

# 2011 ANNUAL REPORT

Czech Environmental Inspectorate



ČESKÁ INSPEKCE  
ŽIVOTNÍHO PROSTŘEDÍ



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ŽIVOTNÍHO PROSTŘEDÍ

Author:	Czech Environmental Inspectorate	
Headquarters:	Na Břehu 267, 190 00 Praha 9	
Telephone:	00420 222 860 111 (central)	
Fax:	00420 283 892 662	
Freephone:	800 011 011	
E-mail:	<a href="mailto:public@cizp.cz">public@cizp.cz</a>	
Internet:	<a href="http://www.cizp.cz">www.cizp.cz</a>	
Toll-free:	800 011 011	
Office hours:	Mondays and Wednesdays 8am–5pm	Other weekdays 8am–2pm by appointment
Superordinate institution:	Ministry of the Environment	

## Dear Friends,

The year 2011 was very important for the Czech Environmental Inspectorate. It celebrated its twentieth anniversary. We all had an opportunity to recall the past period and support its current and future endeavours. The Czech Environmental Inspectorate is an institution exposed to massive public supervision, pressures by the media, businesses, social and non-governmental organizations. Yet it has become a highly professional and respected organization over these twenty years.

The past year was not only important but very difficult for the Inspectorate. Its inspectors' work focused on key environmental protection problems, particularly inspecting the adherence to air pollution limits in areas with impaired air quality. These are mostly the Moravian-Silesian, Ústí nad Labem, Pardubice, and Central Bohemian Regions. The adverse air quality in the two former regions was additionally complicated by ongoing remediation works in the Ostrava lagoons, storage of fuel made from the extracted waste, its transportation to the Ústí nad Labem Region and its experimental combustion at Lafarge Cement a.s. in Čížkovice.

The Inspectorate also faced a difficult situation in the other areas of environmental management, especially nature protection. The situation in the Šumava National Park aroused the attention of the media, the professional and lay public in 2011. The National Park managers' novel approaches to handling the bark beetle calamity were the object of many submissions that the Inspectorate had to deal with. Most of them were assessed as unjustified after on-site examination. The handling of professionally and legally complex cases identified during the checks has continued into this year in the form of administrative proceedings. Expert assessments are being developed to help the objective assessment of the interventions against the bark beetle.



The existence and authority of the Czech Environmental Inspectorate have led to an intensified emergence of environmentally friendly conduct and awareness among both the public and business entities. That is why, in 2012, I expect the Inspectorate to rigorously supervise the sludge neutralization in the Moravian-Silesian Region, its storage and combustion quality. In addition, I expect it to intensify and toughen its checks of landfill and recycling yard operators and supervise them more effectively. Representatives of CEI Territorial Inspectorates need to cooperate with municipal authorities that deal with socially excluded locations, help identify problems associated with crime and handle transgressions related to illegal collection and selling of waste.

Allow me to wish you, Czech Environmental Inspectorate staff, continued success in your work. I firmly believe your work is your mission as well.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'T. Chalupa', written over a horizontal line.

Mgr. TOMÁŠ CHALUPA  
Minister

**Ing. Jan Slanec was appointed by the director of CEI  
in December 2011**



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# 1 CHARACTERIZATION

## OF CEI ACTIVITIES

## 1.1 GENERAL INFORMATION

### Czech Environmental Inspectorate

was established in 1991 by Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and its competencies in forestry protection; the other units joined it progressively in 1991–1992. CEI is a separate state agency established by the Ministry of the Environment of the Czech Republic. Performs activities in 5 spheres: air protection, water protection, waste management, nature protection and forestry protection. It increasingly applies an integrated approach to environmental protection both based on the Acts on Integrated Prevention (IPPC) and Environmental Impact Assessment (EIA) and in the overall concept of inspection work.

### OVERVIEW OF CEI ACTIVITIES

- supervision of adherence to legal regulations on environmental protection
- performance of inspections and checks
- imposition of measures to remedy identified deficiencies
- imposition of sanctions for failure to adhere to environmental legislation
- inspection of trade in and handling of endangered animal and plant species and products from them (seizure of illicitly acquired specimens and items)
- restriction or discontinuation orders to operations that are serious environmental threats
- involvement in handling old environmental burdens
- handling of submissions from citizens and corporate bodies
- information provision based on applications pursuant to legislation in force
- public, media and state administration information on environmental data acquired in the course of its inspection activities
- development of statements for other state administration bodies
- involvement in handling environmental accidents
- cooperation with inspection bodies in European Union states and the EU inspectorate network (IMPEL)
- definition of charges for wastewater discharges and groundwater consumption.

## 1.2 CEI ORGANIZATIONAL STRUCTURE

The CEI is structured into 10 territorial inspectorates, two branch offices and headquarters; it currently employs 602 people, approx. 80% of whom are inspectors.

### Territorial inspectorates in:

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

The CEI Director is appointed by the Minister of the Environment.



### Overview of CEI competencies in the individual sectors of the environment

CEI COMPETENCIES		SECTOR OF THE ENVIRONMENT				
		Air	Water	Waste	Nature	Forest
<b>supervision</b>	controls, revisions, reviews, investigations etc	*	*	*	*	*
<b>sanction</b>	fines to legal entities	*	*	*	*	*
	fines to individuals	*	*	*	*	*
	restricting or closing operations	*	*		*	*
<b>measures</b>	measures for rectification of identified shortcomings	*	*	*	*	*
	dealing with old environmental burdens		*			
	accidents registrations and cooperation in dealing with accidents	*	*	*		
	detention and confiscation of illegal specimens of endangered species of animals and plants				*	
	confiscation of illegally held specimen, confiscation of products	*			*	
<b>charges</b>	charges for discharging of waste water, charges for groundwater abstraction		*			
<b>permitting and approbations</b>	regulating rules, co-incineration of several fuels, classification of sources	*				
<b>statements</b>	statements, comments or approvals for other administrative bodies	*	*	*	*	*
<b>motions</b>	processing motions	*	*	*	*	*

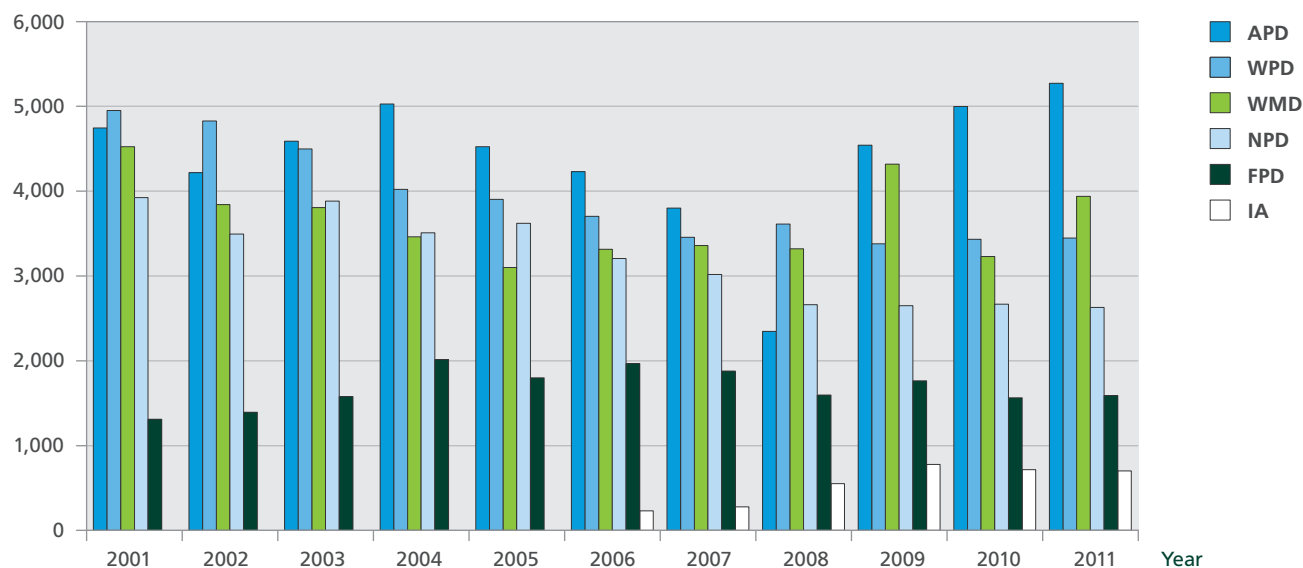


### 1.3 INSPECTION ACTIVITY INTENSITY IN 2011

The CEI performed 17,576 inspections in 2011 (16,603 in 2010; 17,432 in 2009; 14,255 in 2008). The number of inspections per inspector was 38 in 2011 (35 in 2010; 36 in 2009; 34 in 2008; 38 in 2007). The CEI issued 10,270 final decisions in 2011 (including 2,079 decisions on charges and advances for wastewater discharges and 5,106 decisions on charges and advances for groundwater consumption).

