Act, administrative proceedings were not held if the obligation in question is no longer required by the

new Act no. 201/2012 Coll. This Act entered into effect on 1 Sep 2012 (in connection to Act no. 2/1993 Coll., as amended by Act no. 162/1998 Coll., i.e., Charter of Fundamental Rights and Freedoms, Art. 2, Para. 3: "Everyone can do what law does not forbid, and no-one can be forced to do what law does not order").

It is thus relevant, e.g., for the so-called Eco-Auditing amendment of the Waste Act no. 169/2013 Coll. (e.g., approval for handling hazardous waste when collecting it), or provision of amendment no. 223/2015 Coll.

Integrated Pollution Register

In 2015, we inspected 356 facilities for adherence to the IPR Act, including 313 inspections as part of integrated inspections (under Act no. 76/2002 Coll.). There were 40 separate IPR inspections. This time, we no longer made any of the inspections purely in a letter form – comparison against environmental reports in the integrated system for reporting obligations (ISPOP).

The total amount of the fines in force for not observing the reporting obligations for the IPR was CZK 410 thousand. Given 21 decisions in force, the average fine was around CZK 19.5 thousand.

Like in previous years, the penalties awarded were near the lower bound of the legal range (up to CZK 500 thousand)

– form the usual CZK 10 thousand for wrong implementation of the IPR reporting obligation to CZK 80 thousand (Toyota Peugeot Citroën Automobile Czech, s.r.o., primarily for stating wrong data in their IPR reports for 2012 and 2013), mostly in the form of an order under Section 150 of the Rules of Administrative Procedure.

Violations of legal regulations on the IPR concerned mostly not submitting reports on time, reporting wrong data, not reporting transfers of waste or pollutants in waste. Thus, the supervisory work in the area of the IPR generally concerns formal environmental errors committed by operators or misunderstandings and late reports, and the CEI treats them as such. It is almost the rule that large operators of facilities with an integrated permit perform their obligations under respective legislation much better than others, i.e., particularly small and medium agricultural operations and facilities. These smaller entities typically still lack sufficient information about the IPR. Based on the progressive results of the CEI inspection work in the area of IPR, it can be concluded that generally the awareness of obligations under the legislation and adherence to it has been improving, with the numbers of administrative violations decreasing.

Environmental harm

Administrative proceedings in connection with Act no. 167/2008 Coll. on Preventing Environmental Harm and its Remedy and on amendment of certain acts, have not been initiated so far.

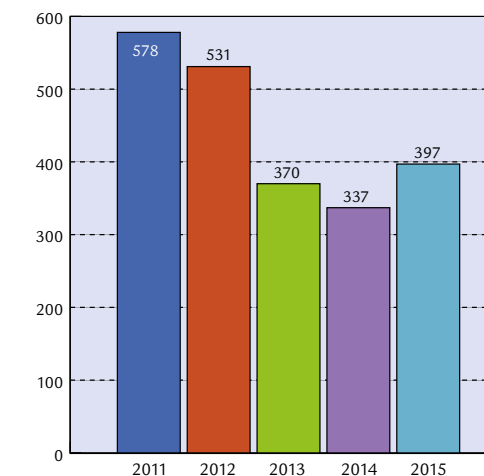
In 2015, the CEI made 229 inspections of adherence to the Act on Preventing Environmental Harm. We received basic risk assessments – 50 points were only exceeded in two cases, where detailed risk assessments were thus submitted. No administrative violations were committed.

Suggestions and petitions

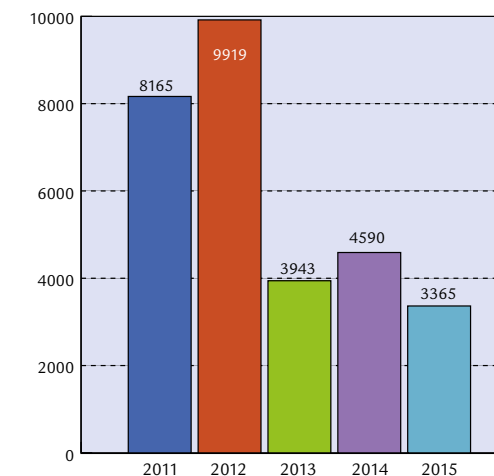
Coordinators of integrated agendas were actively involved in handling 83 suggestions and petitions, par-

ticularly in cases related to more departments. The principal task of the CIA was to ensure a coordinated approach to the cases.

Numbers of facility inspections made by CIA



Fines awarded by CIA in the last 5 years



Based on suggestions, we made a number of inspections, incl. without warning, e.g., at facilities in category 5.4: *Landfills admitting more than 10 t daily or with a total capacity above 25,000 t, except inert waste landfills.*

Additional suggestions concerned, e.g., illegal dumps, dumping of small watercourses, low flow rates downstream of small hydropower plants.

Accidents

Coordinators of integrated agendas were actively involved in solving 15 accidents or non-standard operations at IPPC facilities, e.g.: **Facility of Partner in Pet Food CZ s.r.o.** “*Manufacturing of pet food at Partner in Pet Food CZ s.r.o. in Veselí nad Lužnicí*”. – based on a suggestion, an inspection made by České Budějovice TI WPD physically identified and documented overflowing of a wastewater reservoir from a treatment plant (of insufficient capacity) into the storm sewer and wastewater discharge into the Lužnice river. This was a repeated case of the same situation not only during the CEI inspection but also previously as identified by citizens and employees of Soběslav Municipal Authority. An administrative proceeding with the operator is in progress.

Plzeň TI – Only on 9 Jul 2015, in connection with a request by the Czech Police for cooperation in a case of leaked toxic substances from the **Central treatment plant for hazardous waste operated in Plzeň by SITA CZ a.s.** the CEI learnt the details of the case that had occurred at the facility on 29 May 2015, when inclement probably a technical defect at the air inlet for stirring for tank Cr1 caused a leak of “aerosol” above the tank – analysed by FRS laboratory. However, these facts were not evident from the event report submitted by the operator. The CEI considers the event an accident under the Air Protection Act.

6.3 Non-supervisory CEI work on integrated agendas

This work includes primarily development of statements and position statements:

- as part of the environmental impact assessment process (EIA/SEA),
- on applications for integrated permits or changes to integrated permits,
- on subsidies from environmental operational programmes (SEF axis 5.1),
- on Environmental Management and Audit Systems – as part of registration of EMAS, EMS,
- on facility operating permits in terms of air protection at IPPC facilities,
- as part of the Safe Business programme,
- on environmental audits,
- as part of requests for information under Act no. 123/1998 Coll., 106/1999 Coll., etc.

