



CZECH ENVIRONMENTAL INSPECTORATE

Annual Report 2019





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Basic contact details:

Author organisation:	Czech Environmental Inspectorate
Headquarters address:	Na Břehu 267/1a, 190 00 Praha 9
Telephone:	222 860 111 (HQ exchange)
Web site:	www.cizp.cz
E-mail:	podatelna@cizp.cz
Toll free number:	800 011 011
Business hours:	Mondays and Wednesdays 8 am - 5 pm, other business days 8 am - 2 pm by appointment
Name of establisher:	Ministry of the Environment

DIRECTOR'S FOREWORD



The year 2019 belonged among very good years in the history of the Czech Environmental Inspectorate (CEI) in terms of meeting all the parameters and criteria. In spite of that, it was the first in the last 6 years when the Inspectorate had to deal notably with reduced funds for salaries. As of 31 December 2019, a decision by the Government and the Ministry of the Environment necessitated a reduction to the number of employees by 30 persons, which affected not only the expert component and each of the regional workplaces, but also the working climate in these work teams. The situation in the area of salaries to the Inspectorate employees (e.g., long-term lowest average income of all the inspectorates in the CR) thus remains one of the significant threats and limits to quality performance of inspection work.

Before I get to the evaluation itself, let me present a basic diagram of the Inspectorate's position in the context of Czech public administration. The role of the Czech Environmental Inspectorate within the Czech public administration system corresponds to its legal definition. The primary mission of the Inspectorate's work is thus supervision over compliance with environmental legislation in all its components (water, air, waste, nature, forest). By law, the CEI is a first-instance administrative authority, meaning that its administrative decisions are conclusive either upon expiry of the appeal period for entities against which the proceedings are held, or – in the event of an appeal – only after the decision of an appeal authority, i.e., one of public administration performance units (territorial) that are incorporated in the organisational structure of the Ministry of the Environment.

The Inspectorate's own activity is defined on an annual basis by the Czech Environmental Inspectorate Work Plan for the given year. The structured development of the Plan reflects both direct legal obligations (e.g., inspection of entities that are subject to IPPC integrated permits) and direct tasks assigned by the Ministry of the Environment, tasks arising from performance of relevant international agreements and governmental strategic documents, etc.

The performance of the Inspection Work Plan is monitored and inspected. Another significant part of the inspection work (over 40%) is inspection work based on public suggestions, the number of which continued to increase in 2019 as well. Each such suggestion has to be checked by law (typically by way of unannounced on-site inspection), and an administrative proceeding is or is not initiated depending on the findings.

The following CEI's key topics are critical in the long run:

- Within the CEI's legally defined areas of activity, focus all work on serving the public (communication, prevention, awareness raising, direct handling of suggestions) and an important factor is provision of a fair and non-discriminatory economic, social and environmental system.
- Base all external and internal activity from ethical rules and full moral and ethical integrity, including all tendering.
- Tasks arising from the institution's transformation pursuant to the Civil Service Act are undoubtedly a burden for the Inspectorate beyond its normal work and have impact not only on inspection work but also things such as the ability of smooth replacement of staff as part of standard fluctuation.
- That said, the CEI's "showcase" is its highly educated, expert and professional inspectors and other staff. Retention of these professional employees, their education and training and their work safety are a long-term priority.
- Continue to act as an open authority in the sense of "absolute transparency" of all work done, of course in light of existing legal restrictions (e.g., the non-public nature of administrative proceedings as a strict requirement of the Rules of Administrative Procedure in force). The Inspectorate is open to any suggestion and all the expert and lay public and citizens.

The monitored goals and parameters specified above have been met in 2019, namely in the following areas:

- Inspection Work Plan met.
- All suggestions received handled.
- Other work tasks met; primarily expert statements (EIA, IPPC) and position statements pursuant to component law.
- As part of the reduction in "vacant service jobs" managed by the Ministry of Finance, an accelerate pace of tenders led to lower numbers of temporarily vacant system jobs.
- Additional legislative obligations in the area of the Inspectorate's "rearward" work (electronic records management, internal information systems, GDPR, HR system, etc.) implemented without disrupting normal inspection work.
- Requirements of the Civil Service Act and, most importantly its continuously generated lower-level standards (decrees, measures and Mol methodological instructions) met.
- Qualified staff continuously added, particularly team of senior civil servants stabilized.

In addition to the above, we also achieved the following in the three-year assessment period 2016-2019:

- Standard performance of inspection work retained (all tasks and suggestions carried out); the average work intensity can be characterised by the average number of inspections in excess of 40 per executive inspector throughout the period across the components. Here, I must emphasise the capacity intensity of inspections at the largest pollution sources, which are carried out by law periodically once a year, as well as the demanding investigation of every suggestion, however trivial (their numbers increasing year-on-year).
- Continuing improvement of inspection work technical equipment (new sophisticated equipment increasing efficiency and effectiveness of inspections) and inspector's work tools. A drone was purchased and a pilot trained among the CEI staff.
- Methodology of inspection work unified across the territorial inspectorates, notably by way of joint handling of certain standard problems in environmental components and clear methodological guidance by the Headquarters.
- Improved coordination and quality of cooperation with institutions in the areas of the CEI's work at the national (police, customs administration, public prosecutors) and international levels (IMPEL, Interpol, EUFJ, etc.).
- CEI focus on the entire range of administrative proceeding outcomes, also in conjunction with the new Misdemeanour Act and environmental component protection acts in force.
- Information openness of the authority maintained (provision of information under respective acts without serious defects, website, communication with the public).
- Fundamental changes in media activity and public perception of the CEI. Periodic press information about completed administrative proceedings aimed at educational effect and wider awareness among both expert and lay public. Change in the structure of "positive" and "negative" news, leading to an overwhelming majority of information about successful inspection work.
- All inspection work integrated ethical, moral and public control principles, which can be documented by the relatively very strict (beyond legal requirements) CEI procurement and public contract policy.

The following are the major restrictions on the CEI work:

- Ambiguity of legal regulations enforced, resulting generally from the legislative negotiation process (various changes, amendments, interventions during parliamentary consultation, results of lobbying, etc.). Along with the increase in legal obligations of entities (meaning growth in the CEI's objective inspection obligations), this generates pressure on decreasing the quality and time demand of inspection.
- Lower social pressure on legal compliance in general, including environmental legislation.
- Gaps in methodological communication and unification of procedures with authorities of appeal, including differing views of regional appeal authorities, e.g., regarding correct and just amounts and type of penalties for the same environmental misdemeanours.
- Long-term undervaluation of salaries paid to CEI's staff, particularly executive inspectors. According to continuously published comparisons of salaries in organisations in the governmental sector, the CEI continues to sit at the bottom of the ranking. It is the worst-paid inspectorate (compared to trade, veterinary, phytosanitary and other similar inspection authorities), the second-worst-paid organisation in the environmental department, and higher average wages are reported by institutions such as district archives and similar. This unambiguously leads to relatively high staff fluctuation, so the total annual numbers of admissions and departures are almost equal in spite of very successful filling of vacant jobs after those leaving.
- Moreover, the CEI staff numbers were reduced by 30 persons in 2019, as mentioned above, which does not make a positive impression on the CEI motivation and work climate.
- The nature of the inspection work as such, which is demanding particularly on inspectors' psychic qualities and overall resilience while demanding great levels of specialized expertise. There is a lack of experts notably in the legal area, as lawyers are almost impossible to pay well under the CEI's salary conditions described above.

In conclusion, I must say that despite the above problems, the year 2019 belongs among very successful years overall in the twenty-eight years of existence of the Czech Environmental Inspectorate. The planned targets were met and the inspection work proceeded in spite of numerous objective restrictions of an intensity similar to that in previous years. We carried out 16,896 inspections, which was 324 more than the year before. The long-term average number of inspections per inspector is over 41. We received 3,493 suggestion from the public; this too is an increase of 449, confirming the high prestige the CEI enjoys among the citizens. We imposed 2,532 conclusive fines totalling 112 million CZK (12 million CZK more than the year before. These CEI's achievements deserve my sincere thanks to all the CEI employees from the highly professional inspectors to my colleagues in the CEI management.

Erik Geuss
CEI Director

SUMMARY INFORMATION ABOUT ACTIVITY IN 2015-2019

Summary information about activity in 2015-2019

	2015	2016	2017	2018	2019
No. of inspectors (as of 31 Dec) ¹	385	395	396	408	409
No. of inspections	15,677	15,883	15,864	16,572	16,896

All decisions (fines and other decisions, including on charges) in force:	10,337	10,260	10,249	8,541	8,607
All decisions on fines in force	2,808	2,755	2,655	2,543	2,532
Other decisions in force (other decisions, incl. on charges)	7,529	7,505	7,594	5,998	6,075
Total amount of fines in force, CZK	135,719,214	130,717,343	113,051,685	100,274,621	112,329,717

Other decision in forces:	502	494	417	424	412
No. of decisions in force					
– halting or restriction to operations, a facility of part of it	44	23	22	38	71
No. of decisions in force					
seizing / confiscation	107	123	143	157	119
No. of decisions on remedial measures in force	351	348	252	229	222

No. of issued decisions on charges and advances for charges:	7,027	7,011	7,177	** 5,796	** 5,678
No. of issued decisions on charges and advances for wastewater discharges	2,087	2,068	2,001	1,062	1,029
No. of issued decisions on charges and advances for groundwater collection	4,940	4,943	5,175	4,734	4,637
No. of issued decisions on charges for imports of controlled substances	0	0	1	0	12
Amount of charges imposed by CEI decision, CZK (charges for groundwater collection and wastewater discharges are collected and enforced by Customs Authorities)	843,017,177	908,180,824	900,828,457	916,483,401	920,300,714

¹ Note: The number of inspectors excludes joint public administration and self-government officers and directors of territorial inspectorates.

** Decrease caused by the fact that the amended Waters Act no. 113/2018 Coll. no longer requires the CEI to issue decisions on advances for charges.

EIA statements (Act no. 100/2001 Coll.)	1,162	1,013	1,019	*** 610	657
Other expert statements issued	8,622	6,986	5,356	5,333	5,538
No. of suggestions and petitions received	2,746	2,759	2,781	3,044	**** 3,493
No. of suggestions submitted to public authorities from own inspection work	164	322	233	322	309
No. of crime reports	17	16	8	14	18
No. of accidents and emergencies	256	265	431*	413	369
No. of requests for information (Act no. 106/1999 Coll. and Act no. 123/1998 Coll.)	332	309	295	325	362
No. of complaints about CEI work or inspectors (Section 175 of the RAP)	70	54	54	43	57
No. of relevant notifications of illicit activity	0	0	0	0	0
Total number of employees as of 31 December	538	539	536	550	557
Education structure (% of tertiary graduates among all employees)	76.41	77.9	77.8	77.8	81.5
Occupational safety/injuries (frequency of injuries per 100 employees)	0.18	0.37	0.19	0	0
Rate of unscheduled employee absence (sickness, injury) (% of scheduled time)	3.69	3.30	3.39	3.07	3.84
% of voluntary fluctuation (excludes forced departures, incl. reasons such as organisational changes, retirements)	3.49	4.1	7.2	4.8	6
Total CEI budget funds, CZK	349,762,551.56	387,715,855.30	418,991,688.36	430,837,260.55	509,237,482.82

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

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

**** The CEI Water Protection Department was rid, as of 1 January 2019 by Act no. 113/2018, amending Act no. 254/2001 Coll. on Waters and on amendment of certain acts, of the power to inspect natural persons not doing business. Since 1 January 2019, inspectors of the CEI Water Protection Department cannot inspect natural persons, even if investigating suggestions.



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1 DESCRIPTION OF ACTIVITIES

1.1 Role of the CEI

CEI organisation

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

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

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

Legal framework of CEI activity

The legal concept of environmental protection, of which the CEI is a part, is based on the principle of separate definitions for each environmental component under so-called component acts (see introductions to the components in the Work Plan for 2020 at www.cizp.cz/Plany-cinnosti). In addition, general legal regulations that affect the work of the CEI as a whole have to be listed. Being a specialised authority carrying out prevention, inspection and penalty work in the area of environmental protection, the CEI is required to act in accordance with these general legal regulations.

The general legal regulations include Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended, defining the general framework for administrative proceedings and being the fundamental legal regulation in the area of administrative law. Another general legal regulation for the CEI's work is Act no. 255/2012 Coll. on Inspection (Inspection Rules), as amended, defining the process of inspection. Another, no less important source of law is Act no. 250/2016 Coll. on Liability for Misdemeanours and Proceedings Thereabout, fully superseding Act no. 200/1990 Coll. on Misdemeanours, as amended, and defining both material and procedural aspects of handling misdemeanours. The right to a favourable environment is also pursued by the public by means of so-called information acts, namely Act no. 123/1998 Coll. on the Right to Environmental Information, as amended, and Act no. 106/1999 Coll. on Free Access to Information, as amended. Given the CEI's work and position within environmental protection, the general legal regulations also include Act no. 224/2015 Coll. on Prevention of Major Accidents Caused by Selected Hazardous Chemical Substances or Mixtures and amending Act no. 634/5004 Coll. on Administrative Fees, as amended (Major Accident Prevention Act), as amended, Act no. 167/2008 Coll. on Prevention of Environmental Harm and its Remedy and on amendment of certain acts, as amended, and Act no. 40/2009 Coll., the Penal Code, as amended.

[1] CEI work under the CITES Convention on International Trade in Endangered Species.

CEI prevention and penalty work

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

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

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

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

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

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

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

In case someone feels deprived of his rights by the decision of the authority (OVSS), he can demand an administrative court to repeal the decision or to declare it nugatory. Proceedings on administrative charges are conducted by an administrative court pursuant to Act no. 150/2002 Coll., Judicial Administrative Rules, as amended.

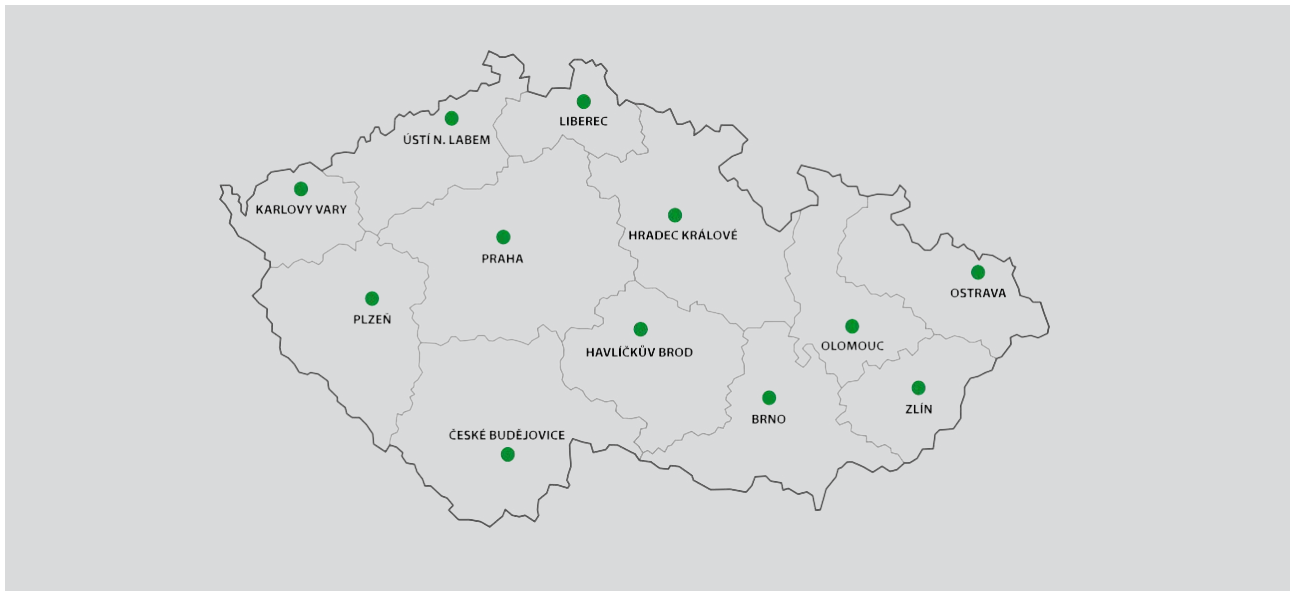
1.2 Organisational structure

The CEI is divided into 10 territorial inspectorates, two branch offices and headquarters. As of 31 December 2019, it employed 557 persons, including 446 expert employees.

Territorial inspectorates

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

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



Overview of powers by environmental component		Environmental component				
CEI powers		Air	Water	Waste	Nature	Forest
Supervision	Inspections, reviews, checks, investigations, etc.	•	•	•	•	•
Penalties	Fines to legal entities	•	•	•	•	•
	Fines to natural persons	•	•	•	•	•
	Restriction or halt of operations	•	•	•	•	•
Measure	Measures to remedy identified shortcomings as well as serious status under Waters Act	•	•	•	•	•
	Seizing and confiscation of specimens of endangered animal or plant species				•	
	Seizing of illicitly held individuals, sampling	•			•	
Register of accidents	and cooperation on resolving them	•	•	•		
Position statements	Position statements, statements, approvals for other authorities	•	•	•	•	•
Suggestions	Handling of suggestions	•	•	•	•	•

1.3 Intensity of inspection work

In 2019, the CEI carried out a total of 16,896 inspections and issued 8,607 decisions in force (including 1,029 decisions on charges and advances for wastewater discharge and 4,637 decisions on charges and advances for groundwater collection). Compared to 2018, the total number of inspections increased slightly (+324) as did the number of decisions issued and in force (+66). The total number of CEI inspectors in 2019 was 409. One inspector thus made 41 inspections on average. In 2019, the CEI issued 6,195 position statements and statements, including 657 on EIA processes.

Numbers of inspections by territorial inspectorates

	2014	2015	2016	2017	2018	2019
Prague TI	2,057	2,279	2,169	2,200	2,221	1,970
České Budějovice TI	966	1,113	1,191	1,146	1,293	1,331
Plzeň TI	1,437	1,355	1,425	1,667	1,635	1,675
Ústí nad Labem TI	1,378	1,416	1,371	1,393	1,564	1,517
Hradec Králové TI	1,427	1,491	1,602	1,682	1,782	2,099
Havlíčkův Brod TI	1,322	1,262	1,468	1,408	1,405	1,474
Brno TI	1,743	2,247	2,237	1,962	2,064	2,224
Olomouc TI	1,567	1,544	1,324	1,244	1,227	1,327
Ostrava TI	1,534	1,572	1,630	1,705	1,705	1,698
Liberec TI	679	800	827	788	900	867
Headquarters	524	598	639	669	776	714

Year-on-year comparison of amounts of fines imposed and in force

	No. of fines imposed	No. of fines in force	Total amount of fines in force (CZK)
2014	2,948	2,948	148,022,282
2015	2,941	2,808	153,719,214
2016	2,887	2,755	130,717,343
2017	2,712	2,655	113,051,685
2018	2,641	2,543	100,274,621
2019	2,630	2,532	112,329,717

2 OVERVIEW OF WORK OF TERRITORIAL INSPECTORATES

Overview of work

Territorial Inspectorate	No. of inspectors	No. of inspections	Statements		Fines			Other decisions										No. of suggestions submitted to public authorities from own inspection work	No. of crime reports
			EIA statements (Act no. 100/2001 Coll.)	Other statements	All 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 collection	No. of charges assessed for imports of controlled substances	No. of emergencies (under air acts) and accidents (under Waters Act)	No. of suggestions and petitions handled		
PH	55	1970	128	1,174	217	213	20,073,700	4	6	26	0	0	190	643	0	53	992	54	0
ČB	32	1331	52	248	233	229	12,216,020	32	1	33	0	0	81	520	0	9	216	18	0
PL	35	1675	48	538	252	242	17,936,372	0	2	17	0	0	62	467	0	8	249	13	4
UL	44	1517	67	624	204	190	6,996,398	3	0	29	0	0	124	311	0	30	397	13	0
HK	37	2099	90	311	379	362	10,664,190	2	4	11	0	0	97	683	0	50	328	50	5
HB	31	1474	40	391	336	328	8,557,065	1	2	14	0	0	68	565	0	5	350	31	0
BR	45	2224	115	1,044	335	305	11,653,757	17	4	39	0	0	196	644	0	27	455	22	1
OL	29	1327	24	194	194	186	6,570,788	2	0	16	0	0	63	372	0	37	200	37	0
OV	40	1698	64	638	276	282	13,594,537	0	3	5	0	0	106	190	0	139	350	21	4
LI	26	867	26	313	104	95	3,354,340	1	2	30	2	0	42	242	0	11	189	22	1
HQ	35	714	3	63	100	100	712,550	9	95	0	0	0	0	0	12	0	23	28	3
Total	409	16,896	657	5,538	2,630	2,532	112,329,717	71	119	220	2	0	1,029	4,637	12	369	3,749	309	18

3 DEALINGS WITH STAKEHOLDERS

3.1 Cooperation with the public – suggestions and provision of information

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

3.1.1 Suggestions

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

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

Suggestions for investigation can be made to the CEI by any citizen of the CR or any natural person, natural person doing business and legal entity. See also www.cizp.cz/Podavani-podnetu-stiznosti.

CEI and the citizen public

Suggestions, complaints and petitions are an important element in the CEI communication with the public. The citizens often point to violations of laws that would otherwise remain hidden. Suggestions and petitions are a starting point for the CEI's further steps (external inspection work). If the CEI investigation finds grounds to initiate an official proceeding, then it initiates a penalty proceeding or a proceeding on remedial measures. Another important component of handling of suggestions is increasing legal awareness of the public

in the area of environmental protection. Some suggestion are transferred for investigation to other applicable public authorities if the CEI is not applicable.

Numbers of suggestions received

In 2019, the CEI received 3,493 suggestions. The numbers of suggestions received by CEI TIs in 2019 are shown in the table below. As in previous years, Prague CEI Territorial Inspectorate handled the most suggestions in 2019. Sometimes the CEI receives a suggestion for the investigation of which it does not have legal powers. Such suggestions are transferred for investigation to a public authority of factual and territorial jurisdiction. This was the case with 439 suggestions in 2019.

A single suggestion may draw attention to endangerment or damage to multiple environmental components. It is thus often the case that several departments act on the same suggestion. Information about how the different departments contributed to handling of suggestions in 2019 is shown in the table below.

Numbers of suggestions received by TIs in 2019

Territorial inspectorate	received suggestions	within that, transferred for non-applicability
Prague	943	48
České Budějovice	216	30
Plzeň	232	24
Ústí nad Labem	337	56
Hradec Králové	328	47
Havlíčkův Brod	279	20
Brno	381	58
Olomouc	167	21
Ostrava	325	43
Liberec	162	13
Headquarters	123	79
Total	3,493	439

Numbers of received suggestions in 2010-2019 by TI

Territorial Inspectorate	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Prague	653	534	503	521	572	611	580	597	704	943
České Budějovice	240	223	184	211	240	257	282	223	209	216
Plzeň	261	157	138	196	214	169	176	235	232	232
Ústí nad Labem	257	297	305	230	247	254	300	265	367	337
Hradec Králové	266	163	188	204	196	227	282	266	299	328
Havlíčkův Brod	188	161	158	189	213	217	236	233	236	279
Brno	284	257	262	264	306	346	336	322	331	381
Olomouc	144	174	177	158	178	180	133	136	153	167
Ostrava	237	291	291	262	290	294	283	300	274	325
Liberec	179	167	161	190	161	182	147	159	158	162
Headquarters	0	0	0	0	3	9	4	45	81	123
Total	2,709	2,424	2,367	2,425	2,620	2,746	2,759	2,781	3,044	3,493

The TI departments contributed to handling of suggestions received in 2019 as follows

Territorial Inspectorate	Air Protection	Water Protection	Waste Management	Nature Protection	Forest Protection	Integrated Agendas	TI total
Prague	368	123	167	294	36	4	992
České Budějovice	21	44	42	93	14	2	216
Plzeň	30	45	61	103	10	0	249
Ústí nad Labem	82	61	113	124	17	0	397
Hradec Králové	60	67	87	92	20	2	328
Havlíčkův Brod	56	76	58	136	22	2	350
Brno	84	82	133	133	23	0	455
Olomouc	41	34	39	76	7	3	200
Ostrava	40	54	94	140	22	0	350
Liberec	28	39	42	63	17	0	189
Headquarters	12	1	0	9	0	1	23
Total	822	626	836	1,263	188	14	3,749

The table shows shares of departments in handling of suggestions received by TIs in 2019, i.e., numbers of suggestions in the table Numbers of suggestions received by TIs in 2019. Since a single suggestion may point to violations of multiple laws on different environmental components, more departments may contribute to its handling.

Principal suggestion topics in 2019

The CEI Air Protection Department most frequently handled suggestions concerning annoying emissions of odorous substances in the air and dust from industrial compounds. It also dealt with combustion of waste.

The Water Protection Department most frequently handled suggestions to investigate water hazards resulting from wastewater discharges into both surface and groundwater, as well as unpermitted collection from drinking water sources (wells).

The Waste Management Department handled citizens' suggestions concerning waste handling, packaging, chemical substances and mixtures (including biocidal products). In particular, they included illegal waste backfilling and unpermitted landscaping using waste. Besides, the Waste Management Department frequently handled illegal dumps.

The CEI Nature Protection Department most frequently handled suggestions to investigate cutting of non-forest trees, damaging of trees (intentional and unintentional trimming, interventions in the root system, covering of aboveground parts of trees in earth works) and other forms of harm to nature. We also handled interference with natural evolution of specially protected animal and plant species.

The Forest Protection Department handled mostly suggestions on inaction of forest owners face to face with bark beetle infestation, and missing of insufficient clearance of timber infested by the bark beetle. Besides, we handled waste backfilling on forest land.

Toll free number

Effective as of 1 September 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 receiving citizens' suggestions, handling citizens' queries regarding environmental issues, and citizens are also informed about the CEI's legal powers in this way. The number is in operation on weekdays between 8 am and 4 pm. We handle 1-2 phone calls a day on average.

3.1.2 Provision of information

In 2019, the Czech Environmental Inspectorate handled 362 requests for information, including 13 pursuant to Act no. 106/1999 Coll. on Free Access to Information, as amended, and 349 pursuant to Act no. 123/1998 Coll. on Right to Environmental Information, as amended. Besides information provided by the CEI pursuant to the above Acts, it also communicates with the public in the form of press releases and annual reports, brochures, leaflets, etc.

Information provision helps establish a stronger public feedback for the CEI. The primary objectives are to maintain contact with both professional and lay public and the media, answer questions regarding the CEI's inspection and supervision powers as well as possible, and provide objective information about CEI inspection results.

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 on its web site the Annual Report for 2019 about its

activity in provision of information, including among other things mandatory information shown in the table below.

Requested information pursuant to Act no. 106/1999 Coll.

	Number
No. of requests for information	13
No. of issued decisions on refusal	4
No. of appeals against the decision	2
Duplicate of substantial parts of each judgement 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	\
List of exclusive licences granted, including justification of necessity of granting of exclusive licence	\
No. of complaints filed pursuant to Section 16a, reasons for filing and brief description of their handling	2
	Reason: In both cases, the complaint pursuant to Section 16a of the Act aims against the CEI's decision refusing a part of the request.
	Method of handling: In both cases, MoE decisions refused the complaints and confirmed the contested CEI decisions.
Other information relating to enforcement of this Act	In three out of the four cases, we decided to refuse only a part of the request.

Provision of information pursuant to Act no. 123/1998 Coll.

on Right to Environmental Information

Pursuant to this Act, 349 requests were received in 2019. Prague

Territorial Inspectorate handled the most requests, Liberec TI handled the fewest.

Overview of requests for information in 2019 by TI

TI	Total number of requests	No. of requests	
		pursuant to Act no. 106/1999 Coll.	pursuant to Act no. 123/1998 Coll.
Prague	65	0	65
České Budějovice	25	0	25
Plzeň	26	0	26
Ústí nad Labem	19	0	19
Hradec Králové	46	0	46
Havlíčkův Brod	32	0	32
Brno	31	0	31
Olomouc	26	0	26
Ostrava	24	0	24
Liberec	14	0	14
Headquarters	54	13	41
Total	362	13	349

Note: The number of requests under Act no. 106/1999 Coll. should be zero for all the TI, since requests under Act no. 106/1999 Coll. are handled exclusively by the CEI Headquarters pursuant to the CEI Director's Service Regulation no. 10/2016.

Trend of requests for information in 2010-2019 The total number of requests for information increased slightly in 2019. The CEI received 39 more requests pursuant to Act no. 123/1998 Coll. and 2 fewer requests pursuant to Act no. 106/1999 Coll. compared to 2018. The public interest in provision of information is constantly relatively high. Public queries posted on the CEI discussion forum are not included in the records pursuant to the above Acts.

Numbers of requests for information in 2010-2019

Year	Total number of requests	No. of requests under Act no. 106/1999 Coll.	No. of requests under Act no. 123/1998 Coll.
2019	362	13	349
2018	325	15	310
2017	295	18	277
2016	309	30	279
2015	332	59	273
2014	262	76	186
2013	209	55	154
2012	229	63	166
2011	233	44	189
2010	181	36	145

Discussion forum

The Czech Environmental Inspectorate runs a discussion forum on its website (www.cizp.cz/Diskuse), where citizens can ask all types of questions about the environment. These questions are not included in the records pursuant to the above Acts. In 2019, the Czech Environmental Inspectorate received 57 queries and comments, which was 15 fewer compared to the year before. Like in 2018, the questions concerned mostly the areas of nature and landscape protection, waste management and water protection. The most frequent discussion topics were unpermitted tree cutting, waste handling and methods of wastewater disposal. A part of the questions also concerned issued outside of the CEI's powers.

3.2 Cooperation with state institutions, professional and interest organisations

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

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

3.3 International collaboration

In 2019, there were 55 trips abroad, involving 85 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 projects.

The IMPEL held a General Assembly in Helsinki 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. Like every year, our inspectors were involved in the projects "Meetings of contact persons for transboundary waste transport", the IMPEL conference on waste and transboundary waste transport and the SWEAP project. The project on implementation of the Industrial Emissions Directive continued another year. Besides, our inspector participated

at a conference on water and soil dedicated to drought issues, and we had an important presence at a mini conference dealing with use of new technologies in environmental inspection.

Based on MoE nomination, the CEI Director participated in a high-key EC meeting on the European Commission communication "EU actions to improve environmental compliance and governance" – the 3rd ECA Forum in Brussels. At the request of the MoE, he also participated in an international trip as part of the government delegated headed by the Minister of the environment Mgr. Richard Brabec to Malaysia and Vietnam, where he informed about existing cooperation with Vietnam and the TIGRIS ID project. In addition, he participated in a meeting with the Slovak Environmental Inspectorate based on a bilateral agreement, which dealt primarily about odour annoyance of the population.

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. Our inspector participated in the Forensic Wildlife Conference, focused on proving illegal activity in the area of wildlife, new animal and plant identification methods, genetic analysis and new technologies. Our inspectors participated in the 18th CITES Conference of Parties as members of the Czech Republic delegation. They consulted key issues relating to cases handled in the CR. The CITES Conference of Parties is the most important worldwide action under the CITES convention, held once every three years. The conference deals with fundamental changes relating to inclusion or exclusion of annex species, export quotas and resolutions or convention enforcement issues. The next conference will be held in the Czech Republic under the Czech EU Presidency. Our inspectors participated in an operative meeting regarding an organized group trading in endangered species active in European countries, including the CR, and a visit to a US Fish and Wildlife forensic laboratory in Oregon to obtain new information to improve the work of CEI inspectors and implement missing or little mastered professional processes in the area of handling information for forensic evidencing. Besides, our inspector participated in the 30th meeting of the Interpol Wildlife Crime Working Group and gave a lecture at a training for Slovak Police. Like every year, we attended two meetings of the European EU Wildlife Enforcement Group.

In the area of forest protection, a CEI inspector participated in an Interpol meeting where participants exchanged experience in the area of illegal logging and timber trading.

Our inspector also participated in a meeting on the EMPACT operative action Environmental Crime – illicit handling of used batteries, which involves specific

focused actions dealing with different areas of illicit activity associated with violation of environmental protection regulations.

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 a trip abroad dealing with water 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 connected with our EU membership on the other. In total, the CEI expended CZK 533,306.49 on the trips abroad; a large part of the costs was funded directly from the EU budget.

3.4 Communication with public and media

The CEI communicates with the public and the media on a systemic basis. In 2019, we published 172 press releases and answered 337 media questions. The CEI organised 10 press conferences: one at the CEI Headquarters in Prague and 9 at territorial inspectorates. According to Newton Media agency, the CEI was mentioned in 3,087 media items. Within that, 141 items were broadcast by radio, 265 by television, 928 articles were published in print dailies and regional papers, 1,700 in online papers and 54 articles in specialized journals (e.g., Odpady, Průmyslová ekologie, Moderní obec, Zemědělec, Komora.cz, Technický týdeník, Veřejná správa, Agrobaze zpravodaj, Svět motorů, etc.). However, Newton Media does not monitor all output, particularly in electronic media. These include the show K vašim službám broadcast by Czech Radio Dvojka station.

In 2019, the media were most interested in the bark beetle outbreak, inspections of groundwater collection for ski slopes, inspections of small hydropower plants, facilities of OKK Kokšovny, the Strakáč smokestack in Ostrava, closure of the ZOO park in Zvole, the STUTOX II case, the VAFO case, waste landfilling by AVE, and smuggling of glass eels.



4 CEI WORK IN 2019 BY DEPARTMENT

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

Overview of CEI work in 2019 by department

		Air Protection	Water Protection	Waste Management	Nature Protection and CITES	Forest Protection	Integrate d Agendas	TOTAL 2019
No. of inspectors (heads of departments, directors of units + inspectors; final as of 31 December)*		80	83	99	83	48	16	409
No. of inspections		4,628	3,128	3,495	3,713	1,394	538	16,896
EIA statements (Act no. 100/2001 Coll.) reported by IAD			reported by IAD	reported by IAD	reported by IAD	reported by IAD	657	657
Other statements		2,926	695	156	574	390	797	5,538
Fines	All issued decisions on fines	388	518	878	630	164	52	2,630
	All decisions on fines that entered into force	386	505	828	614	149	50	2,532
	Total amount of fines in force, CZK	13,124,400	21,112,947	47,549,000	9,257,250	17,806,800	3,479,320	112,329,717
Other decisions	No. of decisions in force – halting restriction to operations, a facility of part of it	3	0	0	40	27	1	71
	No. of decisions in force – seizing or confiscation	0	x	x	119	x	x	119
	No. of decisions on remedial measures in force	3	60	9	25	124	1	222
No. of issued decisions on charges and advances		12	5,666	x	x	x	x	5,678
No. of emergencies (under air acts) and accidents (under Waters Act)		204	165	x	x	x	x	369

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

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

4.1.1 Overview of inspection work in 2019

Inspection work in 2019 was carried out by the Air Protection inspectors in the areas of air protection proper, ozone layer protection and Earth's climate system protection to the full extent of powers defined in legal regulations in force and effect embracing the related environmental protection aspects. We inspected performance of obligations imposed by generally binding national legal regulations and EU regulations as well as performance of obligation specified in permits for operation of stationary sources of air pollution. In total we made 4,628 inspections, including 42 % scheduled and 58 % unscheduled.

The numbers and distribution of inspections carried out in 2019 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 (3,875 checks) and the related activities of persons authorised for emission measurement and development of expert assessments (338 checks), and fewer inspections concerned compliance with requirements for protection of Earth's climate system (374 checks, within that 46 at facilities included in the greenhouse gas emissions permit trading system and 328 at entities handling fluorinated greenhouse gases) and ozone layer protection / stratospheric ozone (30 checks). In connection with inspections of adherence to requirements when handling controlled substances and fluorinated greenhouse gases, we inspected 6 entities doing activities requiring certification by the Ministry of the Environment. In addition, we made 5 checks at entities operating air pollution sources that cannot be classified in any of the above inspection categories.