#### Inspection trends by sectors

no. of inspections



# 2 DECISIONS

## IN ADMINISTRATIVE PROCEEDINGS



## 2.1 ADMINISTRATIVE PROCEEDINGS ON SANCTIONS

The CEI imposed 2,428 fines, and 2,355 fines entered into force in this year (2,554 fines imposed and 2,512 in force in 2010; 2,778 fines imposed and 2,650 in force in 2009; 2,684 fines imposed and 2,501 in force in 2008). The total fine amount was CZK 109,081,069, which is a decrease compared to 2010 (CZK 141,820,843 in 2010; CZK 164,165,643 in 2009; CZK 142,921,818 in 2008). Fine decreases were registered in the waste and water management sectors. The decrease in the total amount of final and conclusive impositions of fines is a result of handling difficult cases for which large fines are imposed. Some of these cases have been appealed against. Among territorial inspectorates, the greatest amounts of fines were imposed by Brno TI (CZK 16,768,734) and Ústí nad Labem TI (CZK 15,041,250). The average amount of a final and conclusive fine imposed in an administrative

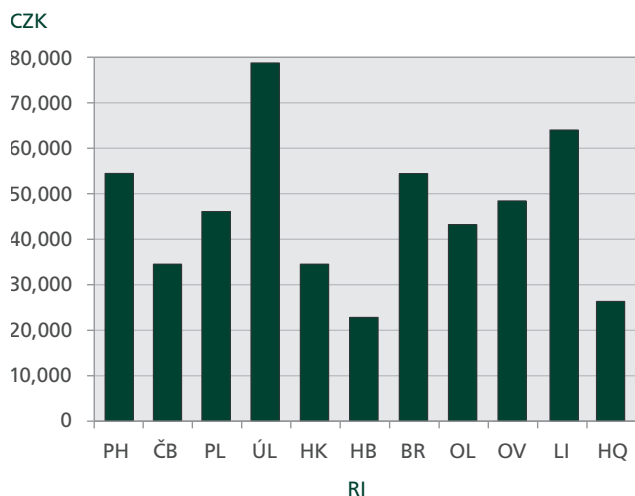
proceeding was CZK 46,135 (CZK 56,457 in 2010; CZK 56,077 in 2009; CZK 57,146 in 2008). The average fine amounts differ both among the sectors and the regions. The highest average fines were imposed in the waste management sector; the lowest ones in the nature protection sector, which is explained by the nature of their activity and the legislative system of sanctions.

## 2.2 ADMINISTRATIVE PROCEEDINGS ON REMEDY

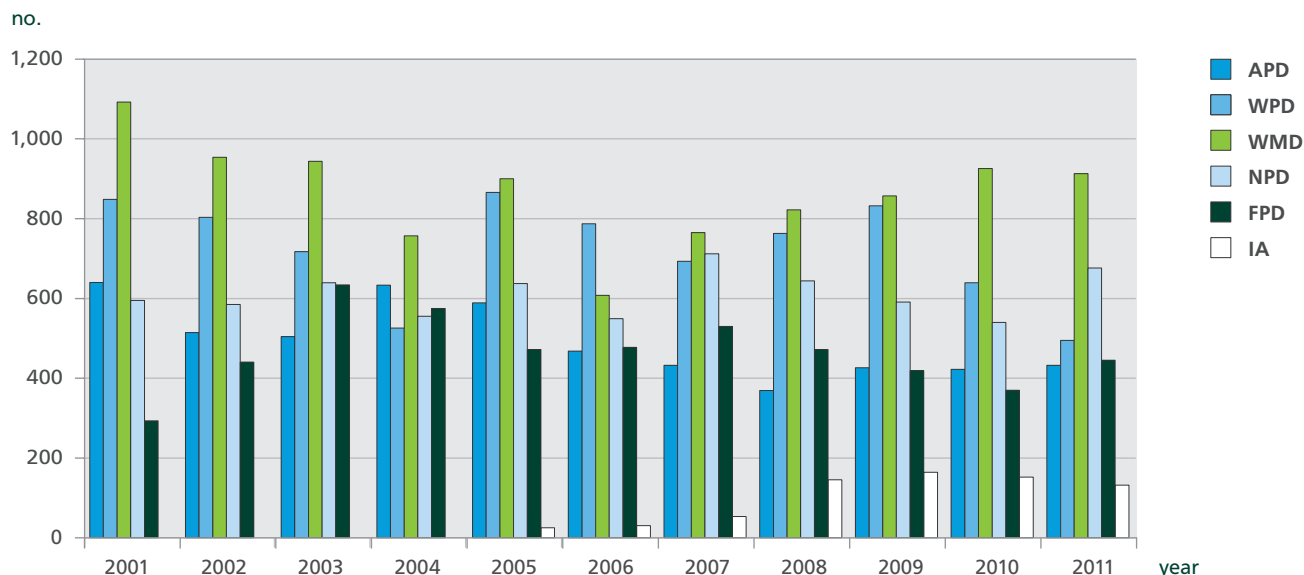
Decisions on remedy are the other category of decisions besides sanctions as a response of the administrative body to identification of legal non-compliance. This type of measures is imposed separately or in connection with decisions on sanctions. We issued 413 decisions on remedial measures in 2011 (340 in 2010; 406 in 2009; 427 in 2008; 503 in 2007), along with 113 decisions to restrict or discontinue operation (68 in 2010; 70 in 2009; 51 in 2008; 66 in 2007).

There were 58 instances of seizure and confiscation of live or non-live specimens based on administrative decisions, including the CITES (53 in 2010; 68 in 2009; 84 in 2008). Seizure of illicitly kept specimens, restriction or discontinuation of harmful activity or operation are extreme options for the administrative body to respond to identified legal non-compliance. This is reflected in their proportion in the total numbers of decisions.

Average fine amounts by RI



### Trend in penal and remedial decisions (penalties, remedial measures and operation discontinuation)



## 2.3 ACTIVITIES OUTSIDE ADMINISTRATIVE PROCEEDINGS

These comprise statements and position papers for other agencies, such as statements on applications for support from the SEF, statements on EIA studies, etc. The CEI issued 12,548 such statements (11,592 in 2010; 12,006 in 2009; 12,013 in 2008).

The CEI cooperates with the MoE and departmental organizations as well as the General Customs Directorate concerning CITES, GMO and transboundary transport of waste, the Czech Police, the Fire Rescue Service, the Czech Trade Inspectorate, the Occupational Safety Inspectorate, the Public Health Service, regional and local agencies and institutions, courts, etc.



# 3 COOPERATION

## WITH THE PUBLIC

## 3.1 SUBMISSIONS AND COMPLAINTS

### CEI and civil society

Examination of submissions, complaints and petitions make up about 8% of the CEI's total workload. Submissions, complaints and petitions are an important element in the CEI's communication with the public. They point at violations of law that might otherwise remain unnoticed. Justified submissions are an incentive for the CEI to proceed with either a sanction or remedy administrative procedure. Some of the submissions and petitions are also forwarded to other public administration bodies for examination.

Complaints about inappropriate conduct of inspectors or steps taken by CEI territorial inspectorates are important feedback, which helps the organization improve its work.

Improvement of the public's legal awareness concerning environmental protection is another important aspect of handling submissions, complaints and petitions.

The CEI handled 2,423 submissions in 2011. Some of them were handled by multiple environmental protection units or forwarded to relevant public administration bodies following an on-site examination to authenticate the situation.

In addition to the aforesaid examination of submissions and petitions by the environmental protection units, territorial inspectorates reported proceedings pursuant to Act no. 76/2002 Coll. on Integrated Pollution Prevention and Control, as amended. We examined 131 cases pursuant to this Act.

### Green Line

A so-called Green Line was inaugurated by the CEI as of 1 September 2008. This is a direct and toll-free connection between the CEI and the civil public. The line is used both for informing citizens about the CEI's sphere of authority and for receiving citizens' submissions and complaints. The line is in operation between 8 am and 4 pm every day.

The submission, complaint and petition agenda is an important component of the CEI's work in all the environmental protection sectors. Handling submissions and complaints is the privileged task of the CEI Director and territorial inspectorate directors. This activity is anchored in the CEI Statutes and the CEI Organizational Rules. The CEI Headquarters internal inspection department is the methodological supervision unit for this agenda.



## 3.2 INFORMATION PROVISION

The Czech Environmental Inspectorate (CEI) handled 233 applications for information in 2011, including 44 pursuant to Act no. 106/1999 Coll. on Free Access to Information, and 189 pursuant to Act no. 123/1998 Coll., on the Right to Environmental Information. Five of the applications for information were refused (mostly because the respective administrative proceedings had not been concluded).

The development trend in the public interest in information provision in 2011 was a growth compared to previous years (181 in 2010; 207 in 2009; 141 in 2008). The reason was an increase in the numbers of accepted applications for information especially concerning air protection. A large portion of the applications concerned the smog situation around Ostrava and the odour from the remediation works in the Ostrava Pools (mostly in Ostrava-Fifejdy and Přívoz). We also replied to a number of telephone inquiries concerning the odour from the Ostrava Pools, which were not registered because they were not applied for pursuant to the respective Acts. Other inquiries concerned issues such as air quality in general, i.e., dustiness due to road construction and air pollution from local heating throughout the Czech Republic.