In 2014 and 2015, the CEI also cooperated on drafting the bill for Act no. 39/2015 Coll., amending Act no. 100/2001 Coll. on Environmental Impact Assessment and on amendment of certain acts, as amended, and other associated acts. First and foremost, the issue was to ensure compatibility of the Czech legal definition of environmental impact assessment with the EIA Directive of the European Parliament and the Council no. 2011/92/EU, i.e., to remedy shortcomings rebuked to the CR in transposing the Directive.

Besides, coordinators of integrated agendas were actively involved in 2015 in work of technical workgroups, primarily for the MoE and the MIT, such as “Regions and Integrated Prevention” and “Forum for Exchange of Information on BAT”.

EIA/SEA

In 2015, the CEI developed 1153 statements on plans, documentations, reviews, notifications of strategies and proposals for strategies as part of the EIA/SEA process. Compared to last year, this is only a 2% increase in the statements issued (1129).

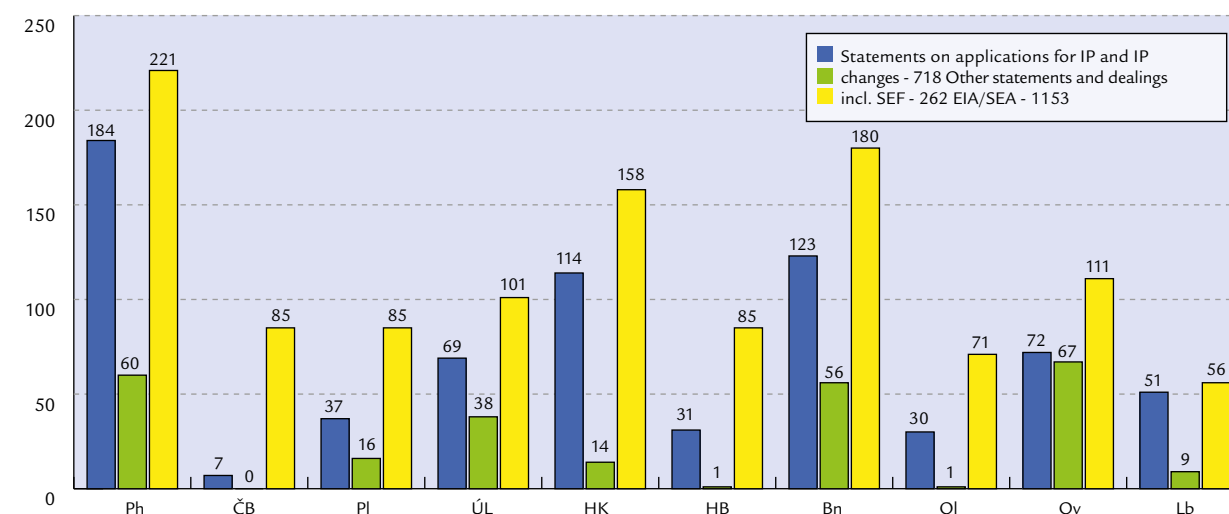
It can be concluded that, like in previous years, the quality of notifications submitted still showed some shortcomings in 2015. In particular, some data on inputs and outputs, their evaluation or alternative designs were still missing.

Major EIA cases

MSK1941, plan “Reclamation and site preparation of development area Bohumín”. This plan consistent in landscaping of a site in the regime of reuse of waste on the ground in the form of an embankment 1.5 m above existing ground at Nový Bohumín. The landscaping would be made by the applicant in order to level the ground and improve the foundation conditions (reduce effects of raised water table) before further development of the site. The CEI fundamentally opposed the project implementation, because based on the notification it was not land reclamation but disposal of construction waste without any security measures. Current status: The assessment was halted at the applicant’s request.

“Mobile facility for low-temperature pyrolytic breakdown”. The subject matter of the plan is to install a mobile facility for disposal of old tyres in the former military compound in Přáslavice u Olomouce, on the premises of

Position statements and statements issued by CEI TI



Flenexa plus s.r.o. This is a mobile technology that will be situated in a truck container sized 2.4 m x 2.4 m x 12 m. The device is designed for processing 1000 t of tyres annually. The admitted tyres will be stored in the open courtyard area. The disposal is based on the low-temperature pyrolytic breakdown method. The output products will be a liquid fraction, gas and a solid remainder. The oil produced (about 400 t/year) will be stored on the company's premises, continuously decanted into storage container, which will be stored in the existing inflammable storehouse. The gas produced (about 100 t/year) will be combusted in a burner or used to generate electricity. The solid remainder will be stored in bigbags and periodically taken away (about 400 t/year of solid remainders and 100 t/year of steel). With respect to the insufficient elaboration of the notification, insufficient information about the technology and its risks, the CEI demands that an entire EIA process take place. Current status: Plan notified.

Applications for integrated permits

In the area of integrated prevention, the CEI actively cooperates with regional authorities; this cooperation also includes issuance of statements on integrated permits and, much more commonly, substantial changes to integrated permits.

In 2015, the CEI developed 718 statements on applications for integrated permits or changes thereto. This is a decrease compared to last year (904). In 19 cases, CEI representatives attended face-to-face meetings on applications for integrated permits or changes thereto.

Other position statements and statements

In addition, coordinators of integrated agendas of the TI made or cooperated on another 262 statements on ISO 14001, for the SEF CR, under the Safe Business programme, and on applications for registration for EMAS programmes, environmental audits, etc.

Reports on inspection

Pursuant to Section 20b, Para. 9 of the Act on Integrated Prevention in connection with each inspection and beside the inspection report on the spot, the CEI has to elaborate a report containing a description of the inspection findings and conclusions about any other measures, known as a "report on inspection". In addition, under Section 20b, Para. 11 of the Act, we have to publish the report via the integrated prevention information system (IS IPPC) run by the MoE, within 4 months of the on-site inspection date. However, the report can only be made after the expiry of the period for submitting protests against the inspection finding shown in the report under Section 13 of Act no. 255/2012 Coll. on Inspection.

Each CEI territorial inspectorate is required (which is also inspected) to adhere to the terms regarding the posting of these reports on inspection in the IS IPPC.

In 2015, the CEI inspected 1256 facilities. The number of posted reports on inspection in the IS IPPC, due to the date shift by 4 months after the date of inspection on the spot, does not match that number. In total, the IS has posted over 1500 reports on inspection so far.

6.4 Major cases from inspection work

Prague TI awarded the legal entity ALFA SYSTEM s.r.o. a conclusive fine of CZK 100 thousand under the Act on Integrated Prevention for operation without a valid IP. The company committed the violation by operating the "Tursko Biodegradation Area" from 1 Jan 2008 to 31 Dec 2013, i.e., for 2192 days, without a valid integrated permit. When setting the fine amount, the CEI took as a significant mitigating circumstance the fact that the company

halted the operation at Tursko after the CEI inspection. In force as of 9 Apr 2015.