Inspections made in 2019 resulted in 359 conclusive decisions on fines for violation of obligations in air protection, ozone layer protection and Earth's climate system protection initiated in 2019. In 2019, a total of 386 decisions on fines entered into force, including 359 initiated in 2019 and 27 initiated in the previous year, totalling CZK 13,124,400. The decision on fines in force handled a total of 506 misdemeanours. Another 18 misdemeanours were resolved with reprimands. Besides separate inspections on adherence to obligations of operators of stationary sources of air pollution, the department inspectors were involved in 345 inspections of facilities with integrated permits (integrated checks), inspecting adherence to all environmental protection requirements. Violations of air protection requirements

resulted in 13 cases of fines with a share in air protection totalling CZK 385,000.

The total amount of fines imposed by Air Protection inspectors for violation of air protection requirements in proceedings run separately by the APD inspectors was CZK 12,160,400; it was CZK 781,000 for violation of requirements for handling of fluorinated greenhouse gases and CZK 130,000 for violation of requirements for handling of controlled substances. Fines totalling CZK 53,000 were imposed on authorised and certified entities. No fines were imposed on operators of facilities included in the greenhouse gas (carbon dioxide) emission permit trading system.

4.1.2 Overview of performance of departmental tasks

4.1.2.1 Air protection

In the area of air protection, departmental tasks were performed in 2019 as a part of the 5 categories of departmental tasks, namely (i) inspection of operation of facilities based on permits of air protection authorities and in accordance with the permits, (ii) compliance with set pollution levels (emission limits and emission ceilings) and technical requirements replacing or extending emission ceilings, (iii) detection of air pollution levels, (iv) record-keeping and notification duties, and (v) other duties of entities operating stationary sources of air pollution and bans on selected operations.

I.

In 120 cases, the inspections found out that operators or stationary sources of air pollution listed in Annex 2 to the Air Protection Act, the operation of which requires a permit of an air protection authority, operated the facilities without a permit. Fines totalling CZK 4,769,900 were imposed for the proven delicts. In 2019, the number of identified cases of operation without a permit decreased slightly compared to the previous years.

In three cases, the CEI proceeded to halting of operation of stationary sources of air pollution due to absence of an operating permit. We halted a source operated by GADLABAN s.r.o. – animal farming – in Křižanovice, a source operated by DŘEVO VYSOČINA a.s. – industrial wood processing – in Žďár nad Sázavou and a source operated by Slezské kamenolomy a.s. – surface treatment of stone by blasting – in Mikulovice. The decision-making on halting the stationary sources of air pollution considered their location and impact on air quality in their immediate surroundings.

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Since 2012, the operating permits have also included requirements for operation when exceeding air pollutant threshold values (the smog warning and regulation system), approved by the CEI before 2012 as regulation rules. All the announced smog situations and regulations due to exceedance of pollutant thresholds in 2019 resulted from exceedance of the thresholds for PM10 (airborne dust) and ground-level (tropospheric) ozone (O3).

Smog situations were announced for exceedance of the PM10 threshold for one agglomeration, three areas and one zone for a duration of 385 hours, and regulation for one agglomeration and one area for 162 hours, as shown in the table.

Numbers of smog situations and regulations announced for PM10

Area	Smog situation duration h	Regulation duration h
O/K/FM agglomeration excluding Třinec area	94	84
Třinec area	90	78
Zlín Region	73	0
Moravian-Silesian zone	75	0
Olomouc Region	53	0

At times of the regulation signal announcement, our Air Protection Department inspectors made 14 checks at sources with operating requirements for exceedance of an air pollutant threshold. None of the checks identified a violation of the set requirements.

Smog situations were announced for exceedance of ground-level ozone thresholds for five areas and one zone for 90 hours. The warning signal was not announced in 2019. Information about ground-level ozone concentrations and exceedance of its thresholds is only for the population's information and has no impact on operating conditions for stationary sources of air pollution and make no demands on the CEI inspection work.

II.

Exceedance of emission limits for pollutants and technical requirements that replace or extend emission limits was identified in 99 cases; fines totalling CZK 4,636,000 were imposed for the delicts in 83 cases in proceedings run separately by Air Protection inspectors. The remaining 13 cases were handled in joint proceedings with other misdemeanours, and three cases resolved with reprimands. Out of this number, we found 25 cases of exceedance of specific emission limits for pollutants, for which we imposed fines totalling CZK 830,000 in 17 separate proceedings; the remaining seven cases were handled

in joint proceedings and one case resolved with a reprimand. The most numerous were instances of exceedance of specific emission limits for carbon monoxide (eight cases, combustion processes), followed by particulate matter (seven cases, solid fuel combustion in boilers and blasting surface treatment), volatile organic compounds (five cases, painting surface treatment), nitrogen oxides (two cases, combustion processes), one case of exceedance of a specific emission limit for gaseous inorganic compounds of fluorine from firing of ceramic products, and one case of sulphur dioxide from a coal-burning boiler. We did not find any exceedance of emission ceilings.

Inspection of adherence to prescribed pollution levels (specific emission limits) and air impacts of sources was also done by means of measurements carried out by Air Protection Department employees of the CEI Headquarters. Direct measurements determined concentrations of six pollutants and 42 samples of particulate matter and noxious odorous substances were analysed in laboratories. We found two cases of exceedance of emission limits (particulate matter and sulphur dioxide). In order to determine the air impact of sources emitting noxious odorous substances, Headquarters air protection inspectors collected 30 samples of air mass and analysed them using dynamic olfactometry. All the cases were sources with no specific emission limit for noxious odorous substances set. Some of the measurement results were used as arguments for the CEI statements in the permitting process of regional authorities, and other were used to deduce an objective level of pollution when handling suggestions.

In addition, we found 74 cases of violation of technical operating requirements for stationary sources of air pollution replacing or extending emission limits. For these delicts, we imposed fines totalling CZK 3,806,000 in 66 separate proceedings run by air protection inspectors; six misdemeanours were handled in joint proceedings with others, and two were resolved with reprimands. The failures consisted in serious deviations from set requirements in operation of pollutant separators, exceedance of design production capacity, exceedance of design consumption of volatile organic compounds or solvents, non-compliance with requirements on interception and transport of air pollutants and operating conditions, such as temperature. Violations of air protection requirements were also identified by integrated inspections in which air protection inspectors were involved. These findings resulted in three cases of fines with a share in violation of air protection requirements totalling CZK 385,000.

III.

In 2019, the CEI inspected adherence to the duty of identification and evaluation of air pollution levels by direct measurements taken by

authorised persons as single measurements or continuous 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 1,113,500 were imposed for these delicts in 35 separate proceedings. The other 24 misdemeanours were handled in joint proceedings with others. In 45 cases, operators of facilities did not adhere to the obligation to submit the report with measurement results to the Inspectorate, for which we imposed fines totalling CZK 278,000. The other 10 misdemeanours were handled in joint proceedings with others, and three were resolved with reprimands. In addition, we found one case of non-evaluation of continuous emissions measurement. This misdemeanour was handled in a joint proceeding with another.

In 2019, CEI inspectors checked 338 cases of adherence to duties of persons authorised by the Ministry of the Environment for development of expert reviews and performance of single emission measurements. The checks identified one violation of duties of an authorised person, namely performing an authorised emission measurement at an air pollution source to which it had supplied the equipment. For this violation, we imposed a fine of CZK 30,000.

The inspected expert reviews had been developed by their authors in accordance with the MoE Air Protection Department methodological instruction for development of expert reviews, and showed no formal shortcomings.

IV.

Failure to adhere to the obligation to keep operating records or submit summary operating records and report to the IPR was proven to operators of stationary sources of air pollution in 125 cases. Fines totalling CZK 571,000 were awarded for these delicts in 56 separate proceedings. The other 60 misdemeanours were handled in joint proceedings with others, and nine were resolved with reprimands.

V.

Our inspection work also identified violation of other obligations and bans in air protection. Among these obligations, there were particularly the obligations to enable inspection and cooperate on it, provide operating data, pay charges and submit notifications on charge calculation, combust waste only in facilities designed for it, eliminate dangerous situations in stationary sources of air pollution, and perform related notification duties. Combustion of materials other than dry plant material not contaminated with chemicals in open fires is prohibited.

Our inspections found one case where the operator of a stationary source of air pollution had not submitted a notification on charge calculation, for which we imposed a fine of CZK 5,000.

We found five cases of combustion of unpermitted materials in open fires. We imposed fines of CZK 180,000 for this violation in three separate proceedings, one misdemeanour was handled in a joint proceeding with another, and one was resolved with a reprimand.

Combustion of waste in stationary combustion sources was proven to operators in 11 cases. They were mostly cases of combustion of used oils in combustion facilities. Fines totalling CZK 167,000 were imposed for these delicts.

There were three cases of non-cooperation on inspections – or non-provision of requested information and documents. Fines totalling CZK 70,000 were imposed for these delicts.

There were two cases of operators eliminating dangerous situations resulting from a breakdown during operation. Fines totalling CZK 330,000 were imposed for these delicts. There was one case of non-submission of a breakdown report to the CEI. For this violation, we imposed a fine of CZK 30,000.

An inspection found that the technical condition of a combustion source with a capacity below 300 kW had not been checked by a professionally qualified person. A fine of CZK 10,000 was imposed on the operator as part of the misdemeanour proceeding.

4.1. 2. 2 Earth's climate system protection

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

The result of the 328 checks made at operators of facilities containing fluorinated greenhouse gases and other entities handling fluorinated greenhouse gases was the proving of 45 misdemeanours, for which we imposed fines totalling CZK 781,000 in 32 cases; 11 misdemeanours were handled in joint proceedings with others, and two were resolved with reprimands. The violations consisted in non-performance of equipment tightness checks (30 cases, 26 proceedings imposed fines of CZK 646,000, two cases handled in joint proceedings and two resolved with reprimands), violation of the record-keeping and reporting obligation (nine cases, three leading to imposition of fines totalling CZK 30,000 and six

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cases handled in joint proceedings with other misdemeanours), non-operation of a leak detection system (four cases, one leading to a fine of CZK 80,000, three cases handled with others), and exceedance of the quota for import of fluorinated greenhouse gases in pre-filled equipment (two cases, total fine of CZK 25,000).

In 2019, we made 46 inspections of stationary facilities included in the greenhouse gas (carbon dioxide) emission permit trading system. None of the checks identified a violation of the requirements.

4.1.2.3 Ozone layer protection

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

The result of 30 checks of compliance with requirements on handling controlled substances was four cases of violations, for which we imposed four fines totalling CZK 130,000 in separate proceedings. Entities handling controlled substances committed one misdemeanour by not assuring equipment tightness checks by an entity certified by the Ministry of the Environment; in one case, controlled substances had not been submitted to a certified entity for disposal; in one case, controlled substances had been imported without a licence issued by the European Commission, and in one case, a report was not made to the EC.

Being the administrator of the fee for imports and production of controlled substances, the CEI inspected compliance with the fee duty of entities marketing the controlled substances. In seven cases, we determined the obligation to pay fees totalling CZK 206,833, for imported halons for critical uses; in another five cases, the we determined the entities' obligation to pay appurtenances on the fees (penalty on default) totalling CZK 44,276.

We also inspected six entities doing activities that require certification by the Ministry of the Environment, notably tightness checks, service and maintenance of equipment containing coolants on the basis of controlled substances and fluorinated greenhouse gases, entities processing discarded cooling equipment, and attestation and evaluation entities. In two cases,

were found violation of obligations, for which fines totalling CZK 23,000 were imposed.

4.1.3 Overview of performance of specific tasks

Due to the extent of the departmental tasks, covering all of the air protection inspector's inspection work in the areas of air protection, climate and ozone layer protection, no specific tasks were assigned for 2019.

4.1.4 Major cases by amount of fine imposed and decisions on halting operations

Prague TI

The CEI imposed a fine of CZK 100,000 on VAFO PRAHA for operating an extruded animal fodder production facility in Chrastany.

České Budějovice TI

The CEI imposed a fine of CZK 290,000 on Gienanth Czechia for operating surface treatment sources in contravention of permits in Zdíky, Bujanov.

Plzeň TI

The CEI imposed a fine of CZK 250,000 on Plzeňská teplárenská for operating the pollution source Teplárna Doubravická in Plzeň in contravention of the permit by failing to eliminate equipment breakdown within set terms.

Ústí nad Labem TI

The CEI imposed a fine of CZK 90,000 on BENTELER Automotive Klášterec for operating hot pressing and welding equipment without a permit.

Liberec TI

The CEI imposed a fine of CZK 200,000 on CIKAUTXO CZ for operating combustion and process equipment without a permit in Jablonec nad Nisou.

Hradec Králové TI

The CEI imposed a fine of CZK 170,000 on RONAL CR for exceeding the annual design capacity of its foundry and total design consumption of pulverized plastics in its aluminium foundry and paint shop in Jičín.

Havlíčkův Brod TI

The CEI imposed a fine of CZK 180,000 on UNICON for violating operating requirements, exceeding consumption of materials containing volatile organic compounds and painting large components in the open in contravention of its operating rules.

The CEI ruled to halt the operation of a stationary source of air pollution of DŘEVO VYSOČINA. – industrial timber processing – in Žďár nad Sázavou for operating a source without an air protection authority permit.

Brno TI

The CEI imposed a fine of CZK 200,000 on CAUDETE for operating a movable building material crusher inside a farm cooperative compound in Mikulov without notification and without minimising dustiness.



The operation of CAUDETE crusher resulted in enormous dustiness.

The CEI ruled to halt the operation of a stationary source of air pollution of GADLABAN – animal farming – in Křižanovice for operating a source without an air protection authority permit.

Olomouc TI

The CEI imposed a fine of CZK 100,000 on Slovácké strojírny for not detecting the air pollution levels from its stationary combustion sources, an alloy smelting facility and a paint shop operated in Postřelmov.

The CEI imposed a fine of CZK 100,000 on Obalovna Lipník for exceeding the maximum daily production capacity of its asphalt concrete production plant in Lipník nad Bečvou.

The CEI ruled to halt the operation of a stationary source of air pollution of Slezské kamenolomy – surface treatment of stone by blasting – in Mikulovice for operating a source without an air protection authority permit.

Ostrava TI

The CEI imposed a fine of CZK 600,000 on UPIA International for non-compliance with operating requirements on its thermal cleaning facility at Studénka-Butovice, and non-monitoring of its operating parameters.

Headquarters Air Protection Department

The CEI imposed a fine of CZK 60,000 on ESTO Cheb for not submitting 1,069 kg of controlled substances to a certified entity for disposal, storing halon 1301 without a certificate and non-submission of a halon report.

4.1.5 Conclusions from inspection work

The Czech Environmental Inspectorate's inspections covered the entire scope of its powers in the areas of air protection, ozone layer and climate protection, defined in both national generally binding legal regulations and EU regulations in force. In the latter half of 2019, the CEI paid increased attention to inspections of sources and facilities listed under the Clean Air Dialogue.

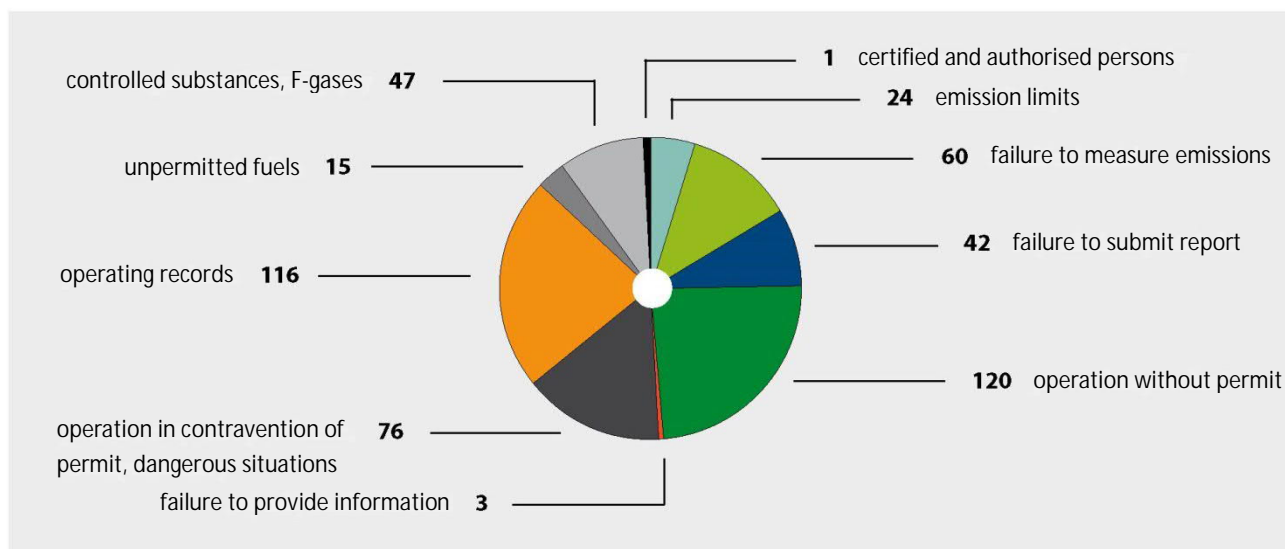
In 2019, the number of inspections made increased slightly compared to 2018 (from 4,428 to 4,628). The number of misdemeanours handled also grew from 500 in 2018 to 532 in 2019.

The number of cases of operation of air pollution sources without a permit is still very high, although the trend is slightly decreasing in the recent years. In 2019, we handled 120 misdemeanours of operating sources without a permit; it was 131 misdemeanours in 2018.

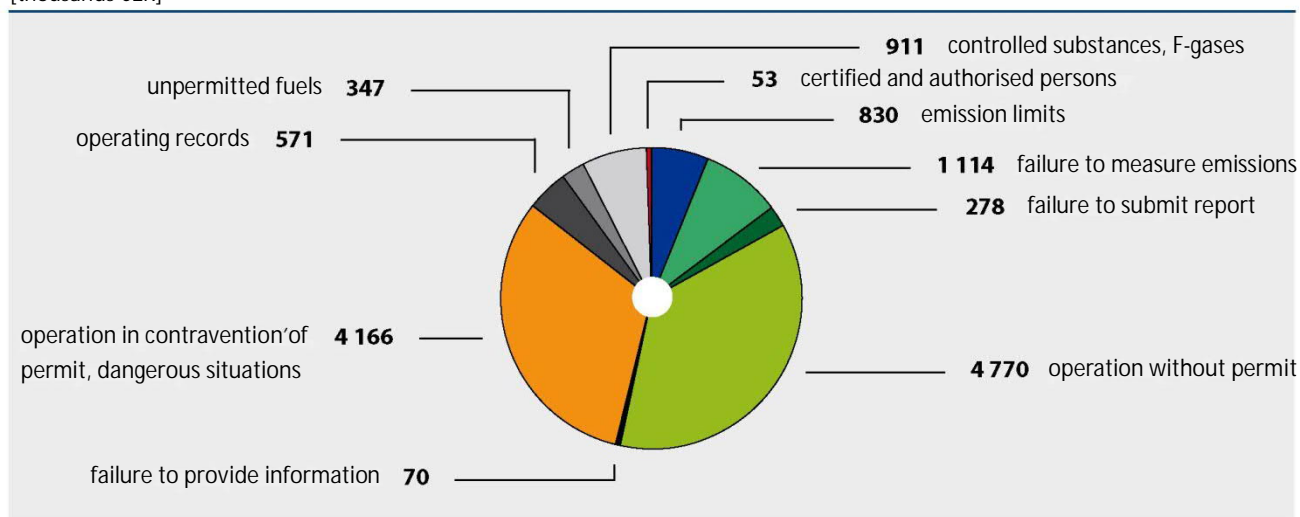
The CEI paid great attention to Earth's climate system protection, both prevention of leakage of fluorinated greenhouse gases and compliance with requirements on operators of facilities included in the greenhouse gas emission permit trading system. The numbers of misdemeanour handled have been almost unchanged for several years, ranging around 50.

Even though the use of ozone layer depleting controlled substances is in a phase-out, we handled four misdemeanours in 2019 of violation of requirements for handling them and marketing them. In 2019, we found seven cases of non-performance of the fee duty of importers for marketing controlled substances (halons for critical uses) and prescribed payment of the fees and their appurtenances, being the fee administrator.

Numbers of misdemeanours in air protection, ozone layer and Earth's climate system protection in 2019 in proceedings on fines



Fines awarded for violations of air protection, ozone layer and climate protection requirements in 2019, by type of violation
[thousands CZK]



4.2 Water protection and prevention of major industrial accidents

4.2.1 Overview of inspection work in 2019

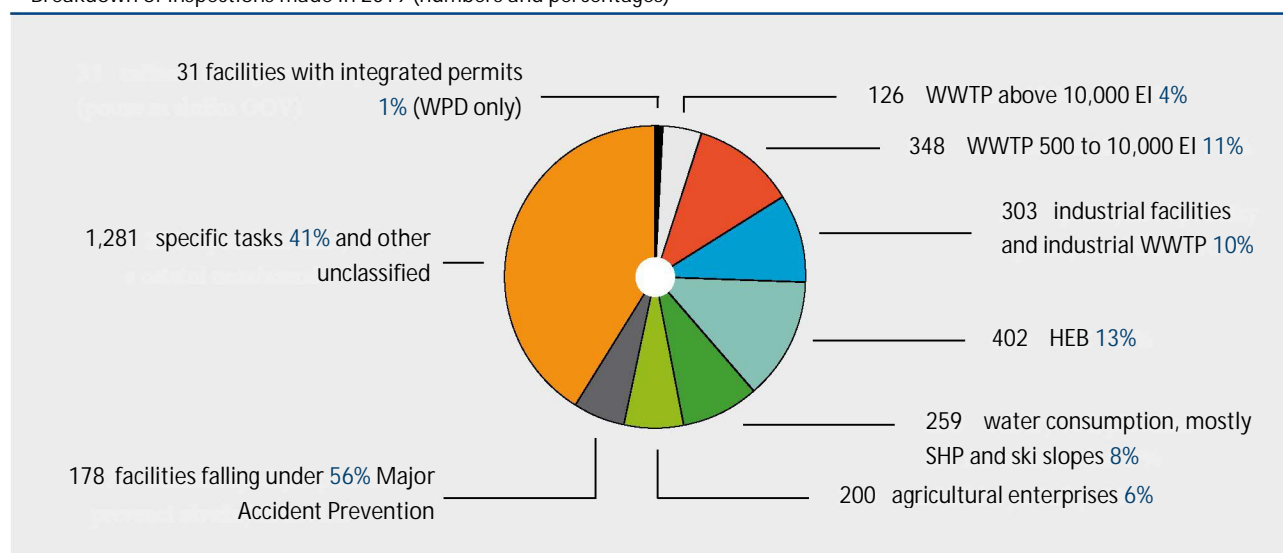
Inspection work in 2019 was done by the Water Protection inspectors to the full extent of powers defined by the Waters Act, Major Accident Prevention Act and Integrated Prevention Act in force and effect.

In 2019, Water Protection Department (WPD) inspectors carried out 3,128 separate checks. Within that, 46% were scheduled (1,452) and 54% were unscheduled (1,676), including

checks carried out based on suggestions. Moreover, the WPD inspectors made 371 checks under the Integrated Prevention Act in cooperation with the other Departments.

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

Breakdown of inspections made in 2019 (numbers and percentages)

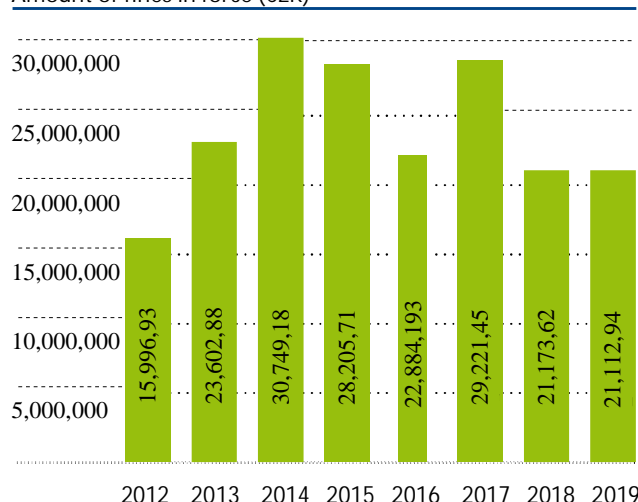


Based on the inspection work, we initiated 520 misdemeanour proceedings and issued 505 conclusive decisions on fines totalling CZK 21,112,947. Moreover, WPD inspectors cooperated on the issuance of 19 decisions as part of inspections in businesses with integrated permits (IP) that are registered in Chapter 4.7. The greater part of the fines were imposed based on results of unscheduled checks. To eliminate identified shortcomings and defects, we issued 62 decisions imposing remedial measures with deadlines.

As part of the charge agendas, we issued 5,666 decisions, comprising 1,029 on charges for wastewater discharge into surface water totalling CZK 195,394,339, and 4,637 on groundwater collection totalling CZK 724,655,225. Act no. 113/2018 Coll. cancelled, as of 1 January 2019, collection of advance charges. At the same time, the Waters Act amendment transferred the complete charge agendas to the State Environmental Fund (SEF CR).

WPD inspectors developed 1,762 statements, both separately for the WPD (695) and as part of aggregate statements.

Amount of fines in force (CZK)



4.2.2 Overview of performance of main and departmental tasks

Inspections at environmental component pollution sources with valid integrated permits

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

We made 402 checks as part of the task. WPD inspectors in cooperation with other departments made 371 integrated inspections, and made 31 inspections on their own. A total of 28 penalty decisions imposed by the WPD entered into force, for fines totalling CZK 1,530,950. The most frequent misdemeanour was exceedance of emission limits in wastewater discharged. Detailed information relating to inspections made under the Integrated Prevention Act is provided in Chapter 4.7. Integrated agendas.

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

The objective of the inspections was to check wastewater treatment plant (WWTP) operations with an emphasis on identification of actual operating status and pollution produced and discharged. The inspections included checks and documentation of WWTP relieving chambers and checks of wastewater discharge from outlets from combined sewerage in accordance with the Waters Act amendment (no. 113/2018 Coll.), which newly requires operators to have a water management authority permit for discharging wastewater from relieving chambers, which do not protect combined sewers from hydraulic overload, into surface water.

The size of pollution discharged from relieving chambers is not known and the pollution is not effectively regulated. The effects of the pollution are only observed subsequently from impaired or non-improving quality of the water body in spite of gradually improving quality of treatment discharge. Results of the monitoring may lead to adoption of measures to eliminate the impacts of diffuse pollution sources on surface water.

In 2019, we inspected 126 municipal WWTP for more than 10,000 EI. Sources in this category do not commit frequent or significant violations of the Waters Act, but still we imposed

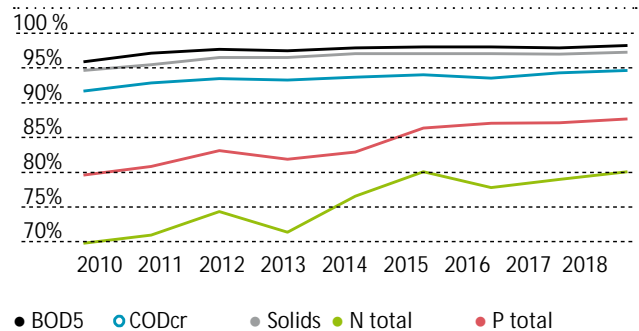
four conclusive fines totalling CZK 175,000 for exceedance of permitted emission limits.

Renovations of structural and process components of WWTP and use of best available techniques result in constant improvements to the treatment process, as documented by the observable trend of increasing efficiency of wastewater treatment, particularly for the frequently debated indicator P_{tot} (more than 9% in 2010-2018; see schematic chart of average efficiency of pollutant removal).

Average efficiency of pollutant removal

	BOD ₅	COD _{cr}	Solids	N _{tot}	P _{tot}
2010	96.5	92.9	95.4	71.0	80.1
2011	97.7	94.0	96.2	72.1	81.3
2012	98.2	94.6	97.2	75.2	83.4
2013	98.0	94.4	97.2	72.5	82.2
2014	98.4	94.8	97.7	77.3	83.2
2015	98.5	95.1	97.7	80.5	86.4
2016	98.5	94.7	97.7	78.4	87.0
2017	98.4	95.4	97.6	79.5	87.1
2018	98.7	95.7	97.9	80.5	87.6

Average efficiency of pollutant removal



For all municipal WWTP in this category, we inspected the balance data for 2018, which indicate that the WWTP monitored treated 432,000,000 m³ of wastewater in total. The wastewater treatment efficiency in urban WWTP was 98.7 % for BOD₅, 95.7% for COD_{Cr}, 97.9% for Solids, 80.5% for N_{tot}, and 87.6% for P_{tot}.



WWTP sludge in a watercourse.

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

Inspection of wastewater treatment plants for 500 – 10,000 EI focused on compliance with requirements of water management authority permits and provisions of the Waters Act relating to charges for wastewater discharge into surface water. The checks included inspection of permits for discharge of wastewater from relieving chambers into surface water in response to the new legislation. The results show that WWTP operators requested the permits on time but most of the request proceedings have not been finished.

Under this task, we made 348 inspections and issued 40 conclusive decisions on fines totalling CZK 1,365,030. The most frequent violations are exceedance of pollution emission limits and amounts of wastewater discharged, non-adherence to frequency of inspection sampling, and wastewater discharge without a water management authority permit.

The inspection results show that the worst shortcomings in operation occur constantly and regularly at WWTP operated by small municipalities and voluntary associations of municipalities. Due to long-term experience, professional staff and extent and availability of technical resources, water utilities operate treatment plants without major shortcomings and without process deviations affecting quality of treatment discharge. The numbers of unscheduled inspections based on citizens' suggestion have increased significantly in recent years due to increasing public interest in water issues.



Operation of a wastewater treatment plant for 2000-10,000 EI.

Inspection of industrial entities handling potential pollutants

The inspections focused primarily on major industrial compounds where potential pollutants are stored or handled on a larger scale. The task included inspection of industrial WWTP. Those checks focused primarily on compliance with requirements of permits for discharge wastewater into surface water and sewerage.

Under this departmental task, we made 303 inspections. We found 49 cases (approx. 16% of the checks) of violation of legal regulations. The most frequent shortcoming was exceedance of emission limits at industrial WWTP and failure to meet obligations for handling potential pollutants (securing of reservoirs against leakage of stored substances, reservoir tightness tests, etc.). A total of 42 decisions entered into force in 2019, imposing fines totalling CZK 1,988,910.

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

The task comprises assessment of outcomes of remediation of historic environmental burdens. Funding for remediation works is provided by the State, and it is ultimately the lack of funds that causes problems with continuous performance of the remediation process. Continuity is important not only for speed of removing the burden but for the equally important factor of efficiency and effectiveness of spending of funds. Lack of funds

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also affects performance of remedial measures by set dates, which entails additional negative consequences for the acquirers. Based on this fact and on joint meetings between the CEI and both Ministries, the Ministry of Finance together with the Ministry of the Environment has developed a plan of priorities for tendering public contracts for the coming years, which reflects the current need to start or continue remediation on selected sites. The priority criterion is the degree of risk for the environment and population.

In 2019, the CEI made 402 inspections of historic environmental burdens and issued 17 conclusive decisions on remedial measures; affirmative statements on termination of remediation works was issued for eight sites.

Serious cases are sites with historic burdens where the implementation of remediation works lags behind and there is a risk of recontamination of cleared areas or spreading of contamination leading to risk for drinking water sources.



Removal of tar sludge as part of remediation of historic environmental burden.

Inspection of (mostly surface) water collection

This task focused on water collection with an emphasis on compliance with requirements of water management authority permits (observance of minimum residual flow rates) and observance of permitted quantity of water collected, both surface and groundwater. In the summer, the inspections focused primarily on water collection for operation of small hydropower plants. In the winter, we inspected water collection by skiing resorts, which use water for artificial snowing of ski slopes. Under this departmental task, we made 259 inspections. 42 decisions on fines totalling CZK 2,889,186 entered into force. The most frequent finding was exceedance of the quantity of water collected for artificial snowing and for drinking and utility water supply. Small hydropower plants violated the minimum residual flow rates in watercourses as a consequence of non-compliance with operating requirements.

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

Inspections at selected entities focused on compliance of all legal requirements, notably safe handling of specific agricultural potential pollutants. The inspections concerned selected farms, where we inspected the water management security measures in storage areas for mineral and organic fertilisers, bulk fodder, petroleum products, plant protection products, field deposits, stable areas and manure pits. We also inspected water handling in grazing areas.

A total of 200 checks were carried out. Based on these inspections, we imposed 86 fines totalling CZK 2,755,536 and 19 conclusive decisions on remedial measures. The principal shortcoming identified was unpermitted handling of potential pollutants, and other shortcomings were found in water handling without required water management authority documentation.



Unsecured manure pit in an agricultural compound.

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

The objective of the inspection was to check entities classified in category B and selected entities in category A. In total, we carried out 149 inspections based on the annual plan approved by the MoE. Three inspections were made due to removal of an entity after plan approval by the MoE in 2018 or unapproved safety documentation. Another 29 inspections were made beyond the scope of the MoE annual plan. The MoE set priorities for the annual inspection plan, including description of changes in the entity, considering whether they could lead to changed conditions of safety management, with an emphasis on checking measures adopted by operators after a major accident.

The inspections were made in cooperation with integrated inspection authorities and regional authorities pursuant to Act no. 224/2015 Coll., which integrates latest European regulations, notably Directive 2012/18/EU of the European Parliament and of the Council on the control of major-accident hazards involving dangerous substances. The inspections focused on basic elements of the safety management system, evaluation of major accident prevention (MAP) system status, contents of reports on inspection or audit results, and registration of emergencies and methods of their evaluation. The primary subject matter of the inspections was assessment whether information in safety documentation matches actual site conditions, whether measures adopted to prevent major accidents are sufficient, whether resources mitigating potential consequences of major accidents are appropriate, and whether preventive precautions specified in mandatory documentation are observed. Seven major accidents occurred in six regions in the course of 2019. They involved releases of dangerous substances, fires and explosions. Some of the shortcomings identified were eliminated during inspection. Implementation of remedial measures imposed as part of the protocol has been checked or will be checked by inspections in coming years. One of the inspections identified a violation of the MAP Act. The penalty imposed for the misdemeanour is not yet in force.

4.2.3 Overview of performance of specific tasks – summary

WPD inspectors made another 1,281 checks, both as part of specific tasks and ones that cannot be classified under any of the tasks. The violations led to 263 conclusive penalty decisions totalling CZK 10,408,335.

In 2019, the inspectors dealt in more detail, for example, with entities operating inside buffer zones of water sources, recreation, accommodation and dining facilities in areas with special protection, checks of municipal sewerage (wastewater discharges from open-ended sewer outlets) and sources up to 500 EI, checks of water management security of fuel stations, concrete mixing plants, car repair shops, checks of live fish storage tanks and fishponds and, last but not least, inspection of pollution sources in the Hodonin wine-growing region.

Due to the strategic importance of water sources and requirements for their increased protection, we comment more on inspections of pollution sources, notably in buffer zones of water sources and within reach of hydraulic structures:

In total, we made 65 inspections under this task. Seven conclusive decisions on fines totalling CZK 71,500 were imposed. The objective and purpose of the task was to emphasise the presence of the supervision authority in the catchment area of drinking water reservoirs in terms of population sizes supplied by the most important ones (Švihov, Vir) and those that supply drinking water to fewer inhabitants

(Horka, Podhora and Mariánské Lázně, Myslívny and Stanovice). Along with this task, we make evaluation of inspections of the Luhačovice reservoir and watercourses near it, although it is not a drinking water reservoir. The inspections focused on entities that could influence or influence quality of surface water or groundwater in the buffer zone of a water source, regardless of their line of business. The purpose was to identify how much the individual selected potential polluters contribute to contamination of reservoirs and watercourses near them.

We imposed fines for violation of WWTP operating rules and missing reservoir tightness tests, particularly in agricultural businesses.

In terms of extent of inspection, a noteworthy specific tasks was inspection of performance of legal obligations in recreation facilities, primarily those located in areas with special environment protection.

We made 179 inspections focused primarily on water handling – drinking water supply to inspected buildings and disposal of sewer wastewater produced by the operation of the properties checked. A total of 28 decisions entered into force, imposing penalties totalling CZK 684,463. The most frequent reasons for fines were wastewater discharge from WWTP without or in contravention of a permit and unpermitted groundwater collection for supplying recreation facilities.

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4.2.4 Major cases

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

Plzeň TI: Maso Brejcha s.r.o.