Nature protection was another sphere frequently inquired about. The demand for information mostly concerned inspections in the Šumava NP as well as tree protection in general, tree felling outside forests, damage done to prominent landscape features, and landscape character protection.

Inquiries in the waste management sector concerned outcomes of examinations and administrative proceedings on waste management. The information in the water protection sphere was mostly on administrative bodies' proceedings on handling of unwholesome substances and watercourse pollution. Other applications requested information about relevant state administrative bodies, methods of submission handling, and inspections performed.

The Czech Environmental Inspectorate has handled increasing amounts of information requests immediately by way of a discussion forum, which is not restricted by legal response periods. These requests are not included in the records pursuant to the respective Acts. The overwhelming majority of information requests were made by citizens' associations and natural persons. The CEI TIs in České Budějovice and Ostrava registered the greatest numbers of requests.

# 4 CEI INVOLVEMENT

## IN HANDLING ACCIDENTS



### Central register of water accidents

Pursuant to Act no. 254/2001 Coll. on Waters, as amended, the CEI has kept a central register of accidents since 2002. Since 2003, the Inspectorate has cooperated with the Fire Rescue Service, chiefly on forwarding information on accidents. The CEI registered 181 accidents in 2011 that complied with the accident definition as per Section 40 of Act no. 254/2001 on Waters. Tens of other accidents we reported to the CEI in 2011. Not all of them were accidents according to the Waters Act, but the CEI examined many of them. The numbers of accidents caused by transport increased by 19 registered cases. Fish died in 27 accidents, which is 11 more than in the previous year. The accident originator was known in 120 cases, which is 66 % of the total registered number, translating into a 21 % increase in the number of known originators. The CEI examined or was directly involved in the examination of 70 of the accidents. Groundwater was affected in 4 of the accidents.

#### Biogas station accident in Křižany

In this accident, part of the liquid contents of the fermenting tank (approx. capacity 2,500 m<sup>3</sup>) leaked onto the surrounding ground and then into an amelioration gutter near both the fermenting tanks. After some 200 metres, the amelioration gutter joins the Ještědský brook (a breeding watercourse for salmonid fish fingerlings, including the newly introduced Atlantic salmon, according to Ústí nad Labem Anglers Union). Fish died as a result of the leak. TECHNOINVEST, a.s., Liberec was the originator of the accidental leak of the

hazardous unwholesome substance. The CEI is conducting an administrative proceeding with the accident originator on the issue.

#### Aviation kerosene leak

The greatest registered accidents in the reporting period include the accident of 24 May 2011 that occurred on the premises of UNION CONSULTING, s.r.o., in Kostelec u Heřmanova Městce. Aviation kerosene leaked out of a tank on the premises through a venting line after an external contractor had modified the storage control system; the control system got blocked afterwards. A total of 16.8 m<sup>3</sup> of aviation kerosene leaked into the rock environment and afterwards, into the sewerage. In addition, the pollutant entered an area of spoil heaps left after mining. The accident intervention – extraction of the contaminated earth – started already on 24 May 2011. An accidental leak of aviation kerosene through a system of oil drains to Dolanský pond, from which water flows into the Citkovský brook, was detected on 30 June 2011, following intense rain. Application of accident barriers and leak remediation started immediately after the situation was detected. Active remediation has been suspended and only monitoring is being performed on the groundwater in boreholes and surface water at the Dolanský pond discharge and in the Citkovský brook. The groundwater and surface water monitoring will be assessed by 31 March 2012. Chrudim Municipal Authority and the CEI will decide on further steps during an on-site inspection on 18 April 2012; an operative on-site inspection may be summoned if additional important facts are identified.

#### Accident at OMGD, s. r. o., in Kaznějov

On 29 September 2011, Povodí Vltavy reported to Kralovice Municipal Authority Environment Department an accident on a right-side tributary to the Kaznějovský brook caused by an unknown pollutant released from OMGD, s. r. o. However, the authority failed to identify the cause of the accident. Plzeň CEI Water Management Department therefore performed an additional examination of the accidental pollution on

13 October 2011, which identified that the accident had been caused by the release of approx. 5 m<sup>3</sup> of molasses into the storm sewer during demolition works on a former molasses storehouse. In order to gain better access to an accident sump, the workers doing the job demolished a corner section of its perimeter wall, which released the molasses into the storm sewer and from there, to the company WWTP. As a result, the contents of the WWTP biological stage was significantly

polluted and massively polluted wastewater flowed out into the Kaznějovský brook tributary. We imposed 9 remedial measures to eliminate the accident consequences and a fine of CZK 100,000, which became final and conclusive. The company proceeded proactively to fulfil the remedy orders and cooperated with the CEI. The assessment of the fine reflected that, among other things.

#### Classification of accidents by leaked pollutant category in 2011

POLLUTANT CATEGORY	NUMBER OF ACCIDENTS	%
petroleum derivatives	102	56,4
wastewater	19	10,5
chemicals except heavy metals	12	6,6
animal husbandry waste	6	3,3
sludge and suspended solids	3	1,7
food processing products	2	1,1
heavy metals	2	1,1
oxygen deficiency	2	1,1
other substances	14	7,7
undetermined	19	10,5
<b>Total</b>	<b>181</b>	<b>100</b>

#### Classification of accidents by general cause in 2011

CAUSE OF ACCIDENT	NUMBER OF ACCIDENTS	%
human factor	92	50,8
technical cause	33	18,2
natural forces	7	3,9
undetermined	49	27,1
<b>Total</b>	<b>181</b>	<b>100</b>





# 5 CEI ACTIVITIES

## BY SECTOR IN 2011

## 5.1 AIR, OZONE LAYER AND EARTH'S CLIMATE SYSTEM PROTECTION

### INSPECTION ACTIVITIES IN 2011

Air protection inspectors performed 5,272 inspections of adherence to air, ozone layer and Earth's climate system protection requirements in 2011. Within these inspections, 49.5% (2,611) were scheduled and 50.5% (2,661) were not scheduled. A total of 4,556 inspections focused on air protection. The rest concerned adherence of operators of facilities involved in the carbon dioxide emission permit trading system to requirements (104 inspections), adherence to requirements on handling regulated substances and fluorinated greenhouse gases (466 inspections), performance of authorized persons' jobs (108 inspections); the rest were examinations of activities with an impact on air that cannot be included in any of the aforesaid categories (38 inspections). In addition to these checks, our air protection inspectors were involved, together with other sectoral inspectors, in 227 checks of sources with integrated permits and 10 joint proceedings in which operators of facilities with integrated permits were fined to pay a total of CZK 229,000 for violating air protection requirements.

The inspections resulted in 400 sanction administrative proceedings due to violation of duties, out of 358 became final and conclusive in 2011, as well as 31 administrative proceedings imposing remedial measures and 1 proceeding ordering a restriction to operation. A total of 384 decisions on fines (358 under proceedings initiated in 2011 and 26 under proceedings initiated in the previous year) became final and conclusive in 2011, worth CZK 15,193,000. Out of these final and conclusive rulings, 269 concerned delicts in air protection and 131 concerned delicts in ozone layer and Earth's climate system protection.

The air protection inspectors' work – inspection of adherence to emission limits, emission ceilings and specific production-

-related emissions – was enhanced with pollutant emission measurements using our own measuring equipment in 36 instances at the operators of 10 stationary air pollution sources.

The most serious delicts proven in 2011 were violations of emission limits, specific production-related emissions and emission reduction plans. A total of 37 such delicts were proven among operators of stationary air pollution sources, and fines totalling CZK 2,980,000 were imposed for them. Other delicts included failure to detect air pollution levels—to measure emissions (54 instances, fines totalling CZK 1,535,000), failure to adhere to operating rules (16 instances, fines totalling CZK 695,000), violation of conditions on the permit (13 instances, fines totalling CZK 1,255,000), operation or modification of sources without permission (58 instances, fines totalling CZK 3,576,000), failure to implement remedial measures (3 instances, fines totalling CZK 290,000), failure to provide the Inspectorate with information (3 instances, fines totalling CZK 110,000), failure to keep operating records or develop and furnish summary operating records (105 instances, fines totalling CZK 1,140,000), violation of duties when handling volatile organic compounds (9 instances, fines totalling CZK 340,000), violation of directives and bans on handling regulated substances (57 instances, fines totalling CZK 911,000), and violation of directives on handling fluorinated greenhouse gases (102 instances, fines totalling CZK 2,114,000). In 25 instances, entities doing servicing, maintenance and checks of tightness of installations containing regulated substances or fluorinated greenhouse gases were proven to have performed the activities without a valid Ministry of the Environment certificate. They were fined with a combined amount of CZK 247,000 for these delicts.