ANIVEG ECO s.r.o. – WOWITRA s.r.o. In 2015 as well, the Ústí nad Labem TI continued to solve the case of WOWITRA s.r.o. (the premises of the former "oil plant" in Lovosice formerly housed the facility "Organic derivative production", which was removed, but still has an active IP since requirements relating to the end of operation and facility liquidation were not met); in 2014, the CEI water protection and waste management departments awarded the company with 2 conclusive fines totalling CZK 1,750,000.

The CEI (WPD, or accompanied by WMD) should use 18. Mar 2015 and 29 Jul 2015 for a pre-notified inspection at WOWITRA s.r.o., but the operator failed to present itself at either inspection, the premises were empty and closed, so that the operator did not allow the CEI to make the inspection. The CEI had neither been allowed to make an inspection on 30 Oct 2014. The operator thus committed an administrative violation of Act no. 255/2012 Coll. on Inspection, where for not allowing inspection on 30 Oct 2014 and not allowing the inspectors to perform their authority under the Inspection Rules, the CEI awarded to WOWITRA s.r.o. a fine by a decision of

28 Jan 2015, amounting to CZK 100,000 (fine in force, not appealed) and afterwards, for a repeated administrative violation (not allowing inspection on 18 Mar 2015 and 29 Jul 2015), a decision of 29 Sep 2015 awarded a fine of CZK 200,000 (decision rests with OVSS Chomutov, the operator made a late appeal approx. 3 weeks after the deadline).

In April 2014, the entire premises of WOWITRA s.r.o. was sold to the hands of the natural person of Belgian nationality Beyne Bruno Beatrice (registration in the Cadastre on 12 Aug 2014). However, from the environmental point of view, WOWITRA s.r.o. continues to be the facility operator with a valid integrated permit. The company WOWITRA s.r.o. does not communicate with public authorities, and has not paid the fines. According to latest information, the municipality of Lovosice has been granted a subsidy from the SEF CR for disposal of substances situated in the former oil plant, which are a significant threat to environmental quality (particularly soil and groundwater). Now a tender should take place for the contractor of disposal and remediation works; the disposal itself should take place in the spring of 2016.

Slovácké strojířny, a.s. Based on an inspection made by Olomouc TI in this company, it was awarded a fine, being



Ronov landfill, operated by Přibyslav Municipality

the operator of the facility “Galvanising plant – facility for surface treatment of metals and plastics using electrolytic or chemical processes at Postřelmov”, opakovaný správní amounting to CZK 100,000. The fine was ordered under the Integrated Prevention Act for the operator failing to report to the regional authority a planned change in the use, operating method or extent of the facility, with potential environmental impact, thus violating Section 16, Para. 1, item b) of the Act. This met the definition of an administrative violation under Section 37, Para. 1, item a) of said Act, being the most significant violation. Said decision also included administrative violations under Act no. 201/2012 Coll. on Air Protection, as amended; specifically, it was a failure to carry out one-off emission measurement at the air pollution source within three months of the interference with the source design, and to submit summary operating records for the air pollution sources for 2012 and 2013. The proceeding party did not appeal against said decision. In force as of 10 Jul 2015.

Havlíčkův Brod T1 – When inspecting the **Ronov landfill**, industrial activity in category 5.4 as per Annex 1 to the Integrated Prevention Act, (*Landfills admitting more than 10 t daily or with a total capacity above 25,000 t, except inert waste landfills*), we found reusable waste that obviously was not part of municipal waste (separate bags or piles of reusable waste) – plastic sheet and binding straps, clean office paper (large amount of full binders from a business), cut branches, tyres inside and on the surface of the landfill, not as technical means for covering the sheet. The facility operator was ordered a conclusive fine of CZK 40,000. In force as of 7 Aug 2015.

6.5 Conclusion

Violations of obligations of facilities with integrated permits show a decreasing tendency, because comprehensive inspections have generally been made at these facilities and the operators are already aware of and meet their legislative obligations.

The amended Integrated Prevention Act meant a relatively substantial increase in the extent of obligations for operators (baseline reports already on the first change), regional authorities (conclusions on BAT and exemptions), the CEI and RPHA (more inspection work, reports on inspections).

The quality of the CEI’s inspection work in the area of integrated prevention continue to depend on the quality of IP in force, agreement of IP with the current state of the facilities, and formulation of their binding requirements, thus their enforceability.

In its work, the CEI does not focus strictly only on awarding fines; it also pays attention to prevention and soft methods and actively cooperates with other public authorities, particularly regional authorities, which permit operation of facilities under the Integrated Prevention Act. The purpose of this cooperation is to improve the quality of integrated permits and thus ensure high quality of environmental protection. However, the progressive increase in changes to integrated permits results in increased complexity of inspections. Inspections in the area of integrated prevention thus demand particularly precise preparation and sufficient time.



7 | International collaboration

In 2015, there were 52 trips abroad, involving 94 employees. One of our most important international activities is collaboration in the IMPEL, an organisation dealing with implementation and enforcement of environmental law and representing organisations of EU member states, accession and candidate countries, EEA and EFTA countries dealing with implementation and enforcement of environmental law. The IMPEL's mission is to contribute to environmental protection by involvement in effective implementation and enforcement of EU environmental law by building capacity, sharing good practice, provision of handbooks and tools, promoting cooperation and provision of feedback to legislators and regulators on practicality and enforceability of environmental legislation. The core of the network's work is various projects.

The IMPEL held a General Assembly in Luxembourg and CEI inspectors participated in work of expert groups: air and industry, water and soil, transboundary waste transport and waste, nature and overlapping tools and approaches. As annually, they attended the TFS conference, focusing primarily on criminal aspects of transboundary waste transport. In addition, our inspectors were involved in IMPEL projects "Meeting of contact persons for transboundary waste transport" and "Landfill inspections". The project on implementation of the Industrial Emissions Directive continued in 2015, and our inspector attended a seminar dealing with industrial accidents. Moreover, we attended two IMPEL conferences: on soil and new technologies. Since nature protection was included in the IMPEL work agenda in 2013, our inspectors were also involved in two projects focused on the area, namely "Illegal bird killing" and "Implementation and execution of EU Regulation laying down obligations of businesses marketing wood and wood products". Our inspector was also invited as a member of an expert as-

essment team to an IRI (voluntary audit of an inspection and supervision system) to Kosovo.