We imposed a fine of CZK 1,000,000 for wastewater discharge into surface water in contravention of requirements of a water management authority permit, wastewater discharge into groundwater without a permit, and failure to report a surface water accident. In addition, we imposed a fine of CZK 23,200 for collecting 580 m³ of surface water without a permit. The decision was the second one issued on the same matter due to repeated appeals made by the company. They appealed against this decision as well, but the appeal authority refused it. The MoE decision entered into force on 5 June 2019.

Olomouc TI: MORAVAMALT, s.r.o.

We imposed a fine for groundwater collection without a permit, totalling 41,001 m³. The fine was assessed at a reduced rate of CZK 30 per m³ of illegally collected groundwater. The company appealed against the CEI decision, the MoE reduced the rate to CZK 20 per m³ of illegally collected groundwater. After the MoE decision, the fine of CZK 820,020 entered into force on 26 November 2019.



Highest conclusive fines in the Water Protection Department by TI

Territorial Inspectorate	Entity	Imposed fine	Date of
		in force	entry into force
Plzeň TI	Maso Brejcha s.r.o.	CZK 1,023,200.00	5. 6 2019
Olomouc TI	MORAVAMALT, s.r.o.	CZK 820,020.00	26 11. 2019
Ostrava TI	Mayr-Melnhof Holz Paskov s.r.o.	CZK 680,000.00	30 4. 2019
Hradec Králové TI	Amcor Flexibles Nový Bydžov, s.r.o.	CZK 350,000.00	23 2. 2019
Prague TI	FOBOS INVEST, a.s.	CZK 300,000.00	11. 9. 2019
České Budějovice TI	“GNOSIS” spol. s. r.o.	CZK 285,750.00	28 December 2019
Brno TI	SATESO, s.r.o.	CZK 260,000.00	30 11. 2019
Havlíčkův Brod TI	FRITAGRO Nížkov, s.r.o.	CZK 200,000.00	18 1 2019
Ústí nad Labem TI	Děčinská sportovní, state-funded institution	CZK 153,850.00	6 December 2019
Liberec TI	ALFA VERUS spol. s.r.o.	CZK 55,000.00	23 3 2019

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

The fine was imposed for unpermitted discharging strongly contaminated wastewater into surface water (Olešná river) and groundwater and for failure to report an accident. The company appealed against the fine of CZK 680,000, but the appeal authority confirmed the CEI's decision. The MoE decision entered into force on 30 April 2019

Hradec Králové TI: Amcor Flexibles Nový Bydžov s.r.o. The fine was imposed for handling of potential pollutants in contravention of integrated permit in force. On 9 June 2018, approximately 15 m³ of ethyl acetate leaked from a storage tanks outside a hydraulically secured area and then via sewerage into a rainwater storage tank, followed by discharge into surface water (Zábědovský brook). For the misdemeanour, the CEI imposed a fine of CZK 350,000 on the company. A protest was made against the order. In an administrative proceeding, the CEI issued a decision on a fine, against which the company appealed again. Before the appeal was decided by the appeal authority, the company withdrew its appeal. The MoE decision entered into force on 23 February 2019



Residue of ethyl acetate leaked on the floor of a pump room at Amcor Flexibles Nový Bydžov.

Prague TI: FOBOS INVEST, a.s.

A fine of CZK 300,000 was imposed for handling of potential pollutants without an approved accident plan and non-submission of tightness test reports for three tanks storing petroleum-type waste. The fine entered into force on 11 September 2019.

České Budějovice TI: "GNOSIS", spol s.r.o.

In operating the Hotel Alpská vyhlídka at Bučina u Kvildy and the Penzion Hájenka at Knížecí Pláně, the defendant violated the Waters Act inside Zone 2 of the Šumava National Park. Two fines totalling CZK 285,750 were imposed for the identified delicts. The first fine of CZK 85,750 was imposed for unpermitted

groundwater collection for the Penzion Hájenka (totalling 1,225 m³). The fine was assessed at the legal rate of CZK 70 per m³ of illegally collected groundwater. The other fine of CZK 200,000 was imposed for wastewater discharge into surface water without a valid permit from both the Penzion Hájenka and the Hotel Alpská vyhlídka. Moreover, we found that the treatment plant of the Penzion Hájenka was operated in contravention of the approved operating rules, and the Hotel Alpská vyhlídka handled potential pollutants without an approved accident plan. The defendant did not appeal against the CEI decision, so it entered into force on 28 December 2019.



Uncleaned bar screen of wastewater treatment plant at Penzion Hájenka in Knížecí Pláně.

Brno TI: SATESO, s.r.o.

On 30 November 2019, the decision imposing a fine totalling CZK 260,000 entered into force; it was imposed for operating a waste disposal facility (Šlapanice landfill) in contravention of an integrated permit (CZK 200,000) and for discharging pre-treated wastewater into public sewerage in contravention of a water management authority permit (CZK 60,000). The company did not appeal against the CEI decision.

Havlíčkův Brod TI: FRITAGRO Nižkov, s.r.o.

We imposed a fine of CZK 200,000 for accidental release of a potential pollutant into storm sewerage and then a left-side tributary of the Římský brook and for discharging wastewater into surface water with exceedance of emission limits. The company appealed against the decision. The CEI decision was confirmed by the appeal authority and on 18 January 2019, it entered into force.

Ústí nad Labem TI: Děčinská sportovní, state-funded institution

The CEI imposed a fine of CZK 153,850 for collecting 6,154 m³ of groundwater beyond the permitted limit. The fine was calculated using a rate of CZK 25 per m³ of illegally collected groundwater. The fine entered into force on 6 December 2019.

Liberec TI: ALFA VERUS spol. s r.o.

We imposed a fine of CZK 55,000 for discharging wastewater into surface water without a permit. The defender did not appeal, and the decision entered into force on 23 March 2019.

4.2.5 Conclusions from inspection work

The CEI work in the area of water protection in 2019 did not differ from previous years. The inspection plan development followed legal obligations, as the Major Accident Prevention Act and the Integrated Prevention Act set exact inspection intervals. Most of the entities inspected by the CEI performed their obligations under legal standards in the area of water protection and major accident prevention duly. We found a legislative violation at approximately one in six entities inspected. In the area of supervision and identification of legislative violations followed by imposition of fines, we have confirmed a trend of more unscheduled checks than findings from scheduled ones, meaning more time and administrative demand for producing evidence, documentation and concluding investigation.

The inspection work planning put an emphasis on inspecting the principal polluters discharging wastewater (large WWTP) as well as major industrial and agricultural businesses. The highest percentage of violations was found in facilities with integrated permits, where the WPD inspectors made 31 water protection checks and imposed 28 conclusive fines, amounting to nearly CZK 55,000 on average. Equally faulty were agricultural and industrial operations with equipment without integrated permits, where the violation rate is between 43 and 49%. In contrast, the violation rate of entities in the area of surface water or groundwater collection is only around 16%, but the average penalty amount is the highest: over CZK 68,000, which is due exclusively to the fines being calculated using legal rates. Most of the shortcomings identified in normal inspection work related to unpermitted handling of potential pollutants, unpermitted groundwater or surface water collections, or unsatisfactory quality of wastewater discharged into watercourses.

It followed from the inspection findings that WWTP above 10,000 EI constantly have few problems complying with legislation. It is both due to their more responsible attitude to environmental protection and due to the WPD consistent work focused on the area. Violations of the Waters Act were only found in five percent of large WWTP, which is the lowest violation rate in any of the inspection areas. These WWTP show a constantly improving quality of the treatment process. Shortcomings in operation occur constantly at WWTP operated by small municipalities and voluntary associations of municipalities. The continuing long-term problems include insufficient municipal sewerage and the method of

wastewater disposal, particularly at holiday resorts in mountains and foothills.

Since 1 January 2019, the amended Waters Act has been in effect (Act no. 113/2018 Coll.), bringing many changes, the most important being the facts that the CEI no longer has the power to inspect natural persons not doing business and the whole charge agenda is transferred to the SEF CR. However, the expected decrease in workload related to the reduced powers in inspection of natural persons was not massive in 2019, since the CEI continues to receive suggestions concerning natural persons and checking (frequently on the spot) whether the suggestion topic is connected with a natural person or a natural person doing business and subsequent transfer of suggestions to water management authorities still requires some inspection work. The year 2019 was the last for the CEI to issue charge assessments for all entities registered in the ISPOP.

As for HEB remediation, sites where the historic environmental burden lingers with insufficient guarantee amount are problematic. If remedial measures are not implemented by the deadline set by a decision in force, the CEI has to order distraintment to enforce the liability arising from the distraintment. A typical unresolved historic environmental burden is the case of summer 2019, when the CEI checked the source of increased HCB, DDT metabolite and HCBd rates in sediment deposits of the Elbe river at the metering point Schmilka/Hřensko. Most of these substances were deposited in the Elbe and Bílina river sediments in the past.

Inspection work under the Major Accident Prevention Act continues to have a positive impact on prevention of accidents and emergencies.

Inspections under specific tasks are an important tool for each of the TIs. The two specific tasks described in more detail above are the most important. Our consistent, multiannual inspection within reach of drinking water reservoirs has led to elimination of actual or potential sources of pollution, but problems linger mainly with contamination with total phosphorus and nitrogen, causing eutrophication. A major problem is the recurring presence of pesticides in reservoir headwaters. In many cases, it is evident that respective water handling permits (or operating rules for hydraulic structures) issued under law in force before 2001 do not assure sufficient protection of interests protected by the current Waters Act. Inspections of recreation and accommodation facilities found that even if we focused on areas with a certain degree of protection, the operators' legal awareness of water management issues was still very low.

The inspections are still a major preventive tool in the area of water protection; therefore, the CEI will continue its consistent supervision over larger and more important pollution sources as well as systemic searching for new sources in field investigations and in cooperation with water management authorities, watercourse and catchment area administrators to prevent as much as possible contamination of watercourses, fishponds and water reservoirs by any legal entity. We will focus primarily on inspecting facilities in which we have found violations of water protection regulations in the past.

4.3 Waste management, chemicals and biocidal products

4.3.1 Overview of inspection work in 2019

The CEI Waste Management Department (WMD) inspectors made 3,495 checks all around the Czech Republic in 2019. They were inspections of compliance with legal standards in the area of waste management, packaging and chemicals. The checks include both scheduled ones (1,323) and unscheduled (2,172), the latter including inspections made based on suggestions received. Besides, the WMD inspectors were involved in integrated inspections pursuant to Act no. 76/2002 Coll. on Integrated Prevention (IPPC) in 313 cases in 2019.

In 2019, we initiated 841 proceedings and issued 878 decisions on fines. A total of 828 decisions on fines entered into force in 2019, and remedial measures were ordered conclusively in nine cases. Fines totalling CZK 47,549,000 entered into force in the report period. Moreover, we made four crime reports in 2019. WMD inspectors issued 156 statements and position statements.

4.3.2 Overview of performance of departmental tasks Waste

disposal and treatment facilities

Inspectors checking compliance with the Waste Act and the Integrated Prevention Act as part of checks focused on waste disposal facilities made 438 inspections in 2019. Within that, 202 inspections were made based on suggestions received.

In 2019, violations of the Integrated Prevention Act and violations of obligations under the Waste Act led to 93 misdemeanour proceedings and 99 decisions, and 91 decision entered into force in the report period, totalling CZK 8,168,000 (highest fine was CZK 2,000,000). The total includes cases of violations of Inspection Rules and proceedings ordering remedial measures and deadlines.

Under this departmental task, we made inspections of landfills, both in active operation (all hazardous waste landfills and selected other and inert waste landfills)

and landfills in the follow-up management regime. We also checked hazardous waste incinerators, waste co-incineration facilities and waste modification facilities.

The overwhelming majority are facilities operated based on integrated permits; therefore, the most frequent finding was violation of the Integrated Prevention Act, meaning non-compliance with requirements of the integrated permit or approved facility operating rules.

Another most frequent conclusion of inspections of illicit waste dumping was violation of the obligation to handle waste in facilities where it is permitted by law. In cases where we found waste dumping outside approved facilities (most importantly construction and demolition waste and illegal dumps), it is very often impossible to identify the waste originator. If identified, they are frequently in liquidation or insolvency, so removal of illegally dumped waste cannot be enforced.

Landfills

Inspections made at landfills in 2019 found the continuing and increasing efforts of operators to circumvent the charge obligation. This results, among other things, from incorrectly kept records (material for technical landfill securing, balancing layer, structural elements, products made from waste).

It can also be concluded that there is a growing trend of expanding waste handling methods (composting, biodegradation, solidification, sorting, production of alternative fuels, free and paid recycling collection) in facilities originally classified for disposal. At present, these facility types can be described as waste management centres.

Several landfill fires occurred in 2019. In such cases, the CEI cooperates closely with the Fire Rescue Service.

In addition to the above violations of record-keeping duty, landfill operators were found to violate legal obligations. They consisted in non-compliance with specified landfilling processes, recurring insufficient coverage of inactive areas on the landfill body, and exceedance of maximum size of active areas. In connection with waste coverage, we also found insufficient coverage of asbestos-containing waste.

In the area of waste used for technical landfill securing, we found use of waste unpermitted for the purpose. Landfill inspections also found storage (disposal) of unpermitted waste types.

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A major negative finding is that sufficient landfill reclamation stock was not produced. Last but not least, we can also mention incomplete annual landfill monitoring, storage of waste without requiring accompanying documentation of its properties, and presence of seepage water beyond the marked edge of the secured landfill body.

Waste incinerators

Inspections of hazardous waste incinerators and waste energy recovery facilities only find sporadic cases of violation of legal obligations. They included, for example, admission of unpermitted waste (violation of operating rules), identification of hazardous waste containers in contravention of applicable legal regulations, and storage of hazardous waste outside respective rooms or secured areas.

Other facilities

In 2019, the other types of inspected facilities were decontamination areas and deemulsification stations, where physical and chemical processes are employed to eliminate hazardous properties of waste.

Waste reuse facilities

In the area of waste reuse, the CEI inspectors made 351 checks in the course of 2019, checking various types of facilities: facilities for reuse of construction and demolition waste, notably landscaping and construction waste recycling, reclamation of landfills and other areas, waste reuse as substitute for input raw materials, biodegradation areas, recycling facilities (e.g., recycling of plastics and metals), recovery of waste oil, facilities treating biodegradable waste such as composting plants, biogas stations and application of sludge to farmland, as well as facilities treating waste before reuse (sorting, crushing, etc.). In this area, the CEI deals with both illegal operations and approved waste handling facilities.

In connection with waste reuse issues, the CEI investigated 152 suggestions received, most frequently pointing to illegal transport and dumping of construction and demolition waste and landscaping. In 2019, we initiated 132 proceedings on fines in this area, and 116 CEI decisions imposed fines totalling CZK 19,862,000 that entered into force. We imposed one fine for failure to implement remedial measures. We also conducted misdemeanour proceedings and imposed fines for violations of Inspection Rules where the inspected entities did not cooperate with the CEI.

CEI inspectors' findings indicate that, like in previous years, the inspected entities most frequently violate the Waste Act by handling waste in places not permitted for the purpose (e.g., unpermitted landscaping). Other violations included transfer of waste to unauthorised persons and acceptance

of waste by unauthorised persons, record-keeping errors (failure to present continuous waste records, submit annual waste reports, reporting wrong data, etc.). In approved facilities under Section 14, Para. 1 of the Waste Act, the CEI most frequently finds violations of operating rules, e.g., exceedance of defined capacity, storing waste outside areas specified by operating rules, not determining quality of admitted waste, and not assessing quality of output.



Approved facilities for reuse of plastic and other waste.

Demolition and construction waste handling

Like in previous years, most of the suggestions handled by WMD inspectors pointed to construction and demolition waste handling. In inspections, the CEI most commonly comes across construction waste handling (earth, mixed construction waste, concrete, bricks, etc.) in places not meant for the purpose, i.e., various backfills and unpermitted landscaping. The CEI deals not only with landscaping using waste earth of unknown quality or exceeding pollutant limits set for waste reuse on ground surface (see Decree no. 294/2005 Coll.), but also landscaping using untreated construction waste (bits of bricks, concrete, mixed construction waste, earth mixed such waste, etc.).

In this area, the CEI finds essentially the same violations as in the whole waste reuse area. Besides handling in places not intended for the purpose, they include transfer of waste to unauthorised persons or acceptance of waste by such, violation of record-keeping and reporting duties and, in facilities approved by regional authorities, violations of operating rules. For example, the CEI imposed a conclusive fine of CZK 250,000 for operating a waste reuse facility (landscaping) in contravention of approved operating rules. The violation of operating rules consisted in the facility operator admitting waste types not permitted in the operating rules (mixed construction waste) and reusing waste without observing the plot boundaries and elevations according to the project design.

We also find major violations and impose high fines in the area of demolition waste and waste earth handling in the long run; for example, we imposed a conclusive fine of CZK 8,000,000 in 2019 for handling 82,000 tonnes of construction waste on a plot not intended for the purpose under the Waste Act, and for violation of obligations when operating a mobile construction waste crushing plant.

Biodegradable waste reuse facilities

In the area of reuse of biodegradable waste (BDW), the CEI inspected 59 composting plants, four biogas stations admitting BDW, and 12 cases of application of sludge to farmland. The CEI inspectors investigated ten suggestions received, most of which (six) concerned the area of application of sludge on farmland.

Most of the inspections in this area dealt with composting plant operators. In 2019, the CEI checked composting plant operated based on the applicable regional authority approval or an integrated permit, as well as so-called small-scale facilities (see the table below). Pursuant to the Waste Act, a small-scale facility refers to a facility processing biodegradable waste in which the amount of BDW per batch does not exceed ten tonnes a year, and the total annual amount of biodegradable waste processed by the facility must not exceed 150 tonnes.

Composting plant inspections

Total composting plant inspections	59
Facilities under Section 14, Para. 1 of Waste Act	44
Small-scale facilities	15

Thus, the CEI inspectors checked a total of 59 composting plant, including three checks made based on suggestions received. In the course of 2019, we initiated 23 fine proceedings with composting plant operators, and 21 decisions entered into force, imposing fines totalling CZK 862,000 (these figures include proceedings conducted based on findings of inspections made in 2018).

The misconduct most frequently found in the CEI inspections of composting plants operated under Section 14, Para. 1 of the Waste Act include violations of facility operating rules (e.g., exceedance of capacity, insufficient temperature measurement in batches, insufficient frequency of compost analyses and BDW handling outside secured composting plant area) and violation of record-keeping duty (errors in continuous records, non-submission of annual waste handling and production reports, failure to keep an operating log or batch cards, etc.). An example is a composting plant where the CEI inspection found violation of several points of the operating rules, e.g., non-observance of batch dimensions and the set formula, non-assessment of composting plant output quality, and non-compliance with the record-keeping duty. For this

misconduct, we imposed a conclusive fine of CZK 180,000 on the composting plant operator in 2019.

The CEI also found malpractice among operators of small-scale facilities in 2019. For example, when checking a composting plant that was meant to be a small-scale facility only, the CEI inspectors found over 300 tonnes of waste stacked in two batches. The composting process in the batches was not monitored (e.g., temperature measurement) and they were not hoed. The composting plant was supposed to have a regional authority permit and approved operating rules. For the violation of the Waste Act, we imposed a conclusive fine of CZK 120,000.

Moreover, the CEI has frequently found the record-keeping error that composting plants classify waste in their continuous records on waste and waste handling methods as xN13 already when admitting the waste to the facility although the composting process has not been completed. Composting is a long-term process by nature with results depending on correct setting of inputs and operating conditions. Until the process is completed, the material is still the original waste admitted to the facility that is undergoing treatment.

Besides, CEI inspectors also check performance of obligations under the Waste Act and its executive decree in application of sludge to farmland. In this area, we initiated seven proceedings on fines in the course of 2019, and seven decisions entered into force, imposing fines totalling CZK 470,000. They were mostly proceedings based on inspections made in 2018. The highest conclusive fine in this area, amounting to CZK 150,000, was imposed on an entity for temporary storage of treated sludge in contravention of the farmland sludge reuse scheme.

Waste collection and repurchase facilities

In 2019, we made 242 inspections at waste collection and repurchase facilities, including 44 based on suggestions received. We initiated 75 proceedings on fines, and 76 decisions entered into force, imposing fines totalling CZK 5,890,000.

In 2019, the WMD focused, for example, on mobile waste collection and repurchase facilities, which store waste without being intended for it pursuant to the Waste Act. Afterwards, the mobile facilities report the waste balance in annual waste production and handling reports. Besides, the CEI comes across cases of storage of waste, often hazardous, on sites totally different from those shown in records.

Across the territorial inspectorates, inspections at waste collection and repurchase facilities reported notably operation of facilities in contravention of their approved operating rules. The malpractice included admission of unpermitted waste to facilities, wrong classification of repurchased waste according to the Waste Catalogue,

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cases where the submitting person was not identified properly on waste repurchase, piling of waste in places not intended for it by the operating rules, and exceedance of facility capacity. The inspectors also came across late, false or incomplete waste production and management reports.

For instance, a fine entered into force in 2019 that was imposed on a waste collection and repurchase facility for violating the provision specifying for operators of such facilities methods of making cashless payments when repurchasing selected types of waste. In this case, however, the operator was sending money by direct transfer to bank account that he himself owned, although the bills were issued for various natural persons. This procedure absolutely negated the purpose of the law, which is to use cashless money transfers for identification of the actual person submitting waste to the facility. The appeal authority confirmed the fine in full.

Car wreck collection, repurchase and processing facilities

In 2019, the CEI made 90 inspections in the area of car wreck handling, including 35 based on suggestions received. This is a slight decrease compared to 2018, when we made 98 checks with 37 based on suggestions. In 2019, we initiated 39 misdemeanour proceedings on fines, and 34 decisions entered into force, imposing fines totalling CZK 1,340,000 (these figures include cases where the inspection took place in 2018 and the proceeding on fines was conducted in 2019).

The CEI inspectors identified both illegal admission and dismantling of car wrecks and misconduct in car wreck collection and processing facilities approved by applicable regional authorities. The most frequent violation for which the CEI imposed fines in 2019 was handling of car wrecks in places not intended for it. Besides, the CEI imposed fines for violations of operating rules, record-keeping errors and violations of the Inspection Rules (i.e., not enabling inspection or not presenting requested documents). The CEI inspectors also came across cases in 2019 where a metal recycling yard admitted a complete car wreck without being permitted to do so.

More serious findings are cases of the Czech Police identifying car wrecks in operation (e.g., flagging them down in road checks). They are car wrecks that were submitted to an approved car wreck collection facility by the owner, who received a confirmation of environmentally friendly disposal, yet they are then found back in traffic. CEI inspectors dealt with five such cases in 2019. One of them was a case where the Czech Police flagged down a Toyota car as part of a routine road check and found that a permitted facility had issued a confirmation of environmentally friendly disposal for it. Based on this finding, the CEI imposed a conclusive fine of CZK 40,000 on the permitted scrapyard.

In addition, the CEI comes across cases where car wrecks admitted to permitted facilities are then dismantled into spare parts at illicit scrapyards (not having the necessary regional authority approval). CEI inspectors also deal with cases where illicit facilities dismantle into spare parts cars purchased abroad that were never registered for operation in the CR, and vehicles that ceased to exist officially on the Road Act amendment (vehicles in the so-called “half-transfer” process or deposited for a long time).

At approved facilities (operated based on applicable regional authority approval pursuant to Section 14, Para. 1 of the Waste Act or an integrated permit), the CEI found in 2019 and fined particularly violations of operating rules (e.g., exceedance of capacity, storage and dismantling of car wrecks outside places defined by the facility operating rules), violation of record-keeping duty as well as transfer of car wrecks to unauthorised persons. For instance, the CEI imposed a conclusive fine of CZK 100,000 on the operator of a car wreck crushing plant (shredder) for violating two points the operating rules, i.e., exceedance of the annual shredder capacity and operating it outside the business hours defined by the operating rules.

Recollection of used products

Under this departmental task, the CEI work focuses on problematic current aspects of recollection, i.e., areas with recurring failure to observe obligations by required entities/manufacturers of tyres, electrical appliances and (storage) batteries as well as problems of practical implementation of recollection of such used commodities in recollection facilities.

The table below shows an overview of numbers of inspections, broken down by product type subject to recollection.

Recollection of used products

Total inspections	183
Suggestions	62
Electrical appliances (manufacturers, incl. vendors)	53
Tyres (required entities, recollection points	
incl. vendors)	105
Batteries and storage batteries	
(manufacturers, incl. vendors, recollection points)	32
Electric waste processors	6

Note: The total number of inspections includes numbers of inspections at facilities, followed by checks at facilities sorted by focus.

The CEI made 183 inspections in 2019, including 62 based on suggestions, which pointed mostly at non-provision of recollection of tyres. The increase in the suggestions compared to the previous period was almost threefold: clearly the most frequent complaints are about non-functioning of tyre recollection points in car repair shops or at vehicle and equipment vendors. We initiated 55 misdemeanour proceedings and 53 decisions totalling CZK 694,000 entered into force in 2019. The highest conclusive fines for violations of the Waste Act in this area were imposed for:

- non-cooperation with authority (tyre vendor), CZK 60,000;
- non-performance of obligations of end vendor of appliances (e-shop) pursuant to Section 37k, Para. 4, item a), CZK 20,000;
- violation of WEEE processor's obligation when making a waste management report, CZK 60,000;
- WEEE processor handling waste in places not intended for it, CZK 50,000;
- free riding – non-performance of manufacturer's obligations, electric waste and tyres, CZK 20,000.

Tyres

The inspections in the area of tyres focused primarily on the obligation to provide recollection at points identified by required entities as recollection points, obligation to register on the List (unregistered importers – free riders), information duty of end vendors and implementation of recollection as well as obligations relating to stating information about costs of tyre recollection on sales documents.

In the area of tyre recollection, we imposed 29 penalties, the total conclusive fines amounting to CZK 289,000.

Again, the most problems and thus greatest focus on inspection work were in the area of tyre recollection, which is related to the large existing numbers of tyre importers who perform their obligations individually. The most problems are found in inspections at recollection points, where the CEI still comes across refusal to recollect tyres or conditioning tyre recollection on purchase of new tyres, failure to identify recollection points, etc. Consumers' complaints also mostly (2/3 of all the suggestions in this area) point at non-functioning of recollection points included in the MoE register for individually registered tyre importers. The points shown in the register are not always quite up-to-date, vendors often do not know they are a recollection point or they condition tyre recollection on new purchase. Thus, the CEI imposed 16 fines or reprimands for non-provision of recollection, non-identification of recollection points or non-performance of the information duty. Compared to collective performance, tyre importers performing their obligations individually still have relatively low

recollection levels, but they are at the legal minimum. We only found two shortcomings in this area. Since 2020, the mandatory recollection rate is raised from 35% to 65% of the marketed quantity, so it is a question whether individually performing manufacturers will proceed to more effective recollection, expansion of recollection networks or transition to collective performance, etc., which will undoubtedly be reflected in increased costs of this performance.

Free riding was only identified in three cases in 2019. In this respect, there is a positive trend where the registered frequency of free riding in the area of tyres is lower than elsewhere. We found seven cases of vendors not specifying the costs of tyre recollection on sales documents.

Electrical appliances, batteries

In the area of electrical appliances, 1 January 2019 factually brought a new classification of electrical appliances. This change was accompanied by an expansion to the group of manufacturers (importers) who now have to perform obligations regarding electrical appliances (e.g., household lighting fixtures). For this reason, too, inspections in the area focused on identification of free riding. The inspections were made mostly based on selection from the General Customs Directorate importer database and other findings. There are still some unclear points relating to some exemptions from the law for some, primarily large industrial EEE, which may cause problems to EEE manufacturers, operators of collective systems and inspection authorities.

In the area of recollection of these commodities, we initiated 23 misdemeanour proceedings, and 23 decisions entered into force, imposing fines totalling CZK 405,000. The most frequent legal violation in this area is "free riding" of electrical appliance and battery importers and the related non-submission of annual reports to the MoE on imports and recollection (ten proceedings). The CEI also focused on inspection of compliance with information duty on recollection and the obligatory free recollection of electrical appliances by e-shops. Here, we imposed eight fines totalling CZK 115,000, since the e-shops did not offer the service or did not inform end users; in some cases, they demanded a payment from the customer for taking away the old appliance in contravention of the law, or the service was only offer as part of first-class transport service associated with extra payment.



Illegal facility for handling electric waste.

Industrial businesses and other waste producers In 2019, our inspectors made 998 checks of waste producers, including 208 based on suggestions received. We initiated 198 proceedings on fines, and 202 decisions entered into force in 2019, imposing fines totalling CZK 5,247,000.

In 2019, the inspectors traditionally focused on scheduled inspections of waste producers' compliance with obligations, notably in large industrial businesses, which typically have integrated permits. We again confirmed the positive finding that these large waste producers, thanks to company environmental officers as well, are better-versed in waste management issues and comply with applicable legislation better. Smaller waste producers do not always know all their obligations, which is why violations of the Waste Act are found more often at them.

We most frequently found violations of the Waste Act in the form of insufficient waste sorting and performance of record-keeping and reporting duties. Moreover, our inspectors found errors in labelling and identification of hazardous waste, transfer of waste to entities not authorised to accept it, and insufficient securing of waste against destruction or release into the environment.

For instance, the inspectors came across a case of not sorting waste from demolition works and handling it in a place not intended for it. After the demolition of a farm building, CEI inspectors arrived on the site, which contained a large dumping area with construction and demolition waste. Several of the heaps contained, for example, concrete, steel girders, petrol cans, hardboard, tyres, mattresses and roofing paper containing tar. They also found a fireplace with wood waste constantly ablaze, as well as asbestos cement roofing and tinsmith products. A fine was imposed for these violations of the Waste Act, which entered into force in 2019 and was confirmed in full by the appeal authority.

Municipalities

In 2019, the WMD made 93 inspections at municipalities, including 21 based on suggestions. We initiated 15 proceedings on fines, and 14 decisions entered into force, imposing fines totalling CZK 233,000.

Inspections at municipalities focus primarily on provision of sites for separate collection of municipal waste components, i.e., hazardous waste, paper, plastics, glass, metals and biodegradable waste (BDW) in the form of a system set in the municipality's generally binding ordinance. In exceptional cases, the CEI has found municipalities without a generally binding ordinance defining the system, or the ordinance not specifying points for collection of some of the municipal waste components (e.g., BDW and metals). Such municipalities make remedy after the CEI inspections.

In 2019, the inspectors checking municipalities came mostly across violations of record-keeping and reporting duties, non-provision of places for separate collection of hazardous waste, biodegradable waste or metals. In the case of construction and demolition waste or earth, we found violations of the Waste Act due to handling it in places not intended for it. The reason may be insufficient knowledge of legislation, where the municipality does not meet all the requisites for waste reuse on ground surface (e.g., quality analyses).

Transboundary waste transport

The CEI performs inspections focused on meeting of obligations related to transboundary waste transport, notably at waste senders and recipients pursuant to EU Regulation on shipments of waste no. 1013/2006 (the "Regulation"). They include mainly mandatorily scheduled inspections as required by the Regulation, made at waste producers or facilities that trade in waste (import and export). Besides, we dealt with cases based on suggestions by the MoE (international collaboration) and customs authorities. The purpose of the inspections was to check compliance with the Regulation (notably prohibitions and restrictions, waste classification), including transport administration (documents). In 2019, we cooperated intensively with customs authorities (CA), which perform checks on roads, particularly at former border crossings. In this respect, the cooperation between the CEI and authorities in criminal proceedings and the judiciary was more intensive, since many cases of unpermitted transport potentially shows signs of the crime of unpermitted waste handling. We also signed an agreement with the Polish GIOS on close cooperation in the area. In this respect, cooperation with all the relevant authorities will continue in 2020.

Facilities and waste producers

We inspected 69 waste senders and recipients, mostly based on the schedule and mostly at entities transport so-called Green List waste. A total of 23 inspections were made based on requests forwarded by authorities abroad

or suggestions, mostly in response to unpermitted shipments identified by the Customs Administration, where checks of waste hauliers and recipient have ensued. Under this departmental task, we initiated 23 misdemeanour proceedings and imposed 21 conclusive fines totalling CZK 405,000. The highest fine was imposed for non-cooperation on inspection, amounting to CZK 150,000.

The most common and constantly recurring administrative findings are discrepancies in documents – incorrectly or falsely completed information under Annex VII to the Regulation and absence of a contract pursuant to Art. 18 of the Regulation. If the information completed is false with respect to the actual route, waste recipient and type, the shipment is interpreted as unpermitted, with clear consequences, typically in the form of a misdemeanour proceeding for the waste sender or recipient.

It must be noted that the haulier too is responsible for the driver during the shipment having properly completed documents depending on the shipment type; usually there are shortcomings in Green List shipment, e.g., incorrect recipient, waste declaration, weight, sender's signatures, etc. For these shortcomings, usually also connected with not labelling the vehicle, we imposed eight fines on hauliers totalling CZK 78,000.

We also repeatedly come across cases where a recipient operating a facility for preliminary treatment of R12/R13 waste does not comply with the rules of Government Regulation no. 352/2014 on the Waste Management Plan of the CR. If waste intended for preliminary reuse are shipped to the CR, information on the subsequent use other than preliminary has to be provided in a document under Annex VII to the Regulation or an annex to the document. Transporting waste only for preliminary use operations (sorting, treatment, storage) is not transporting for the purpose of eco-friendly waste reuse.

Cases of unpermitted waste shipments

Serious cases of unpermitted waste shipments to the CR were detected in 2019. In close cooperation of the CEI, MoE and CA and intelligence information from international collaboration of authorities of criminal proceedings, we initiated specific inspection actions focused on waste imports based on the information and existing experience. We gradually detected repeating cases of importation of waste comprising mixed waste with various additions, as well as other waste. It is likely a consequence of the reduced export of waste to Asia, leading to a lack of processing capacity, including energy recovery, in the EU and the resulting intersection of supply and demand in disposal of waste produced primarily in Germany, Italy and Austria. Of course, senders offer a monetary reward for acceptance of such waste from these countries via intermediaries, particularly in larger volumes, and some Czech recipients probably actively demand such waste and organise

shipments to the CR, thus helping organise the activity. It is clear that may entities in the CR have taken the chance of accepting foreign waste for disposal as an attractive, relatively easy and fast profit. As part of our actions, we inspected more than a thousand shipments, primarily at former border crossings, we intercepted 17 vehicles illegally shipping waste, and the CR was a transit country according to the papers in nine of the cases. In some of the cases of transit via the Czech Republic, the waste was transported along a very illogical route, which gave rise to suspicion whether the waste is only transiting the CR or the Czech Republic was in fact meant to be its final destination. In the cases where the Czech Republic was the destination, we concluded a violation of the Waste Shipment Regulation. In all the identified cases, the shipments (imports) to the CR pursuant to Art. 18 of the Regulation contained waste declared in the accompanying documents as plastics included on the Green List, but in fact it was waste or waste mixtures of inadequate quality and purity (e.g., unsorted waste, e.g., from household and literally impossible to recycle, suitable for energy recovery at best); it was shipped to storage facilities or waste collection and repurchase facilities without assuring proper reuse of the waste in the Czech Republic. The role of the CEI in this action consists primarily in expert assessment of the waste and subsequent inspection at the recipient. Thus, a common denominator of the unpermitted shipments was an effort to import the waste as Green List waste in contravention of the Regulation. The waste recipients often did not even have respective permits for acceptance and handling of the waste or equipment for handling it (moreover, plastics are a specific category of waste as not every technology is able to process all types of plastics). Our inspections repeatedly found illicit storage of waste in buildings without necessary permits and deliberate change of the waste origin and transport type from foreign to domestic. In addition to violation of the Waste Shipment Regulation, however, this irresponsible "business" resulted in many cases in illicit waste storage or waste disposal, where the State will have to repatriate or dispose of the waste in a demanding and costly way in some cases. It is therefore in order for authorities of criminal proceedings to prosecute and punish specific responsible natural persons. Thus, based on these findings, the CEI made four crime reports on justified suspicion of the commitment of a crime of unpermitted waste shipment to the CR, and we cooperate with the Czech Police on the cases. Since the cases and person are still in investigation or proceedings have not been concluded, we cannot provide specific details on these cases yet. The CEI also cooperates on cases of one-off imports of hazardous waste from Poland to illicit storehouses in the Moravian-Silesian Region; the Czech Police has handled the cases as crimes from the start.