In one case, having proven a violation of an emission limit for organic compounds and failure to implement a remedial measure led us to order a restriction to the operation of the stationary source: a power-heated tunnel furnace for firing ceramics.

Furthermore, the Czech Environmental Inspectorate issued a total of 130 decisions to operators of stationary air pollution

sources, including 97 on definition of stationary air pollution sources and their classification in the respective categories, 30 on approval of regulatory rules for operators of sources listed in the central regulatory rules and regional and local regulatory rules, and 3 on setting of emission limits for combined combustion of multiple fuel types. These 97 Czech Environmental Inspectorate decisions defined 201 stationary air pollution sources and classified them in the respective categories: 15 large sources, 86 medium-sized sources, and 100 small sources.

Decree no. 373/2009 Coll., amending Ministry of the Environment Decree no. 553/2002 Coll., setting out special pollution limits for pollutants, the Central Regulatory Rules and the methods of its implementation, including a list of stationary sources subject to the regulation, rules for developing and implementing regional and local regulatory rules, and the method and scope of making information on air pollution levels available to the public, has extended the list of pollutants and their respective special pollution limits with suspended PM10 particles. This amendment also announces a list of air pollution sources included in the Central Regulatory Rules, to which “warning” and “regulation” signals for violation of the special pollution limits for PM10 under conditions defined for these signals. Moreover, respective regional and local authorities chose additional air pollution sources subject to the regulation in regions with worse air quality. As a result, operators of such sources were obliged to develop regulatory rules and submit them to the Czech Environmental Inspectorate for approval. The affected CEI territorial inspectorates in Ústí nad Labem, Brno and Ostrava approved 30 regulatory rules for operations, involving 51 stationary air pollution sources, in 2011. These regulatory rules approved the measures proposed by the operators that represent effective reduction to the emissions of those pollutants for which the regulation is announced by the signal. As of the end of 2011, the source operation regulation system for periods of worsened dispersion conditions based on the central, regional and local regulatory rules involved 29 sources to be regulated if the special pollution limit for NO<sup>2</sup> is

exceeded, 29 sources to be regulated if the special pollution limit for SO<sup>2</sup> is exceeded, and 97 sources to be regulated if the special pollution limit for PM10 volatile dust is exceeded.

Our territorial inspectors performed 62 checks of adherence to the duties arising from the approved regulatory rules in periods of worsened dispersion conditions after regulation signal announcements. All of the checks confirmed operation in compliance with the regulatory rules.

The proceedings to set emission limits for combined combustion of multiple fuel types resulted in 3 decisions setting emission limits for stationary pollution sources that combust solid fuels. One of them concerned combined combustion of non-contaminated wood mass (biomass) with wood mass containing synthetic bonding agents (crushed particleboards and fibreboards) at a 1:1 weight ratio in a medium-sized stationary combustion source with a power output of 1.16 MW. The subject of the other 2 proceedings was to set emission limits for combined combustion of non-contaminated wood mass (biomass) with wood mass containing synthetic bonding agents (crushed particleboards and fibreboards) at 4:1 and 9:1 weight ratio in large stationary combustion sources with a power output of 6.98 MW and 11.46 MW respectively.

Our territorial inspectorates’ air protection units and the Czech Environmental Inspectorate Headquarters air protection department collected summary operating records for especially large and large sources for the purposes of maintaining the air quality information system, including the register of air pollution sources, and checked them in order to verify the identity of both the operators and the operations. The detailed verification of completeness and correctness of the information was not performed in every case but also as part of on-site inspections in the sources or following a notice by the Czech Hydrometeorological Institute, which processes the information and is charged with maintaining the database.

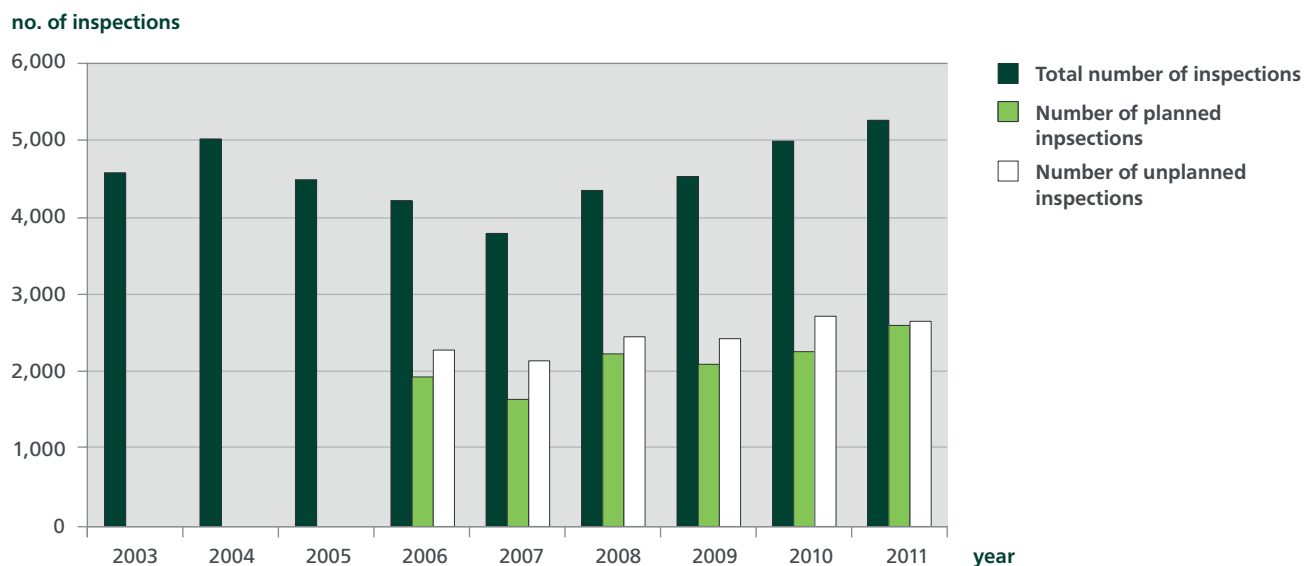
Being the relevant administrative body in the area of air protection in proceedings concerning issuance of permits for construction, modification and commissioning of especially large, large and medium-sized stationary air pollution sources registered by regional authorities, our air protection unit inspectors issued 3,752 statements in 2011. In addition to these statements, a total of 1,605 other statements and position papers were issued in the reporting period based on requests made by other air protection agencies, authorities handling air, ozone layer and Earth's climate system protection issues, and the general public.

As part of the Czech Environmental Inspectorate's cooperation with the Ministry of the Environment, we developed extensive information for the Ministry Air Protection Department for transposing the EU Directive on industrial emissions (we collected results from continuous emission measurement

systems in selected especially large combustion air pollution sources) and information for the annual report on meeting the requirements of the EU Directive on reducing emissions of volatile organic compounds.

The number of submissions handled in 2011 decreased from 391 in the preceding year to 300. The submissions mostly informed about air pollution from the operation of stationary sources. Six of the submissions concerned especially large sources, 103 concerned large ones, 113 concerned medium-sized sources, and 67 were concerned with small ones. In addition, we received 2 submissions informing about the work of authorized persons, and 9 submissions concerning activities that could not be regarded as air pollution sources pursuant to the Air Protection Act. Annually recurrent submissions concerning the operation of small stationary pollution sources include complaints about intolerable

### Development of number of inspections in 2003–2011



annoyance with smoke and odours, mostly from small combustion air pollution sources operated for single-family house heating, and annoyance with odours by activities involving biological treatment of raw materials or waste and by animal husbandry. Another category of submissions concerned sources using volatile organic compounds, such as paint and lamination shops. In 29 instances, our inspections in sources concerned by the submissions identified reasons for initiating administrative proceedings on violation of duties causing the situation specified in the submissions.