On 9 -11 Sep 2015, the Czech Environmental Inspectorate hosted an IRI (IMPEL Review Initiative) assessment. The assessment team was composed of experts from seven IMPEL member countries (United Kingdom, Germany, Austria, Romania, Portugal, Italy and Kosovo). The IRI focused particularly on inspecting the Industrial Emissions Directive and the Seveso Directive (prevention of major accidents). The IRI is a voluntary assessment of the inspection and supervision cycle, carried out in the individual organisations, which deal with environmental protection (inspectorates and environmental agencies) in the member countries of the IMPEL. The purpose of the IRI is to provide the assessed organisation with non-binding recommendations for potential improvement of its performance; on the other hand, the assessment searches for examples of "good practice" in the host organisation's work, which are then further recommended for implementation to the other IMPEL member countries. This helps improve the quality of work and harmonise EU environmental legislation across member states. The assessment report confirms that both the directives inspected, i.e., the Industrial Emissions Directive and the Seveso Directive, are fully implemented and that the CEI structure and enforcement of environmental law are in accordance with the recommendation setting minimum criteria for environmental inspectorates (RMCEI), and that the objectives of the EU environmental law are met in the Czech Republic as follows from the CEI review.

In the area of the international CITES treaty, CEI employees represent the Czech Republic at meetings of expert groups and boards focused on promotion of laws on protection of endangered species. In February 2015, the

CEI Director represented the Minister of the Environment at the Ministerial Dialogue and meeting of high CITES officials on illegal rhinoceros hunting and trade in Lyon. Like every year, we attended two meetings of the European EU Wildlife Enforcement Group. Very important cooperation takes place under the Interpol Wildlife Working Group, helping solve serious cases of an international nature. In 2015, our inspector attended the 26th meeting of the Interpol Wildlife Working Group, connected with the second annual meeting "Interpol Environmental Compliance and Enforcement Events", also attended by the Deputy CEI Director and focused on innovation of strategies, boosting global cooperation, operative support and international investigation in the area of environmental criminal offences. A CEI representative also attended a Central European meeting of specialists on combating environmental crime.

A CEI inspector regularly attended the Forum of the European Chemicals Agency (ECHA), used for exchange of information on enforcement of the REACH Regulation. Based on a treaty with Slovakia, we made several trips abroad dealing with water, air, nature and forest protection.

Under so-called executive international relations, our inspectors represented the Czech environmental department at meetings of international boards for the protection of boundary waters and big rivers (International Commission for the Protection of the Oder and Elbe, Danube Commission, Austrian Boundary Waters). Most of the trips abroad were made in order to secure the CR's contractual commitments under international organisations, treaties and protocols on the one hand and activities directly connected with the EU membership on the other hand. In total, the CEI expended CZK 471,203.47 on the trips abroad; a large part of the costs was funded directly from the EU budget.

EEA – European Economic Area

EFTA – European Free Trade Association

8 | Human resources

8.1 HR agenda

In 2015, the HR department work focused on implementation of Act no. 234/2014 Coll. on Public Service. Managerial employees entered public service on 1 Jul 2015. The other employees entered public service on 1 Dec 2015.

In addition, the HR department work in 2015 focused on good and timely implementation of legislative changes in employment law, wages and training in the CEI. As every year, the dominant task of the HR department was economic and sensible use of wage resources allocated.

Classification of employees by education and sex – as of 31 Dec 2015

education attained	Men	Women	Total	%
Primary	0	0	0	0
Secondary	1	4	5	0,92
Complete secondary	3	15	18	3,35
Complete secondary	21	78	99	18,4
Higher professional	3	2	5	0,92
University	227	184	411	76,41
Total	255	283	538	100

Summary data on start and end of employment in 2015

	Number
Admissions	32
Dismissals	48

As of 1 July 2015, public service entered by: 75 seniors; in December 2015, public service entered by: 360 employees

duration of employment – as of 31 Dec 2015

Duration	Number	%
up to 5 years	114	21,19
up to 10 years	147	27,32
up to 15 years	100	18,58
up to 20 years	93	17,29
over 20 years	84	15,61
Total	538	100,0

8.2 Training

In 2015, employee training was implemented in accordance with Directive no. 5/2012 on CEI Employee Training.

The mandatory training for newly admitted employees was made in accordance with Government Resolution no. 1542/2005. It comprised introductory initial training, attended by 28 employees on four dates. This part of the training in the attendance form was organised for the territorial inspectorates and the Headquarters by the HR Department of the CEI Headquarters. The primary objective was to introduce the specific CEI issues, basic knowledge and legal standards for work in public administration. Another mandatory part of the training is the follow-up initial training, which was professionally guaranteed by the Ministry of the Interior in the study period. In eight e-learning courses, it was successfully completed by 33 employees.

The main contents are legal awareness basics, Rules of Administrative Procedure, public administration in the CR, public finance, EU minimum, etc.

In order to deepen their professional education, new inspectors attend theoretical and practical specialisation training. This was successfully completed by 21 employees on 12 dates. It involved specialisation in the areas of waste management, air, forest, water and nature protection.

The further employee training mostly made use of the Institute for Public Administration Prague, own instructors and external agencies. The events focused primarily on specialised professional training. The teaching form was mostly attendance-based, but also used e-learning courses on eGovernment organised by the Institute for Public Administration Prague. The total number of at-

tendances at such further training activities was 1181. Within that, the HR department organised and financed 613 attendances, with partial funding support from the Ministry of the Environment. These events focused primarily on legislation, such as administrative law, Inspection Rules, Public Service Act, criminal prosecution, Waters Act, etc.

9 | Economics

In 2015, the CEI managed budgetary non-investment funds amounting to CZK 325,831,070.30 and budgetary investment funds of CZK 23,931,481.26.

The total budgetary funds thus were CZK 349,762,551.56. The CEI also managed a limit on non-budgetary funds of CZK 5,624,166.18.

Drawing of non-investment expenditures for 2015

Indicator	Adjusted budget	Drawing	Balance
Salaries of employed employees	152 091 571,00	151 344 632,00	746 939,00
Salaries of employed employees – NNV	3 100 000,00	3 100 000,00	
Salaries of public servants – SZ	34 259 763,00	33 634 118,00	625 645,00
WPD	423 257,00	318 190,00	105 067,00
Severance pay	900 000,00	729 892,00	170 108,00
Insurance – SS+HI	63 503 362,00	62 964 661,00	538 701,00
Insurance – SS+HI – NNV	1 054 000,00	1 054 000,00	
Total wage expenditures	255 331 953,00	253 145 493,00	2 186 460,00

Indicator	Adjusted budget	Drawing	Balance
Other current non-investment expenditures	57 269 232,00	51 703 719,54	427 856,00
Transfer to CSNF	1 863 513,00	1 863 513,00	27 528,45
Transfer to CSNF – NNV	31 000,00	31 000,00	87 891,24
Non-budgetary CEI resources	1 439 166,18	1 369 727,94	774 809,31
Non-budgetary resources – increase for insurance premium	221 768,00	221 768,00	1 318 085,00
Total current non-investment expenditures	60 824 679,18	55 189 728,48	9 139 495,70