Besides, the CEI imposed a penalty of CZK 30,000 in 2019 for unpermitted shipment of electric waste to non-EU countries; the exporter tried to ship non-functioning used mobile phones under the used goods regime. Moreover, it can be said that the

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Customs Administration monitors waste importation in border areas, notably from Germany, by natural persons (e.g., large-scale municipal waste, used clothing, construction waste, etc.), for example for the purpose of storing it in recycling yards for a payment from the sender. Proven cases are transferred to the CEI for imposing a penalty on the natural person.



Storage of waste from unpermitted waste shipment.

Inspection of compliance with Packaging Act

In 2019, we made 104 inspections focused on compliance with Act no. 477/2001 Coll. on Packaging and on amendment of certain acts, as amended (the Packaging Act), including five based on suggestions received. We initiated 78 proceedings on fines in the course of 2019, and 73 decision entered into force, imposing fines for violations of the Packaging Act or the Inspection Rules totalling CZK 1,282,000. Out of that, CZK 85,000 were imposed for violations of the Inspection Rules, i.e., failure to enable inspection, or for non-submission of requested document (four conclusive decisions).

In this area, the CEI again focused primarily on entities that it suspected did not perform their obligations under the Packaging Act at all (comprising approx. 75% of checks in this area). The entities are mainly importers and transboundary hauliers of packaged goods and packaging manufacturers (so-called “packaging fillers”) not registered on the List of Entities and not having a contract with an authorised packaging company (AOS). The CEI selects the entities and plans its inspections using data from the General Customs Directorates on goods imports, such as clothing, shoes, wines, electric light bulbs or discharge lamps. Most of the entities at which the CEI identified a violation of the Packaging Act made remedy afterwards.

In several cases, we came across the inspect entity applying an exemption pursuant to Section 15a of the Packaging Act. The provision says that obligations specified in Sections 10 to 15 do not apply to entities that market or circulate less than 300 kg of packaging per calendar year and, at the same time, their annual turnover or annual net total turnover does not exceed CZK 4.5 million, meaning both conditions have to be met simultaneously. The inspected entity has to prove that it met both conditions.

The highest conclusive fine amounting to CZK 185,000 was imposed in 2019 on a company that sold packaged goods in 14 shops (e.g., furnishings, kitchen and office accessories, creative arts supplies, games, toys, food, beverages and cosmetics) transported transboundary from Denmark, and did not perform its obligations under the Packaging Act. The fine was imposed for violation of several provisions of the Packaging Act, including not assuring that packaging waste from marketed goods is reused to the extent specified by the Packaging Act. The purpose of this provision of the Packaging Act is to reduce the amount of packaging waste deposited in landfills and assure material reuse of packaging waste. In this case, the quantity was over 50 tonnes of packaging intended for consumers that the company marketed without assuring recycling and reuse to the set extent.

In addition, the CEI imposed a conclusive fine of CZK 160,000 on the operator of a fast food chain. In this case, the CEI specifically inspected five fast food establishments of the same company, which marketed primarily polystyrene packaging for main dishes and soups, and plastic cups. However, the company did not perform its obligations under the Packaging Act. In 2019, the CEI also imposed fines on other fast food operators as well as vendors of wine, food, clothes, shoes, household supplies, etc.

Inspections of adherence to Chemicals Act and Biocides Act

CEI inspectors check compliance with regulations on chemicals. They are the Chemicals Act no. 350/2011 Coll., Biocides Act no. 324/2016 Coll. and related directly applicable European regulations – Regulation no. 1907/2006 on registration, evaluation, authorisation and restriction of chemicals (REACH), Regulation no. 1272/2008 on classification, labelling and packaging of substances (CLP), Regulation no. 648/2004 on detergents, Regulation no. 528/2012 on biocides, and others. Under the above regulations, the CEI made 593 inspections. Most of the inspections concerned REACH (registration of substances, material safety data sheets, restricted and authorised substances, totalling 264 checks) and obligations under CLP (classification, labelling and packaging of substances, 221 checks). Biocidal products were checked in 76 cases (we inspected 93 biocidal products and treated items, of which 38 showed defects). Another 311 inspections were made based on 142 notifications received from the EU Rapid Alert System for Non-Food Products (Safety Gate/RAPEX). One product was reported to the Safety Gate system. The CEI also made inspections based on notifications from the Poison Centre; they were cases of accidents in connection with a dangerous chemical mixture that had not been reported to the Ministry of Health register (CHLAP chemical and preparation register).

Four percent of the REACH inspections dealt with manufacturers in the CR, 13% with importers from third-party countries (non-EU), 21% with subsequent users (including end users), and 54% with distributors of chemical substances and mixtures.

A total of 56% of the chemical substances or mixtures checked in 2019 came from the European Union or third-party countries. Every year, those products are found to show more violations of chemical regulations than products made in the CR. A total of 60% of chemical substances or products made in the EU failed to comply with chemical regulations; only 44% of products made in the CR did not comply.

In 2019, 152 fines imposed by the CEI under the Chemicals Act, the Biocides Act and Inspection Rules (Act no. 255/2012 Coll.) entered into force, totalling CZK 4,329,500. We initiated 151 misdemeanour proceedings and proceedings ordering remedial measures. Most of the violations concerned wrong identification of substances or mixtures, notification of chemical mixtures to the Ministry of Health register, quality of material safety data sheets, advertising on the internet and restricted substances.

The CEI was involved in the work of the European Chemicals Agency (specifically, its enforcement information exchange forum and biocides working group). Three CEI employees were actively involved in several forum meetings.

Thematic inspections

As part of the Europe-wide inspection project REF7, we checked primarily entities importing or producing chemical substances. The substances were inspected in terms of compliance with registration duties. Moreover, in some cases, we made inspections of intermediate products and compliance with strict requirements for use of intermediate products. We inspected 38 substances and found three cases of violation in their registration.

Inspections as part of the European project BEF1 focused on entities marketing items treated with biocidal products (e.g., treated timber, textiles, etc.). We checked 38 items of 28 companies marketing treated products and 15 of them were found to be in violation of obligations under the Biocides Regulation. Only 15 of the products were labelled in accordance with the Regulation.

In 2019, we were also involved in a pilot inspection action organised by the ECHA and the PARCS network of European customs authorities, focused on regulated substances (notably heavy metals) and basic obligations under the CLP Regulation when importing substances, mixtures and products from third-party countries. The checks involving Customs Administration and CEI inspectors were made before releasing the goods into free circulation. We inspected 71 products (bracelets, earrings, pendants, chains, cufflinks, rings and electronic cigarette liquids).

4.3.3 Overview of performance of specific tasks

In addition to nation-wide departmental tasks, the CEI TI set specific tasks. These tasks correspond to local needs based on knowledge of the respective region. Alternatively, they were inspections at a specific entity with follow-up checks monitoring individual waste streams. Under the specific tasks, we inspected facilities reporting higher waste balances in store, including mobile facilities. Besides, we inspected small-scale facilities processing biodegradable waste and food processing facilities. Another sector, chosen by two TI for their specific tasks, was inspection of construction and demolition waste handling. The specific tasks also included waste produced by remediation of historic environmental burdens and waste from titanite oxide production.

4.3.4 Major cases

Highest conclusive fines in the department by TI

Prague TI

Natural person authorised to do business

A fine of CZK 5,000,000 imposed on a natural person authorised to do business for violation of the Waste Act entered into force in 2019. The person handled hundreds of thousands of tonnes of waste by accepting it and depositing without authorisation in places not intended for it. The appeal authority confirmed the fine in full. In its waste processing and disposal facility operated without authorisation, the natural person accepted over 350,000 tonnes of earth and stone, which he then used for unpermitted landscaping.

České Budějovice TI

AVE CZ odpadové hospodářství s.r.o.

A fine imposed on AVE CZ odpadové hospodářství for repeated violations of the Waste Act entered into force in 2019. The CEI imposed the fine at its maximum amount of CZK 1,000,000, but the appeal authority reduced it to one half, that is CZK 500,000. Along with the monetary penalty, the company was ordered remedial measures, which decision the appeal authority confirmed in full. The fine was imposed on the company for operating the Fedruš landfill near Jindřichův Hradec, where the CEI's investigation found no generation of financial reserve for "product from waste" and for waste deposited in the landfill as "construction materials", which were similar shortcomings as in previous years. CEI decision on the imposition of fines and remedial measures for the same malpractice in previous periods (we repeatedly determined the obligation to generate and complete the financial reserve) have been confirmed twice by both the appeal authority and the Municipal Court in Prague.

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Plzeň TI

TORESO CB s.r.o.

A fine of CZK 8,000,000 imposed on TORESO CB for violation of the Waste Act entered into force in 2019; the company operated two facilities without approval, handled over 80,000 tonnes of waste in places not intended for it, and failed to perform its reporting duty related to the start and end of operation of a recycling plant. The company's two unapproved facilities accepted construction and demolition waste, asphalt mixtures, earth and stone. The company then transferred this waste, accepted without authorisation, to its mobile waste reuse facility, a recycling plant. The recycling plant output was still waste even after the processing, which the company disposed of by dumping it on a plot not intended for it. The recycling plant operation itself was not in accordance with the Waste Act, because the company violated the operating requirement to notify the CEI Plzeň TI and the authority of local jurisdiction of the location of the mobile facility. In addition, the company did not notify the applicable authorities of ending the mobile facility operation.

Ústí nad Labem TI

Purum s.r.o.

A fine of CZK 450,000 imposed on Purum for violation of the Waste Act entered into force in 2019; the company's mobile waste collection and repurchase facility had handled hazardous medical waste, which it was not authorised to accept and handle. The appeal authority confirmed the fine in full.

The company's mobile semitrailer located in an industrial hall in Srbsice accepted almost 247 tonnes of hazardous medical waste, including infectious waste and unusable cytostatics. Moreover, when accepting this waste, the company completed hazardous waste shipment notification sheets so that the data in the papers did not agree with reality; for example, the waste unloading points were specified falsely as other facilities than where the waste was actually taken. Another identified violation by Purum was submission of a false waste production and handling report.

Hradec Králové TI

MACHI s.r.o.

A conclusive fine of CZK 240,000 was imposed on MACHI s.r.o. for violation of the Waste Act, as it had done landscaping using various types of construction and demolition waste and waste excavated earth without knowledge of their quality, on plots not intended for it. The appeal authority confirmed the fine in full. The waste was deposited on the site in smaller heaps of construction and demolition waste (bricks, concrete chunks, tiling) and larger heaps of mostly excavated earth. The CEI estimate was thousands of tonnes of waste, partly already used for landscaping.

Telmont s.r.o.

CEI inspector imposed a fine of CZK 240,000 on Telmont s.r.o. for violation of the Waste Act, as the company had illicitly accepted to its ownership waste without authorisation and handled it in places not intended for it. The company had dumped over 11,000 tonnes of waste earth on a plot in a village near Chrudim and used it for extensive landscaping. However, the plot was not intended for waste handling. In addition, the company was not authorised for waste management, so it should not have accepted and handled the waste earth.



Waste earth illicitly dumped by Telmont s.r.o. in Kočí near Chrudim.

Havlíčkův Brod TI

GOLTZE INVESTMENTS s.r.o.

The CEI imposed a fine of CZK 160,000 on GOLTZE INVESTMENTS s.r.o., which had operated a car wreck collection, repurchase and recovery facility without having an approval under the Waste Act for it. According to the Commercial Register, the company runs road vehicle repair and manufacturing, trading and service not specified in Annexes 1-3 to the Trades Act. In reality, however, the company collected and dismantled car wreck at its address and then offered the spare parts for sale. Besides, we found illegal transfer of car wrecks between GOLTZE INVESTMENTS and the entrepreneur František Nohejl. František Nohejl, a natural person authorised to do business, accepted the car wrecks in his properly authorised facility and then supplied it to GOLTZE INVESTMENTS for dismantling based on a documented contract for work.

František Nohejl, a natural person authorised to do business who transferred some of his car wrecks to the GOLTZE INVESTMENTS facility, was fined CZK 100,000 for operating a facility in contravention of its operating rules; the fine is conclusive.

Brno TI

CG Komunální servis s.r.o.

A fine of CZK 1,000,000 imposed by the CEI on CG Komunální servis s.r.o. for violation of the Waste Act entered into force in 2019. The company violated the law by being an entity authorised for operating a mobile waste collection and repurchase facility but not submitting the 2017 waste production and handling report. However, the company demonstrably accepted to its ownership hundreds of tonnes of hazardous waste and tens of tonnes of the "other" category waste from various entities in 2017. This was a repeated violation of the same obligation; another fine of CZK 1,000,000 entered into force last year because the company had submitted its 2016 waste production and handling report either. Like in the previous inspection period, CG Komunální servis s.r.o. did not cooperate on the inspection.

Olomouc TI Petr Ramiš

A fine of CZK 90,000 imposed by CEI inspectors on Petr Ramiš, a natural person authorised to do business for violation of the Waste Act entered into force in 2019; being the operator of a waste collection, repurchase and processing facility, he had collected different types of "other" waste in variously sized heaps in an unpaved area without securing them from undesirable loss of value, theft or leakage. Moreover, the inspectors found a violation of the Waste Act by not identifying the facility with a sign containing all the required information. The natural person authorised to do business also failed to present the CEI during a site investigation with documents necessary for complete inspection pursuant to the Waste Act and no relevant information about the matter. In this case, the CEI consider it an aggravating circumstance that it was not the person's first violation of the Waste Act.

IMOS group s.r.o.

A fine of CZK 90,000 imposed by CEI inspectors on IMOS group s.r.o. for violation of the Waste Act entered into force in 2019; being a waste producer, the company had handled hazardous and other waste on a plot not intended for waste handling under the Waste Act. The company had deposited waste such as wastewater treatment sludge, excavated earth and stone with additions of construction and demolition waste on the plot in question. Besides, the company failed to cooperate with the CEI in any way and to present requested documents until the date of the decision.

Ostrava TI Flambium s.r.o.

A fine of CZK 500,000 imposed on Flambium s.r.o. for failing an obligation imposed by the CEI's order in 2018 entered into force in 2019; it was a decision ordering remedial measures for unpermitted waste handling in a place

not intended for it. The company was ordered to make remedy by a set deadline by removing construction and demolition waste (including earth excavated from contaminated areas) from the plot. The waste was supposed to be handed over to an entity authorised to accept it under the Waste Act in order to dispose of it or reuse it, and restoration of the plot to its original condition.

Noroo Bee Chemical Czech s.r.o.

A fine of CZK 500,000 imposed on Noroo Bee Chemical Czech s.r.o. for violation of the REACH Regulation entered into force in 2019; the company had imported tens of tonnes of substances that should be registered pursuant to the Regulation, but had failed to register them. Besides, the company violated the CLP Regulation by being the importer of a dangerous chemical mixture classified as irritating, harmful and highly flammable and marketing it, but not providing a labelling for the mixture. The last violation found by the CEI was related to the Chemicals Act, which lays down the obligation for the importer and the supplier who first markets in the Czech Republic a mixture having dangerous physical or chemical properties or properties dangerous to health to provide the Ministry of Health with information by a prescribed date, which the company did not do.

Liberec TI Miroslav Veselý

A fine of CZK 250,000 imposed on a natural person authorised to do business for violation of the Waste Act entered into force in 2019; he had operated a waste reuse facility for landscaping in contravention of its operating rules, and the fine was confirmed in full by the appeal authority. The facility had accepted waste not permitted by the facility operating rules (e.g., scraps of bricks, masonry units, PUR foam, textile, asbestos-containing roofing) and the facility was not properly marked and, according to a geodetic survey of the waste used, the highest elevation specified by the approved project design were exceeded. Besides, the natural person authorised to do business operated the facility on plots not approved for the use, thus expanding his facility illegally.

Otakar Kurucz

The natural person authorised to do business was fined CZK 250,000 for handling waste in places not intended for it; the appeal authority confirmed the fine in full. We identified mostly construction and demolition waste and other waste, such as tyres, wood waste, plastic packaging, cables, fire extinguisher packaging, electrical appliances, air-handling components, electric motors and car gear boxes, asbestos-containing roofing, etc., in various thickness over an area of approx. 30,000 m². The area was not authorised as a facility for waste collection and storage. Another violation of the Waste Act in this case was failure to keep continuous records on waste and methods of handling it.

4.3.5 Conclusions from inspection work

By comparing conclusions from inspection work under the departmental tasks, it can be concluded that many areas of waste management and chemicals showed similar shortcomings as in previous years. Fundamental findings were made notably in the area of transboundary waste transport, where the CEI dealt, particularly in late 2019, with illicit transboundary shipments of mixed plastics with considerable quantities of additions (declared wrongly as Green List waste), moreover stored in the CR in places not permitted to handle waste. This illicit activity has numerous causes, notably closure of Asian waste markets for European countries, lack of processing capacity in Europe and last but not least, high profits from the illegal activity. Since the situation on the waste market is going to change very slowly, the CEI will continue its intensive cooperation with other public authorities, primarily customs authorities and Czech Police.

Another significant trend that affected the WMD work in 2019 was further increase in suggestions for investigation in the area of waste management. They were most importantly suggestions related to construction and demolition waste handling, specifically landscaping. In this connection, it can be said that many of the suggestions could be resolved by other public authorities that also have inspection powers in the area of waste management, such as municipalities, municipalities with extended powers and regional authorities.

As for chemicals, it can be concluded that worse shortcomings were identified in the area biocidal products and treated items, indicating lower awareness among required entities.

4.4 Nature protection and CITES

4.4.1 Overview of inspection work in 2019

The Czech Environmental Inspectorate's inspection work in the area of nature protection and CITES in 2019 focused, like in previous years, on checking situations, activities and entities that may pose serious threats to interests protected by respective component laws. The CEI's inspection activity can be divided into scheduled checks, following up on previous findings, reflecting current situation and comprising about 40% of the inspection capacity, and checks made based on public suggestions (another approx. 40%) and made operatively based on our own findings (about 20%).

Nature protection inspectors made 3,713 checks and investigations in 2019, which is 44 investigations per inspector per year on average with 85 inspectors. A total of 849 decisions entered into force in 2019, including 614 decisions on the imposition of fines (299 for misdemeanours of legal entities and natural persons

doing business and 315 for misdemeanours of natural persons), 40 decision on restricting or halting of operations, 119 decisions on seizures or confiscations, 25 decisions on remedial measures, and 51 on preliminary measures. That is a quantitative increase by 8-9% in administrative work compared to the previous year.

The total sum of conclusive fines in 2019 was CZK 9,257,250 (CZK 7,506,600 were fines to legal entities and natural persons doing business, and CZK 1,750,650 were fines to natural persons not doing business). In this work segment, the year-on-year increase was almost 10%.

Besides, the CEI made 13 notifications to authorities of criminal proceedings in the area of nature protection and CITES in 2019 and 118 suggestions to public authorities at various levels. The quantity of suggestions made by the public grows constantly too. In 2019, the inspectors handled 1,263 suggestions, which was about 15% more than the year before. On average, there are thus nearly 17 investigated suggestions per year per inspector.

Legislative changes, often connected with increase in inspection powers, scientific advances and public activity demand constant professional growth of our inspectors specializing in nature protection. Among other things, they issued 547 statements in 2019, typically as part of EIA processes, and provided ongoing expert consultations for authorities of various levels and jurisdictions, authorities of criminal proceedings and legal entities and natural persons in a wide range of situations relating to compliance with legal bans and obligations in economic activity and everyday life. The most important aspect that affects the CEI's work in nature protection is the inspection and administrative work related to compliance with Act no. 114/1992 Coll. on Nature and Landscape Protection, mainly in connection with management of non-forest trees. In the second half of the report period in particular, a significant portion of the inspection work was protection of specially protected species and specially protected areas in connection with application of rodenticides against overpopulated field pests. The unprecedented scale of this activity demanded definition of specific procedures and designating of a special departmental task.

The CEI maintains long-term cooperation with authorities of criminal proceedings and judicial authorities, particularly in the area of unpermitted holding or trade in species protected by national regulations or international conventions. In connection with solving illegal trade in specially protected species by authorities of criminal proceedings, the importance of the CEI's expert work is increasing; it was represented in 2019 by assistance in eight house searches and development of 16 expert statements.

Inspection work focused on compliance with Act no. 334/1992 Coll. on Agricultural Land Fund Protection is gaining increasing importance. Improving public awareness

of the existence of the CEI's inspection powers in this area leads to constantly increasing numbers of suggestions received. The traditional checks of farmland contamination and introduction of foreign substances were expanded in 2019 with farmland contamination with lead in connection with operation of sports shooting ranges; five of the suggestions pointed to it. Inspections in the area of agricultural land fund protection usually cannot be made without collecting samples and making necessary analyses, be it using our own resources or by way of other entities. Based on the results obtained, the CEI takes further steps in relation to the inspected entities and other concerned public authorities, including suggestions beyond the CEI's inspection powers. In 2019, we dealt with 52 cases in the area of agricultural land fund protection, typically based on suggestions, which is more than double the number in the year before. Nine decisions on the imposition of fines for misdemeanours in the area of ALF protection, totalling CZK 264,000, entered into force in 2019.

An extensive part of the CEI's scheduled work in the long run is checks of farming entities as part of the Cross Compliance system. The principal outcome of these checks is information for the SEF, which decides on applications for agricultural subsidies. Thanks to this direct connection, inspections at applicants for agricultural subsidies play primarily a preventive role in enforcement of compliance with legislation in this area.

Inspections under Act no. 100/2004 Coll. on Protection of Wild Animal and Plant Species by Regulating Trade in Them are made by both territorial inspectorates and the separate Headquarters CITES Department. The most important part of the CEI's work in this areas is solving extensive and organised crime, frequently with major international overlaps.

Inspections of compliance with Act no. 78/2004 Coll. on Handling of Genetically Modified Organisms and Genetic Products and Act no. 162/2003 Coll. on Requirements for Operation of Zoological Gardens are made according to the plan and in conjunction with MoE calls. Their extent remains constant in the long run due to the limited number of entities.

The public traditionally views the CEI as a trustworthy and independent inspection institution in the area of nature protection. That is why investigation of suggestions made by citizens and civic associations make up a significant part of the supervision work; they are a valuable source of information notably in terms of protection of non-forest trees and agricultural land fund from contamination. Unfortunately, justified suggestions mostly point to completed acts, and therefore usually have potential only for misdemeanour proceedings. Only a small portion of suggestions provide information about intended acts, where preventive intervention is possible. Suggestions

delivered traditionally include submissions that cannot be interpreted as justified and some that should be given to other authorities (suspicion of cruelty to animals, various animals annoying people, dogs fouling public spaces).

Trade in endangered species – CITES

In 2019, CEI inspectors made 558 inspections under Act no. 100/2004 Coll. (CITES). Most of the CITES inspection work is done by the International Biodiversity Protection and CITES Department of the CEI Headquarters (408 checks), which deals with international issues of the CITES convention (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.

Inspections of imports and exports comprised 74% of all the CITES inspections in 2019 (412 checks). We performed 235 checks at airports with international traffic, primarily Václav Havel Airport Prague (230 checks), and 177 checks at the customs post office.

CEI inspectors cooperated with other public authorities, notably Customs Administration and Czech Police, and by way of telephone consultations during inspection; there were 827 cases, including 123 consultations as part of standby duty outside working hours. Inland inspections in the CR focused on breeders, growers and holders of non-living specimens made up 19% of the CEI inspection work (103 checks), and inspections at traders and companies 4% (23 checks). We inspected one swap meet in 2019.

The CEI carried out 174 fine proceedings; fines totalling CZK 446,200 were imposed in the CITES area (decision in force); serious cases are forwarded to authorities of criminal prosecution, with which the CEI actively cooperates on investigation of the cases. There were 111 cases of conclusive confiscation of CITES specimens, totalling 72,189 CITES specimens, including 70,162 living and 2027 non-living or dead specimens. The great number of living specimens confiscated is due to the case of interception of glass eels at the Prague Airport (18 kg of glass eels comprising about 70,000 specimens of eel larvae).

The CEI made seven crime reports in the area of CITES in 2019, and inspectors assisted in 16 house searches and implementations by authorities of criminal proceedings (as expert consultants or authors of expert statements). The most important action was implementation of the Lovec (Hunter) criminal dossier, focused on illegal hunting of protected species, mainly beasts of prey (lynx, wolf, bear, otter), grouse, black grouse, elks, etc. CEI inspectors developed 19 expert statements for authorities of criminal proceedings (the Lovec criminal case involved very demanding assessment of specimens and authentication of information abroad, the statements totalled 586 pages).

In 2019, the CEI continued inspecting entities selected for the departmental task in 2018 at which the inspections could not be carried out or completed in 2018 for various reasons. The department task Parrot Checks focused primarily on the hyacinth macaw, palm cockatoo and Cacatua, Ara and Amazona genera listed in Annex A to Regulation 338/97 EC. The inspections found numerous violations of law, mainly in the area of specimen identification, non-documentation of origin, non-performance of registration duty, etc. Eight entities were proven to not own or hold any more specimens; specimens owned by two entities are currently the subject matter of inheritance proceedings, which makes inspection impossible. Inspections at seven entities were initiated and five of them are still continuing due to the large extent of the breeds and complexity of associated investigations.

4.4.2 Overview of performance of departmental tasks

CEI-wide, departmental tasks included primarily mandatory checks arising from interdepartmental links (Cross Compliance), some complete agendas linked to existing knowledge, experience of MoE requirements (handling of genetically modified organisms, zoological gardens, inspections of performance of imposed measures) and current topics (application of rodenticides).

1. Inspections of farming entities as part of Cross Compliance (CC)

In connection with the agricultural subsidy distribution system, the CEI made 340 compliance inspections at 334 farming entities in 2019. In 236 cases, we assessed compliance with statutory management requirements (PPH) arising from Council Directive no. 79/409/EEC on the protection of wild birds (PPH 2); and in 104 cases, compliance with the requirement arising from Council Directive no. 92/43/EEC on habitat protection was checked (PPH 3). Inspections focused on both European Directives were made at six of the entities.

Inspections focused on performance of PPH arising from said European Directives and compliance with applicable provisions of Act no. 114/1992 Coll. focused mainly on areas with greater risks of conflict of farming and protected interests. In the case of PPH 2, these are plots posing a risk of unpermitted intervention in non-forest trees, prominent landscape features (watercourse and bottomland) or bird nesting sites, or located in areas of presence of selected specially protected species bound to grassland (blue butterflies, corncrake). The requirement PPH 3 is checked in conjunction with the existence of a Site of Community Importance in a farmed area or its immediate vicinity.

The basis for the inspection work is a centralized inspection plan covering at least one percent of the total number of applicants for agricultural subsidies, which is the statutory minimum extent of inspection. Extraordinary inspections were only made in five cases, based either on a suggestion or own findings, including additional extension to cover the other Directive. In each inspection, map groundwork was used to select risk sites with a higher probability of conflict between farming and nature protection.

Three cases of violation of the inspection requirement CC and the respective provision of Act no. 114/1992 Coll. were found in 2019. Two of the inspections found that farming led to unpermitted cutting of or damage to non-forest trees; there were several larger canopied tree areas in one case, and a greater number of individual trees were cut down or damaged in the other. The last identified violation concerned an unpermitted intervention in a watercourse prominent landscape feature, specifically in connection with removal of sediments and the associated vegetation along a longer stretch of the bed. In all the cases, we initiated misdemeanour proceedings with the responsible entities and made motions to reduce the agricultural subsidies by up to one percent.

Inspected entities usually cooperate with the CEI and respect our instructions in the form of implementation of preventive measures that will preclude potential conflicts between farming and public interest of nature and landscape protection. The CEI continuously highlights selected protected interest and potential risk factors of farming during inspections, including potential impacts on reductions to agricultural subsidies.

The current form of the agricultural subsidy policy appears unfavourable in terms of nature protection interests in the long run, since it does not motivate land owners to implement measures that would help water retention in landscape, reduction of contiguous farmed plots and increasing habitat diversity of the agricultural landscape. We still sometimes come across quite the opposite attitude in maintenance of watercourses, landscape features and waterlogged plots, which promotes undesirable landscape changes.

2. GMO inspections

Implementation of periodic inspections of handling of genetically modified organisms derives from Act no. 78/2004 Coll. on Handling of Genetically Modified Organisms And Genetic Products. The inspection work proceeds according to a fixed schedule, which is consulted with the MoE and makes it possible to check each GMO user at least once every two years due to the limited number of entities handling genetically modified organisms. In 2019, we made 33 inspections in this area. In 28 of the cases, we inspected closed handling of GMO in risk categories 1-3. We found three cases of violation of the GMO Handling Act, but typically they were minor administrative errors. We imposed a fine for a misdemeanour in the area of GMO handling in once case, a reprimand in another, and the misdemeanour proceeding has not started yet in the third.

In addition, we made five inspections of GMO introduction into the environment in 2019. They concerned field experiments in four cases. Since the number of entities making field experiments has decreased in recent years, we were able to inspect compliance with requirements of MoE decisions on GMO introduction into the environment and legal regulations in force at all the entities authorised to do so and schedule the inspections for the harvest time for GM crops. In the case of a new entity handling GM barley, we also made an inspection during sowing of the experimental field. The other entities, handling GM plum trees and soya, have made field experiments with the crops for several years, and have been inspected by the CEI annually.

Another type of GMO introduction into the environment is clinical assessments of medical preparations using GM cells. In 2019, we made one check at an entity that received a Ministry of the Environment decision in 2019 authorising it for this type of GMO introduction into the environment. For preventive and ethical reasons, the CEI checked compliance with requirements of the MoE decision and legal regulations before the medical preparation was first administered to patients. None of the inspections related to GMO introduction into the environment found any violation of the GMO Handling Act. We completed the inspection of an entity that had sown soya on two soil blocks with a suspicion of GMO contamination. Based on the results of seed stock analyses, which did not prove any contents of GMO additions, we concluded no violation of the GMO Handling Act.

In July 2019, we were contacted by the ÚKZÚZ concerning the so-called "circular experiment" with soya plants in progress in multiple EU countries, including the CR. One of the varieties used by the ÚKZÚZ in the experiment contained a detectable amount of addition of genetically modified stock. Since the plants of the variety were starting to go into bloom, we chose a quick solution to prevent possible pollination of other varieties (the possibility is slight but cannot be ruled out), and the plants were destroyed without delay after a consultation with the CEI. The MoE was informed about the case and entered the information in the EU CIRCA database. According to information obtained afterwards, the same solution was chosen in the other EU states as well.

In the course of 2019, the CEI intercepted several dead specimens of the aquarium fish *Danio rerio*. Since the CEI became suspicious that they might be GM individuals due to their atypical colouration, with a gene for a fluorescent protein inserted in their genome, we arranged their analysis. The analyses have so far reliably proven genetic modification only in one colouration type, where we established a gene for a red protein originating from a *Discosoma* sp. coral and a green protein originating from the jellyfish *Aequorea victoria*. The MoE was informed about the analysis results.

3. Inspections of zoos and breeding facilities whose activity may match the definition of a zoological garden

In the course of 2019, we made ten inspections of zoological gardens operated based on MoE licences. A significant part of such inspections comprises not only verification of compliance with obligations under Act no. 162/2003 Coll. on Zoological Gardens but also inspection of handling of CITES specimens pursuant to Act no. 100/2004 Coll. and individuals of specially protected animal species and wild birds pursuant to Act no. 114/1992 Coll. Since they are mostly facilities keeping large quantities of specimens and the inspection requires assessment of large numbers of documents, including authentication of facts with other public authorities, all the inspections have not been completed yet. We found violations of Act no. 100/2004 Coll. and Act no. 114/1992 Coll. in two zoological gardens. They were all minor errors of an administrative type. The CEI imposed fines on one of the facilities for the identified shortcomings.

The CEI continuously cooperates with the MoE, which it provides with information and documents necessary for its own inspection work, most importantly in the form of position statements on MoE periodic inspections and statements on applications for licences. In 2019, the CEI made 13 position statements on MoE periodic inspections and two statements on applications for licences for operation of a zoological garden.

A significant part of the inspection work focused on compliance with Act no. 162/2003 Coll. was checks at breeding facilities whose activity may match the definition of a zoological garden. Based on experience gained in the past, when the CEI dealt with several cases investigating whether a facility is a zoological garden pursuant to Act no. 162/2003 Coll. or not, we included this type of checks in the work plan for 2019 as a departmental task. The objective was to map facilities that may meet the limits set by the Act on Requirements for Operation of Zoological Garden, and inspect them under the Act and inspect their compliance with statutory requirements for handling CITES specimens pursuant to Act no. 100/2004 Coll. and individuals of specially protected species of animals and wild birds pursuant to Act no. 114/1992 Coll.

In 2019, we inspected 11 such facilities, and imposed a fine on one of the operators for violation of Act no. 100/2004 Coll. Some of the inspections have not yet been completed, but it can be assumed that misdemeanour proceedings will be conducted with other entities as well. There were two cases of probable violation of some provisions of Act no. 100/2004 Coll. (a specimen held in contravention of the Act will probably be confiscated from one). In another two cases, we cannot rule out violation of Act no. 162/2004 Coll., namely operation of a zoological garden without a licence. Proceedings on closing the zoological garden for the public and imposition of a fine will probably start with the operators of these facilities next year.

This year, the CEI imposed two fines for misdemeanours consisting in operating a zoological garden without a licence. At the same time, one of the facilities was closed for the public by the CEI decision.

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

Inspections of implementation of ordered measures were included in the work plan for 2019 based on results of an internal audit of CEI work. Their objective was to check that the required entities are implementing measures (or operating requirements) imposed on them by the CEI. The entities to check were selected based on a centralized analysis involving all the CEI decisions ordering measures or operating requirements in the last five years pursuant to Sections 66 and 86 of Act no. 114/1992 Coll. on Nature and Landscape Protection. Each territorial Inspectorate was asked to make five inspections of this type.

The inspections of remedial measures were dominated by checks of implementation of substitute tree planting; the checks of compliance with operating requirements dealt mostly with prohibitions of landscaping, moving of materials and requirements to remove backfills from prominent landscape features or specially protected areas and requirements for grazing and mowing of grassland. The required entities mostly respected the measures and requirements. We identified six cases of non-adherence to the planting obligation, three cases of violation of CEI decisions in relation to landscaping, and three cases of non-compliance with other requirements made pursuant to Sections 86 and 66 of Act no. 114/1992 Coll. Applicable proceedings on fines for misdemeanours were initiated with the concerned entities.

5. Inspectorate-wide check

A thematic inspectorate-wide check in the region of the Vsetínské Beskydy and Hostýnské vrchy, focused on small-scale specially protected areas outside the PLA, was made in the first half of 2019. The inspectorate-wide check involved 27 CEI employees. We made 36 field investigations on 25 sites, focused on inspection of compliance with requirements set in the environmental impact assessment (EIA) process and inspection of damage to biologically valuable parts of Valašsko. In 13 cases, we found inadequate marking of the areas, inconsistent management or absence of valid management plans. In nine cases, we expressed suspicion of more serious violations of Act no. 114/1992 Coll. (unpermitted tree cutting, construction of logging roads, paved areas and rest and hunting facilities, travel of vehicles in protected areas, waste dumps). We found eight cases of minor unpermitted interventions in protected areas (fireplaces, litter, installation of geocaches).

In two cases when inspecting five planned investment projects, we expressed suspicion of malpractice of a nature protection authority when issuing decisions and one case of suspected violation of Act no. 114/1992 Coll. when building a lookout tower on Kelčský Javorník. When inspecting four biologically valuable sites, we found a larger presence of non-native, invasive knotweed (*Reynoutria* spp.) in the Červenka valley. Adequate outcomes by the CEI included invitations to remedy, initiation of inspections and respective proceedings.