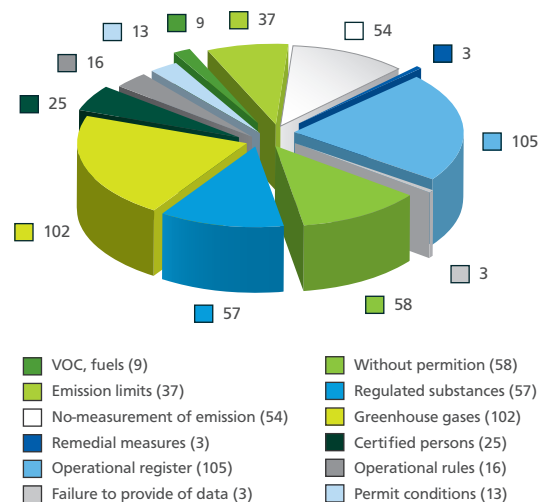
## OVERVIEW OF PERFORMANCE OF DEPARTMENTAL TASKS

### Inspections of adherence to emission limits, emission ceilings, emission reduction plans, compliance with requirements of permits, operating rules and regulatory rules, and implementation of remedial measures

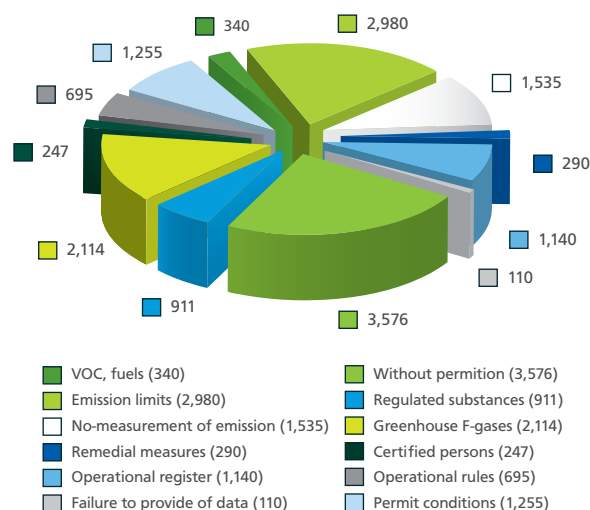
The most serious delicts proven in 2011 included violation of emission limits, specific production-related emissions, and emission reduction plans. We proved 37 such delicts among operators of stationary air pollution sources and fined them to pay a combined amount of CZK 2,980,000. Adherence to emission limits, emission ceilings and emission reduction plans was examined both during on-site inspections in the operated sources and based on information obtained from emission measurement reports made by authorized persons or the Czech Environmental Inspectorate.

As a result of the facts identified, we issued 16 decisions ordering remedy (adherence to emission limits) and one ordering restriction to operation due to violating an emission limit for organic compounds and failing to remedy the situation. Emission limits for volatile organic compounds, nitrogen oxides, carbon monoxide and particulate matter were most often exceeded. Emission limits for halogen compounds (Cl) were exceeded exceptionally. The air pollution sources concerned included combustion energy-generating sources, paint application shops, foundries, and one municipal waste incinerator.

### Number of debated delicts according to types



### Amount of fines according to type of delicts in thousands CZK



The emission ceilings for particulate matter, sulphur dioxide and nitrogen oxides set for existing especially large combustion sources were not hit nation-wide in 2010 as inspected in 2011. The operators made a frequent use of the possibility to apply a joint emission ceiling (including ČEZ power plants, Dalkia Česká republika heating plants, Teplárny České Budějovice, UNIPETROL RPA) as well as exchange among the sources (ČEZ, a.s., UNIPETROL RPA, s.r.o., United Energy, a.s., Teplárna Trmice, a.s., and ENERGY Ústí nad Labem, a.s.), so that none of the operators exceeded the set emission ceilings. From this perspective, the emission ceilings cannot be regarded as an effective tool of emission reduction and path towards improved air quality.

As for other major duties, our inspections examined the operation of sources based on and in compliance with permits issued by air protection agencies. In 58 instances, we found out that the source operators were operating the sources without a relevant permit by an air protection agency and were fined to pay a combined amount of CZK 3,576,000. Other delicts included failure to detect air pollution levels – to measure emissions (54 instances, fines totalling CZK 1,535,000), failure to adhere to operating rules (16 instances, fines totalling CZK 695,000), violation of conditions on the permit (13 instances, fines totalling CZK 1,255,000), failure to implement remedial measures (3 instances, fines totalling CZK 290,000), failure to provide the Inspectorate with information (3 instances, fines totalling CZK 110,000), and violation of duties when handling volatile organic compounds (9 instances, fines totalling CZK 340,000).

Our territorial inspectors performed 62 checks of adherence to the duties arising from the approved regulatory rules in periods of worsened dispersion conditions after regulation signal announcements. All of the checks confirmed operation in compliance with the regulatory rules.

### **Examination of operational record keeping and reporting of summary operational data**

Our territorial inspectorates' air protection units and the Czech Environmental Inspectorate Headquarters air protection department collected summary operating records for especially large and large sources for the purposes of maintaining the air quality information system, including the register of air pollution sources, and checked them in order to verify the identity of both the operators and the operations. The detailed verification of completeness and correctness of the information was not performed in every case but also as part of on-site inspections in the sources or following a notice by the Czech Hydrometeorological Institute, which processes the information and is charged with maintaining the database. We examined operational record keeping and reporting of summary operational data in 5,145 cases. The examination identified 105 violations of some of the record-keeping or reporting duties, and the operators were fined to pay a combined amount of CZK 1,140,000.

### **Decisions on definition of stationary air pollution sources and their classification in the respective categories, and decisions on setting of emission limits for combined combustion of multiple fuel types**

Czech Environmental Inspectorate decisions in 97 administrative proceedings defined 201 stationary air pollution sources and classified them in the respective categories: 15 large sources, 86 medium-sized sources, and 100 small sources.

The proceedings to set emission limits for combined combustion of multiple fuel types resulted in 3 decisions setting emission limits for stationary pollution sources that combust solid fuels. One of them concerned combined combustion of non-contaminated wood mass (biomass) with wood mass containing synthetic bonding agents (crushed particleboards and fibreboards) at a 1:1 weight ratio in a medium-sized stationary combustion source with a power output of 1.16 MW. The subject of the other 2 proceedings was to set emission

limits for combined combustion of non-contaminated wood mass (biomass) with wood mass containing synthetic bonding agents (crushed particleboards and fibreboards) at 4:1 and 9:1 weight ratio in large stationary combustion sources with a power output of 6.98 MW and 11.46 MW respectively. Where plans for combined combustion of primary fuels with fuels made from waste in facilities subject to the Integrated Prevention Act were discussed, the Czech Environmental Inspectorate only issued position statements for the respective regional authorities.

#### **Approvals to regulatory rules and examination of adherence to rules after regulation signal announcement**

The affected CEI territorial inspectorates in Ústí nad Labem, Brno and Ostrava approved 30 regulatory rules for operations, involving 51 stationary air pollution sources, in 2011. These regulatory rules approved the measures proposed by the operators that represent effective reduction to the emissions of those pollutants for which the regulation is announced by the signal. As of the end of 2011, the source operation regulation system for periods of worsened dispersion conditions based on the central, regional and local regulatory rules involved 29 sources to be regulated if the special pollution limit for NO<sub>2</sub> is exceeded, 29 sources to be regulated if the special pollution limit for SO<sub>2</sub> is exceeded, and 97 sources to be regulated if the special pollution limit for PM<sub>10</sub> volatile dust is exceeded.

In the reporting period (the year 2011), “warning” and “regulation” signals were announced for 6 locations, always based on the violation of a special pollution limit for PM<sub>10</sub>: two locations in the Moravian-Silesian Region (Ostrava/Karviná and Třinec locations) and for Ústí nad Labem, Pardubice and Central Bohemian Region as well as the city of Prague. The warning and regulation signals were announced for periods totalling 30 days and 28 days respectively in the Ostrava/Karviná location; for 14 and 17 days respectively in the Třinec location; and for 27 days and 5 days respectively in Ústí nad Labem Region. In addition, regulation and warning about possible regulation were announced for Central

Bohemian Region (10 and 2 days respectively). Only the warning signals were announced for Pardubice Region and the city of Prague. When examining the adherence to the requirements of the respective regulatory rules, the Czech Environmental Inspectorate inspectors found no violation of any of the duties for source regulation periods: their operators adhered to the requirements of the respective regulatory rules in spite of perceptible economic losses.

#### **Inspection of work of persons authorized for emission and pollution measurement, issuance of expert assessments, calculation of dispersion studies, supervision over incinerator operation, and verification of reports on carbon dioxide emissions**

In 2011, we inspected 108 persons performing activities for which the Air Protection Act requires authorization by the Ministry of the Environment. The work of none of the authorized persons showed deficiencies that would be a reason for initiation of administrative proceedings. The Ministry of the Environment was notified about the minor deficiencies identified in the emission measurement reports and expert assessment for use in evaluation of applicants for authorization extension. No deficiencies were identified in any of the other activities subject to authorization.

#### **Update of information on waste incinerators and combined combustion facilities**

We provided the Czech Hydrometeorological Institute, which maintains a publicly accessible register of incinerators and combined combustion facilities based on authorization by the Ministry of the Environment, with regular monthly updates of information on these air pollution sources. We submitted reports on 3 municipal waste incinerators, 31 hazardous waste incinerators and 6 combined combustion facilities in 2011. We ran an administrative proceeding against the operator of one of the municipal waste incinerators because of a violation of the emission limit for nitrogen oxides, and imposed a final and conclusive fine of CZK 500,000 on the operator of the facility. No other violations of operating

requirements were identified in waste incinerators and combined combustion facilities.