Indicator	Adjusted budget	Drawing	Balance
Non-investment expenditures – Wage and HR information system	427 856,00	0,00	427 856,00
Non-investment expenditures – Acquisition of ICT in 2015	3 328 945,95	3 301 417,50	27 528,45
Non-investment expenditures – Acquisition of licences	2 511 000,00	2 423 108,76	87 891,24
Non-investment expenditures on ICT	3 406 636,17	2 631 826,86	774 809,31
Total non-investment expenditures – ISPROFIN	9 674 438,12	8 356 353,12	1 318 085,00
Total non-investment expenditures	325 831 070,30	316 691 574,60	9 139 495,70

Drawing of investment expenditures for 2015

Indicator	Adjusted budget	Drawing	Balance
Investment expenditures	15 622 545,50	2 110 060,74	13 512 484,76
Implementation of new CIS in 2014	7 000 000,00	653 400,00	6 346 600,00
Additional Microsoft licences	87 000,00	83 115,24	3 884,76
Car purchases in 2015	3 980 000,00	0,00	3 980 000,00
Facade lagging of Liberec TI	195 677,00	195 677,00	
New elevator installation at Liberec TI	940 000,00	0,00	940 000,00
Purchase and installation of new bicycle shelter	77 911,90	77 911,90	
Construction of auxiliary storehouse at České Budějovice TI	55 938,00	55 938,00	
Staircase upgrading at Ostrava TI	246 631,00	246 631,00	
Purchase of PM measurement kit	790 000,00	0,00	790 000,00
X-ray spectrometer	520 124,60	520 124,60	
Decimetre GPS receiver	207 467,00	207 467,00	
Boosting the camera system at Prague TI	69 796,00	69 796,00	
Raman spectrometer	1 452 000,00	0,00	1 452 000,00
Non-budgetary resources	8 308 935,76	6 889 731,00	1 419 204,76
CIS functionality	1 419 200,00	0,00	1 419 200,00
Wage and HR information system	1,00	0,00	1,00
Eco-friendly heating at Ústí nad Labem TI	533 567,00	533 567,00	
Window replacement at Ústí nad Labem TI	2 587 249,00	2 587 249,00	
Car purchases in 2014	3 768 918,76	3 768 915,00	3,76
Total investment expenditures	23 931 481,26	8 999 791,74	14 931 689,52
Total costs	349 762 551,56	325 691 366,34	

9.1 Overview of transfers of budget fund savings to unspent expense claim report

A saving of non-investment expenditures at **CZK 5,634,950.70** occurred because on 2 Jul 2015, we obtained increased non-investment funds for sample analy-

sis, ALF, guard service and training amounting to CZK 4,160,000. We were not able to spend these funds entirely by the end of the year. Also, CZK 69,438.24 of NNV remained unspent.

The saving of ISPROFIN non-investment expenditures of **CZK 1,318,085.00** enabled the drawing from the non-budgetary source of CZK 906,636.17 for ICT operation

and the unspent funds for the wage and HR information system of CZK 427,856.00.

A saving of investment expenditures of **CZK 14,931,689.52** occurred chiefly by not drawing investment funds for car purchases in 2015 of CZK 3,980,000.00, for new elevator installation at Liberec TI of CZK 940,000.00, for purchase of PM measurement kit of CZK 790,000.00, and for the Raman spectrometer of CZK 1,452,000.00. These plans were shifted to 2016. The project “Implementation of new CIS in 2014” only consumed CZK 653,400.00 in 2015. Likewise, the project “CIS functionality” did not take place in 2015.

9.2 Use of reserve fund and other non-budgetary resources

The CEI did not use the reserve fund in 2015. The balance of the reserve fund as of 31 Dec 2015 was CZK 0.

Claims of unspent expenditures in past years were spent on:

1. project 115V02300D004 – Eco-friendly heating at Ústí nad Labem TI: released claim of CZK 533,567.00 – drawn CZK 533,567.00
2. project 115V02300D010 – Replacement of windows at Ústí nad Labem TI: released claim of CZK 2,587,249.00 – drawn CZK 2,587,249.00
3. project 115V02400D004 – Car purchase in 2014 – released claim of CZK 3,768,918.76 – drawn CZK 3,768,915.00

Non-budgetary resources

NNV not profiling	5 624 166,18
NNV profiling	0,00
Insurance premiums	221 768,00

NNV not profiling		
5 624 166,18	3 100 000,00	5011
	775 000,00	5031
	279 000,00	5032
	31 000,00	5342
	4 575,00	5132
	601,00	5136
	19 000,00	5151
	20 000,00	5161
	100 000,00	5163
	80 000,00	5164
	13 066,00	5166
	315 758,00	5169
	613 166,18	5171
	4 000,00	5173
	269 000,00	5137

9.3 Total income assessment

The CEI's total income in 2015 was **CZK 5,230,307.68**.

Budgetary income	SR	RU	Reality
SR		280 000,00	328 755,91
RU		3 000,00	3 600,00
Reality	0	0	12 907,00
2322	50 000,00	50 000,00	430 424,00
2324	2 430 000,00	2 430 000,00	2 473 834,90
2329	20 000,00	20 000,00	1 360,00
3113	0,00	0,00	659 100,00
4118	0,00	0,00	1 178 509,87
4132	0,00	0,00	141 816,00
Total	2 783 000,00	2 783 000,00	5 230 307,68

Income analysis		
2132	income from rental of other real estate and parts thereof	item 2132 includes income from renting office spaces at Havlíčkův Brod, Liberec and Ústí nad Labem TI
2133	income from rental of moveable assets	item 2133 includes income from renting moveable assets at Havlíčkův Brod TI
2310	income from sales of short-term and low-value assets	item 2310 includes income from sales of PPE to employees at the end of employment
2322	received insurance adjustments	item 2322 includes insurance benefits from insurance companies in past years
2324	received non-capital contributions and compensations	item 2324 includes proceeding costs and distraintment
2329	other non-tax income	item 2329 includes other non-tax income
4132	transfer from other own funds	item 4132 includes transfer of unspent wage funds from 12/2014
3113	income from sales of other long-term assets	item 3113 includes income from sales of long-term tangible assets
4118	non-investment transfers from the EU	item 4118 includes EU projects