6. Special departmental task – Stutox

In the second half of 2019, the CEI received information from the ÚKZÚZ about 1,419 notifications on application of the rodenticide Stutox II in order to eradicate overpopulated rodents, notably voles. The notifications, concerning the whole territory of the CR but largely concentrated in South Moravian, Olomouc, Zlín and Vysočina Regions, necessitated checking over 10,000 soil blocks and forest stands with a view to potential effects on specially protected areas or habitats with specially protected species, which might have been negatively affected directly or indirectly by the rodenticide application. Based on preliminary findings, the CEI made 191 field investigations in selected soil blocks. It resulted in the finding of

43 errors in the biocide application, which were handed over to the ÚKZÚZ to resolve in accordance with its powers. The CEI itself initiated one misdemeanour proceeding. The priority focus was on preventive measures and elimination of harmful impacts, so we initiated another 41 proceedings on setting conditions, particularly with a view to proven presence of specially protected species or existence of specially protected sites. In these cases, the required entities respected the CEI decisions, so it can be concluded that the action had a significant preventive effect for protection of the concerned territories, species and their associations.

4.4.3 Overview of performance of specific tasks

The specific tasks reflect activities and entities representing current or potential serious threats to nature protection interests in territorial jurisdiction of our territorial inspectorates. Targeted inspection work is thus based on knowledge of the region and focused on activities and entities that can be expected to pose potential serious threats to nature protection interests.

1. Inspections of preserved condition of specially protected areas
Inspections of specially protected areas are considered by the CEI to be one of its long-term priorities in nature and landscape protection. Among other things, specially protected areas contribute to habitat diversity of landscape and provide refuges for disappearing, rare and specially protected animal and plant species. In 2019, therefore, the CEI implemented about 180

checks and investigations in small-scale and large-scale specially protected areas and Sites of Community Importance. We focused primarily on boundary marking and compliance with basic and detailed protection requirements of both management and visitors. Identified shortcomings in area marking were consulted with applicable public authorities. Malpractice in relation to compliance with protection requirements was only found in less than one fifth of the cases. Mostly, they were manifestations of personal disorderliness of visitors, unpermitted entries, unpermitted climbing or camping.

2. Inspections of public administration performance in tree protection
These checks were made with a special focus on the chronic shortcomings in the tree cutting permitting process and ordering of substitute planting by authorities of local jurisdiction that the CEI found in previous years. The statement sections of inspected decisions consistently contain shortcomings, notably in specification of trees, resulting in impossibility to review the decisions. Ordering of substitute planting to compensate for the environmental harm done by cutting the trees, which is an efficient nature protection tool, is frequently neglected. During administrative proceedings, nature protection authorities frequently did not pay enough attention to seriousness of the reasons for cutting or assessment of the functional and social importance of the trees.

The authorities are aware of being practically unpunishable in cases where violation of the applicable process or material legal principles does not reach the social dangerousness of a criminal act, so the CEI frequently observes a formalistic approach to public administration in its inspections of nature protection. CEI inspectors instructed representatives of inspected authorities in the requisites of administrative processes verbally on the spot and then via a written inspection report. Nature protection inspectors make this type of checks routinely, and they are a major preventive tool in practical enforcement of nature protection. Nevertheless, the efficiency is significantly reduced by the high level of fluctuation of persons in charge, especially at lower-level municipal authorities.

3. Inspections of interventions in watercourses

Watercourses are prominent landscape features by law, which bans, among other things, disrupting their ecological stabilisation function, yet they are one of the most acutely endangered landscape components in the long run. This type of checks focused primarily on unpermitted interventions in riverbank vegetation and watercourse beds and observance of minimum residual flow rates when collecting water for SHPP and ski slopes. Except one case of non-compliance with SHPP operating requirements, we did not find any major shortcomings in this area, but other inspections (including CC)

have repeatedly shown, for example, modifications to small watercourses, typically by dredging, resulting in increased flow capacity and accelerated drainage, which is absolutely undesirable from the point of view of water retention in landscape.

4. Inspections of veteran trees and registered prominent landscape features

Registered prominent landscape features are sites registered by the applicable nature protection authority due to their ecological, geomorphological or aesthetic value. Veteran trees are dominant features of landscape-forming and cultural history importance. We inspected more than 45 veteran trees and found an improvement compared to last year in terms of quality of their statutory protection. Legal violations were not identified, only in several cases we stated impaired health condition of a veteran tree, so the conclusions were handed over to authorities of local and factual jurisdiction. We found only sporadic shortcomings in marking of registered PLF in the terrain, which authorities in charge remedied immediately after our notification. Inspection of 43 registered prominent landscape features brought findings of five cases of legal violations related to farming activities, which were resolved by initiating respective proceedings.

5. Inspections of protection of non-forest trees in protective zones of power and gas distribution networks

Trees in these protective zones enjoy the same protection as other non-forest trees, only their cutting as part of maintenance of the utility systems does not require a permit. However, intended cutting has to be announced to the nature protection authority in advance to enable it to assess whether it may contradict tree protection requirements and halt, restrict or prohibit it if so. Managers of linear utility networks frequently circumvented the reporting in duty in the past, primarily for financial and operating reasons. Inspections made in 2019 concluded that the reporting discipline of required entities had improved and respective notifications are made in accordance with requirements of Act no. 114/1992 Coll. However, we found six cases of trees being damaged by insensitive pruning, leading to adequate consequences in the form of misdemeanour proceedings.

6. Inspections of parrots

As part of a departmental task focused on inspections of parrots, the CEI focused on selected species of Annex A to Regulation 338/97 EC already in 2018. The complexity of the investigations, which have to cope with shortcomings in records, marking, identification and registration of specimens, caused most of the inspections under this task, planned as departmental for 2018, not being completed. Unperformed or unfinished inspections were therefore moved into 2019 as specific tasks. In 2019, territorial inspectorates

continued their checks at selected major breeders. These checks, relating to living CITES specimens, are traditionally among the most difficult, notably due to movements of animals among breeders (sales, donations, depositing, international connections) and changes in their numbers (deaths, reproduction). Besides parrot breeders, we also inspected keepers of great beasts of prey (tiger) and primates (gibbon). Legal violations were identified in about one half of the cases investigated. The most frequent shortcomings consisted in failure to document origin and comply with reporting and registration duties. The cases were resolved with fines in misdemeanour or on-the-spot (less significant misdemeanours) proceedings and confiscation of specimens as necessary.

7. Inspections of potential major threats to nature protection interests

This section presents a summary overview of specific inspections in regions, focused on areas, activities and entities that can be expected, based on current own findings, past experience or repeated suggestions, to pose potential major threats to nature protection interests. For example, large glazed areas such as noise-reducing barriers along roads, building lobbies and public transport shelters pose constant danger to birds. However problematic it is to demand modification to transparency of glass surface from the legal point of view, the CEI managed with educational activity in 2019 to achieve changes to coatings to make transparent areas easier to recognise for animals.

In the South Bohemian Region, for example, the CEI focused on checks of illegal harm to nature by moldavite mining, and issued three prohibitions pursuant to Section 66 of Act no. 114/1992 Coll. Depending on local situation, the CEI also focused on inspecting investors and implementers of major construction projects and farming entities in connection with use of intensive techniques and equipment, the design for which was based on findings from EIA/SEA processes. In Liberec Region, our inspectors made scheduled inspections at five entities with a view to agricultural land fund protection, and found shortcomings in two cases. In connection with increasing suggestions in this area, agricultural land fund protection can be expected to become a significant part of CEI activity over time. It is a very complex issue, requiring cooperation with accredited laboratories and intensive communication with other public authorities. Pollutants in soil often originated in distant past, their sources are difficult to identify and remedial measures practically unenforceable due to the polluter being unknown or defunct.

4.4.4 Major cases

A number of major cases handled in 2019 were related to protection of non-forest trees. However, another important component of our inspection work was penalties for serious damage to prominent landscape features and interventions in valuable biotopes. Agricultural land pollution and endangerment is a brand new important aspect.

Prague TI

Fine for DE BARONS INVESTMENT, s.r.o. for non-compliance with substitute planting requirements

The CEI imposed a fine of CZK 48,000 on DE BARONS INVESTMENT, s.r.o. for non-compliance with substitute planting orders made under Section 86 of Act no. 114/1992 Coll. As a compensation for environmental harm resulting from unpermitted cutting of trees, we ordered substitute planting of six trees on a selected plot at Mníšek pod Brdy, including follow-up management for three years after the planting. The required entity did the planting in December 2017, but inexpertly. In particular, it neglected follow-up management, resulting in death of the planted trees. Thus, the obligation had not been performed in full, leading to the fine.

České Budějovice TI

Cutting of two linden trees in Blatná without a permit and unpermitted harmful intervention in natural evolution of specially protected animal species at Hněvkov u Mačkova and at Blatná

In April 2018, the Road and Motorway Directorate cut two linden trees and seven other trees by means of Knap Praha s.r.o. without a permit; they had been a biotope for the specially protected species hermit beetle (*Osmoderma eremita*) and rusty click beetle (*Elaterrugineus*). For the more strictly punishable misdemeanour, i.e., unpermitted intervention in natural evolution of specially protected species pursuant to Section 88, Para. 1, item e) of Act no. 114/1992 Coll., we imposed a fine of CZK 200,000 on the Road and Motorway Directorate and CZK 50,000 on Knap Praha s.r.o., being the implementer, in a joint proceeding in accordance with applicable provisions of the Misdemeanour Act. The MoE confirmed the CEI's decision in the appeal proceeding.

Plzeň TI

Non-compliance with requirements of an exemption for specially protected animals at Plzeň – Valcha

In contravention of an exemption that it received, the company Valcha Property Development a.s. built a construction site road in a biotope for specially protected amphibians (smooth newt, northern crested newt, agile frog, common toad and yellow-bellied toad) at Plzeň-Valcha, thus harmfully intervening with their natural evolution. The company was fined CZK 100,000 for a misdemeanour pursuant to Section 88, Para. 2, item p) of Act no. 114/1992 Coll. In addition,

we initiated an administrative proceeding with the company regarding elimination of the consequences of its unauthorised interventions by ordering a measure under Section 86 of Act no. 114/1992 Coll., consisting in removal of the road built, securing of the site by extending the existing fence, building of pools and reptile havens and removal of self-seeding woody plants.



Valcha Property Development a.s. built a paved road in a place that should contain vegetation and a biotope for endangered amphibians.

Ústí nad Labem TI

Damage to prominent landscape feature Kosový brook

The illicit activity occurred in connection with a uncontrolled release of contaminated wastewater and substances harmful to water from a wastewater pumping station in the cadastral area Valy u Mariánských Lázní. Besides an unpermitted harmful intervention in a watercourse prominent landscape feature, it caused the death of several individuals of specially protected species European bullhead, brook lamprey and noble crayfish. For a misdemeanour of major damage to the prominent landscape feature Kosový brook and a misdemeanour of causing the death of specially protected animal species pursuant to Section 88, Para. 2, item b) and Section 88, Para. 2, item e) of Act no. 114/1992 Coll., the responsible legal entity CHEVAK Cheb was fined CZK 250,000. The MoE confirmed the CEI's decision in the appeal proceeding.

Hradec Králové TI

Damage to three linden trees by pruning in Litošice

The municipality of Litošice was fined for a misdemeanour pursuant to Section 88, Para. 1, item c) of Act no. 114/1992 Coll., consisting in damaging a group of non-forest trees, amounting to CZK 40,000. Specifically, three linden trees growing in the village were damaged by excessive pruning, consisting in lowering and narrowing their crowns.

Damage to 16 maples in Rychnov nad Kněžnou

The company ZENOVA services damaged by inadequate pruning 16 young field maples of the Elsrijk cultivar, growing in the parking area of the Kaufland hypermarket in Rychnov nad Kněžnou. For a misdemeanour of damaging a group of non-forest trees pursuant to Section 88, Para. 1, item c) of Act no. 114/1992 Coll., the entity was fined CZK 40,000.

Havlíčkův Brod TI

Damage to non-forest trees by dumping earth and other materials on plots at Kožichovice

At least 79 trees and several dozen shrubs were damaged by dumping materials on plots at Kožichovice. The woody plants were partly to completely covered and broken apart by the weight of the material. The responsible entity, company MV Speed s.r.o., was fined for a misdemeanour of damaging non-forest trees pursuant to Section 88, Para. 1, item c) of Act no. 114/1992 Coll., amounting to CZK 178,000.

Dumping of earth and waste on plots belonging to agricultural land fund at Kožichovice

The aforesaid dumping of materials also affected plots that belong to the agricultural land fund. The responsible entity, MV Speed s.r.o., again in this case, was fined for violation of Section 3, Para. 2 of Act no. 334/1992 Coll. on Agricultural Land Fund Protection, amounting to CZK 120,000. In this case, the violation is of the prohibition of introducing to agricultural land substances other than those defined by special regulations, which is one of the misdemeanours defined by Act no. 334/1992 Coll. on Agricultural Land Fund Protection. The CEI powers were expanded to cover these issues in connection with the latest amendment to the Act.



Trees and shrubs buried as a consequence of dumping earth on plots at Kožichovice.

Brno TI

Serious damage to 343 trees growing in a windbreak near Suchá Loz

Removal of sediments and deepening of drainage ditches along a utility road in the cadastral area Suchá Loz resulted in irreversible damage to the root systems of an existing windbreak, which had performed important ecological and aesthetic functions in a landscape marked with intensive agriculture. The damage of 343 trees will lead to their reduced lifetime and gradual withering and increased soil erosion. The CEI fined the responsible

entity, the Municipality of Suchá Loz, for a misdemeanour of damaging a group of non-forest trees pursuant to Section 88, Para. 1, item c) of Act no. 114/1992 Coll., amounting to CZK 80,000.

Damage to trees by burying at Karolinka

A total of 44 trees were damaged at Karolinka by burying their root systems with earth and aggregate during construction work. The responsible entity, Cobbler s.r.o., was fined for a misdemeanour of damaging a group of non-forest trees pursuant to Section 88, Para. 1, item c) of Act no. 114/1992 Coll., amounting to CZK 80,000.

Olomouc TI

Non-compliance with ordered obligation to restore a damaged nature site protected under Act no. 114/1992 Coll. to its original condition at Habartice u Jindřichova and Pusté Žibřidovice
The company IMOS group s.r.o. failed to perform the aforesaid obligation ordered by a conclusive CEI decision pursuant to Section 86, Para. 1 of Act no. 114/1992 Coll. Specifically, it was ordered to remove waste material originating from sewerage construction that it had dumped in prominent landscape feature, namely the bottomland and bed of the Staříč watercourse. For the misdemeanour consisting in non-performance of remedial measures under Section 88, Para. 2, item c) of Act no. 114/1992 Coll., the CEI fined the entity CZK 200,000.

Ostrava TI

Harmful intervention in natural evolution of specially protected bat species at Nový Bohumín

By means of a natural person doing business, Ing. Lech Rzeszut, the Town of Bohumín cut an oak in Petr Bezruč Park in Nový Bohumín, which was home to a winter bat colony of 50 common noctules (*Nyctalus noctula*) and one common pipistrelle (*Pipistrellus pipistrellus*). In a joint proceeding, the CEI fined the contracting authority CZK 250,000. and the implementer CZK 50,000 for a misdemeanour of unpermitted intervention with the natural evolution of specially protected species under Section 88, Para. 1, item e) of Act no. 114/1992 Coll. In the appeal proceeding, the MoE confirmed the penalty for the contracting authority and reduced the fine for the contractor to CZK 35,000.



Only a torso about five metres tall remains of the mighty oak cut down in Petr Bezruč Park in Nový Bohumín.

Liberec TI

Unpermitted cutting of trees along railway in Kokořínsko – Máchův kraj Protected Landscape Area

Without a permit, the company IM-stav Praha s. r. o. cut over 100 trees and over 400 m² of canopied stands along the railway line between Bakov nad Jizerou and Jedlová, situated inside the Kokořínsko – Máchův kraj Protected Landscape Area. For the misdemeanour of unpermitted cutting of trees, the company was fined pursuant to Section 88, Para. 1, item c) of Act no. 114/1992 Coll., amounting to CZK 180,000. The MoE confirmed the CEI's decision in full during the appeals proceeding.



Trees cut without a permit along railway line Bakov nad Jizerou – Jedlová.

4.4.5 Conclusions from inspection work

The nature protection and CITES agenda is exceptionally diverse. Within the CEI, its powers encompass six departmental laws: Acts no. 114/1992 Coll. on Nature and Landscape Protection, no. 100/2004 Coll. on Protection of Wild Animal and Plant Species by Regulating Trade in Them, no. 78/2004 Coll. on Handling of Genetically Modified Organisms and Genetic Products, no. 162/2003 Coll. on Requirements for Operation of Zoological Gardens, no. 334/1992 Coll. on Agricultural Land

Fund Protection and 93/2018 Coll. on Requirements on Use of Genetic Sources under the Nagoya Protocol.

The centre of the department's activity is traditionally inspection of compliance with Act no. 114/1992 Coll. In the long run, public suggestions are an important source of information on suspicion of legal violation; a considerable part of the misdemeanour and administrative proceedings are initiated based on them. Traditionally abundant topics of suggestions such as unpermitted cutting and damaging of trees, interventions in prominent landscape features or natural evolution of specially protected species, expanded in 2019 with a large number of submissions relating to agricultural land protection.

In recent years, we most frequently concluded violations of Act no. 114/1992 Coll., specifically provision on protection of non-forest trees and unpermitted landscaping. In 2019, the range of most important delicts expanded mainly with cases of extensive damage to watercourses, being prominent landscape features, by discharging wastewater and potential pollutants and harmful interventions in natural evolution of specially protected species by devastating their biotopes.

Within its powers under Act no. 114/1992 Coll., the CEI continued inspecting the public administration performance. Shortcomings are identified repeatedly in this area, concerning mostly lowest-level authorities. Inconsistency in administrative processes is shown in shortcomings of decisions issued, suffering from the defect of lack of examinability. Moreover, the authorities still do not understand and use substitute planting as practically the only, yet very effective tool to compensate for environmental harm caused by tree cutting.

Cross Compliance checks are one of the most extensive agendas in terms of numbers of inspections, due to a statutory share of subsidy applicants to inspect. This agenda is predominated by the preventive and educational effect of inspections, since the numbers of violations found are usually quite low. In the CEI's opinion, this is in part due to administrative reasons related to application of central interdepartmental rules for selection of entities to check and implementation of inspection work itself. So far, for example, it has not been possible to achieve such conditions for drawing the inspection plan that would aim sufficiently at really problematic farming entities. On the other hand, at least some of the problem activities in agricultural businesses have been largely eliminated by the CEI's inspection work.

In the second half of 2019, there was a need for immediate and significant increase in inspection and administrative work related to application of rodenticides. The analytical, administrative and inspection work was mostly done by the Headquarters and territorial Inspectorates with the greatest proportion of farmland. The CEI invested immense concentrated efforts in preventing large-scale harm to populations of specially protected

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species and specially protected areas, resulting from the vast extent of planned applications and, most importantly, the complexity of inspection and administrative tools for restricting the application as necessary.

The CEI's inspection work in the area of agricultural land fund protection has grown dynamically. The primary reason is the constantly improving public awareness of the CEI's powers in the area and extent of farmland.

A significant component of the department's work is performance of duties of non-inspection nature. In 2019, this included, for example, formulation of comments in the process of amending Act no. 114/1992 Coll. in light of implementation of EU law on introduced and invasive species. Another branch of organisationally demanding activity was practical implementation of so-called Nagoya Protocol provisions, which are transposed in the national legislation by Act no. 93/2018 Coll., associated with commencement of respective monitoring in accordance with MoE Methodological Instruction no. ZP17/2019 on procedure under Act no. 93/2018 Coll. on Requirements on Use of Genetic Sources under the Nagoya Protocol. In cooperation with the MoE, we used findings from the monitoring of selected entities in development of the annual user inspection plan for 2020, drawn using an approach based on risk assessment. Like in previous years, a significant part of the CEI's non-supervision work in the area of nature protection and CITES in 2019 was methodological and cooperative work in relation to public authorities and consultation services for the public.

4.5 Forest protection

4.5.1 Overview of inspection work in 2019

In 2019, the Forest Protection Department did its inspection work by way of 46 inspectors, which is a minor increase compared to previous years. As such, each inspector was in charge of 58,447 ha of supervised forest.

The forest inspection work proceeded based on a legal framework similar to previous years. 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., Act no. 250/2016 Coll. on Liability for Misdemeanours and Proceedings Thereabout, and CEI internal managerial deeds.

The Forest Protection Department inspectors made 1,394 checks in the report period. We made 539 scheduled checks, 252 unscheduled and 603 others. Again, they comprised field activities in the form of pre-inspection work not followed by inspection, various investigations based on suggestions and information received, and cooperation with other public authorities, Police, etc. In addition, FPD inspectors were involved in 47 multi-departmental checks made by other CEI departments.

Numbers of inspections in 2019

Total inspections	1,394
Scheduled inspections	539
Unscheduled inspections	252
Other inspection work	603
Participation in multi-departmental checks	47

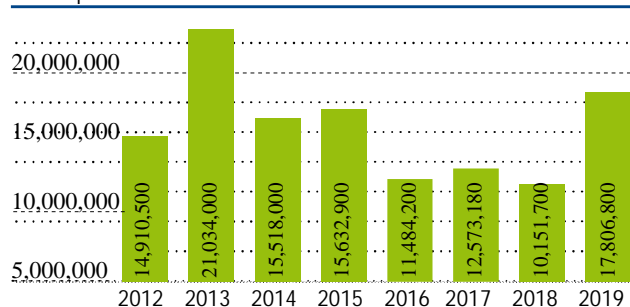
The total number of inspections in 2019 was 50 more than the year before.

Again, we inspected forest in all forms of ownership with an emphasis, particularly in some of the supervised areas with excessive bark beetle outbreaks, on properties of LČR, s.p. (Moravian-Silesian Region) and small-scale properties. The primary objective of those inspections was their preventive and educational potential. Only repeated and gross legal violations resulted in administrative or misdemeanour proceedings.

In our other inspection work, we made 196 statements for EIA processes and 390 other position statements and statements for natural persons and legal entities as well as public authorities and Czech Police. In 2019, we issued 164 decisions on imposition of fines as part of administrative and misdemeanour proceedings. 149 decisions on fines entered into force. Twelve decisions on fines issued in previous periods entered into force in 2019. The total amount of conclusive fines was CZK 17,806,800.

The Forest Protection Departments contributed to the fines imposed as follows: Prague CZK 3,390,000; České Budějovice CZK 5,389,000; Plzeň CZK 1,602,000; Ústí nad Labem CZK 465,000; Hradec Králové CZK 419,500; Havlíčkův Brod CZK 1,001,000; Brno CZK 212,000; Olomouc CZK 692,500; Ostrava CZK 4,295,800; Liberec CZK 340,000.

Development of conclusive fines in CZK in 2012-2019



The violations for which the above fines were imposed are similar to previous years, comprising notably misdemeanours of not preventing outbreak of biotic factors, violation of forest renewal regulations, damaging of land intended for performance of forest functions with forest traffic, unpermitted occupation of land intended for performance of forest functions, waste and litter in forests, non-performance of remedial measures to eliminate unlawful state of forests, etc.

We also conducted administrative proceedings on remedial measures in the report period, where we issued 127 administrative decisions. 124 decisions on remedial measures entered into force, including five decisions on remedial measures issued in the previous years that entered into force in 2019. Inspections of performance of remedial measures showed that they were implemented in most cases.

In 2019, out of the total number of 291 administrative decisions issued (164 on fines and 127 on remedial measures), 46 cases were appealed against.

Prague TI dealt with eight cases by way of court in 2019; they concerned non-performance of remedial measures (reforestation), forest landscaping and unpermitted occupation of LIFFF.

We issued no preliminary measures, and halting or restriction to operations was done in 27 cases. They were all done by the České Budějovice TI FPD.

In 2019, we again employed the institute of invitations to make remedy where it was clear that a legal violation would occur or a minor violation had already occurred. In terms of environmental impact in forests, it is more efficient to give the forest owner a change for remedy by a near date than conduct a lengthy administrative proceeding with an uncertain outcome. Thus, this instrument partly substitutes for administrative proceedings and remedial measures. It is employed particularly with small forest owners, who are thus informed about existing shortcomings and their obligations under a specific legal regulation. Only if the invitation is ignored or if the legal violation repeats, do we run a misdemeanour proceeding on a fine or remedial measures.

As guarantors of suggestions, TI FPD inspectors dealt with 166 suggestions and petitions received, compared to 175 cases in 2018. The numbers of suggestions received in recent years do not decrease, and their justification increases too. The most suggestions were handled by Prague TI FPD, Havlíčkův Brod TI FPD and Ostrava TI FPD.

No crime reports were made in the report year.

4.5.2 Overview of performance of departmental tasks

The departmental task for 2019 is again Development of biotic factors and damage to forests by forest traffic. Its objectives were assessment of forest owners' approach to destruction of calamity insect pests and possible associated damage to forests by forest traffic (Section 34 of the Forest Act), as well as objective assessment of contingent logging in terms of utilisation of all available capacity to reduce the processing time for bark beetle-infested timber in forests under all types of ownership. The departmental task monitoring made use of every form of field work, i.e., as part of ordinary checks pursuant to the Inspection Act, while investigating suggestions, pre-inspection work, etc. A unified procedure for this departmental task was conventionally governed by internal regulations, namely standard programmes no. 2/2008 on development of biotic factors (harmful insect pests, fungi and rodents), no. 6/2008 on damage to forests by logging, skidding and upset stand stability, and Methodological Instruction no. 1/2016 setting procedures for departmental task inspection, investigation and evaluation.

The following findings can be concluded for the 2019 departmental task:

- The Central Bohemian Region, under the jurisdiction of Prague TI FPD, saw continuing significant gradation of the spruce bark beetle alongside the double-spined bark beetle. A large part of the supervised territory

is experiencing a calamity outbreak. Further expansion can be expected in future. Presence of pests was registered in forest properties in every type of ownership. Generally, the approach of small forest owners (natural persons) to forest protection is more problematic than among larger owners and state forests. It is largely due to difficulty obtaining logging capacity for timely processing of infested timber and lack of sale opportunities.

Generally speaking, we found no major problems in owners' attitude to LIFF protection from forest traffic.

- The results of inspections regarding development of biotic factors in the South Bohemian Region, under the jurisdiction of České Budějovice TI FPD, indicate increased numbers of calamity bark beetles, namely the spruce bark beetle, the spruce wood engraver and the double-spined bark beetle. The presence of these calamity beetles in the inspected forest properties was high to disastrous, covering the whole of the South Bohemian Region. Adequate attention was paid to forest protection issues in properties owned by LČR and VLS ČR.

Although the clearance employs new insecticide nets, tarpaulins and traditional chemical treatment, the FPD sees the worst problems in the continuing method of infested timber clearance, with predominant clearance by removal.

As for the Šumava National Park, it can be concluded that the situation is stabilised for the time being. Infested timber has been processed within statutory periods, defensive measures have been sufficient and due attention has been paid to clearance too. The worst problems occur in the Radvanovický hill area, near the zero-intervention zone.

- In the Plzeň Region, Plzeň TI FPD made 52 separate inspections focused on bark beetle development and 13 comprehensive inspections. Plzeň Region too is experiencing a constant progressive increase in forest threatened by bark beetles, expected to continue in 2020. The situation in the Šumava NP appears stable.
- In the Ústí nad Labem and Karlovy Vary Regions, Ústí nad Labem TI FPD made 22 inspections as part of the departmental task in 2019. One administrative proceeding on remedial measures was initiated. As of 31 December 2019, České Švýcarsko NP registered 600,000 m³ of beetle-infested timber. In the Karlovy Vary Region, the most affected areas are higher-lying parts of the Ore Mountains with the most rugged topography, with difficult machinery access.

- In the Hradec Králové and Pardubice Regions, Hradec Králové TI identified larger spread of bark beetles mostly in small owners' forests, who do not perform sufficient inspections of their properties. The extent of the infestation has been growing since 2015.

The weather will shape future development. Given the current significant quantities of bark-dwelling pathogenic insects in the forests, we can expect continued withering of spruce forests, particularly in areas outside the native zone, where the spruce is threatened by drought, etc.

A long-lasting cause of this situation is the fact that small forest owners ignore active forest inspection, lack processing capacity or do not attempt obtaining it. Progressive spreading of bark beetles then leads to cases of late clearance of infested timber due to overloading of processors.

The presence of bark beetles in the supervised regions is so far such that timely clearance can effectively prevent formation of large bark beetle pockets.

Inspections of damage to forests by transporting cut timber only found minimal shortcomings. Massive soil erosion due to traffic was identified around Vrchlabí. A fine was imposed and remedial measures ordered near Hradec Králové for damaging a juvenile stand and forest trees.

Under this task, the CEI TI FPD see a major problem in increasing quantities of timber transported. The soil erosion risk increases under unfavourable climate conditions.

- In Vysočina Region, unclear boundaries between swarmings have been observed and swarmings even overlap and sister generations occur. This situation makes it difficult, even impossible in some cases, to apply defensive and protective measures. Laying of trap trees is no longer effective in the current situation and pheromone traps are used only for monitoring.

With increasing population density, bark beetles also observably shift to lower age groups, so that the pest infests the second age group as well as branches of infested trees. This population density also leads to infestation of not only the Norway spruce but also the Scots pine and the European larch.

The presence of the double-spined bark beetle in infested stands was only found at several owners.

The spruce wood engraver, a pest primarily in younger stands, was found in most of the properties. They often accompany the spruce bark beetle. This species' difficult monitoring is a problem for protection.

In terms of defence, practically only contingent logging is done; it is thus the only type of logging used by practically all the owners. This logging often significantly exceeds the planned decennial allowance, and the owners frequently fail to request it in contravention of regulations.

Lacking processing capacity is a major problem, most pressing on small owners, who are practically unable to attain necessary equipment within reasonable time.

Inspections also focused on existence of logging furrows due to logging and skidding, but no violations were found.

- In the Zlín and South Moravian Regions, the year 2019 continued without significant changes in large-scale withering of spruce stands. The situation is not improving, with the impacts of the long-term drought and subsequent bark beetle outbreak observable practically throughout the two regions on all sites where the spruce is present. The spruce bark beetle continues to dominate, ably seconded by the double-spined bark beetle, especially in higher altitudinal zones. The spruce wood engraver then devastates young stands, assisted on many sites by the spruce bark beetle and the apex bark beetle. The spruce bark beetle has been detected on firs, larches and Douglas firs, among other species. The bark beetles primarily infest larger monoculture spruce stands, but even spruces growing in groups and in particular in mostly broadleaf stands have been found devastated by them. The overwhelming majority of the two supervised regions' territory is classified as calamity areas, with practically no larger spruce stands where bark beetle activity has not been registered. Most of the owners and administrators of larger forest properties have stopped processing standing dead trees and abandoned the use of defensive measures, investing all their resources into processing timber with active bark beetles. Nevertheless, it can be assumed that the lack of processing capacity and problems selling the infested timber will result in large quantities of unprocessed infested timber left in the forests, and it is with a high probability that the calamity can be expected to continue after the mild winter.

Besides disintegration of spruce stands, withering of pines is also escalating. Pines are unable to satisfy their moisture need by using surface rainwater, and the groundwater table, on which pines depend, continues to drop. Afterwards, the weakened pines are infested by *Ips acuminatus*, *Ips sexdentatus* and *Ips cembrae*. Weevils arrive in a secondary wave. Withering of pines is unfavourable in terms of forest stand renewal, as the pine could have provided suitable conditions for rejuvenation or planting.

Damage to forest by traffic, which was monitored in all our investigations and inspections, could occur more than before due to the great extent of logging and other forestry work. However, due to the predominant dry weather, the permanent track network in all categories has not suffered any major harm, and degradation of 4L tractor tracks and skidding tracks leading to erosion furrows did not occur in places inspected.

- In the Olomouc Region, Olomouc TI FPD monitored the presence and development of biotic factors included in all comprehensive checks and other investigations. The plan for 2019 scheduled 26 comprehensive checks, and three comprehensive checks were made beyond the scheduled tasks. The forests were owned by municipalities and natural persons. Investigations were made particularly in areas where forest stands had not been infested by bark beetle on a large scale. We made 59 inspections and investigations under this task.

No major changes occurred in processing of beetle-infested stands. The situation continues where processing entities are fully busy or disinterested in logging infested timber. It is almost unsellable and is frequently left in the pickup points in forests. Clearance of infested stands and sale of cut timber are difficult for small forest owners in particular. The need for processing infested stands after repeated bark beetle infestations is very demanding in terms of money or even destructive to natural persons and smaller businesses. No improvement in the situation has been registered even after the Ministry of Agriculture general measure to resolve the forest calamity.

In areas with multiple forest owners where spruce stands have largely disintegrated, it is difficult, if not impossible, to identify the one responsible for the unlawful condition and penalty liability cannot be set clearly.

Bark beetle calamity processing was in progress in 2019, and still continues, particularly in Jeseník ORP (Zlaté Hory, Rejvíz). In the lower-lying Hranice, Lipník nad Bečvou, Olomouc, Štemberk and Uničov ORP, the disintegration of stands with high spruce share is almost complete. In higher-lying areas of Zábřeh, Mohelnice, Šumperk, Litovel, Konice, Hranice and Prostějov ORP, spruce stands are suffering considerable harm. The inspection work therefore focuses on those areas.

- In the Moravian-Silesian Region, Ostrava TI FPD made 36 inspection actions in the report year, partly or wholly focused on development of biotic factors. The inspection actions involved 54 investigations (reports on pre-inspection work) and 34 checks pursuant to the Inspection Rules. After finding non-compliance with law, the Forest Protection Department proceeded not to announce an inspection but, in some cases, first sent written calls to process beetle-infested trees.

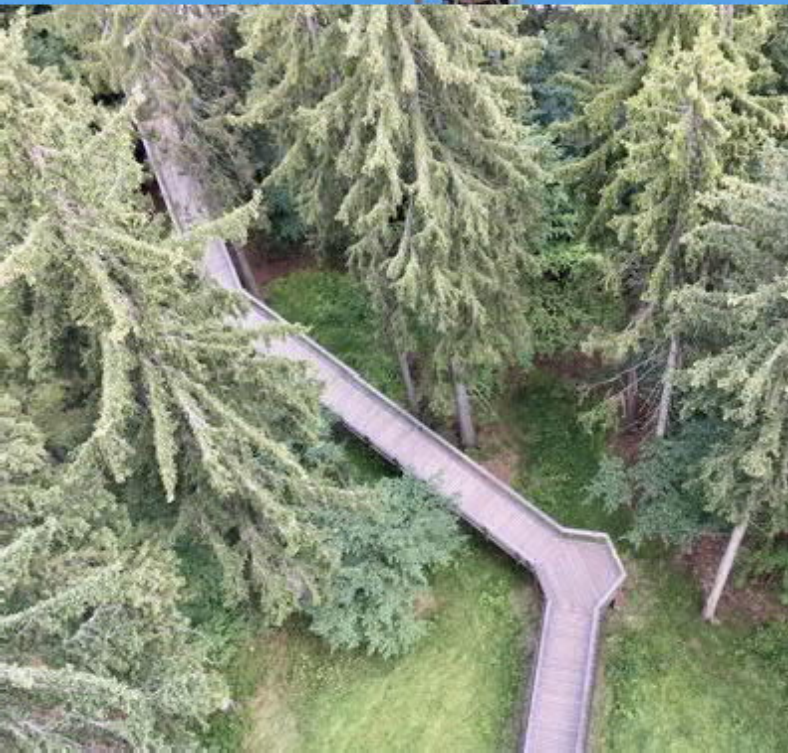
Damage to forest by traffic was investigated by the FPD in 23 inspection actions, partly or wholly focused on the topic. The inspection actions involved 38 investigations (reports on pre-inspection work) and eight checks pursuant to the Inspection Rules. No situation that the FPD would interpret as environmental damage or endangerment in forests.

- In the Liberec Region, Liberec TI FPD made 32 inspections focused on the departmental task. Within that, 15 checks were scheduled pursuant to Act no. 255/2012 Coll. on Inspection, one was an unscheduled inspection, and 16 were part of other inspection work mostly within ORP pursuant to approved inspection plan for 2019.

In this region too, the bark beetle were found in increased quantities on some sites below 400 m a.s.l., particularly in some small owners' forests.

Three fines were imposed and one remedial measure ordered. We sent 31 notifications of the need for clearance of infested timber and treatment of forest tracks. The shortcomings were remedied in most cases.

The TI FPD intends to continue using the "bark beetle map" from the ÚHÚL map server for its inspection work.