### **Inspections of adherence to requirements when handling regulated substances, fluorinated greenhouse gases and products that contain them**

As part of our departmental tasks set for the area of ozone layer and Earth's climate system protection, we inspected all the activities that entities handling regulated substances and selected fluorinated greenhouse gases are obliged to perform. These activities were inspected in parallel due to the parallel use of regulated substances and fluorinated greenhouse gases for identical or similar purposes in applications with a coolant content of more than 3 kg. CEI inspectors performed 466 checks, which identified both violations of regulations and bans on handling regulated substances (57 instances, fines totalling CZK 911,000) and violations of regulations on handling fluorinated greenhouse gases (102 instances, fines totalling CZK 2,114,000). In 25 cases, we proved that entities performing servicing, maintenance and tightness inspection on installations containing regulated substances or fluorinated greenhouse gases did so without valid Ministry of the Environment certificates. They were fined to pay a combined amount of CZK 247,000 for these delicts.

The most common delicts included failure to ensure tightness inspection on applications, servicing, maintenance and tightness inspection without valid certificates, absence of coolant leak detectors, and failure to keep records. We issued 1 decision on a remedial measure: installing a coolant leak detection system.

### **Inspection of adherence to obligations of operators of facilities included in the carbon dioxide emission permit trading system**

In 104 performed inspections of facilities included in the carbon dioxide emission permit trading system, we compared the condition of the facilities with their definitions in permits issued by the Ministry of the Environment, and the methods

of monitoring, verification and reporting of carbon dioxide emissions. We did not identify any failures or violations concerning any of the duties. Based on a call of the Ministry of the Environment, we applied the results of our inspection work to developing a report on the status and factual use of paper manufacturing facilities in the Czech Republic that are included in the carbon dioxide emission permit trading system.

## **OVERVIEW OF PERFORMANCE OF SPECIFIC TASKS – SUMMARY**

The Czech Environmental Inspectorate Headquarters air protection department and territorial inspectorates' air protection units performed in full their specific tasks based on the Plan of Specific Tasks for 2010.

Since both the departmental and thematic tasks cover the overwhelming majority of the Czech Environmental Inspectorate's work in the spheres of air, ozone layer and Earth's climate system protection, the territorial inspectorates' air protection units only designed specific tasks for 2010 exceptionally, mostly as inspections of adherence to duties of operators of major sources and enforcement and inspection of new obligations.

## **MAJOR CASES**

**Yuncheng Plate-making CZ, s.r.o.**, Pečky, operator of two air pollution sources – galvanic metal plating: operation without an air protection agency's permit. Imposed a final and conclusive fine of CZK 500,000.

**SAKO Brno, a.s.**, municipal waste incinerator (facility for thermic recovery of municipal waste). Imposed a final and conclusive fine of CZK 500,000 for violating the emission limit for nitrogen oxides.

**FERMAT CZ, s.r.o.**, Praha 5, facility operated within CTPark Brno, a paint shop with degreasing pre-treatment. Imposed

a final and conclusive fine of CZK 500,000 for operation in conflict with the permit and violating the emission limit for fugitive emissions of volatile organic compounds.

**PROMET FOUNDRY, a.s.,** Ostrava, Vsetín operation, a paint shop and ferrous metal foundry. Imposed a final and conclusive fine of CZK 200,000 for violating the emission limit for fugitive emissions of volatile organic compounds from the paint shop, and a final and conclusive fine of CZK 350,000 for violating the emission limit for carbon monoxide from the foundry.

### CONCLUSIONS FROM INSPECTION ACTIVITY

The air inspection sector activity in the areas of air, ozone layer and Earth's climate system protection adhered to the schedule for 2011. The number of inspections in 2011 increased by approx. 5% compared to preceding years, and the ratio of scheduled to non-scheduled inspections changed slightly in favour of scheduled ones. Again in 2011, the most serious delicts included violations of pollutant emission limits and nominal production-related emissions, but their numbers decreased slightly compared to the previous year. Limits mostly exceeded were for volatile organic compounds, particulate matter and carbon monoxide. Emission limits continue to be the main air quality protection tools, which cannot be said for emission ceilings. The latter tool no longer fulfils its regulatory function due to the possibility of applying joint emission ceilings and exchanges among operators. The dispersion conditions were worsened in the Moravian-Silesian and Ústí nad Labem Regions in the winter of 2011, and less so in the Central Bohemian and Pardubice Regions. Source regulation was announced for the two former regions. All of the operators of facilities involved in the regulatory system fulfilled their duties according to approved regulatory rules. We paid considerable attention to relatively novel issues, such as inspection of adherence to requirements on handling regulated substances and fluorinated greenhouse gases. This was reflected in the numbers of proven delicts, which increased compared to preceding years.

## 5.2 WATER PROTECTION AND PREVENTION OF MAJOR INDUSTRIAL ACCIDENTS

### INSPECTION ACTIVITY IN 2011

Inspection of adherence to duties pursuant to Act no. 254/2001 Coll. on Waters and Act no. 59/2006 Coll. on the Prevention of Major Accidents is performed by 87 inspectors in the water protection units. Their inspection activities primarily focus on the most serious issues in water protection in their respective regions. They performed 3,448 inspections in 2011, including 1,741 scheduled and 1,707 non-scheduled. The inspectors were also involved in 241 checks under Act no. 76/2002 Coll. on Integrated Prevention. A total of 384 decisions on fines, totalling CZK 16,622,219, became final and conclusive in the reporting period (including 31 decisions issued in 2010); 55 of the decisions issued in 2011 have not become final and conclusive yet. The decrease in the number of decisions issued compared to previous years is due to the fact that the latest amendment of the Waters Act does not allow us to penalize failure to fulfil charge payment duties. Previously, the proportion of decisions issued because of delayed reporting and registration was one half of all the decisions issued. In addition, final and conclusive decisions ordered 79 remedial measures.

A considerable portion of the work of our water protection inspectors is made up of handling issues that are mostly local and of little environmental impact but require a lot of time and administrative effort. Submissions are frequently forwarded from the MoE. We handled 420 submissions in 2011, of which only 23% were found legitimate. This proportion is comparable to that in 2010.

We issued 1,105 position statements concerning the granting of subsidies from the SEF, audits and statements for other agencies, including state administration. In cooperation with

other CEI units, we developed 1,473 position statements on EIA/SEA documentations and applications for the issuance or change of integrated permits. In their work, our water protection inspectors mostly collaborate with water management authorities, the Czech Police, the Fire Rescue Service (chiefly when handling accidents), the Povodí agencies, and other state administration and devolved authorities. Based on their expert knowledge and findings from their inspection work, our inspectors make assessments of Povodí plans, permits issued by water management authorities, etc. In the context of international environmental protection, they cooperate with environmental protection agencies in neighbouring countries; they are members of international committees such as the MKOL and working groups such as the CLEAN NYSA, and are involved in IMPEL working group sessions.

## OVERVIEW OF PERFORMANCE OF DEPARTMENTAL TASKS

### Monitoring of major wastewater treatment plants over 10,000 EI

The objective of the annual examination of major wastewater treatment plants is to check the legal condition of the major pollution sources combined with identification of the actual amounts of pollution produced and discharged. We also verify the current status of the WWTP and sewerage refurbishment process for the Czech Republic's settlements of more than 10,000 EI, listed by the Czech Government as priorities for meeting the requirements of Council Directive 91/271/EEC concerning urban wastewater treatment. We performed this examination in 223 sources in the Czech Republic in 2011. They comprised 200 municipal WWTP (i.e., treatment plants handling sewage water or mixture of sewage and industrial wastewater) with a design load higher than 10,000 EI, and 23 sources of industrial wastewater.

Among the municipal WWTP examined, 138 had an actual capacity of more than 10,000 EI based on their admitted loads; they treated 692 million m<sup>3</sup> of wastewater with an input

contamination of 159 thousand tonnes of BOD<sub>5</sub>, representing utilization by approx. 7.3 million EI. About 40% of this load was handled by 9 WWTPs with capacities over 100,000 EI. The treated wastewater discharged into watercourses from these plants contained 2,979 tonnes of BOD<sub>5</sub> at an average concentration of 4.2 mg/l (156 thousand tonnes removed), 19,553 tonnes of COD at an average concentration of 26.5 mg/l (340 thousand tonnes removed), 8,227 tonnes of total nitrogen at an average concentration of 10.5 mg/l (21.3 thousand tonnes removed), and 507 tonnes of phosphorus at an average concentration of 0.86 mg/l (3.5 thousand tonnes removed). The average efficiency of removing pollutants from wastewater was 98.0% for BOD<sub>5</sub>, 94.2% for COD, 71.6% for total nitrogen, and 83.7% for phosphorus. The quantity and quality of wastewater discharged did not change significantly compared to the previous year.