10 | OVERVIEW OF WORK OF TERRITORIAL INSPECTORATES

Overview of work of territorial inspectorates in 2015

Department	No. of inspectors	No. of inspections	EIA position statements and statements	Other position statements and statements	Fines			Other decisions					Charge agendas		No. of accidents registered	No. of suggestions and petitions handled	No. of suggestions submitted to public authorities	No. of crime reports
					All decisions on fines issued in study period	All decisions on fines that entered into force in study period	Total amount of fines in legal force (CZK)	No. of decisions in force – halting or restriction of operation, facility or parts thereof	No. of decisions in force – seizing or confiscation	No. of decisions on remedial measures in force in study period	No. of decisions on remedial measures to meet emission limits	Seizing and halting of validity of certificates of hazardous waste properties	No. of decisions on charges and advances for wastewater discharge	No. of decisions on charges and advances for groundwater consumption				
PH	53	2 279	221	1 857	354	329	23 512 095	14	1	26	0	0	358	740	67	621	11	1
ČB	30	1 113	85	482	285	287	10 867 900	7	1	69	0	0	159	562	23	248	24	0
PL	32	1 355	85	647	290	259	18 881 006	1	2	32	1	0	131	496	3	163	15	1
UL	38	1 416	101	700	245	230	12 468 490	1	0	22	0	0	255	380	26	253	17	4
HK	34	1 491	158	710	268	261	9 932 450	2	2	26	1	0	200	758	35	226	50	0
HB	26	1 262	85	662	294	283	8 003 210	4	0	27	0	0	140	533	4	219	30	1
BR	46	2 247	180	1 540	383	375	20 968 975	6	3	30	2	0	392	694	22	325	43	0
OL	27	1 544	71	368	224	232	8 010 404	1	0	45	2	0	131	360	20	179	28	0
OV	39	1 572	111	1 312	359	335	17 012 824	4	2	20	0	0	237	195	23	285	24	4
LI	25	800	56	316	147	127	5 653 860	4	0	48	0	0	84	222	33	176	22	0
Ř	35	598	9	28	92	90	408 000	0	96	0	0	0	0	0	0	9	0	6
Total	385	15 677	1 162	8 622	2 941	2 808	135 719 214	44	107	345	6	0	2 087	4 940	256	2 704	264	17



11 | FINANCIAL STATEMENT AS OF 31 DEC 2015

Balance sheet

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD			
		CURRENT			PREVIOUS
		Gross	Correction	Net	
		1	2	3	
TOTAL ASSETS		786785639,93	303174614,68	483611025,25	489899637,01
Fixed assets		751060467,18	303174614,68	447885852,5	456808643,07
Long-term intangible assets		39119366,34	34344845,54	4774520,8	4847173,46
Intangible research and development results	012				
Software	013	26417313,28	22899509,48	3517803,8	4230488,46
Valuable rights	014	183000	160483	22517	35885
Emission permits and preference limits	015				
Low-value long-term intangible assets	018	11284853,06	11284853,06		
Other long-term intangible assets	019				
Unfinished long-term intangible assets	041	1234200		1234200	580800
Alignment account for technical valuation of long-term intangible assets	044				
Advances granted for long-term intangible assets	051				
Long-term intangible assets scheduled for sale	035				
Long-term tangible assets		711941100,84	268829769,14	443111331,7	451961469,61
Land	031	12526284		12526284	12526284
Cultural items	032	11491		11491	11491
Structures	021	488125727,56	103779671	384346056,56	388887436,66
Individual tangible moveable assets and sets of tangible moveable assets	022	113059681,9	66901977,76	46157704,14	50502257,95
Cultivation wholes of permanent stands	025				
Low-value long-term tangible assets	028	98148120,38	98148120,38		
Other low-value tangible assets	029				
Unfinished long-term tangible assets	042	69796		69796	34000
Alignment account for technical valuation of long-term tangible assets	045				
Advances granted for long-term tangible assets	052				

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD			
		CURRENT			PREVIOUS
		Gross	Correction	Net	
		1	2	3	
Long-term tangible assets scheduled for sale	036				
Long-term financial assets					
Property interests in entities with decisive influence	061				
Property interests in entities with substantial influence	062				
Debt securities held until payable	063				
Long-term loans	067				
Long-term time deposits	068				
Other long-term financial assets	069				
Acquired long-term financial assets	043				
Advances granted for long-term financial assets	053				
Long-term receivables					
Long-term returnable financial aid granted	462				
Long-term receivables from ceded credits	464				
Long-term advances granted	465				
Long-term receivables from guarantees	466				
Other long-term receivables	469				
Long-term advances granted for transfers	471				
Mediation of long-term transfers	475				
Current assets		35725172,75		35725172,75	33090993,94
Inventory					
Material acquisition	111				
Material in store	112				
Material on the way	119				
Unfinished production	121				
Self-made semifinished products	122				
Products	123				
Goods acquisition	131				
Goods in store	132				

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD			
		CURRENT			PREVIOUS
		Gross	Correction	Net	
		1	2	3	
Goods on the way	138				
Other inventory	139				
Short-term receivables		2226816,52		2226816,52	2365057,87
Clients	311				
Bills for cashing	312				
Receivables for discounted securities	313				
Short-term advances granted	314	2218054,52		2218054,52	2309122,49
Other receivables from main operation	315				4500
Short-term returnable financial aid granted	316				
Short-term receivables from ceded credits	317				
Receivables for employees	335	8762		8762	51435,38
Social security	336				
Health insurance	337				
Pension plans	338				
Income tax	341				
Other taxes, charges and other similar pecuniary performance	342				
Value added tax	343				
Receivables from entities except selected governmental institutions	344				
Receivables from selected central governmental institutions	346				
Receivables from selected local governmental institutions	348				
Receivables from tax administration	352				
Clearance from tax redistribution	355				
Receivables from distraintment and other handling of foreign assets	356				
Other receivables from tax administration	358				
Short-term receivables from guarantees	361				
Fixed time operations and options	363				

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD			
		CURRENT			PREVIOUS
		Gross	Correction	Net	
		1	2	3	
Receivables from financial security	365				
Receivables from bonds issued	367				
Short-term advances granted for transfers	373				
Mediation of short-term transfers	375				
Costs of future periods	381				
Incomes from future periods	385				
Active estimate accounts	388				
Other short-term receivables	377				
Short-term financial assets		33498356,23		33498356,23	
Asset securities for trading	251				
Credit securities for trading	253				
Other securities	256				
Short-term time deposits	244				
Other current accounts	245	32334503,96		32334503,96	
Managed funds accounts	247				
Summary accounts	248				
Accounts for tax sharing and split management	249				
Current account	241				
Current account CSNF	243	1161447,27		1161447,27	
Current accounts of state organisational component funds	225				
Postage stamps	263	2405		2405	
Money on the way	262				
Cash	261				