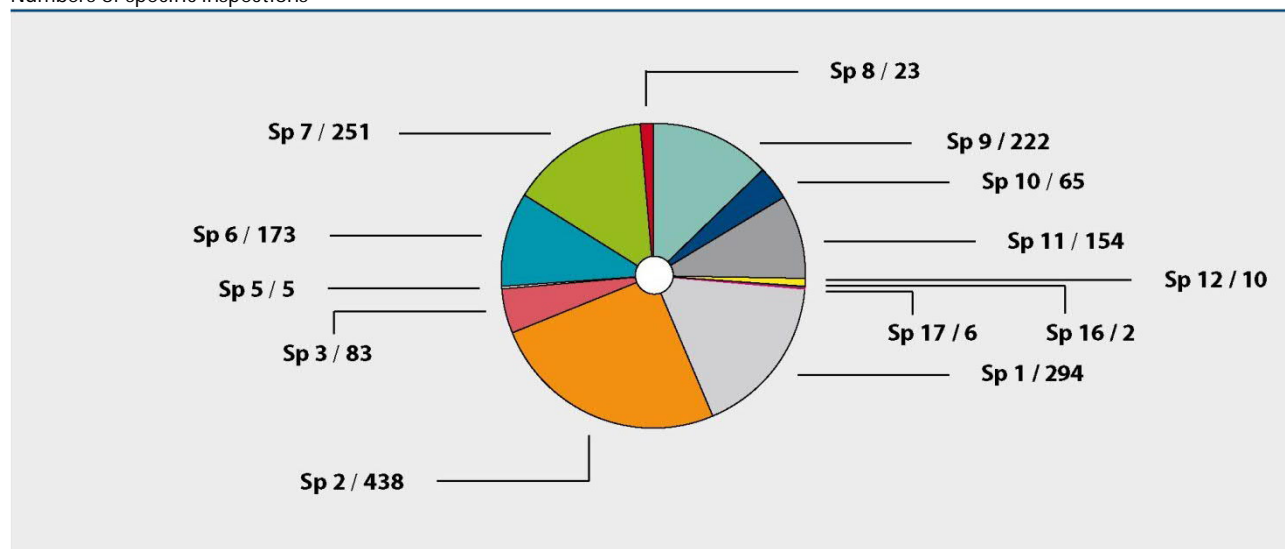
4.5.3 Overview of performance of specific tasks

The below frequencies of specific task checks do not match the total numbers of inspections since many inspections encompass several specific topics simultaneously. Thus, specific tasks in 2019 involved 1,726 cases with 1,394 inspections.

TI FPD checked 13 topics in both scheduled and unscheduled inspections, namely:

Inspection topic abbreviation	Inspection topic	Number of inspections
Sp 1	Comprehensive checks	294
Sp 2	Development of biotic factors	438
Sp 3	Damage by game	83
Sp 5	Use of biodegradable oils and hydraulic fluids	5
Sp 6	Damage to forest by logging, skidding and upset stand stability	173
Sp 7	Protection of forest land fund, including use of surroundings of mining areas	251
Sp 8	Circulation of reproductive material of forest trees	23
Sp 9	Forest stand restoration, including stands after illicit logging	222
Sp 10	Adherence to binding provisions of FMP and FMG	65
Sp 11	Implementation of remedial measures from administrative decisions	154
Sp 12	Forest land fund protection, recreational activities	10
Sp 16	Pruning in stand age groups up to 40 years	2
Sp 17	Inspections in cooperation with NPD under Act no. 114/1992 Coll.	6

Numbers of specific inspections



4.5.4 Major cases

Prague TI

A natural person committed a misdemeanour by ordering landscaping, embankments of excavated earth and dumping of construction materials on forest land in the cadastral zone of Lipence. For this violation, we imposed a conclusive fine of CZK 2,000,000.

České Budějovice TI

Non-compliance with forest protection obligations against biotic factors (bark beetles) on forest plots at Červený Újezdec, Libníč, Borek and Lhotice, owned by HAgrana s.r.o. We imposed a conclusive fine of CZK 4,000,000. The case is being handled by a court at present.



Consequences of forest damage by bark beetles at Červený Újezdec.

Bark beetle logging in Šumava National Park in 2010-2019

Year	Quantity [m3]
2010	343,000
2011	235,000
2012	75,500
2013	40,770
2014	22,900
2015	21,050
2016	29,000
2017	50,000
2018	50,900
2019	209,000

Plzeň TI

The company T.E.P. HOLZ s.r.o was fined for damaging forest soil by ruts caused by timber skidding between September 2012 and April 2013 in Český les Protected Landscape Area. The MoE confirmed the conclusive fine amount of CZK 500,000.

Ústí nad Labem TI

The case of KERAMOST a.s. led to the imposition of a conclusive fine of CZK 400,000 and ordering of remedial measures for unlawful use of LIFFF for purposes other than defined by law. The cause of the intervention was the need to transport equipment for continued quarry operation. However, confusion in cadastral areas led to other owners' forest plots being affected.



KERAMOST a.s. built a road to its quarry on plots intended to fulfil forest functions.

Hradec Králové TI

The Market Town of České Heřmanice was fined conclusively CZK 100,000 for having 260 m3 of waste dumped on a forest plot in its ownership. A remedial measure was ordered at the same time.



Waste dumped on a forest plot by the Market Town of České Heřmanice.

Havlíčkův Brod TI

The TI FPD fined PROJEKT MISSION s.r.o. for long-term failure to renew an area of 2.38 ha. The fine amounted to CZK 238,000. The decision entered into force.



Unrenewed area left by logging at Velká Bíteš, Hrdá Ves and Věžná.

Brno TI

The TI FPD conducted a misdemeanour proceeding on a fine with a natural person, imposing a conclusive fine of CZK 60,000 for misdemeanours in handling reproduction material in contravention of Act no. 149/2003 Coll.

Olomouc TI

A fine was imposed on a natural person, forest owner at Luká. The owner failed to implement measures to remedy shortcomings identified, namely dumped excavation earth and construction waste. For this violation, we imposed a fine of CZK 100,000. The fine entered into force.

Ostrava TI

The company JT Company s.r.o. (in liquidation), formerly active as SKOGAR s.r.o., failed to implement a remedial measure consisting in reforesting a clearing by the statutory date, protect forest stands against development and spread of harmful factors (bark beetles) at Krásná pod Lysou horou, and received another in a series of fines relating to the same forest property, this time amounting to CZK 300,000. The fine entered into force. In the course of our latest inspection, the Commercial Register stated that the company is in liquidation. After completion of the check, the TI FPD imposed a fine of CZK 3,600,000 on the company, which is in force. The company continues its zero activity in reforestation and remedial measures.

Liberec TI

The TI FPD imposed a fine on FORESTMAN s.r.o. for not implementing a remedial measure in force, consisting in forest renewal. For the misdemeanour, we imposed a fine of CZK 280,000 on the company, which appealed the decision, but the MoE confirmed it, so the decision entered into force.

4.5.5 Conclusions from inspection work

- Cardinal problems with bark beetle outbreaks occur in parts of the Moravian-Silesian, Olomouc, Zlín, Vysočina and Plzeň Regions and, last but not least, in the Central Bohemian Region.
- It is realistic to assume that the calamity will further escalate in 2020, the weather being a significant factor.
- The CEI Forest Protection Department continues to suffer lack of staff, and forest supervision tasks are beyond our capacity. There were 58,447 ha of supervised forests per forest protection inspector in 2019.
- There were continuing problems connected with decision-making and permitting by some authorities (building, forestry, hunting authorities) and the situation is differentiated by ORP.
- An efficient tool for both inspection work and planning is the remote access to the Cadastre and operating the ForesterWin application and tablets with GPS functionality.
- The cooperation with the ÚHÚL on inspections of reproductive material of forest trees has repeatedly been assessed as positive.
- Besides the enormous outbreak of biotic factors, the cardinal problems in 2019 included damage to forest soil by timber transport during logging, illicit occupation of land intended for performance of forest functions, unpermitted dumps and landscaping in forests, damage by game, and failure to implement remedial measures on time.
- Involvement of Forest Protection Department inspectors in reconnaissance flights as part of bark beetle monitoring is repeatedly assessed as positive. It is meaningful to shift the flights to a period before the end of the first-generation outbreak for better identification of the state instead of late August or September, when the outbreak culminates but measures are no longer effective enough due to high shares of abandoned trees.

- Periodic monitoring of forest condition in risk areas and awareness raising about forest management among small, uninformed forest owners has proven useful.
- Illicit logging was registered sporadically in 2019. The reason is decreasing timber prices and sales due to massive contingent logging.
- Constantly increasing numbers of suggestions and their frequently demanding investigation reduce the inspectors' capacity to the detriment of scheduled inspections and crucial forest supervision work.
- A lingering problem, difficult to solve by the CEI, is off-road motorcycles and ATVs driven on forest land. Greater cooperation with the Czech Police might be a solution.
- There are repeated problems with finding current owners (sales, inheritance) due to ORP not reporting.
- The positive trend of perceived prestige of Forest Protection Department representative continued in 2019, as attested particularly when sending calls to remedy shortcomings in forests, which mostly leads to operative elimination of the problem.
- There was repeated positive feedback on the workshop with representatives of all the MoE appeal authorities in 2018, which contributed to a unification of their practice, and the active participation of a Ministry of Agriculture representative at the meeting.
- We again regard it as meaningful to consider a meeting between the CEI and the MoE regarding MoE requirements for CEI inspection work for 2020.
- We think it would be useful to amend Act no. 134/2016 Coll. on Public Procurement, which is in a fundamental conflict with the Forest Act in terms of timely processing of active beetle-infested timber and considerably contributes to bark beetle outbreaks for owners who have to obey it.

4.6 CEI involvement in accident resolution

Central register of water accidents in 2019

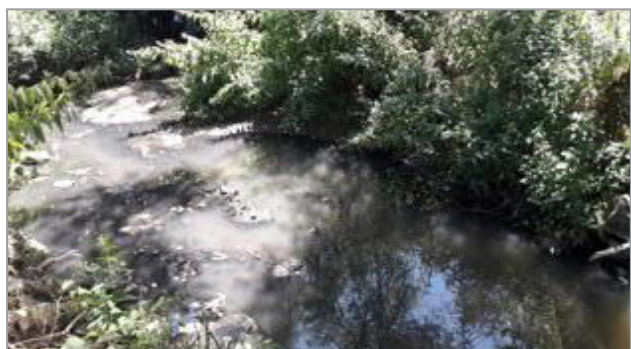
Pursuant to the Water Act, the CEI has maintained a central register of accident since 2002. In 2019, 165 accidents were registered as they factually met the definition of accident pursuant to Section 40 of Act no. 254/2001 Coll. on Waters. In the course of 2019, the CEI was informed about other accidents as well, but did not include them in the central accident register due to their minimal extent without impact on water quality.

Most frequently the accidents are still caused by transport. In 2019, we registered 55, representing 33 % of the total number of cases. Fish deaths accompanied 23 cases in this year, representing 14% of the total number of accidents, like the year before. We registered six accidents caused by agricultural activity. Groundwater contamination occurred only in three cases. The accident originator was known in 83 cases.

Major accident cases Fish

death in Tovaryš fishpond

On 15 July 2019, we received a notification of an accident on the Milevský brook and fish death in Tovaryš fishpond. The accident notification led to an investigation along the Milevský brook with water sampling; high concentrations of N-NH₄ were detected and confirmed by the laboratory. Due to the presence of N-NH₄, the subsequent inspection focused on the Staňkov compound, where AGPI, a.s. runs an agrochemical services centre, storing and handling both liquid and solid fertilisers. High concentrations of N-NH₄ were detected in the storm sewer well inside the compound and in the oil trap (final settling tank): concentration of 4,040 mg/l of N-NH₄ was confirmed at the outflow to the sewer pipe leading to the Milevský brook. A fine amounting to CZK 200,000 was imposed on the company for failing to take adequate measures when handling potential pollutants preventing their release into surface water and environmental damage. The reason for the high fine was the surface water contamination in the Milevský brook. The fine entered into force on 18 December 2019



Accident on the Milevský brook.

Classification of accidents by pollutant category in 2019	Pollutant category	Accidents	%
petroleum products	96	58.2	
wastewater	18	10.9	
chemicals except heavy metals	15	9.1	9.1
sludge and solids	5	3.0	
waste from animal husbandry	4	2.4	
oxygen deficit	2	1.2	
food processing products	2	1.2	
other substances	8	4.9	
unidentified	15	9.1	
TOTAL	165	100	

Classification of accidents by primary cause in 2019	Accident cause	Accidents	%
human error	37	22.4	
technical error	18	10.9	
human+technical error	23	13.9	
natural factors	8	4.8	
unidentified	79	48.0	
TOTAL	165	100	

4.7 Integrated agendas

The dominant part of CEI work in the area of integrated agendas is Integrated Pollution Prevention and Control (IPPC). It is an advanced preventive method of regulation of industrial and agricultural activities in relation to the environment that outperforms the departmental approach and end-of-pipe strategy, which eliminated pollution mostly by installing end-of-pipe separators, filters and other cleaning equipment, often leading only to a shift of the pollution from one environment component to another. The main emphasis is on a preventive approach, avoiding pollution before it occurs by choosing appropriate production techniques, i.e., best available techniques (BAT) as well as use of more environmentally friendly materials if possible.

This integrated approach to holistic environmental protection is ensured by the CEI's expert departments (Air Protection, Waste Management, and Water Protection) under coordination and collaboration of experienced inspectors specialised in these agendas, i.e., coordinators of integrated agendas (CIA).

Supervision (inspection) is the fundamental activity in this area. Another crucial, very important preventive aspect is non-inspection work, consisting, e.g., in issuance of professional CEI statements (on EIA, IPPC, etc.).

4.7.1 Legal foundation of work on integrated agendas

Performance of public administration (obligations and authorities) is delegated to the CEI in the area by legal regulations of the CR on environmental protection in force and effect and directly applicable EC regulations:

- Act 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,
- Act no. 100/2001 Coll. on Environmental Impact Assessment and on amendment of certain acts,
- Act no. 167/2008 Coll. on Prevention of Environmental Harm and its Remedy and on amendment of certain acts,
- Act 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 the Council (EC) no. 166/2006, establishing the European Pollutant Release and Transfer Register (E-PRTR).

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

Integrated agendas total, aggregate data for CEI The work of CEI Departments in respect of integrated agendas done by them directly or in cooperation is also included in the previous points of Section 4 of this Annual Report "CEI work in 2019 by department" (notably 4.1, 4.2 and 4.3).

A priority of inspections at facilities under the Integrated Prevention Act is acceptance of provisions most importantly of Sections 19 b, 20 b, 34 and 37 of the Act, implementing Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions.

According to these provisions, it is necessary, among other things, to observe the time between two inspections on a site (one to three years depending on the facility level of risk). However, this makes considerable requirements on the frequency and extent of inspections and other CEI activity in the area.

In total, the CEI made 1,262 inspections in the area of integrated agendas in 2019, initiated 139 administrative/misdemeanour proceedings, issued 139 decisions and orders, and 138 decisions in force (including from past periods) led to the awarding of fines totalling CZK 9,337,270. Out of the 138 decisions, one decision on reprimand entered into force as well as one on halting operations and four on remedial measures.

The range of fines in force in relation to integrated agendas was from CZK 5,000 to CZK 900,000 (conclusive fine for the operator of Municipal Waste Landfill Slavičín Radašovy for operating it in contravention of IP requirements and operating rules, not implementing remedial measures etc.; entry into force on 28 January 2019).

The average amount of fine per decision (order) in force, in aggregate for integrated agendas, in the period was about CZK 70,200.

Integrated prevention, aggregate data for CEI

The ordinary inspection plan and programme for IPPC facilities for 2019 (663) in respect of compliance with the Integrated Prevention Act and integrated permits (IP) was met with a reserve (775 inspections made). These figures include extraordinary inspections made based on suggestions, media cases, accidents or non-standard operation, as well repeated inspections based on gross violations of binding requirements of IP (about 12% in total).

Thus, the CEI made 775 inspections as part of its jurisdiction in the area of integrated prevention in 2019, initiated

114 administrative/misdemeanour proceedings, issued 113 decision and orders, and 111 decision entered into force (including from past periods). Out of this number, one decision on reprimand entered into force as well as four decisions on remedial measures and one on halting operations. The fines imposed (111 decisions) totalled CZK 8,862,270 (in force). Two proceedings were ceased by the CEI.

The average amount of fine per decision (order) in force for integrated prevention in the period was about CZK 83,600.

Major inspection findings

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

- air protection
 - exceedance of pollutant emissions (e.g., carbon monoxide, sulphur dioxide), failure to monitor landfill gas in gas collection wells,
 - violations of operating rules by not connecting landfill gas collection wells to cogeneration plants.
- water protection
 - excessive discharge of potential pollutants into waters, exceedance of permitted groundwater collection quantity,
 - handling of potential pollutants on hydraulically unsecured surfaces,
 - failure to update accident plans,

- failure to monitor (e.g., landfill seepage water before transport to WWTP, water quality in inspection boreholes), failure to make tightness tests.
- waste management
 - wrong handling of hazardous waste (waste similar to municipal), handing of waste to an unauthorised entity, failure to keep records, wrong waste production and management reports, failure to report transfer of substances in waste, insufficient documentation of quality of admitted hazardous waste (waste oil),
 - landfilling of waste types other than those permitted, insufficient completion of basic descriptions of admitted waste, failure to measure dust levels,
 - contamination of free ground surface, for example by placement of car wrecks containing hazardous components outside the dismantling hall,
 - non-compliance with operating rules (technical operating conditions), etc.

Moreover, failure to perform the reporting duty under the Integrated Prevention Act, etc.:

- IP changes,
- reports on compliance with binding requirements of IP,
- transfers (above-threshold) or releases of substances,
- emergencies,
- failure to report measurement by required dates, etc.

Additional violations were disagreement of approved documents with facility descriptions, exceedance of facility capacity, non-compliance with requirements for facility disposal, or even operation without an IP.

A separate chapter continues to be the changes of departmental laws and their reflection in IP.

Integrated Pollution Register, aggregate data for CEI In terms of compliance with the IPR Act, the CEI inspected 291 facilities in 2019, including 287 inspections as part of integrated inspections (under the Integrated Prevention Act). Three IPR inspections were separate. One inspection was made in a letter form – comparison against reports in the integrated system for reporting obligations (ISPOP). A total of 212 IPR inspections were scheduled and 291 made (criterion met). The total amount of the fines in force for the IPR was CZK 425,000. With 26 conclusive decisions, the average amount per fine was approx. CZK 16,350 (several other IPR violations were absorbed under decisions on IPPC violations).

Like in previous years, the penalties imposed were at the lower bound of the statutory range, which is up to CZK 500,000, namely from CZK 5,000 to CZK 120,000 (Tatra Trucks a.s., most importantly for

not reporting pollutant transfers in waste for 2017 and 2018 and waste transfers; entry into force 12 November 2019).

Violations in the area of the IPR concerned mostly not submitting reports to ISPOP on time, reporting wrong data, not reporting transfers of waste or pollutants in waste.

Thus, they were all formal misdemeanours or misunderstandings and late reports, and the CEI treats them as such. It is almost a rule that large operators of facilities with an IP perform their obligations under respective legislation much better than others, 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 misdemeanours decreasing.

Environmental harm, aggregate data for CEI

Misdemeanour 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, either based on requests or by official power.

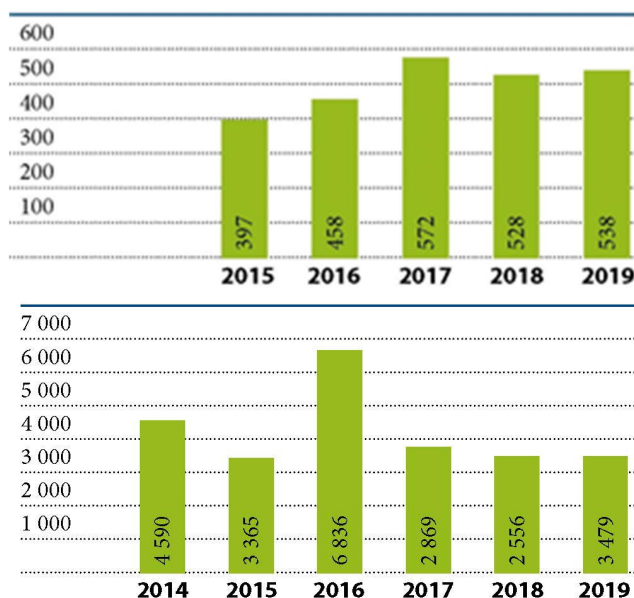
In 2019, the CEI made 196 inspections of adherence to the Act on Preventing Environmental Harm. We had planned at least 39 inspections, which was met. Basic risk assessments were submitted – 50 points were only exceeded in two cases, where detailed risk assessments were thus submitted. No misdemeanours were committed.

Integrated Agenda Department (IAD)

Specialised integrated agenda coordinators (CIA) of the CEI Integrated Agenda Department (IAD), in close collaboration with the expert departments, made, were involved in, cooperated on or coordinated 621 inspections at 538 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 52 administrative/misdemeanour proceedings. The number of decisions on fines (including orders) that entered into force in 2019 was 52; the total amount of fines in force was CZK 3,479,320. Out of that, one decision on a remedial measure, one on halting operations and one on non-cooperation under the Inspection Rules entered into force.

The range of the conclusive fines was from CZK 5,000 to CZK 800,000 (conclusively imposed on VAFO PRAHA, s.r.o., Chrášťany for operating the facility "Production of extruded fodder for animals in hobby breeding" without an integrated permit; entry into force on 11 July 2019).

Number of facility inspections led by CEI IAD



The average amount of fine per decision (order) in force in the period was about CZK 69,600.

Annual Report 2019

Departmental tasks for IAD

So-called integrated inspections were made as overall comprehensive checks of operators in the area of the environment, or as checks under specific MoE tasks or regional themes, reflecting the emission levels and types, sensitivity of local environment and accident risk (e.g., inspections at facilities that have historically committed gross violations of the Integrated Prevention Act, experienced accidents, cases covered by the media, etc.).

In addition, there were (inter)departmental inspections at IPPC facilities for adherence to IP requirements, which would otherwise (under departmental permits) be made ordinarily as part of departmental specific tasks by expert environmental protection departments (Water, Air, Waste), e.g., energy facilities such as power plants and heating plants, production facilities such as cement works and lime works, major wastewater treatment plants, chemical operations, entities handling larger quantities of potential pollutants, hazardous waste landfills, etc.

Specific tasks for IAD

By agreement in addition to primary performance of statutory obligations, the MoE Environmental Impact Assessment and Integrated Prevention Department required increased attention to landfilling under a specific task for 2018 and 2019. The CEI carried out the MoE task. All landfills (facility category

5.4 under Annex 1 to the Integrated Prevention Act) were inspected in 2018 and 2019. Due to the great administrative demand for inspecting a landfill, some of the inspections are still in progress. The most important violation of the Integrated Prevention Act found by the IAD while performing the task, and fined conclusively, was by the landfill at Stráž nad Nežárkou – Pistina. In an inspection in 2018, the České Budějovice TI found, most importantly, failure to report an emergency consisting in having to shut down seep water inflow to the reservoir, disagreement in operating rules, failure to connect the gas collecting well to an active degassing system, failure to stabilise the landfill by compacting and covering the waste deposited, failure to mark with appropriate signs places with explosion risk, etc. We imposed a fine of CZK 170,000 (the operator did not appeal, entry into force on 2 March 2019).

Other legal violations were found at:

- Landfill Klenovice II

In an inspection in 2018, the České Budějovice TI found asbestos-containing construction waste stored on the landfill surface and not covered, the composting plant leach water not drained to a reservoir, the seep water inflow to the reservoir shut, some gas collection wells not raised along with waste deposition, landfill gas from some gas collection wells not disposed of, and the report on performance of integrated permit performance not submitted pursuant to the Decree requirements. For these violations, we imposed a fine of CZK 130,000.

An unannounced check in 2019 found components for material recovery not removed from large-volume waste admitted, anomalies detected by groundwater monitoring but no inspection measurements taken, etc.

We imposed a fine of CZK 45,000 (the operator did not appeal, entry into force on 22 November 2019).

- Landfill S-003 at Senice na Hané

The landfill is operated by the municipality of Senice na Hané. Olomouc TI made an overall inspection in 2018, including inspection of IPR reports. We found a violation of integrated permit requirements in the waste management section (Section 16, Para. 1, item a) of Act no. 76/2001 Coll.), for which we imposed a fine of CZK 60,000; it entered into force on 14 August 2019.

- Landfill SKO Osová Bítýška, site Vlkovská, facility category 5.4
- The facility was operated in contravention of the valid IP, namely requirement 8 made in point C) "Requirements for health, animal and environmental protection", ordering the operator to maintain the outer drainage ditches in an operable condition, i.e., clean and unclogged, so that they can perform their function, as well as requirement 2 made in points

H) and I) "Measures to minimise long-distance transfer of pollution and measures to ensure high quality of environmental protection as a whole", which also orders the operator to maintain the outer drainage ditches in an operable condition, i.e., clean and unclogged, so that they can perform their function, and the requirement made in point B) "Waste management requirements", pursuant to which the operation must comply with the approved operating rules ("Operating rules of Landfill Osová Bítýška, August 2014"), specifically the facility was operated in contravention of the requirements of Article 8 "Facility maintenance requirements", paragraph 8.2 "Interception ditches" of the Operating Rules (page 33), as well as the requirement made in point B) "Waste management requirements", ordering that the operation must follow said landfill operating rules, approved in the fourth IP change. For these violations, Havlíčkův Brod TI imposed a fine of CZK 50,000 on the operator; entry into force on 16 October 2019.



Waste drifting in the area between the landfill at Osová Bitýška and its fence.

We made two specific inspections to check whether operations fall under the Integrated Prevention Act in 2019 (Prague TI).

Accidents

Coordinators of integrated agendas were actively involved in solving 18 accidents or non-standard operations at IPPC facilities, such as:

Ústí nad Labem TI – Mondi Štětí a.s.

An inspection at Mondi Štětí a.s. facility "Sulphate pulp and paper production, steam boilers K10, K 11" made on 29 January 2019 detected oil emulsion ("a greasy stain") on the Mondi Štětí factory outfall on the right bank of the Elbe river, km 92.87. The Mondi accident team installed a containment boom. The substance intercepted by the boom was continuously sprinkled with a sorbent, collected and stored in appropriate containers. The visibly affected strip of the river by the right bank was cleaned in the same way. In total, about 150 litres of a mixture of water, oil and sorbent were removed. It follows from the report that the root cause of the event (oil leaking into factory storm sewer and then the Elbe river) was not identified. The quantity of the leaked oil was about 20 litres. As a consequence of the event, the installation of a oil-water separator on the clean sewer ahead of the factory outlet is being considered as a preventive measure.

Ostrava TI Industrial waste incinerator operated by SUEZ Využití zdrojů, a.s.

On 13 June 2019, emptying a load of waste in section II of the bunker led to waste self-ignition (probably a reaction of an unknown substance in the waste, maybe sodium remnants). It was extinguished with powder due to suspicion of sodium content. Fire put out in 10 minutes, followed by another 60-70 minutes of drenching. The waste came from separately collected hazardous waste – contaminated packaging and sorbent fabric. Inspection was made and collected samples of waste category 19 01 13* to analyse for PCB and PCDD/PCDF. No violation of the IPPC Act, Waste Act and Air Protection Act was found.

Ústí nad Labem TI SONO PLUS s.r.o.

A fire of a part of "other" waste landfill in Želechovice occurred at 23:17 on 28 April 2019. It required the intervention of 12 fire brigades. The firefighters set up a pumping point and drenched the centre of the fire with water and covered it with foam. The fire covered an area of approx. 60×40 metres. The flames were extinguished at 2:33 am.

On 29 April 2019 at 09:45, the CEI verified that water was being sprayed on the waste, which no longer even smoked, in the active part of the landfill, box C1. The last waste had been deposited there on Saturday 27 April 2019, before 2 pm – large-volume waste from nearby municipalities. The fire brigade investigator did not identify the cause of the fire; the assumption was self-ignition. The landfill insulation layers were not affected.

Suggestions and petitions

Aggregate for the CEI, see 3.1 Cooperation with the public in this Annual Report.

Coordinators of integrated agendas are actively involved in handling of suggestions and petitions, notably in cases concerning multiple departments. Their principal task was to ensure a coordinated approach to the cases.

Interesting suggestions included:

TEBO a.s. – textile manufacturer; the suggestion pointed to insufficient exhausting of fumes produced by a fixation machine and employee health complaints. České Budějovice TI made an inspection with CIA and APD in cooperation with the South Moravian Regional Authority and the RPHA. No violation of the Air Protection Act and Integrated Prevention Act was found.

C-Energy Planá s.r.o. – the suggestion concerned the EVECONT pilot unit, a device for environmentally friendly reuse of plastic waste with no material reusability in a container design installed at the C-Energy heating plant in Planá nad Lužnicí. The suggestion pointed to the fact that C-Energy stated in its press release that the primary mission of EVECONT is to reuse waste produced by the neighbouring Planá nad Lužnicí industrial estate, and suspected that some of the waste may be "hazardous", which requires a screening pursuant to Act no. 100/2001 Coll. It also said that publicly available information suggests that the project had not been screened and no change to the integrated permit had been made, and requested an investigation into the matter (handled by České Budějovice TI). Although the suggestion aimed at C-Energy Planá s.r.o., the EVECONT unit will be operated by EVECO Brno, s.r.o. According to the project design, it will use exclusively "other" category waste and the regional authority stated based on documentation submitted that the project is below-limits and thus not subject to screening pursuant to Section 7 of the Environmental Impact Assessment Act. Thus, if a change is made to the integrated permit, it will only consist in specification of the list (division) of land plots and specification

of the unit in the facility description with a note on the different operator. If the EVECONT unit is operated, it will be subject to periodic CEI inspections.

4.7.3 Non-supervisory CEI work on integrated agendas

This work includes primarily development of expert statements:

- as part of the environmental impact assessment process (EIA/SEA),
- on applications for integrated permits or IP changes or reviews,
- on Environmental Management and Audit Systems as part of registration of EMAS, EMS,
- as part of the Safe Business programme,
- as part of zoning and building permit proceedings, on project documentation,
- on facility operating permits in terms of air protection and approval of operating rules for IPPC facilities,
- on environmental audits,
- on subsidies from environmental operational programmes,
- as part of requests for information under Act no. 123/1998 Coll., 106/1999 Coll., etc.

Besides, coordinators of integrated agendas were actively involved in 2019 in work of technical workgroups, primarily for the MoE, such as "Regions and Integrated Prevention" and the MIT "Forum for Exchange of Information on BAT".

An important task for the IAD inspector in 2019 was transboundary collaboration with the SEI and under IMPEL, such as a project implementing Directive 2010/75/EU on Industrial Emissions and conclusions about BAT for pig and poultry farming.

EIA/SEA

In 2019, the CEI developed 657 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 a nearly 8% increase in the statements issued (610).

It can be concluded that Section 15 of Act no. 100/2001 Coll. on preliminary consultation is popular among notifiers and submitters and is now used in abundance.

Major EIA cases

Ostrava TI – CENNZO Ostrava, OV9201. The case concerned the construction and operation of a facility for thermal processing of hazardous waste (new incinerator plant) in the existing Ostrava hazardous waste incinerator compound. The CEI had a number of comments on the project, and it was assessed comprehensively. Two public hearings took place in 2019 and the documentation was returned for reworking. The public and self-government opposed the

project. However, an approving binding position statement was issued. The Mariánské Hory and Hulváky municipal district of Ostrava brought an administrative action against MŽP.

Brno TI – Waste energy recovery facility – ZEVO Vsetín (long-standing case continued). In October 2018, the CEI received for comments a notification of starting a screening for the project Waste energy recovery facility – ZEVO Vsetín. The aim of the project of Zásobování teplem Vsetín a.s. was to build a waste energy recovery facility (ZEVO) in the notifier's heating plant compound. The ZEVO capacity was designed at 12,000 t/year of mostly mixed municipal waste and other waste types with an annual workload of 333 days and 8,000 hours.

After an assessment of known facts and examination of documents submitted, the CEI made comments on the project. Based on the comments, the Zlín Regional Authority assessed the project and said in the screening conclusion that the project is subject to an environmental impact assessment pursuant to the Environmental Impact Assessment Act.

In June 2019, the CEI received the documentation for the project, on which it made comments and said in its statement that it considers the submitted documentation to be incomplete. Based on the comments received, the Zlín Regional Authority returned the documentation to the notifier for reworking.

Ostrava TI – CT Park Ostrava-Hrabová, building O26, section B, OV9211– project of locating a manufacturing hall for door sealing components for the automotive industry in section B of the new building O26 in the industrial estate in Hrabová. The primary process equipment will be manufacturing lines for making semifinished products from rubber elastomers (EPDM lines). The profile manufacturing in the EPDM lines will proceed in steps: unwinding, extrusion, vulcanisation, cooling, activation, coating, cooling, marking, forming, splitting, end sanding, gluing. The EPDM finishing lines will do the operations: profile cutting, injection moulding and vulcanisation, pressing of glass panes and plastic panels, finishing with cleaning, coating, firing, finishing and packaging.

The CEI pointed out the absence of an assessment of cumulative impacts and unsuitability of the location in an area that elicited complaints about potential odours. In conclusion, the project may have a significant environmental impact.

Example of an operator's calculated conduct towards EIA: In connection with commenting on project notifications, Olomouc TI registered an effort of operators to circumvent the obligation to make an project notification for a facility for disposal or reuse of "other" waste. The operator claims it is not a waste disposal facility but landscaping,

which are no longer among the categories in Annex 1 to Act no. 100/2001 Coll. since 2017, thus the operator is not required to make a project notification. That said, the building authority issued an approval for operating a waste disposal or reuse facility for it, in which case it would be required to make a project notification pursuant to Art. 56 of Annex 1 to Act no. 100/2001 Coll. ("facilities for disposal or reuse of other waste with a capacity up to the set limit", which is 2500 t/year). When issuing the approval, the building authority disregarded Act no. 100/2001 Coll. and, according to a consultation with the Olomouc Regional Authority, EIA and Integrated Prevention Department, the Regional Authority cannot ask the operator afterwards to make the project notification once the approval has been issued.

Applications for integrated permits

The CEI actively cooperates in the area integrated prevention with regional authorities, including issuance of statements on IP, material changes to IP (much more often) and IP reviews.

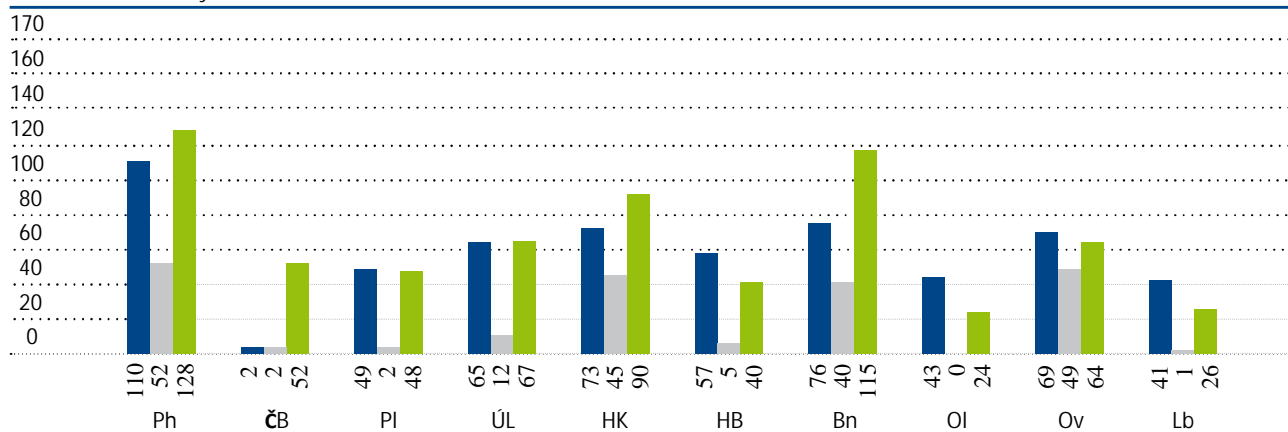
In 2019, the CEI developed 589 statements on applications for integrated permits or changes thereto. This is a decrease by about 10% compared to last year (648). In 20 cases, CEI representatives attended face-to-face meetings on applications for integrated permits or changes thereto.