Based on our findings, we can conclude that most of the WWTP over 10,000 EI are already meeting the requirements of Council Directive 91/271/EEC. The construction or refurbishment of some of the plants will be completed in 2012. In midyear, in cooperation with the MoE Water Protection Department, we inspected 17 selected problematic settlements that had failed to meet the requirements of the Directive as of 1 January 2011 for which we did not know the current state of implementation of measures. We found out that the implementation had not started in some cases due to lack of funds. Subsidies from the OPENV scheme cannot be utilized for the investment due to the existence of long-term operating contracts. This is a major problem for Prague WWTP, which is the biggest source of pollution in the Czech Republic with its quantity of wastewater and pollution discharged (1.5 million EI). The plant severely violates the Directive limits for total nitrogen, which situation has been legalized by the Prague Municipal Authority until mid 2013 by issuing an exemption permit pursuant to Section 38, Para. 12 of the Waters Act. The reason specified is the proceeding refurbishment of final sedimentation tanks, but their completion will not in any way improve the current unsatisfactory condition of wastewater treatment. The extent of the renovation necessary to meet the

Directive limits has not yet been decided, and neither has the financing method. According to the latest information, Prague is going to apply for a postponement of the deadline for compliance with Council Directive 91/271/EEC until 2016. Due to the amended Waters Act, the CEI cannot fine the city of Prague for failing to meet the Directive requirements.

All of the WWTPs examined were discharging wastewater based on valid permits by water management authorities; some of the permits were still not in compliance with legislation in force concerning the total nitrogen indicator. Some of the water management authorities do not respect the WWTP classification pursuant to the amended Government Regulation no. 61/2003 Coll., resulting in classifying some WWTPs in categories with lower requirements on the quality of wastewater discharged and permits being issued by lower-level authorities.

We identified first cases of applications of BAT technologies pursuant to the Annex to the amended Government Regulation no. 61/2003 Coll. resulting in reducing the existing limits for municipal wastewater discharges, thus leading to increased watercourse pollution and justifying the concern that application of BAT as an element limiting the maximum requirements made by water management authorities on the quality of municipal wastewater discharged will not only lead to improvements compared to the current situation but actually increase the pollution.

Our inspections paid increased attention to the issue of untreated wastewater, lifted by rain events from sewers immediately upstream of WWTPs or past WWTP component stages. We found out that, in most cases, the quantity and quality of this wastewater are not registered and that its discharge is not subject to separate water handling permits or otherwise reflected in the conditions of permits to discharge wastewater from WWTPs. Our initial estimates indicate that the amount of pollution contained in the lifted water is very significant and not regulated by any kind of legislation. The CEI will therefore deal with this issue intensively, aiming at

finding an effective method to reduce the quantity of lifted wastewater.

Based on information obtained during CEI inspections, 5 fines for violations of requirements of Act no. 254/2001 Coll., totalling CZK 320,000, were imposed and became final and conclusive in 2011; they were mostly for exceeding permitted limits for discharging wastewater into surface waters.

### Charges for discharging wastewater into surface waters

We issued charge assessments for 2010 totalling CZK 227 million between February and April 2011. The highest charges were assessed for COD (approx. CZK 46 million), inorganic nitrogen (approx. CZK 17 million), inorganic salts (RAS, CZK 51 million), and the quantity of wastewater discharged (approx. CZK 122 million). The amount of postponed charges due to construction or refurbishment of treatment facilities is CZK 15 million for 2010, representing about 7% of the total charge amount. Decisions on advance payments for fees for 2012 were issued between October and December 2011. We issued 1,007 advance payment assessment worth approx. CZK 253 million in total. The trend of constant decrease in the assessed charge amounts is invariable and is due to the decreasing charges for pollution discharged, whereas the charges for wastewater and the numbers of sources subject to payment do not change.

In the latter half of the year, we performed inspections of the charged entities using inspection laboratories and measurement teams funded by the SEF. The total assumed number of inspections throughout the period is about one half of that in the previous period: 2,600 inspection samplings and 150 quantity measurement checks. Approximately 900 samplings and 60 measurements out of this were performed in 2011.

The efficiency of our inspections in terms of deviations identified is very low due to the long dysfunctional charging limits and difficult applicability of results from the inspection

laboratories. Only two charge adjustments were made in the reporting period based on results from the inspection laboratory. In spite of that, we managed to increase the charge again in the last year based on the results of our inspection analyses; the total increase was more than CZK 8 million, which will fully cover the costs of the inspection throughout the two-year period.

### Groundwater consumption

We issued 4,452 charge assessments in 2011, setting the total charge for groundwater consumptions of CZK 731 million. We issued 4,406 advance payment assessments for advance payments in 2012, totalling CZK 1.24 billion. According to the amended Waters Act no. 150/2010 Coll., advance payment assessments issued in 2010 should remain in force where crucial facts had not changed, and advance payment assessments were only issued in 2011 where the permits for groundwater consumption had changed or to new consumers. We issued 343 new and modified advance payment assessments, and cancelled 103 advance payment assessments. We issued 523 resolutions on halting proceedings where entities submitted charge reports illegitimately.

As part of our inspection activities, we imposed fines for illicit groundwater consumption without permits issued by water management authorities or in conflict with them, and fines for failure to meter the quantities of groundwater consumed. We imposed 77 fines worth CZK 4,473,627.

### Inspections of wastewater treatment plants from 500 to 10,000 EI

The supervision focused mostly on adherence to pollution indicator limits, the amounts of which are set by water management authority decisions, inspection of the amounts of wastewater discharged, adherence to requirements of operating and handling rules, and adherence to other requirements of decisions issued. We examined 340 WWTPs for 500 to 10,000 EI in 2011. Based on the identification of shortcomings, we imposed 42 fines totalling CZK 1,435,000.

Since only 12% of the inspected entities had violated the Waters Act, we can conclude that the quality of wastewater treatment is improving.

Our inspections found out that WWTPs operated by municipalities or associations of municipalities tend to perform worse. Conversely, facilities operated by professional companies qualified for the operation tend to achieve better results.

### Examples of penalties imposed:

Lipence WWTP: a fine of CZK 250,000 for wastewater discharges violating pollution indicator limits in conflict with requirements set out in the water management authority permit.

Lechovice WWTP: a fine of CZK 250,000 for violating requirements of the water management permit in the form of release of activated sludge into a watercourse.

Studeněves WWTP: a fine of CZK 100,000 for wastewater discharges violating the maximum set limits.

### Inspection of agricultural enterprises in terms of meeting the requirements of the Waters Act

The inspections aimed at agricultural enterprises in terms of meeting the requirements of the Waters Act, chiefly of Section 39. The inspections mostly focused on the water management of fertilizer, bulk fodder and petroleum derivative storage (including fuel filling station operations), storage of plant protection agents, animal housing, manure reservoirs and field manure deposits. We also reviewed permits for handling surface waters or groundwater.

We inspected 141 agricultural enterprises in 2011; we imposed 22 fines worth CZK 578,306 and issued 29 decisions ordering remedial measures; 9 of the administrative proceedings have not been concluded to date. Eliminations of minor deficiencies were ordered on site, and the enterprises eliminated then within the respective deadlines.

The chief shortcomings identified concerned the storage of farm fertilizers and bulk fodders, handling areas of fuel filling stations, unapproved accident plans, and illicit groundwater consumption.

A major case was the investigation into a submission concerning AGROCENTRUM JIZERAN, a.s. in Semily, which applied manure slurry on sloping land with frozen ground near a watercourse, resulting in a water accident. Since the CEI obtained the notification of the accident about 2 months after it happened, we only had limited chances of proving that the enterprise had been the originator of the accident in question. Eventually we prove that the company had indeed committed the delict, and fined it with CZK 70,000.

#### **Examination of entities subject to Act no. 59/2006 Coll., on the Prevention of Major Accidents**

The examinations were performed based on the annual inspection schedule approved by the Ministry of the Environment. The inspection took place in cooperation with integrated inspection agencies and regional authorities as per Act no. 59/2006 Coll., on the Prevention of Major Accidents. The Act was amended substantially in 2010 with Act no. 488/2009 Coll. Duties arising from the Act have not always been reflected in safety documentations.

The objective was to inspect all of the 117 entities in category B and 30 selected entities in category A. One of the entities inspected was unclassified, but had been in category A at the time of scheduling the inspections. Three of the inspections concerned unclassified entities scheduled by territorial inspectorates in addition to the approved schedule. We therefore performed 151 scheduled inspections. In addition, we also inspected some unclassified or excluded entities. We verified whether their information about the quantities and types of selected hazardous substances stored corresponded with reality. Several of the operators were ordered to rework their non-classification reports. Entities were also excluded from the jurisdiction of the Act in the course of 2011 due

to changing classification of hazardous substances stored and reductions in their quantities.

We imposed fines on one entity in 3 administrative proceedings; a body of appeal cancelled one of them and halted the proceeding; it reduced another of the fines; the third ruling has not become final and conclusive yet. Two entities registered serious operating incidents: one suffered a major accident; the other had buildings destroyed and 4 employees killed by an explosion.

#### **Inspection of old environmental burdens**

We perform regular supervision of both potential and real sources of groundwater and surface water contamination on sites contained in the CEI long-term accident database. In 2011, the long-term accident database contained about 440 sites in different stages of progress and different importance in terms of endangerment to groundwater and surface water resources.