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD	
		CURRENT	PREVIOUS
		1	2
TOTAL LIABILITIES		483611025,3	489899637
Equity capital		450971587,05	460085982,97
Accounting entity property and adjusting items		488557351,07	488557351,07
Accounting entity property	401	726993064,25	726993064,25
Privatisation fund	402		
Exchange rate differences	405		
Pricing differences on initial use of method	406	-238435713,18	-238435713,18
Other pricing differences	407		
Adjustments to previous accounting periods	408		
Accounting entity funds		1190368,97	1178045,35
Cultural and Social Needs Fund	412	1190368,97	1178045,35
Reserve fund made from improved economic result	413		
Reserve fund from other means	414		
Economic result		-1994651253,25	-1665063475,05
Economic result for current accounting period		-329587778,2	-320525071,14
Economic result in approval proceeding	431	-1294574928,53	-974049857,39
Economic result in previous accounting periods	432	-370488546,52	-370488546,52
Income and expenditure account of budgetary activity		1955875120,26	1635414061,6
Income account of state organisational components	222	-5230307,68	-3817135,57
Special expenditures account	223	325691366,34	306537637,69
State budget activity account	227		
Aggregated incomes and expenditures of previous accounting periods	404	1635414061,6	1332693559,48
External resources		32639438,2	29813654,04
Reserves			
Reserves	441		
Long-term payables			
Long-term credits	451		
Long-term returnable financial aid received	452		
Long-term payables from bonds issued	453		

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD	
		CURRENT	PREVIOUS
		1	2
Long-term advances received	455		
Long-term payables from guarantees	456		
Long-term bills for payment	457		
Other long-term payables	459		
Long-term advances received for transfers	472		
Mediation of long-term transfers	475		
Short-term payables		32639438,2	29813654,04
Short-term credits	281		
Discounted short-term bonds (bills)	282		
Short-term payables from bonds issued	283		
Other short-term loans	289		
Suppliers	321		
Bills for payment	322		
Short-term advances received	324	348044,24	347577,24
Payables from split management	325		
Short-term returnable financial aid received	326		
Employees	331		
Other payables towards employees	333	14894081	13707458
Social security	336	6136379	5592132
Health insurance	337	2630460	2396907
Pension plans	338		
Income tax	341		
Other taxes, charges and similar pecuniary performance	342	2549650	2153044
Value added tax	343		
Payables to entities except selected governmental institutions	345		
Payables to selected central governmental institutions	347		
Payables to selected local governmental institutions	349		
Tax advances received	351		
Tax overpayments	353		
Payables from indirect tax returns	354		

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD	
		CURRENT	PREVIOUS
		1	2
Clearance from tax redistribution	355		
Payables from distraintment and other handling of foreign assets	357		
Other payables from tax administration	359		
Short-term payables from guarantees	362		
Fixed time operations and options	363		
Payables from unfinished financial operations	364		
Payables from financial securing	366		
Payables from subscribed unpaid securities and shares	368		
Short-term advances received for transfers	374		
Mediation of short-term transfers	375		
Expenditures of future periods	383		
Revenues from future periods	384		
Passive estimate accounts	389		
Other short-term payables	378	6080823,96	5616535,8

Profit and loss statement

ITEM NAME	SYNTHETIC ACCOUNT	CURRENT PERIOD		PREVIOUS PERIOD	
		MAIN OPERATION	ECONOMIC OPERATION	MAIN OPERATION	ECONOMIC OPERATION
		1	2	3	4
TOTAL COSTS		325 335 536,82		315 870 490,89	
Costs of operation		323 666 121,22		315 846 124,63	
Consumed materials	501	3 575 702,43		3 366 807,66	
Consumed utilities	502	9 126 688,26		10 865 679,25	
Consumption of other unstorable supplies	503				
Goods sold	504				
Capitalisation of long-term assets	506				
Capitalisation of current assets	507				
Change in own production inventory	508				
Repair and maintenance	511	3 187 226,64		5 180 732,78	
Travel costs	512	2 236 066,47		2 121 859,93	
Representation costs	513	123 843,10		192 758,80	
Capitalisation of internal services	516				
Other services	518	34 704 594,95		32 748 570,08	
Wages and salaries	521	189 822 759,00		179 153 375,00	
Mandatory social insurance	524	64 012 961,00		60 637 450,00	
Other social insurance	525				
Mandatory social expenditures	527				
Other social expenditures	528				
Road tax	531				
Property tax	532	1 970,00		2 796,00	
Other taxes and charges	538	211 194,65		198 754,38	
Indirect tax returns	539				
Contractual penalties and interest on late payment	541				
Other penalties	542	219 736,00		1 587 392,00	
Donations and other gratuitous transfers	543				
Materials sold	544				

ITEM NAME	SYNTHETIC ACCOUNT	CURRENT PERIOD		PREVIOUS PERIOD	
		MAIN OPERATION	ECONOMIC OPERATION	MAIN OPERATION	ECONOMIC OPERATION
		1	2	3	4
Deficits and damages	547			7 204,00	
Fund generation	548	1 894 513,00		1 781 662,00	
Depreciation of long-term assets	551	15 552 688,31		19 162 917,79	
Long-term intangible assets sold	552				
Long-term tangible assets sold	553	560 378,00		224 800,00	
Land sold	554			14 400,00	
Reserve generation and clearance	555				
Corrective item generation and clearance	556				
Costs of excluded receivables	557				
Costs of low-value long-term assets	558	8 775 585,65		6 402 472,09	
Other operating costs	549	49 742,28		16 489,46	
Financial costs		1 854 536,73		1 669 415,60	
Securities and shares sold	561				
Interest	562				
Exchange rate loss	563	35 020,73		21 043,60	
Costs of real-value repricing	564	1 819 516,00		1 648 372,00	
Other financial costs	569				
Costs of transfers					
Costs of transfers of selected central governmental institutions	571				
Costs of transfer pre-financing of selected central governmental institutions	575				
Costs of shared taxes and charges					
Costs of shared natural person income tax	581				
Costs of shared legal entity income tax	582				
Costs of shared value added tax	584				
Costs of shared excise duties	585				
Costs of other shared taxes and charges	586				

ITEM NAME	SYNTHETIC ACCOUNT	CURRENT PERIOD		PREVIOUS PERIOD	
		MAIN OPERATION	ECONOMIC OPERATION	MAIN OPERATION	ECONOMIC OPERATION
		1	2	3	4
Income tax					
Income tax	591				
Additional income tax levies	595				
TOTAL REVENUES		6 322 408,27		4 810 465,68	
Operating revenues		5 128 816,40		4 786 469,68	
Revenues from own product sales	601				
Revenues from service sales	602	1 175 933,90		1 714 349,12	
Revenues from rental	603	294 650,68			
Revenues from goods sold	604				
Revenues from administrative charges	605				
Revenues from court charges	607				
Other revenues from own activities	609				
Contractual penalties and interest on late payment	641				
Other penalties	642	2 324 407,72		2 293 387,56	
Revenues from excluded receivables	643				
Revenues from material sales	644				
Revenues from sales of long-term intangible assets	645				
Revenues from sales of long-term tangible assets except land	646	659 100,00		365 600,00	
Revenues from sales of land	647			14 400,00	
Fund drawing	648				
Other operating revenues	649	674 724,10		398 733,00	
Financial revenues		1 193 591,87		23 996,00	
Revenues from sales of securities and shares	661				
Interest	662				
Exchange rate revenues	663				