The CEI applies a uniform position in its statements on IP changes consisting in increasing landfill capacity, pointing to expected legislation changes in the area of waste management and the ban on landfilling mixed municipal waste after 2030. For these reasons, we verify consistently why operators strive for expansion of landfills, for such facilities should be phased out gradually in the sake of environmental protection.

Other expert statements

In addition, coordinators of integrated agendas of the TI made or cooperated on another 208 statements on EMAS, under the Safe Business programme, and environmental audits, etc., as shown in the chart.

Statements issued by CEI TI and HQ in 2019



Statements on IP applications and (aggregate for CEI) 589

Other statements and dealings 208

EIA/SEA (aggregate for CEI) 657 (654 TI + 3 HQ)

Reports on inspection

Pursuant to Section 20b, Para. 9, of the Integrated Prevention Act 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 four 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 pursuant to 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.

The inspection reports are made by the Coordinator of Integrated Agendas or the inspection leader (guarantor). The Coordinator finishes the reports and is responsible for posting them on the MoE IPPC IS portal.

Since 15 August 2016, the IS portal had registered the CEI posting 2,861 reports on inspection.

4.7.4 Major cases from inspection work

Highest fines imposed by CIA, Integrated Prevention Act:

Prague TI – An important continuing case in 2019, which the CIA had dealt with in previous years too, was the misdemeanour proceeding with VAFO PRAHA, s.r.o., Chrástany for operating the facility for “Production of extruded fodder for animals in hobby breeding” without an integrated permit. The facility has been the subject of constant suggestions by complainants from a wide area around the Central Bohemian village of Chrástany, particularly due to alleged odours. In 2019, the CEI imposed a fine of CZK 800,000, which the appeal authority later confirmed. As expected, the penalty was contested by an administrative legal action. The administrative court confirmed the appeal authority's decision and refused the action. The decision entered into force on 11 July 2019.

Ústí nad Labem TI – An inspection at VITRABLOK, s.r.o., Duchcov in 2017 identified a violation of requirement 2.3 of the valid integrated permit for the facility

“Glassworks, pressing production of glass blocks with a mould material chroming line” relating to water protection, specifically a requirement on limits set for quantity of surface water collected from a nameless watercourse.

The annual limit for the surface water collection quantity set in the valid IP (40,000 m³) had been exceeded by 13,634 m³ in 2015.

The annual limit for the surface water collection quantity was exceeded by 2,296 m³ in 2016. The entity's operating records also showed that the monthly limit for the surface water collection quantity was also exceeded in January 2017 by 1,109 m³.

In determining the fine amount, the CEI applied

Section 125a, Para. 4 of Act no. 254/2001 Coll. on Waters, stating that the fine amount is calculated by multiplying the rate of CZK 40 per m³ of surface water collected without permission by the total quantity of such water; Section 125, Para. 6 of the Waters Act says the rate can be reduced for reasons of special regard, but it must be less than CZK 10 per m³.

By a decision of 23 October 2018, the CEI imposed a fine of CZK 363,320 on VITRABLOK, s.r.o. The decision was confirmed in the appeal proceeding by the MoE and entered into force on 14 February 2019.

Olomouc TI – ESET, spol. s r.o. By a decision of 9 January 2019, the CEI imposed a fine of CZK 350,000 on ESET, spol. s r.o., Říčany, for committing an administrative violation pursuant to Section 37, Para. 4 of Act no. 76/2002 Coll., which is the most severely punishable violation. The defendant had operated the facility “Loučka decontamination area” in contravention of integrated permit requirements and failed to cooperate as needed, thus not enabling performance of inspection. The decision entered into force on 5 February 2019.

Plzeň TI conducted a misdemeanour proceeding with the Town of Kralovice for operating a facility in contravention of binding IP requirements. We imposed a fine of CZK 250,000 under the Integrated Prevention Act. The operator contested the decision and appealed against it. The MoE OVSS III confirmed the contested decision in full and refused the appeal. The appeal decision entered into force on 18 December 2019.

The operator failed to submit to the Plzeň Regional Authority a “Procedure Plan” or a facility remediation plan three months before the scheduled termination of the operation, even though it had not admitted any waste to the facility since 1 January 2014, and it did not start land reclamation. Moreover, it collected in the facility compound construction and demolition waste, used paving blocks, damaged concrete posts in contravention of updated operating rules, failed to cover stored and compacted waste with sufficient quantity of inert material/waste for technical securing, violated the approved shape of the landfill mass (during the on-site check, the landfill mass was not sufficiently stable on the slope above Týřovský brook, thus not preventing possible landslides), failed to maintain clear perimeter trench to perform its function, and did not do or commission another entity to do monitoring of landfill mass sinking and deformation, and submitted a partial annual report on compliance with IP requirements to the regional authority several months after the deadline.



Kralovice landfill.

Highest fine imposed by CIA, Integrated Pollution Register Act: Ostrava TI imposed a fine of CZK 120,000 under Act no. 25/2008 Coll. on the Integrated Environmental Pollution Register and the Integrated System of Performance of Reporting Duties in the Area of the Environment and on amendment of certain acts, on the facility operator Tatra Trucks a.s., Kopřivnice, primarily for failing to perform its reporting duty on pollutant transfers in waste (Zn, Pb, Ni, Cu, Cr). As part of its IPR reports for 2017 and 2018, the operator had not reported any pollutant transfers in waste. It did not report its waste transfers within set periods in the same years either. The decision entered into force on 12 November 2019.

Example of positive effect of České Budějovice TI work on operators:

An interesting case is the operation of the category 6.10 (6.11) facility Impregnace Soběslav, a. s., the only one in the category to do impregnation of wood with chemical products against wood-decaying fungi, moulds and insects. The impregnating agents used are creosote oils and water-soluble substances based on copper salts. Wood impregnation and protection has been carried out on the site since 1914, since when soil and groundwater contamination has cumulated, mostly with petroleum products, polyaromatic

hydrocarbons and metals (Cr, Zn and Cu). An extensive remediation project started in 1990 and protective remediation groundwater pumping is still continuing.

The first inspection at the facility in 2018 identified violations of almost every act of law, so several penalties were imposed on the operator. The next inspection in 2019 concluded that after the previous inspection, the operator made maximum (even extraordinary) effort in the environmental area by adopting fundamental measures aiming at protection of all environmental components, the most important ones being investment in the construction of an insulated hall for storing products impregnated with creosote oil and cleaning of the original storage area located in the open air.

4.7.5 Conclusions

A general trend in the inspection findings related to violation of obligations under the Integrated Prevention Act is an overall decrease in violations identified, caused both by better operator discipline and a high rate of "inspectedness" among facilities with IP. The CEI has made at least two inspections in each of the facilities (more in most cases), which may lead to fewer violations identified, as the greater part of "chronic shortcomings" have been discovered, remedied by the operators and penalized by the CEI as necessary. The violations detected are often rather sporadic, minor or accident cases.

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 CEI does not focus strictly on imposition of fines only, but cares for prevention and applies soft methods as well. We also actively cooperate with other public authorities, particularly regional authorities, which permit operation of facilities under the Integrated Prevention Act. The purpose of the collaboration is an effort to improve IP quality, their agreement with current facility status, formulation of individual binding operating requirements that are enforceable, and thus achieving high-quality environmental protection.

Inspections in the area of integrated prevention demand particularly precise preparation and sufficient time.

5 Ethics and integrity, anti-corruption activity, handling of complaints and data protection

5.1 Ethics and integrity

Ethical rules

Ethical rules for civil servants and staff in employment doing work pursuant to Section 5 of Act no. 234/2014 Coll. on Civil Service, as amended (the CSA) are defined by the CSA, notably Section 77, Para. 1 and 2 and Section 81, and the Deputy Minister of the Interior Service Regulation for Civil Service no 13/2015 of 14 December 2015¹. Article 9 of the Deputy Minister of the Interior Service Regulation for Civil Service deals with preventing corruption and fraud risks and undesirable external influences that might endanger proper service performance. Ethical rules for staff in employment are defined by Act no. 262/2006 Coll., the Labour Code, as amended, notably Sections 303 and 304.

Moreover, documents that govern civil servants and CEI employees in the area of ethical conduct include the MoE Employee Code of Conduct, published on the CEI web site (www.cizp.cz Protikorupční program).

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

Reporting suspicion of illicit or corruption conduct

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

A report on suspicion of corruption or illicit conduct can be made by a CEI employee or CEI civil servant or another civil servant. Reports are handled as confidential and can be made at any time (in writing or by e-mail). The process of investigating the reported concerns is defined by Government Regulation no. 145/2015 Coll., Deputy Minister of the Interior Methodological Instruction for Civil Service no. 8/2015, and Czech Environmental Inspectorate Director Service Regulation no. 7/2015. Among other things, these documents lay down non-repressive policy against reporting persons.

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

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

Information about the CEI investigators and options for reporting suspicion of illicit or corruption conduct are published on the CEI web site (www.cizp.cz Praktický rádce Podávání oznámení o spáchání protiprávního jednání, včetně korupčního).

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

¹ The Service Regulation, as well as other Deputy Minister of the Interior Service Regulations for Civil Service, is available on the Ministry of the Interior web site <https://www.mvcr.cz/sluzba/clanek/sluzebni-predpisy.aspx> and on the CEI web site www.cizp.cz/Protikorupcni-program.

5.2 Anti-corruption programme

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

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

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

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

The current CEI IAP is published on the CEI web site (www.cizp.cz Protikorupční program).

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

The CEI has in place a map of corruption risks, which is updated continuously. The percentage of CEI organisational units assessed for risks associated with corruption and significant risks identified is 100%. All heads/managers and employees are informed about the organisation's anti-corruption policy and procedures. All the employees are periodically trained and educated.

No corruption cases have been reported in the past four years (2016-2019). Likewise, no contracts with partners and suppliers have been terminated or not renewed due to violation of corruption regulations.

5.3 Complaint handling

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

No relevant suspicions of corruption conduct pursuant to Government Regulation no 145/2015 were reported to the CEI in 2019. Seven submissions were delivered to the e-mail address prosetrovatel@cizp.cz. Among them, none were relevant reports of suspicion of corruption conduct in a service authority. All the submissions were handed under Section 42 or 175 of the Rules of Administrative Procedure. No written reports were cast in the marked box.

Complaints over inappropriate inspector conduct or TI procedure
As part of its work, the CEI also investigates complaints made under Section 175, Para. 4 of Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended, including complaints both about the authority's procedure and inappropriate conduct of its officials, but they are minimal (www.cizp.cz/Podavani-podnetu-stiznosti). Complaints about inappropriate conduct of CEI inspectors or proceedings of territorial inspectorates constitute an important feedback that helps the organisation improve its work. The CEI investigates the facts stated in the complaint and, based on the investigation, finds it justified, partly justified or unjustified. In 2019, the CEI received 57 complaints, of which 55 were not found justified. One complaint was found partly justified, and one of the total number of complaints was found justified. An overview of the complaints broken down by territorial inspectorates is shown in the table below.

Numbers of complaints about inappropriate conduct of inspectors or TI procedure in 2019

Territorial number inspectorate of complaints		within that,		
		justified	partly justified	unjustified
Prague	12	0	0	12
České Budějovice	2	0	0	2
Píseň	19	0	0	19
Ústí nad Labem	1	0	0	1
Hradec Králové	3	0	0	3
Havlíčkův Brod	1	0	1	0
Brno	3	0	0	3
Olomouc	4	1	0	3
Ostrava	2	0	0	2
Liberec	1	0	0	1
Headquarters	9	0	2	9
Total	57	1	1	55

Employee complaints about employment issues

Complaints by CEI staff in employment are governed by the Labour Code, Sections 276 and 285. Complaints by CEI civil servants are governed by the Civil Service Act (CSA), Section 157. If an employee is in doubt or disagrees with HR decisions, the State Secretary of the Ministry of the Environment is the appeal authority pursuant to Section 162, Para. 4, item c) of the CSA. Besides, the employees can proceed as per legislation in force.

The CEI received no complaints about employment procedures in 2019. The CEI was not fined or otherwise penalized for non-compliance with legislation and regulations in the social (employment) area.

5.4 Data protection and legislative compliance

The CEI states that it did not receive any complaints for 2019, and its conduct or procedures were not the subject matter of complaints about violation of privacy, trade secret, loss of data or unauthorised publication of data. Likewise, the CEI did not fail to comply with any law or regulation in the social (employment) area or in use of products and services.

In 2019, the Czech Environmental Inspectorate paid:

CZK 580,136	to tax authority, penalty and budgetary discipline violation (OP LZZ project under Section 44a, Para. 7 of Act no. 218/2000 Coll. on Budgetary Rules and Section 254 of Act no. 280/2009 Coll., the Tax
CZK 14,941.68	interest to EKOSERVIS RALSKO (Act no. 280/2009 Coll., Tax Code)
343 781Kč	interest to SKLÁDKA ELZET s.r.o. (Act no. 280/2009 Coll., Tax Code)
CZK 40,245	interest to Zemědělské družstvo Měřín (Act no. 280/2009 Coll., Tax Code)
CZK 31,168	costs of judicial proceedings (Pavla Šmerhová)
CZK 23,456	costs of judicial proceedings IC-PARK ENERGO,
CZK 3,388	costs of judicial proceedings (Ing. Karel Simon)
CZK 8,738	costs of judicial proceedings (CZ GOLF INVESTMENT a.s.)
CZK 3,354	contractual penalties
CZK 6,200	finest for traffic offences (imposed for speeding, wrong parking, etc.). The employee deposited the component amounts in the CEI account.

6 Tenders and supply chain in 2019

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

Supply chain

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

- car servicing and repairs,
- cleaning services,
- reception desk services,
- facility management and maintenance,
- provision of legal services,
- printer servicing,
- IT commissions, servicing and systems support.

In addition, there are currently necessary servicing, professional training and purchases of instrumentation or laboratory equipment for CEI departments that contribute to better inspection work.

In 2019, we concluded 49 public contracts worth above CZK 50,000 excl. VAT, totalling CZK 28,133,353 excl. VAT. The costliest investment public contract projects included the roof renovations for the Ústí nad Labem TI and Havlíčkův Brod TI. The Hradec Králové TI underwent a renovation of the fire alarm system (FAS) and electronic security system (ESS). In addition, the Headquarters building commissioned supply and implementation of LAN structured cabling and purchased air-conditioning for the large meeting room and server room cooling.

Auditing of suppliers' environmental impacts, employment procedures and social impacts

When commissioning public contracts, the CEI tries to apply environmental requirements, divide public contracts into parts to enable participation of smaller contractors, and reserve as many public contracts as possible for contractors employing disabled persons.

We audited no suppliers pursuant to Government Resolution no. 465 of 14 June 2010 on Rules for application of environmental requirements when commissioning public contracts, since the CEI did not run any tenders in 2019 where such requirements could be applied.

When screening public contract suppliers in the social area, we always audited the selected supplier for compliance with statutory requirements, contracting authority requirements and the bidding price.

In the below-limit public contract "Provision of cleaning services for Brno TI building" and in the tender "Provision of reception desk services for CEI Prague TI building", we used the contracting authority's right to reserve the contract only for suppliers employing persons with disabilities, so-called reserved contracts, where the bidder has to supply a confirmation of compliance with the criterion from the job authority. Two suppliers were audited in the above contracts, i.e., 4%.

7 Employee environment and human resources

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

As of 31 December 2017, the CEI had 557 employees, including 317 women and 240 men. CEI employees work at inspectorates in 10 regions. Most of the employees work in professional positions (80%) and are tertiary graduates (81.5%). Employees with more than 10 years of CEI experience make up 60.7% of the staff.

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

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

Year	2015	2016	2017	2018	2019
Total employees as of 31 Dec	538	539	536	550	557
Prague and Central Bohemia	62	65	57	62	62
České Budějovice	37	39	38	36	39
Plzeň	41	44	43	44	43
Ústí nad Labem	48	47	48	49	50
Hradec Králové	41	42	42	44	44
Havlíčkův Brod	34	35	37	37	38
Brno	53	50	51	54	55
Olomouc	32	34	34	34	36
Ostrava	46	44	47	47	46
Liberec	31	31	32	32	33
Headquarters (Prague)	113	108	107	111	111

Classification of employees by education and sex, as of 31 December 2019

Education attained	males	females	total	%
Primary	0	0	0	0
Secondary professional	0	6	6	1.1
Complete secondary	2	11	13	2.3
Complete secondary professional	9	68	77	13.8
Higher vocational	2	5	7	1.3
Tertiary	227	227	454	81.5
Total	240	317	557	100

Duration of employment as of 31 December 2019

Duration	Number	%
Under 5 years	167	30
Under 10 years	52	9.3
Under 15 years	115	20.6
Under 20 years	100	18
Over 20 years	123	22.1
Total	557	100

Staff numbers by employment and contract type

Year	2015	2016	2017	2018	2019
Staff as of 31 Dec, total	538	539	536	550	557
Percentage of staff covered by collective agreement	100	100	100	100	100
Staff in top management					
managers + heads of units (civil servants)	16	14	14	15	17
within that, females	3	2	2	2	2
within that, males	13	12	12	13	15
Professional staff (civil servants)	425	431	429	437	446
within that, females	195	205	205	217	229
within that, males	230	226	224	220	217
Supporting staff (staff in employment)	97	94	93	98	94
within that, females	85	81	81	86	86
within that, males	12	13	12	12	8
Employment for an indefinite period of time	488	497	493	492	504
within that, full-time	473	489	486	484	490
within that, part-time	15	8	7	8	14
Employment for a definite period of time*	50	42	43	58	53
within that, full-time	47	40	42	53	52
within that, part-time	3	2	1	5	1
FEMALES, as of 31 Dec	283	288	288	305	317
Employment for an indefinite period of time (females)	256	260	259	269	278
within that, full-time	245	254	253	262	266
within that, part-time	11	6	6	7	12
Employment for a definite period of time (females)	27	28	29	36	39
within that, full-time	26	26	28	33	38
within that, part-time	1	2	1	3	1
MALES, as of 31 Dec	255	251	248	245	240
Employment for an indefinite period of time (males)	232	237	234	223	226
within that, full-time	228	235	231	222	224
within that, part-time	4	2	1	1	2
Employment for a definite period of time (males)	23	14	14	22	14
within that, full-time	21	14	14	20	14
within that, part-time	2	0	0	2	0

* Definite period: pursuant to Section 21 of the CSA, civil servants who have not passed the servant exams are admitted for a definite

period. As soon as they pass the servant exams, their contract changes to an indefinite period.

7.1 HR management

The approach to CEI staff is governed by the Labour Code and the Civil Service Act and is further defined by internal regulations. The key internal guidelines include:

- Collective agreement and Collective contract
- Czech Environmental Inspectorate Working Regulations (effective since 1 May 2012)
- Salary Regulations (effective since 1 June 2012)
- 5/2012 CEI Staff Education Guideline (effective since 1 February 2013)
- 3/2015 Service Regulation on application of Czech Environmental Inspectorate Working Regulations to service contracts of civil servants pursuant to the Civil Service Act (effective since 10 August 2015)
- 8/2015 Service Regulation defining taking of service vows by civil servants in the Czech Environmental Inspectorate (effective on signing by CEI Director)
- 10/2015 Service Regulation defining application of the Civil Service Act in the Czech Environmental Inspectorate (effective on signing by CEI Director)
- 8/2017 Guideline on application of Section 81 of the Civil Service Act in the Czech Environmental Inspectorate (other profit-making activity, effective since 15 June 2017)
- 11/2018 Guideline on provision of occupational physician services in the Czech Environmental Inspectorate (effective since 1 July 2018)
- 1/2019 Guideline on remuneration to civil servants (effective since 7 February 2019)
- 10/2019 Service Regulation laying down the procedure for service evaluation of civil servants serving in the Czech Environmental Inspectorate (effective since 8 October 2019)
- 13/2019 Service Regulation issuing internal systemization of the Czech Environmental Inspectorate (effective since 1 April 2020)

In 2019, the HR department work focused on implementation of the amended Civil Service Act. Electronic salary slips were implemented in February 2019. Every employee can now view their salary slip on the OK Base web portal. Characteristics for all the civil servants were developed in the first half of 2019 in accordance with the Deputy Minister of the Interior Service Regulation for Civil Service no. 5 of 7 December 2018 on characteristics of civil service position; this included a revision of job descriptions for staff in employment. All the civil servant were issued service cards in the third quarter of 2019 in accordance with Act no. 234/2014 Coll. on Civil Service and Decree no. 388/2017 on the Template service card for civil servants. In addition, the HR department work in 2019 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. Implementation of all human resources processes as part of HR Department work complies with applicable legal regulations and the collective agreement and contract.

A public authority audit took place at the CEI in the last quarter of 2019. Staff of the Ministry of the Environment Internal Audit and Financial Inspection Unit were authorised for and carried out the audit. The inspection period was from January 2018 to June 2019. The subject matter of the audit was spending of wage costs from 1/2018 to 6/2019 and filling of systematized vacancies from 1/2018 to 6/2019. The CEI audit was included as extraordinary in the Ministry of the Environment Financial Inspection Unit work plan based on a requirement of the MoE State Secretary. The public authority audit found no major shortcomings in the processes in place.

Employment

Due to its nature, the CEI offers primarily qualified jobs. The imperative is to retain employees, measured by the voluntary fluctuation indicator.

At the end of the year, the CEI had 47 vacant systematized jobs. A remaining current task for CEI management is stabilisation and development of key professions. The average percent of voluntary fluctuation is low in the CEI (6%).

Changes in the staff numbers are monitored by periodic internal reporting and assessed by the management. The job and service vacancies are filled via public tenders. Employee stabilisation is aided by benefits, available in the same degree to both civil servants and staff in employment.

Pursuant to the Civil Service Act (CSA), employee career progress cannot be planned and tenders have to be organised for each systematized vacancy.

Total number, share of new employees and employee fluctuation rate

Newly admitted employee and employee leaving the organization, fluctuation rate in 2015-2019

	2015	2016	2017	2018	2019
Employees admitted in the year, total	32	51	49	59	54
within that, females	17	32	37	33	39
up to 30 years	3	8	10	16	9
aged 30-50	13	22	23	13	22
aged over 50	1	2	4	4	8
within that, males	15	19	12	26	15
up to 30 years	6	7	2	7	3
aged 30-50	5	7	4	10	6
aged over 50	4	5	6	9	6
Total employees as of 31 Dec	538	539	536	550	557
Total number of employees leaving the organization in the year	48	43	55	51	50
within that, males	22	19	23	25	19
up to 30 years	2	1	3	1	2
aged 30-50	10	10	7	15	6
aged over 50	10	8	13	9	11
within that, females	26	24	32	26	31
up to 30 years	3	3	4	4	5
aged 30-50	16	16	18	13	16
aged over 50	7	5	10	9	10
% of voluntary fluctuation *					
(Excluding forced departures, including by reason of organisational changes, retirements, injury or death)	3.49	4.1	7.2	4.8	6
% of total employee fluctuation					
Total number of terminated employments in the period (year)					
× 100 / average registered number of employees	8.81	8	10.2	9.5	9
in the year					

* Employment and service terminated by the employee. Excludes voluntary retirements, service and employment terminated by the employer (termination during trial period, dismissal from management), termination of service by law, and service and employment terminated by expiry of definite period of time.

Overview economic, health and social employee benefits (except pension scheme), relating to full-time employees for an indefinite period of time, 2019

	Staff in top management (civil servants)	– professional employees (civil servants)	Supportive staff (staff in employment)
Average monthly number of employees in the year	17	446	94
Collective agreement	YES	YES	YES
% of staff covered by collective agreement	100 %	100 %	100 %
Healthcare allowance	YES	YES	YES
Parental leave	as per LC	as per LC	as per LC
Financial support for supplementary pension scheme	YES	YES	YES
Sick leave (5 days/year)	YES	YES	YES
Meal allowance	YES	YES	YES
Children's recreation allowance	YES	YES	YES
Family recreation allowance	YES	YES	YES
Anniversary rewards	YES	YES	YES
Culture and sports allowance	YES	YES	YES
Monetary rewards and gifts	YES	YES	YES
Social assistance	YES	YES	YES
Interest-free loans	YES	YES	YES

Diversity and equality of opportunities

The Czech Environmental Inspectorate is an organisation that respect equal opportunities for men and women. Employee selection considers primarily applicants' expertise. Wage transparency is achieved by wage scales. Wage equality is based on each employee's service evaluation.

The different departments are very diverse in terms of gender, age and experience. The organisational culture does not tolerate any form of direct or indirect discrimination promoting gender stereotypes. The Working Regulations contain a requirement for work discipline and observance of rules of politeness and consideration.

The CEI promotes equal opportunities with flexible working hours and part-time employment as necessary, thus enabling each and every employee to harmonize their private and work lives.

A separate presentation is dedicated to equal opportunities as part of admission training. Passing the equal opportunities e-learning course was required for every newly admitted and existing employee in 2018.

CEI employee-management relationships

Civil servants and staff in employment have to have separate collective agreements/contracts, which cover all CEI staff. The collective agreement (or contract for civil servants) defines most importantly employee privacy protection, provision of leave from work, occupational health and safety, wage policy, canteen meals, employee education at work, information sharing between management and trade union representatives, bargaining procedures and generation and drawing of cultural and social fund. The minimum notice periods relating to organisational changes are governed by the Labour Code.

Equal remuneration for men and women is assured by the wage levels systematized for the service or job position.

The standard method of CEI communication with staff is by means of meetings, extended with other communication platforms which facilitate information availability, such as e-mail and intranet, where employees can find, e.g., all the CEI internal standards and information about organisational and staffing changes.

Composition of managing bodies and employee categories in 2019

	Males	Females	Total
Staff in top management (managers + heads of units (civil servants))	15	2	17
Staff – professional staff (civil servants)	217	229	446
Supporting staff (staff in employment)	8	86	94
Total	240	317	557

7.2 Training

A total of 2,016 employees were trained in attendance courses, conferences and e-learning courses in 2019. The number includes training schemes, divided into:

- Internal courses: CEI large-scale training (51 schemes, 943 participants, 292 hours)
- External courses: Individual training (154 schemes, 287 participants, 1334 hours)
- Conferences (42 schemes, 149 participants, 596 hours)
- E-learning training (38 schemes, 637 participants, 512 hours)

The numbers exclude training mandatory by law, which was attended by 876 employees in 2019. This training is divided into:

- OHS for management members (42 participants)
- OHS for employees (144 participants)
- FS for management members (33 participants)
- FS for employees (158 participants)
- First aid (52 participants)
- Drivers (447 participants)

In its internal training schemes, the CEI focuses primarily on perfecting knowledge of legal regulations. In 2019, we ran training schemes on the Rules of Administrative Procedure, the Inspection Rules and the Misdemeanour Act, attended by 99 employees in four terms. These training schemes were taught by CEI Legal Department employees, who are very familiar with problems faced by CEI employees when working in the area. Additional training on legal regulations was held in relation to making administrative decisions and the Tax Code.

The whole CEI was trained in the following professional topics: BAT conclusions, Water and waste sampling, Tightness tests in practice, Car wreck handling, Woody plants and their evaluation, Water law, and Building Act. These professional courses were attended by 299 employees.

In the area of soft skills, the CEI continues training management members and inspectors in communication skills. In 2019, we held training in "Communication skills and problem handling" in seven terms, attended by 72 employees in total. The scheme received positive feedback from the employees. The CEI intends to continue the existing trend of training in soft skills.

Training in the Athena electronic records management system was held in 2019, implemented both externally at the MoE and internally at the CEI. A total of 131 persons were trained. The employees' feedback was very positive, and the training met expectations of most of them. The CEI plans to include the records management training in the admission training for new employees in future.

Along with attendance training, the CEI also provides e-learning for its employees. In 2019 the authority's training portal made available to employees, in addition to statutory training, another 45 e-learning courses in sections of accredited continuous education, lifelong education and ICT education. The courses are permanently accessible for all the employees, primarily as support for their education and compliance with requirements for education based on previous education, and as support for their work activity. The portal is also used by new employees for additional information on top of admission training. Admission training was attended by 42 new employees; follow-up admission training was taken by 24 employees when already employed.

In order to deepen their professional education, new inspectors attended theoretical and practical specialisation training. Specialisation exams in the areas of waste management, air, forest, water, nature and international biodiversity protection and CITES protection were successfully passed by 20 persons in 2019.

Training, study, practice and courses in 2019

	Males	Females	Total
Average hours of all types of training per employee per year of average monthly number of employees	29.4	36.5	33.3
Average hours of all types of training per employee per year as of 31 Dec	30	36	33
Staff in top management (managers + heads of units) (civil servants)	24.5	45	26.9
Staff – professional staff (civil servants)	29.8	38.7	34.4
Supporting staff (staff in employment)	39	27.2	28.2

7.3 Occupational health and safety

Occupational safety principles

Occupational health and safety are among the CEI's fundamental priorities. The guideline "OHS organisation and management" was issued in 2018, defining primarily work of expert CEI employees, who work in a very diverse and demanding environment of various companies and sites, where they inspect facilities with pollution sources or investigate environmental damage or hazards.

The guidelines "Provision of car transport" and "Fire prevention organisation and implementation" will be reviewed next year.

The OHS situation is checked by annual comprehensive audits, provided by an external company and followed by an inspection of performance of guidelines assuring OHS by CEI staff.

The CEI carries out periodic safety training for its employees, and all its employees are familiarised with both general and internal occupational health and safety regulations in force. All the CEI employees are given protective equipment assuring maximum safety depending on their work description pursuant to standards, and are replaced with new ones on the first sign of damage.

Occupational safety issues are a part of collective agreements. Section IV of the collective agreement/contract deals with work environment, occupational health and safety and inspections of work environment, fire prevention and occupational health protection. Pursuant to the collective agreement/contract, occupational safety is supervised by a CEI trade union committee, which represents all the CEI employees and consults OHS issues with CEI management. They attend the periodic annual comprehensive audits of OHS situation, inspect occupational injury records and reports, etc.

Injuries, lost days and absence

The high effectiveness of OHS management and employee discipline are illustrated by zero injuries in 2019. The principal causes of occupational injuries are unpredictable work risks and human error. There were no fatal injuries or occupational diseases in 2014-2019. All workplaces consistently register all injuries, including investigation into their causes.

Injuries, diseases, lost days and absence of CEI employees

	Unit	2015			2016			2017			2018			2019		
		Males	Females	Total	Males	Females	Total	Males	Females	Total	Males	Females	Total	Males	Females	Total
Average monthly number of employees in the year	absolute no.	255	283	545	251	288	539	251	289	540	245	294	539	243	310	553
Number of all occupational injuries	absolute no.	2	0	2	0	3	3	0	1	1	0	0	0	0	0	0
Number of registered occupational injuries leading to incapacity for work for at least 3 days (GRI Injury)	absolute no.	1	0	1	0	2	2	0	1	1	0	0	0	0	0	0
Total number of serious occupational injuries leading to hospitalization for more than 5 days	absolute no.	1	0	1	0	1	1	0	0	0	0	0	0	0	0	0
Total number of absence days due to injury and occupational disease (GRI lost day)	days/shifts	241	0	24	0	59	59	0	12	12	0	0	0	0	0	0

Injuries, diseases, missed days and absence of CEI employees

	Unit	2015	2016	2017	2018	2019
Injury frequency (Number of registered occupational injuries per 100 employees)	relative no.	0.18	0.37	0.19	0.00	0.00
Average number of lost calendar days per registered occupational injury	absolute no.	24.00	29.50	12.00	0.00	0.00
Absence due to disease, occupational and other injuries (0% of total time worked)	%	4.58	4.05	4.04	3.65	4.63
Unscheduled absence rate Absence due to unscheduled absence: disease, occupational and other injuries (0% of scheduled time) (GRI Absentee rate)	%	3.69	3.30	3.39	3.07	3.84
Percentage of incapacity for work Share of number of lost calendar days of incapacity for work times 100 in number of calendar days times number of employees (GRI Lost day rate)	%	0.01	0.03	0.01	0.00	0.00
LTIFR (Lost Time Injury Frequency Rate) Represents the number of injuries after at least 3 days of incapacity for work divided by the total number of hours worked expressed as millions of hours.	absolute no.	1.09	2.19	1.07	0.00	0.00



8 Energy and material intensity of CEI activity

The CEI purchases all of its consumed energy from supplier selected as part of the centralised public contracting system. Electricity was supplied by EP Energy Trading, a.s., natural gas by Pražská plynárenská a.s.

The CEI aims at reducing its consumption of all types of energy; the consumption is affected by climate conditions and petrol and diesel consumption is affected by the number of inspections and distances to inspected sites. The CEI does not use major quantities of any raw materials or materials.

All the buildings owned by the CEI have energy audits and building energy performance certificates. These documents have led to measures implemented gradually to reduce the energy consumption. In 2019, we renovated the heat exchanger plants at Liberec TI and Hradec Králové TI.

Independent of these measures, the CEI adopts secondary measures to reduce energy intensity, e.g., replacement

of windows and entrance doors, insulation of building roof envelopes, installation of energy-efficient light sources, purchase of energy-efficient appliances.

The vehicle fleet was renovated in 2019, replacing 9 petrol and diesel cars with CNG cars. This change will reduce the CO₂ emissions and noise levels. The combustion products of these drives do not contain any harmful sulphur dioxide. Cars with CNG drive do not consume any carcinogenic additives. In the coming years, we expect to gradually replace about 22% cars fuelled by petroleum-based products with cars with alternative propulsion.

The waste management is governed by a separate internal guideline. The CEI work produces sorted (separated) waste, municipal waste and large-volume waste, such as discarded furniture. Batteries, electric waste, fluorescent lamp, light bulbs, etc., are handed over to authorised persons for recollection. The waste is handed over for disposal to regional companies. The wastewater is discharged into public sewerage.

Weight of CEI waste (kg) and method of disposal*

	2016		2017		2018		2019	
	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste
Total production	25	60,049	29	42,324	27	43,960	37	85,510

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

CEI energy, fuel and water consumption

	Fuel or energy type	Unit	2016	2017	2018	2019
Purchased and consumed energy sources	Petrol	l	75,294	68,172	63,165	61,791
	Diesel	l	43,709	50,289	51,243	50,120
	Electricity*	kWh	475,838	511,156	462,409	592,47
	Natural gas	m ³	98,912	93,601	93,397	80,866
	Thermal energy	GJ	1834	1589	1681	2,032
Water consumption from municipal supply or other utility		m ³	8,145	10,822	6,769	6,840

* The origin of electricity supplied to CEI as an end customer by EP Energy Trading a.s. in 2019 was: 23.2% from coal, 15.8% from nuclear installations, 1.2% from natural gas, 56.3% from renewables, including guarantee of origin, 1.5% from secondary energy sources, and 2.0% from other sources.

9 Economics

In 2019, the CEI operated with non-investment funds amounting to CZK 445,636,800.65 (including NNV of CZK 44,833,029.95) and with budgetary investment funds of CZK 63,600,682.17 (including NNV of CZK 34,077,437.55). The total budgetary funds thus were CZK 509,237,482.82. The CEI also managed non-budgetary funds of CZK 410,870.