ITEM NAME	SYNTHETIC ACCOUNT	CURRENT PERIOD		PREVIOUS PERIOD	
		MAIN OPERATION	ECONOMIC OPERATION	MAIN OPERATION	ECONOMIC OPERATION
		1	2	3	4
Revenues from real-value repricing	664			14 080,00	
Revenues from long-term financial assets	665				
Other financial revenues	669	1 193 591,87		9 916,00	
Revenues from taxes and charges					
Revenues from natural person income tax	631				
Revenues from legal entity income tax	632				
Revenues from social insurance	633				
Revenues from value added tax	634				
Revenues from excise duties	635				
Revenues from property taxes	636				
Revenues from energy taxes	637				
Revenues from road tax	638				
Revenues from other taxes and charges	639				
Revenues from transfers					
Revenues from transfers of selected central governmental institutions	671				
Revenues from transfer pre-financing of selected central governmental institutions	675				
Revenues from shared taxes and charges					
Revenues from shared natural person income tax	681				
Revenues from shared legal entity income tax	682				
Revenues from shared value added tax	684				
Revenues from shared excise duties	685				
Revenues from shared property taxes	686				
Revenues from other shared taxes and charges	688				

ITEM NAME	SYNTHETIC ACCOUNT	CURRENT PERIOD		PREVIOUS PERIOD	
		MAIN OPERATION	ECONOMIC OPERATION	MAIN OPERATION	ECONOMIC OPERATION
		1	2	3	4
ECONOMIC RESULT					
Economic result before taxation	-	-329 587 778,20		-320 525 071,14	
Economic result for current accounting period	-	-329 587 778,20		-320 525 071,14	



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ABBREVIATIONS AND EXPLANATIONS

NCA	Nature Conservation Agency	E-PRTR	European Pollutant Release and Transfer Register
BAT	Best available techniques	EU	European Union
BWWTP	Biological wastewater treatment plant	SCI	Site of Community Importance
BGS	Biogas station	CSNF	Cultural and social needs fund
BOD	Biochemical oxygen demand	PVE	Photovoltaic power plant
CC	Cross Compliance (political tool for implementing minimum standards in public health protection, animal health and wellbeing, plant health and environment (soil, water, biodiversity protection, etc.)	GMO	Genetically modified organisms
CIS	Central information system	GMLP	Genetically modified land plants
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora	FRS	Fire Rescue Service
CLP	Regulation of European Parliament and Council (EC) no. 1272/2008, of 16 December 2008, on classification, labelling and packaging of chemical substances and mixtures	PLA	Protected Landscape Area
CHMI	Czech Hydrometeorological Institute	COD	Chemical oxygen demand
CEI	Czech Environmental Inspectorate	IA	Integrated agendas
WWTP	Wastewater treatment plant	ICT	Information and communications technology
CR	Czech Republic	IMPEL	Network of environmental inspection authorities of EU states
ČRS	Czech Fishing Union	IP	Integrated permit
CSO		IPPC	Integrated Pollution Prevention and Control
DPB	Czech Society for Ornithology	ISPOP	Integrated system for reporting obligations
	Sections of soil blocks	IPR	Integrated Pollution Register
EEA	European Economic Area	IRI	Impel Review Initiative (Voluntary assessment of individual organisations involved in the international network of inspectorates and agencies active in protection of the environment
EEP	European Enforcement Project	IS IPPC	IPPC information system
EFTA	European Free Trade Association	ISPROFIN	Programme Funding Information System
ECHA	European Chemicals Agency	IRS	Integrated Rescue System
EIA	Environmental impact assessment	RPHA	Regional Public Health Authority
EH	Environmental harm	CIA	Coordinator of integrated agendas
EL	Emission limit	KN	Cadastre
EMAS	Environmental Management and Audit System	KRNAP	Krkonoše National Park KÚ Regional authority
EMS	Environmental Management System EI Equivalent inhabitants	FMR	Forestry management records
ERMA II	Reproductive material records	FMP	Forestry management plan
EC	Emission ceiling	FMG	Forestry management guidelines
		HO	Heating oil
		MHMP	Prague Municipal Authority
		MMRZ	Non-budgetary resources

MIT	Ministry of Industry and Trade	RS	Regulated substance
MoI	Ministry of the Interior	RPLF	Registered prominent landscape feature
SHPP	Small hydropower plant	SAE	Old amalgam electrolysis
MoA	Ministry of Agriculture	SEA	Strategic environmental impact assessment
MoE	Ministry of the Environment	HEB	Historic environmental burdens
NDS	Neutralisation and de-emulsification station	SEF	State Environmental Fund
NNV	Claims on unspent expenditures	SOR	Summary operating records
NP	National Park	SMR	Statutory management requirements
NNM	National Nature Monument	SVHC	Substances of very high concern
NNR	National Nature Reserve	SAIF	State Agricultural Intervention Fund
ODOIMZ	Species Protection and International Commitment Implementation Department	RIA	Railway Infrastructure Administration
ODP	Substances with lower ozone layer depletion potential	TFS	Transboundary waste transport
OEREŠ	Environmental Risk and Damage Department	TIC	Toxicology Information Centre
OLH	Professional forester	PM	Particulate matter
TI	Territorial inspectorate	TZS	Technical landfill security
WMD	Waste management department	CWWTP	Central wastewater treatment plant ÚHÚL Institute for Forestry Management
FPD	Forest protection department	PLF	Prominent landscape feature
NPD	Nature protection department	WPP	Wind power plant
WPD		ZD	Farming cooperative
OPVIP	Water Protection Department Environmental Impact Assessment and Integrated Prevention Department	SPS	Specially protected species
ORP	Municipality with extended powers	SPA	Specially protected areas
OVSS	Public Administration Execution Department	NLPA	Nature and Landscape Protection Act
PČR	Czech Police	ALF	Agricultural land fund
OR	Operating records	BWD	Basic waste description
LF	Legal force	ENV	Environment
SPA	Special Protection Area		
NM	Nature Monument		
PPH	Statutory management requirements		
NR	Nature Reserve		
LIFF	Land intended for the fulfilment of forest functions		
RAPEX	Rapid Alert System of Non-Food Products (European Union rapid alert information system on dangerous consumer products of non-food nature)		
REACH	Regulation of European Parliament and Council (EC) no. 1907/2006, of 18 December 2006, on		
			registration, assessment, permitting and restriction of chemicals and establishment of the European Chemicals Agency
			Photographs courtesy of: Jana Jandová, Erik Geuss, CEI archives