Drawing of non-investment expenditures for 2019

Indicator	Adjusted budget	Drawing	Balance
Salaries of employed employees	23,383,714.00	20,300,940.00	3,082,774.00
Salaries of employed employees – NNV	16,029,375.00	16,029,375.00	0
Salaries of civil servants – SZ	221,681,156.00	216,702,709.00	0
OOV	2,535,955.00	832,663.00	1,703,292.00
OOV-NNV	1,543,562.00	1,543,562.00	0
Severance pay	500,000.00	99,881.00	400,119.00
Severance pay NNV	655,405.00	85,052.00	570,353.00
Insurance – SS+HI	84,343,914.00	79,857,890.00	4,486,024.00
Insurance – SS+HI – NNV	6,729,225.00	6,729,225.00	0
Total wage expenditures	357,402,306.00	342,181,297.00	15,221,009.00

Indicator	Adjusted budget	Drawing	Balance
Other current expenditures	58,400,000.00	39,099,039.71	19,300,960.29
CSNF transfers	4,901,298.00	4,901,298.00	0
Non-budgetary resources	410,870.00	239,679.85	171,190.15
NNV 2018	17,975,462.95	14,959,989.56	3,015,473.39
Total current expenditures	81,687,630.95	59,200,007.12	22,487,623.83

Indicator	Adjusted budget	Drawing	Balance
Personal computer technology renewal	3,496,863.70	3,496,863.70	0
Mobile telephones	500,000.00	383,328.00	116,672.00
Multifactor identification	350,000.00	341,655.60	8,344.40
Technical and non-technical measures	1,400,000.00	0	1,400,000.00
AM access control	800,000.00	0	800,000.00
Non-investment expenditures SMVS	6,546,863.70	4,221,847.30	2,325,016.40
Total non-investment expenditures	445,636,800.65	405,603,151.42	40,033,649.23

Drawing of investment expenditures for 2019

Indicator	Adjusted budget	Drawing	Balance
CIS functionality	940,040.00	0	940,040.00
New CIS	7,553,000.00	0	7,553,000.00
CEI intranet	344,500.00	0	344,500.00
HQ LAN network renovation	2,009,636.97	2,009,636.97	0
EIS	1,682,844.00	1,645,600.00	37,244.00
Roof renovation at Ústí nad Labem TI	3,805,627.27	3,805,627.27	0
Fireproof doors at Brno TI	459,981.50	459,981.50	0
FAS and ESS renovation at Hradec Králové TI	964,262.31	964,262.31	0

Sewer connection at České Budějovice TI	240,822.67	240,822.67	0
Corridor printer renewal	2,855,052.92	2,855,052.92	0
Web site production	600,000.00	0	600,000.00
Privileged account management	800,000.00	0	800,000.00
AM access control	400,000.00	0	400,000.00
Multifactor identification	1,550,000.00	0	1,550,000.00
IDM user identity management	1,400,000.00	0	1,400,000.00
Purchase of disk arrays	2,389,750.00	2,389,750.00	0
Printing provision	700,000.00	0	700,000.00
Fireproof doors at HQ	200,000.00	0	200,000.00
Outer door frames	265,000.00	0	265,000.00
CCTV system at Havlíčkův Brod TI	134,084.00	134,084.00	0
Roof renovation at Havlíčkův Brod TI	537,240.00	537,240.00	0
Heat exchanger plant at Hradec Králové TI	519,942.00	519,942.00	0
Window replacement at Brno TI	400,000.00	0	400,000.00
Gas boiler at Brno TI	88,253.00	88,253.00	0
Air handling at Brno TI	420,000.00	0	420,000.00
Meeting room cooling	154,154.00	154,154.00	0
FAS renovation at HQ	217,710.46	217,710.46	0
FAS and ESS renovation at Liberec TI	1,621,000.00	0	1,621,000.00
FAS and ESS renovation at Ústí nad Labem TI	1,110,000.00	0	1,110,000.00
Gate remote control at Ústí nad Labem TI	225,000.00	0	225,000.00
Heat exchanger plant at Liberec TI	1,338,149.89	1,338,149.89	0
GPS Trimble purchase	356,829.00	356,829.00	0
FAS end devices at Hradec Králové TI	100,000.00	0	100,000.00
FAS end devices at České Budějovice TI	100,000.00	0	100,000.00
FAS end devices at Prague TI	100,000.00	0	100,000.00
FAS end devices at Havlíčkův Brod TI	100,000.00	0	100,000.00
FAS end devices at Liberec TI	100,000.00	0	100,000.00
FAS end devices at Ústí nad Labem TI	100,000.00	0	100,000.00
FAS end devices at Plzeň TI	100,000.00	0	100,000.00
FAS end devices at HQ	100,000.00	0	100,000.00
Additional GPS Trimble purchase	33,759.00	33,759.00	0
Cars, 2018	5,183,704.37	5,183,704.37	0
Cars, 2019	1,568,094.00	1,568,094.00	0
CNG vehicles	2,992,695.00	2,992,695.00	0
Drone purchase	151,738.01	151,738.01	0.00
Van purchase	992,615.00	992,615.00	0
Off-road cars	8,671,000.00	8,671,000.00	0
Trimble R1 purchase	699,573.60	699,573.60	0
GPS Trimble Geo 7X	667,895.80	667,895.80	0
Large-volume freezer	498,415.94	498,415.94	0
Photo equipment	125,883.00	125,883.00	0
Dynamic olfactometer	2,407,900.00	2,407,900.00	0
Laboratory scales	115,289.00	115,289.00	0
Server room air-conditioning	148,588.00	148,588.00	0
Aggregated projects	2,260,651.46	0	2,260,651.46
Total investment expenditures	63,600,682.17	41,974,246.71	21,626,435.46
Total expenditures	509,237,482.82	447,577,398.13	61,660,084.69

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

The saving of non-investment expenditures of CZK 22,487,623.83 is related to extended supervisory obligations (new ALF Act); besides, furniture purchases for about CZK 2,000,000 were not implemented in full; another reason for the saving is that we had planned to use funds for guarding of buildings by Securitas, painting of HQ offices and carpeting replacement were not quite finished; besides, funds for ICT were not drawn in full, primarily due to reduced maintenance of services related to the new record management and cancellation of support to the geographic information system.

The saving of EDS/SMVS non-investment expenditures amounting to CZK 2,325,016.40 is caused by the fact that the investment projects will only be implemented in 2020.

The savings of investment expenditures of CZK 21,626,435.46 resulted from not drawing funds for investment projects approved in 2019. They were most importantly investment projects in ICT (CZK 14,287,000) and operating investments (CZK 7,339,000). All the unspent investment funds are transferred to 2020, when they will be implemented.

9.2 Use of reserve fund and other non-budgetary resources

The CEI did not use the reserve fund in 2019.

Claims of unspent expenditures in past years were spent on the projects:

- 115V02100D020 Purchase of mobile telephones – released claim of CZK 383,328, spent CZK 383,328
- 115V03100D006 Multifactor identification – released claim of CZK 341,655.60, spent CZK 341,655.60
- 115V02100D029 EIS – released claim of CZK 1,645,600, spent CZK 1,645,600
- 115V02300D032 Roof renovation at Ústí nad Labem TI – released claim of CZK 3,805,627.27, spent CZK 3,805,627.27
- 115V02300D033 Fireproof doors at Brno TI – released claim of CZK 459,981.50, spent CZK 459,981.50
- 115V02300D035 FAS and ESS renovation at Hradec Králové TI – released claim of CZK 964,262.31, spent CZK 964,262.31
- 115V02300D036 Sewer connection at České Budějovice TI – released claim of CZK 240,822.67, spent CZK 240,822.67
- 115V03300D004 CCTV system at Havlíčkův Brod TI – released claim of CZK 134,084, spent CZK 134,084
- 115V02100D027 LAN network renewal – released claim of CZK 2,009,636.97, spent CZK 2,009,636.97.

- 115V03100D002 Corridor printer renewal – released claim of CZK 1,800,000, spent CZK 1,800,000
- 115V03400D002 GPS Trimble purchase – released claim of CZK 356,829, spent CZK 356,829
- 115V03400D013 Additional GPS Trimble purchase – released claim of CZK 33,759, spent CZK 33,759
- 115V03400D014 Purchase of cars – released claim of CZK 5,183,704.37, spent CZK 5,183,704.37
- 115V03400D016 CNG vehicles – released claim of CZK 2,992,695, spent CZK 2,992,695

Non-budgetary resources

- Insurance premium CZK 410,870.00

NNV not profiling

3,082,774.00	5011
4,978,447.00	5013
1,703,292.00	5021
970,472.00	5024
3,354,069.00	5031
1,131,955.00	5032
3,445.22	5132
3,988.80	5133
17,543.00	5134
57,893.80	5136
3,980,318.49	5137
921,702.37	5139
3,470.19	5142
105,457.08	5151
201,906.57	5152
381,582.57	5153
98,231.51	5154
603,731.02	5156
700.00	5157
12,568.00	5161
547,924.38	5162
299,619.86	5163
159,149.47	5164
584,313.02	5166
832,040.23	5167
1,470,986.47	5168
9,854,313.47	5169
1,234,642.41	5171
133,147.50	5172

9.3 Total income assessment

The CEI total income in 2019 was CZK 1,852,933.87.

Budgetary income	Approved budget	Adjusted budget	Reality
2132	350,000.00	350,000.00	346,846.87
2133	3,600.00	3,600.00	0
2310	0.00	0.00	6,665.00
2322	0.00	0.00	438,901.00
2324	1,346,400.00	1,346,400.00	1,044,112.00
4132	0.00	0.00	16,409.00
Total	1,700,000.00	1,700,000.00	1,852,933.87

Income analysis

2132	Income from rental of other real estate and parts thereof	Includes income from rental of office spaces at Havlíčkův Brod and Liberec TI.
2133	Income from rental of moveable assets	Includes income from rented movable property at Havlíčkův Brod TI.
2310	Income from sales of short-term and low-value assets	Includes income for purchase of personal protective equipment.
2322	Received insurance adjustments	Includes insurance money paid for insured events.
2324	Proceeding costs	Includes proceeding costs and distraintment.
4132	Transfer from other own funds	Includes transfer of unspent wage funds for 12/2018.

10 Financial statement as of 31 December 2019

Balance sheet

Item no.	Item name	Synthetic account	Period			Previous
			Gross	Current Correction	Net	
			1	2	3	4
TOTAL ASSETS			854,739,598.19	343,264,796.52	511,474,801.67	458,513,445.99
A. Fixed assets			789,577,348.88	343,264,796.52	446,312,552.36	421,021,562.22
I.	Long-term intangible assets		39,661,626.20	35,401,710.01	4,259,916.19	3,270,145.58
3.	Valuable rights	014	183,000.00	177,238.00	5,762.00	11,369.00
4.	Emission permits and preference limits	015				
5.	Low-value long-term intangible assets	018	17,006,938.32	17,006,938.32		
6.	Other long-term intangible assets	019				
7.	Unfinished long-term intangible assets	041	1,234,200.00		1,234,200.00	1,234,200.00
8.	Advances granted					
	for long-term intangible assets	051				
9.	Long-term intangible assets scheduled for sale	035				
II.	Long-term tangible assets		749,915,722.68	307,863,086.51	442,052,636.17	417,751,416.64
1.	Land	031	12,516,935.00		12,516,935.00	12,519,714.00
2.	Cultural items	032	11,491.00		11,491.00	11,491.00
3.	Buildings	021	506,147,380.43	136,478,219.00	369,669,161.43	367,872,931.36
4.	Individual tangible moveable assets and sets of tangible moveable assets	022	133,519,045.94	73,663,997.20	59,855,048.74	37,304,280.28
5.	Cultivation wholes of permanent stands	025				
6.	Low-value long-term tangible assets	028	97,720,870.31	97,720,870.31		
7.	Other low-value tangible assets	029				
8.	Unfinished long-term tangible assets	042				43,000.00
9.	Advances granted					
	for long-term tangible assets	052				
10.	Long-term tangible assets scheduled for sale	036				
III.	Long-term financial assets					
1.	Property interest in entities with decisive influence	061				
2.	Property interest in entities with material influence	062				
3.	Debt securities held until payable	063				
4.	Long-term loans	067				
5.	Long-term time deposits	068				
6.	Other long-term financial assets	069				
7.	Acquired long-term financial assets	043				
8.	Advances granted for long-term financial assets	053				

Balance sheet

			Period			
Item. no.	Item name	Synthetic account	Gross	Current Correction	Net	Previous
			1	2	3	4
IV. Long-term receivables						
1.	Long-term returnable financial aids granted	462				
2.	Long-term receivables from ceded credits	464				
3.	Long-term advances granted	465				
4.	Long-term receivables from guarantees	466				
5.	Other long-term receivables	469				
6.	Long-term advances granted for transfers	471				
7.	Long-term mediation of transfers	475				
B. Current assets			65,162,249.31		65,162,249.31	37,491,883.77
I.	Inventory					
1.	Material acquisition	111				
2.	Material in store	112				
3.	Material on the way	119				
4.	Unfinished production	121				
5.	Self-made semifinished products	122				
6.	Products	123				
7.	Goods acquisition	131				
8.	Goods in store	132				
9.	Goods on the way	138				
10.	Other inventory	139				
II.	Short-term receivables		33,018,630.24		33,018,630.24	2,236,831.60
1.	Clients	311				18,381.00
2.	Bills for cashing	312				
3.	Receivables for discounted securities	313				
4.	Short-term advances granted	314	2,569,187.24		2,569,187.24	2,218,404.60
5.	Other receivables from main operation	315	30,448,643.00		30,448,643.00	
6.	Short-term returnable financial aid granted	316				
7.	Short-term receivables from ceded credits	317				
9.	Receivables for employees	335	800.00		800.00	46.00
10.	Social security	336				
11.	Health insurance	337				
12.	Pension plans	338				
13.	Income tax	341				
14.	Other taxes, charges and other similar pecuniary performance	342				
15.	Value added tax	343				
16.	Receivables from entities except selected governmental institutions	344				
17.	Receivables from selected central governmental institutions	346				

Balance sheet

Item. no.	Item name	Synthetic account	Period			Previous
			Gross	Current Correction	Net	
			1	2	3	4
18.	Receivables from selected local governmental institutions	348				
19.	Receivables from tax administration	352				
20.	Clearance from tax redistribution	355				
21.	Receivables from distraintment and other handling of foreign assets	356				
22.	Other receivables from tax administration	358				
23.	Short-term receivables from guarantees	361				
24.	Fixed time operations and options	363				
25.	Payables from unfinished financial operations	369				
26.	Receivables from financial security	365				
27.	Receivables from bonds issued	367				
28.	Short-term advances granted for transfers	373				
29.	Long-term mediation of transfers	375				
30.	Costs of future periods	381				
31.	Incomes from future periods	385				
32.	Active estimate accounts	388				
33.	Other short-term receivables	377				
III.	Short-term financial assets		32,143,619.07		32,143,619.07	35,255,052.17
1.	Asset securities for trading	251				
2.	Credit securities for trading	253				
3.	Other securities	256				
4.	Short-term time deposits	244				
5.	Other current accounts	245	30,982,738.78		30,982,738.78	33,781,133.02
6.	State financial asset accounts	247				
7.	Treasury and state debt liquidity control accounts		248			
8.	Accounts for tax sharing and split management	249				
9.	Current account	241				
10.	Current account CSNF	243	1,159,706.29		1,159,706.29	1,472,519.15
14.	Current accounts of state organisational component funds	225				
15.	Postage stamps	263	1,174.00		1,174.00	1,400.00
16.	Money on the way	262				
17.	Checkout	261				

Balance sheet

Item no.	Item name	Synthetic account	Period	
			Current	Previous
			1	2
TOTAL LIABILITIES			511,474,801.67	458,513,445.99
C. Equity capital			449,976,682.89	424,676,702.97
I. Accounting entity property and adjusting items			488,643,027.07	488,579,351.07
1.	Accounting entity property	401	727,056,740.25	726,993,064.25
2.	Privatisation fund	402		
4.	Exchange rate differences	405		
5.	Pricing differences on initial use of method	406	-238,435,713.18	-238,435,713.18
6.	Other pricing differences	407		
7.	Adjustments to previous accounting periods	408	22,000.00	22,000.00
II. Accounting entity funds			1,159,706.29	1,472,519.15
2.	Cultural and Social Needs Fund	412	1,159,706.29	1,472,519.15
4.	Reserve fund from other means	414		
III. Economic result			-3,502,208,888.65	-3,082,033,541.17
1.	Economic result for current accounting period		-420,175,347.48	-381,076,744.24
2.	Economic result in approval proceeding	431	-2,711,544,994.65	-2,330,468,250.41
3.	Economic result in previous accounting periods	432	-370,488,546.52	-370,488,546.52
IV. Income and expenditure account of budgetary activity			3,462,382,838.18	3,016,658,373.92
1.	Income account of state organisational components	222	-1,852,933.87	-2,070,016.84
2.	Special expenditures account	223	447,577,398.13	371,274,194.45
3.	State budget activity account	227		
4.	Aggregated incomes and expenditures of previous accounting periods	404	3,016,658,373.92	2,647,454,196.31
D. External resources			61,498,118.78	33,836,743.02
I. Reserves				
1.	Reserves	441		
II. Long-term payables				
1.	Long-term credits	451		
2.	Long-term returnable financial aid received	452		
3.	Long-term payables from bonds issued	453		
4.	Long-term advances received	455		
5.	Long-term payables from guarantees	456		
6.	Long-term bills for payment	457		
7.	Other long-term payables	459		
8.	Long-term advances received for transfers	472		
9.	Long-term mediation of transfers	475		
III. Short-term payables			61,498,118.78	33,836,743.02
1.	Short-term credits	281		
2.	Discounted short-term bonds (bills)	282		
3.	Short-term payables from bonds issued	283		
4.	Other short-term loans	289		
5.	Suppliers	321		
6.	Bills for payment	322		
7.	Short-term advances received	324	87,705.00	111,184.00

Balance sheet

Item no.	Item name	Synthetic account	Period	
			Current	Previous
			1	2
8.	Payables from split management	325	718,827.00	
9.	Short-term returnable financial aid received	326		
10.	Employees	331		
11.	Other payables towards employees	333	15,023,085.00	14,222,086.00
12.	Social security	336	6,091,368.00	5,775,724.00
13.	Health insurance	337	2,627,838.00	2,439,973.00
14.	Pension plans	338		
15.	Income tax	341		
16.	Other taxes, charges and other similar pecuniary performance	342	2,444,326.00	2,221,390.00
17.	Value added tax	343		
18.	Payables to entities except selected governmental institutions	345		
19.	Payables to selected central governmental institutions	347	22,441,050.60	
20.	Payables to selected local governmental institutions	349	11,630,550.00	
21.	Tax advances received	351		
22.	Tax overpayments	353		
23.	Payables from indirect tax returns	354		
24.	Clearance from tax redistribution	355		
25.	Payables from distraintment and other handling of foreign assets	357		
26.	Other payables from tax administration	359		
27.	Short-term payables from guarantees	362		
28.	Fixed time operations and options	363		
29.	Payables from unfinished financial operations	364		
30.	Payables from financial securing	366		
31.	Payables from subscribed unpaid securities and shares	368		
32.	Short-term advances received for transfers	374		
33.	Long-term mediation of transfers	375		
34.	Payables from state treasury and state debt liquidity management	248		
35.	Expenditures of future periods	383		
36.	Revenues from future periods	384		
37.	Passive estimate accounts	389		
38.	Other short-term payables	378	433,369.18	9,066,386.02

Profit and loss statement

Item no.	Item name	Synthetic account	Current period		Previous period	
			Principal activity	Economic activity	Principal activity	Economic activity
				1		2
A. TOTAL COSTS			422,902,590.32		383,805,149.07	
I. Costs of operation			422,881,060.51		382,985,100.55	
1.	Consumed materials	501	7,431,477.48		7,633,716.73	
2.	Energy consumption	502	5,353,860.87		4,828,446.25	
3.	Consumption of other unstorable supplies	503				
4.	Goods sold	504				
5.	Capitalisation of long-term assets	506				
6.	Capitalisation of current assets	507				
7.	Change in own production inventory	508				
8.	Repair and maintenance	511	3,910,314.28		4,416,166.38	
9.	Travel costs	512	3,711,375.30		3,681,377.13	
10.	Representation costs	513	198,915.80		187,809.50	
11.	Capitalisation of internal services	516				
12.	Other services	518	24,375,815.01		26,051,972.44	
13.	Wages and salaries	521	256,902,676.00		227,657,701.00	
14.	Mandatory social insurance	524	86,546,230.00		76,936,818.00	
15.	Other social insurance	525				
16.	Mandatory social expenditures	527	5,215,320.00		5,274,938.00	
17.	Other social expenditures	528				
18.	Road tax	531				
19.	Property tax	532	1,970.00		1,970.00	
20.	Other taxes and charges	538	140,948.00		202,200.00	
21.	Indirect tax returns	539				
22.	Contractual penalties and interest on late payment	541				
23.	Other penalties	542	1,055,407.68		28,758.00	
24.	Donations and other gratuitous transfers	543				
25.	Materials sold	544				
26.	Deficits and damages	547				
27.	Fund generation	548	4,901,298.00		4,608,561.00	
28.	Depreciation of long-term assets	551	17,119,892.57		15,611,457.82	
29.	Long-term intangible assets sold	552				
30.	Long-term tangible assets sold	553			475,300.00	
31.	Land sold	554				
32.	Reserve generation and clearance	555				
33.	Corrective item generation and clearance	556				
34.	Costs of excluded receivables	557				
35.	Costs of low-value long-term assets	558	6,014,323.98		5,222,801.21	
36.	Other operating costs	549	1,235.54		165,107.09	
II. Financial costs			821,529.81		820,048.52	
1.	Securities and shares sold	561				
2.	Interest	562				
3.	Exchange rate loss	563	21,529.81		18,200.02	
4.	Costs of real-value repricing	564			801,848.50	
5.	Other financial costs	569				

Profit and loss statement

Item no.	Item name	Synthetic account	Current period		Previous period	
			Principal activity	Economic activity	Principal activity	Economic activity
				1		2
III.	Costs of transfers					
1.	Costs of transfers of selected central governmental institutions	571				
3.	Costs of transfer pre-financing of selected central governmental institutions	575				
IV.	Costs of shared taxes and charges					
1.	Costs of shared natural person income tax	581				
2.	Costs of shared legal entity income tax	582				
3.	Costs of shared value added tax	584				
4.	Costs of shared excise duties	585				
5.	Costs of other shared taxes and charges	586				
V.	Income tax					
1.	Income tax	591				
2.	Additional income tax levies	595				
B.	TOTAL REVENUES		2,727,242.84		2,728,404.83	
I.	Operating revenues		2,720,577.84		2,715,305.43	
1.	Revenues from own product sales	601				
2.	Revenues from service sales	602	970,831.97		881,652.78	
3.	Revenues from rental	603	347,496.87		195,082.85	
4.	Revenues from goods sold	604				
5.	Revenues from administrative charges	605				
7.	Revenues from court charges	607				
8.	Other revenues from own activities	609				
9.	Contractual penalties and interest on late payment	641				
10.	Other penalties	642	908,201.00		788,893.80	
11.	Revenues from excluded receivables	643				
12.	Revenues from material sales	644				
13.	Revenues from sales of long-term intangible assets	645				
14.	Revenues from sales of long-term tangible assets except land	646			147,127.00	
15.	Revenues from sales of land	647				
16.	Fund drawing	648				
17.	Other operating revenues	649	494,048.00		702,549.00	
II.	Financial revenues		6,665.00		13,099.40	
1.	Revenues from sales of securities and shares	661				
2.	Interest	662				
3.	Exchange rate revenues	663				
4.	Revenues from real-value repricing	664				
5.	Revenues from long-term financial assets	665				
6.	Other financial revenues	669	6,665.00		13,099.40	

Profit and loss statement

Item no.	Item name	Synthetic account	Current period		Previous period	
			Principal activity	Economic activity	Principal activity	Economic activity
				1		2
III.	Revenues from taxes and fees					
1.	Revenues from natural person income tax	631				
2.	Revenues from legal entity income tax	632				
3.	Revenues from social insurance	633				
4.	Revenues from value added tax	634				
5.	Revenues from excise duties	635				
6.	Revenues from property taxes	636				
7.	Revenues from energy taxes	637				
8.	Revenues from road tax	638				
9.	Revenues from other taxes and fees	639				
IV.	Revenues from transfers					
1.	Costs of transfers of selected central governmental institutions	671				
3.	Costs of transfer pre-financing of selected central governmental institutions	675				
V.	Revenues from shared taxes and charges					
1.	Revenues of shared natural person income tax	681				
2.	Revenues of shared legal entity income tax	682				
3.	Revenues from shared value added tax	684				
4.	Revenues from shared excise duties	685				
5.	Revenues from shared property taxes	686				
6.	Revenues from other shared taxes and fees	688				
C.	ECONOMIC RESULT					
1.	Economic result before taxation	-	-420,175,347.48		-381,076,744.24	
2.	Economic result in current accounting period	-	-420,175,347.48		-381,076,744.24	

11 Overview of meeting of GRI standard indicators

Indicator no.	Indicator name	Chapter	Location in report text on page
	GENERAL DISCLOSURES		
	Organisation profile		
102-1	Organisation name		Imprint and Contacts Abbreviations and explanations
102-2	Primary brands, products and services		irrelevant
102-3	Organisation registered office address		Imprint and Contacts Abbreviations and explanations
102-4	Countries where organisation active		Czech Republic
102-5	Ownership nature and legal status	1.1 Role of the CEI	State organisation, p. 8
102-6	Markets served		irrelevant
102-7	Organisation size	Summary information about activity in 2015-2019, 1.3 Intensity of inspection work	4-5, 11-12
102-8	Employee numbers	7. Employee environment and human resources	78-79
102-9	Organisation supply chain	6 Tendering and supply chain	77
102-10	Major changes	Foreword	1-3
102-11	Precautionary principle - Principle 15 of Rio Declaration	1.1 Role of the CEI, 4. CEI work in 2019 by department	All scheduled inspections and all CEI prevention activity Pp. 8-9, also Chapter 4. pp. 19-73
102-12	Externally developed economic, environmental and social charters, sets of policies	5. Ethics and integrity	74-76
102-13	Membership in associations	3.3 International collaboration	16-17
	Strategy		
102-14	Declaration of highest-ranking person responsible for decisions made by organisation	Foreword	1-3
102-15	Description of key impacts, risks and opportunities	Foreword	(Future targets defined under Acts of law, specifically annually see Work Plan at www.cizp.cz/ Plany-cinnosti) pp. 1-3
	Ethics and integrity		
102-16	Values, principles, standards and norms of conduct in organisation	1.1 Role of the CEI: Legal framework of CEI activity; 5. Ethics and integrity; 6. Tendering	8-9, 74-76, 77
102-17	Internal and external mechanisms for reporting concerns of unethical or illicit conduct	5. Ethics and integrity	74-76
	Organisation management		
102-18	Organisation management structure		10 http://www.cizp.cz/ Organizacni-struktura

Indicator no.	Indicator name	Chapter	Location in report text on page
	STAKEHOLDER ENGAGEMENT		
102-40	List of stakeholder groups interested in organisation work	3. Dealings with stakeholders	13-17
102-41	Collective contract	7. Employee environment and human resources	78-79 and 83
102-42	Information for stakeholder identification and selection	3. Dealings with stakeholders	13-17
102-43	Organisation approach to stakeholder involvement	3. Dealings with stakeholders	13-17
102-44	Key topics and problems raised by stakeholders	3. Dealings with stakeholders; Principal suggestion topics in 2019	13-14
	Identified serious aspects and boundaries		
102-45	All entities contained in consolidated organisation financial statement		CEI
102-46	Procedure for determining report contents and topic boundaries	1.1 Role of the CEI; 4. CEI work in 2019 by department	Report contents are defined by legally defined jurisdiction, internal structure and duties of the CEI. Pp. 8-9, also Chapter 4, pp. 19-73
102-47	Major report topics	1.1 Role of the CEI; 4. CEI work in 2019 by department	Report contents are defined by legally defined jurisdiction, internal structure and duties of the CEI. Pp. 8-9, also Chapter 4, pp. 19-73
102-48	Corrections of information provided in previous reports		Correction of wrong data sum for 2018: p. 4, row "All decisions (fines and other decisions, incl. on charges) in force" from 7,766 to 8,541 - p. 4, row "All decisions on fines that entered into force" from 2547 to 2543, the same number in table on p. 11, row for 2018, third column; - p. 4, row "Other decision in force" from 427 to 424
102-49	Major changes since last report period		No changes
102-50	Report period for information provided		2019
102-51	Date of last previous report		Second CEI GRI report, first in May 2018
102-52	State cycle		annual

Indicator no.	Indicator name	Chapter	Location in report text on page
102-53	Contact point for issues relating to report or its contents		tel.: 222 860 111, podatelna@cizp.cz
102-54	Statement on report agreement with GRI standards		7
102-55	GRI contents index	11. Overview of meeting of GRI standard indicators	100-103
102-56	External report audit		not audited externally
	Management Approach		
103-1	Explanation of basic topics and their boundaries	1.1 Role of the CEI, 4. CEI work in 2019 by department	Report contents are defined by legally defined jurisdiction, internal structure and duties of the CEI. Pp. 8-9, also Chapter 4, pp. 19-73
103-2	Management approach – complaint mechanism	5.3 Complaint handling	74-76
	SUB-CATEGORY: SOCIETY/COMMUNITY		
	Anti-corruption activity		74-75
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CONTACT DETAILS

Headquarters:

Česká inspekce životního prostředí

Na Břehu 267/1a

190 00 Praha 9

tel.: 222 860 111

podatelna@cizp.cz

CITES standby: +420 731 405 056

databox ID: zr5efbb

Territorial inspectorates

PRAHA

Wolkerova 40/11

160 00 Praha 6

tel.: 233 066 111

ph.podatelna@cizp.cz

accident reporting: 731 405 313

databox ID: 4dkdzty

PLZEŇ

Klatovská tř. 48

301 22 Plzeň

tel.: 377 993 411

pl.podatelna@cizp.cz

accident reporting: 731 405 350

databox ID: 82bdy9x

HRADEC KRÁLOVÉ

Resslova 1229

500 02 Hradec Králové

tel.: 495 773 111

hk.podatelna@cizp.cz

accident reporting: 731 405 205

databox ID: skvdzan

ČESKÉ BUDĚJOVICE

U Výstaviště 16, P. O. BOX 32

370 21 České Budějovice

tel.: 386 109 111

cb.podatelna@cizp.cz

accident reporting: 731 405 133

databox ID: v3cdzr7

ÚSTÍ NAD LABEM

Výstupní 508/9

400 07 Ústí nad Labem

tel.: 475 246 011

ul.podatelna@cizp.cz

accident reporting: 731 405 388

databox ID: c6vdzus

pobočka KARLOVY VARY

Závodní 152

360 18 Karlovy Vary-Tašovice

tel.: 353 237 330

kv.podatelna@cizp.cz

accident reporting: 731 405 378

databox ID: c6vdzus

HAVLÍČKŮV BROD

Bělohorská 3304

580 01 Havlíčkův Brod

tel.: 569 496 111

hb.podatelna@cizp.cz

accident reporting: 731 405 166

databox ID: htkdzar

BRNO

Lieberzeitova 14
614 00 Brno

tel.: 545 545 111
bn.podatelna@cizp.cz
accident reporting: 731 405 100
databox ID: 6umdzr3

pobočka ZLÍN

Tř. Tomáše Bati 3792
760 01 Zlín

bn.podatelna@cizp.cz
accident reporting: 731 405 100
databox ID: 6umdzr3

OLOMOUC

Tovární 1059/41
779 00 Olomouc

tel.: 585 243 410
ol.podatelna@cizp.cz
accident reporting: 731 405 265
databox ID: k93dzrd

OSTRAVA

Valchařská 72/15
702 00 Ostrava

tel.: 595 134 111
ov.podatelna@cizp.cz
accident reporting: 731 405 301
databox ID: fmwdzsy

LIBEREC

Tř. 1. máje 858/26
460 02 Liberec

tel.: 485 340 888
lb.podatelna@cizp.cz
accident reporting: 723 083 437
databox ID: 2kndzy8



LIST OF ABBREVIATIONS

ALF	Agricultural land fund
BAT	Best available techniques
BDW	Biodegradable waste
BGS	Biogas station
BOD	Biochemical oxygen demand
BWWTP	Biological wastewater treatment plant
CC	Cross Compliance (political tool for implementation of minimum standards in the areas of public health protection, animal health and welfare, plant health and environmental protection (soil, water, biodiversity, etc.))
CEI	Czech Environmental Inspectorate
CHMI	Czech Hydrometeorological Institute
CIA	Coordinator of integrated agendas
CIS	Central information system
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CLP	Regulation of the European Parliament and the Council (EC) no. 1272/2008 of 16 December 2008 on classification, labelling, and packaging of substances and mixtures
COD	Chemical oxygen demand
ČRS	Czech Fishing Union
CSA	Civil Service Act
CSNF	Cultural and Social Needs Fund
ČSO	Czech Society for Ornithology
CWWTP	Central wastewater treatment plant
DPB	Sections of soil blocks
ECA	Communication from the European Commission "EU actions to improve environmental compliance and governance"
EDS/SMVS	Records and subsidy system and management of state-owned assets
EC	Emission ceiling
ECHA	European Chemicals Agency
EEA	European Economic Area
EEE	Electric and electronic equipment
EFTA	European Free Trade Association
EI	Equivalent inhabitants
EIA	Environmental Impact Assessment
EH	Environmental harm
EL	Emission limit
EMAS	Environmental Management and Audit System
EMS	Environmental Management System
ENV	Environment
EU	European Union
FMG	Forestry management guidelines
FMP	Forestry management plan
FMR	Forestry management records
FP	Fire prevention
FPD	Forest Protection Department
FRS	Fire Rescue Service
GIOS	Główny Inspektorat Ochrony Środowiska, Polish Environmental Inspectorate
GMO	Genetically modified organisms
GMVP	Genetically modified vascular plants
GRI	Global Reporting Initiative
HEB	Historic environmental burdens
HQ	CEI Headquarters

IA	Integrated agendas
IAD	Integrated Agendas Department
IMPEL	Network of environmental inspection authorities of EU states
IP	Integrated permit
IPPC	Integrated Pollution Prevention and Control
IPR	Integrated Pollution Register
IRI	Impel Review Initiative (Voluntary assessment of individual organisations involved in the international network of inspectorates and agencies active in protection)
IRS	Integrated Rescue System
IS IPPC	IPPC information system
ISPOP	Integrated system for reporting obligations
KRNAP	Krkonoše National Park
LČR	Lesy České republiky, s. p.
LF	Legal force
LIFFF	Land intended for the fulfilment of forest functions
LS	Forest administration
MIT	Ministry of Industry and Trade of the Czech Republic
MMW	Mixed municipal waste
MoA	Ministry of Agriculture
MoE	Ministry of the Environment of the Czech Republic
MoF	Ministry of Finance of the Czech Republic
NCA	Nature Conservation Agency of the Czech Republic
NLPA	Nature and Landscape Protection Act
NM	Nature Monument
NNM	National Nature Monument
NNR	National Nature Reserve
NNV	Unspent expenditures claim
NO	Hazardous waste
NP	National Park
NPČS	České Švýcarsko National Park
NPD	Nature Protection Department
NPŠ	Šumava National Park
NR	Nature Reserve
ODP	Ozone depletion potential
OLH	Professional forestry manager
OERES	Environmental Risk and Damage Department
OHS	Occupation Health and Safety
ORP	Municipality with extended powers
OVSS	Public Administration Execution Department
PCB	Polychlorinated biphenyls
PCDD/PCDF	Polychlorinated dibenzodioxins and polychlorinated dibenzofurans
PČR	Czech Police
PLA	Protected Landscape Area
PLF	Prominent landscape feature
PM	Particulate matter
RA	Regional authority
RAPEX	Rapid Alert System of Non-Food Products (European Union rapid alert information system on dangerous consumer products of non-food characteristics)
REACH	Regulation of the European Parliament and the Council (EC) no. 1907/2006 of 18 December 2006 on classification, labelling, assessment, permitting and restriction of chemicals and establishment of the European Chemicals Agency
RIA	Railway Infrastructure Administration
RMD	Road and Motorway Directorate

RPHA	Regional Public Health Authority
RPLF	Registered prominent landscape feature
RS	Regulated substances
SAIF	State Agricultural Intervention Fund
SCI	Site of Community Importance
SEA	Strategic Environmental Assessment
SEF	State Environmental Fund
SEI	Slovakian Environmental Inspectorate
SHPP	Small hydropower plant
SPA	Specially protected areas
SPS	Specially protected species
TI	Territorial Inspectorate
TZS	Technical landfill security
ÚHÚL	Forest Management Institute
VLS ČR	Vojenské lesy a statky České republiky, s. p.
WEEE	Waste electric and electronic equipment
WMD	Waste Management Department
WPD	Water Protection Department
WWTP	Wastewater treatment plant



Photos:

Jana Jandová, Radka Nastoupilová, Erik Geuss

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