We supervise the remediation of the contaminated sites, funded from privatization revenues based on an environmental contract made between the acquirer of the privatized property and the Ministry of Finance, on a quarterly basis in the form of one-day on-site inspections during which the CEI checks the implementation of measures ordered and compliance with project documentation.

The CEI issued 40 orders to remedy an unsatisfactory situation in 2011, including 32 concerning old environmental burdens. We performed 461 inspections under this task. In addition to the inspection work as such, the CEI also issues statements on remediation projects, methodological changes and remediation reports, and participates in expert review procedures for the remediation projects.

The trend of attenuation of remediation works due to the preparation of an eco-tender for the elimination of all environmental burdens was also perceptible in 2011.

The Ministry of Finance announced the public tender for elimination of all old environmental burdens under one huge contract in late 2008.

In spite of reduced public contracts for the sites, some of the sites have managed to continue progressing; problems appear where suspending the remediation works results in recurrent contamination of spaces already remedied or progressive contamination leading to endangerment of drinking water resources. That was the case in ICEC Šlapanice, s.r.o., where groundwater had been extensively contaminated with phenols. After the first stage of remediation ended in 2002, about 50 – 60 m<sup>3</sup> of free tar and approx. 550 m<sup>3</sup> of tar bound to the rock environment were left on the site. The contamination is now spreading outside the premises, towards residential neighbourhoods.

The contamination in Jihostroj Velešín, a.s., is a threat to Římov reservoir, a drinking water resource. Protective maintenance remediation pumping has been done since 1994; it has been funded by the MoF for the last 3 years. The premises of FARMAK, a.s., are located on the northern outskirts of Olomouc, in the district of Klášterní Hradisko. Groundwater is being protected by pumping and filtering. The cardinal intervention will be made in the 2<sup>nd</sup> phase, for which a tender will be announced.

In spite of the reason for attenuating remediation works mentioned above, preparatory works for remediation of the amalgam electrolysis plant in Spolana, a.s., have successfully resulted in a remediation intervention in late 2011. The contractor furnished project documentation for a passive treatment of the environmental burden, consisting in building a so-called eco-containment and impermeable seal walls embedded in impermeable bedrock. This will seal off the contaminated site of SAE. Unfortunately, the protection of groundwater at the centre of the contamination, has been postponed again.

In 2011, the CEI provide information for termination of 4 ecological contracts based on CEI inspection final reports declaring the completion of remedial measures or completion of post-remediation monitoring, concerning the following entities: George Garage, s.r.o., Krodos Servis, s.r.o., TEKAZ, s.r.o.

### Inspection of monitoring systems in landfills in follow-up maintenance

In continuation of its specific task for 2010, the CEI performed inspections of the security of terminated, reclaimed and disused landfills in 2011 and assessed the degree to which their security conforms to legislation in force and how the measures are factually adhered to with respect to water protection. We shortlisted problematic sites in cooperation with state administrative bodies and CEI waste management units. We inspected 60 landfills and imposed fines of CZK 17,000 in total on 2 entities for failure to comply with the Waters Act. The other violations of legislation in force were pursuant to the Waste Act; two penalties totalling CZK 410,000 were imposed.

During our inspection activities, we found out that the follow-up maintenance of landfills complies to legislation in force at the time of operating and terminating the landfills. Decisions on operation and follow-up maintenance of landfills are issued either under the Building Act, the Waste Act or the Integrated Prevention Act.

The security measures, i.e., cover-up and other containment techniques, and follow-up monitoring were defined based on an assessment of the impacts of the landfills on the local natural environment. The follow-up maintenance is largely anchored in the landfill operating rules. The quality of monitoring ordered varies. The operators of some landfills (municipalities) are only required to take samples of water from monitoring boreholes: this is especially true of landfills terminated before 1997; sometimes no monitoring periods are scheduled and the sampling frequency is low, e.g., once

a year. In other cases, the monitoring is broken down into stages derived from the landfill consolidation, and concludes with a final assessment.

Limits for assessing permitted contamination were mostly defined based on the 1996 MoE Methodological Instruction; the “C” values are set as the maximum limits, sometimes “B” values depending on local conditions. Professionally speaking, some of the monitoring indicators defined do not match the situation – the nature of the landfill material in most cases. Inspections of landfills will not be nation-wide next year; they will only be performed by territorial inspectorates.

### Inspection of entities with harmful substances

This type examination checked how entities handling harmful substances adhere to their duties under Section 39 of the Waters Act in particular, and how entities discharging wastewater containing especially hazardous harmful substances into sewerage or watercourses adhere to the requirements of their respective permits to discharge wastewater. At the same time, these examinations checked the overall legal status of the entities and their adherence to the other requirements of the Waters Act.

We performed 88 inspections. In 15 cases, the CEI identified violations of duties under the Waters Act and initiated or will initiate administrative proceedings against the entities. So far, 9 of the decisions have become final and conclusive and impose fines totalling CZK 520,530. Most of the fines were imposed for failure to meet requirements of water management agency permits, handling harmful substances without approved accident plans or without due security measures preventing release of the harmful substances into the soil, groundwater or surface waters. In some cases, where there was an immediate threat to water, the CEI ordered remedial measures on the spot.

The greatest fine, amounting to CZK 400,000, was imposed on EUROCHEMIE, s.r.o., which had committed three

administrative delicts against the Waters Act, namely storing of harmful substances without consent of a water management authority and without an approved accident plan, and not securing the facility in which the harmful substances were stored against accidental release of the harmful substances.

Inspections of adherence to duties when handling harmful substance are performed not only as part of the departmental tasks but also under other inspections. Here, too, the most common shortcomings identified involve storage and handling of harmful substances in spaces that are not adequately secured against water contamination, and operation without approved accident plans and prescribed tightness tests. We will continue the inspection in this area.

### Inspection of operation of small hydropower plants

Inspections of operation of small hydropower plants (SHP) focused on respecting of minimum residual flow (MRF) and other requirements of the Waters Act. As part of our departmental task, we chiefly reviewed the following: existence of valid water management permits for water handling, handling and operating rules approved by water management authorities, technical measures to ensure MRF, practical respecting of MRF, assured migration paths for fish, and methods of storage and handling of harmful substances (oils, greases, etc.) in SHPs. Information obtained in the inspections is stored in a database in an extent as required by the MoE.

We inspected 68 SHPs in 2011. Based on our inspections, we issued 9 decisions on fines totalling CZK 142,000; 5 of the administrative proceedings have not been concluded to date, and one initiated administrative proceeding ordering remedial measures was halted (the entity implemented the measures before the order was issued). Some of the SHP operators eliminated minor shortcomings before the initiation of the administrative proceedings ordering remedial measures, meaning the proceedings did not have to be initiated.

The chief shortcomings identified in the inspections were as follows: water handling permits not limited in time (33 cases), handling rules not developed or approved by water management authorities (10 cases), MRF not respected (8 cases), water level readers or marks installed wrongly or missing altogether (approx. 25%), and valid water handling permits missing (2 cases).

## OVERVIEW OF PERFORMANCE OF SPECIFIC TASKS – SUMMARY

In performing specific tasks, which are not binding for the whole country, territorial inspectorates focus on problematic areas and activities in their respective regions. We performed 592 inspections under 27 specific tasks in 2011. Almost 63% of the tasks were continuation of similar or identical inspection activities performed in the previous year. Among others, we repeated checks of fuel filling stations, industrial estates and chemical operations, and inspections of point sources of pollution in dispersed development. We periodically check sources in catchment areas of major drinking water reservoirs. In 2012, these checks will be performed under a new departmental task: Inspections of buffer zones of water sources.

As in the previous year, we also found out in 2011 that several years of consistent inspections of pollution sources in the catchment area of the Botič have led to improved quality of surface waters in the catchment area, chiefly thanks to improved process discipline and wastewater treatment procedures. Our findings from performance of the specific tasks resulted in 130 administrative proceedings, including 21 ordering remedial measures. The total amount of fines imposed in the reporting period was over CZK 2,280,000. The amount is not final since several of the administrative proceedings have not been concluded yet.

## MAJOR CASES

### BALTOM, s. r. o.

When inspecting fuel deposits established as part of the remediation of DIAMO lagoons in Ostrava and Sedlišť ve Slezsku and Vratimov, we identified a violation of duties under the Waters Act when handling harmful substances, the qualities of which the fuel has based on analyses performed. On the Vratimov site, the entity handled at least 5,000 tonnes of the fuel without an existing and approved accident plan, and the fuel was stored in an area that was not secured against hydraulic releases into the environment. Based on these facts and considering that no adverse effects on water and rock environment were identified, we imposed a fine of CZK 500,000 on the entity, which was affirmed by a body of appeal. The administrative proceeding in progress based on our findings from the deposit at Sedlišť ve Slezsku has not been concluded to date.

### „ZEPIKO“, spol. s r. o.

In the course of 2011, we handled a submission concerning deposits of the certified product PRESTAB, used in landfill reclamation. The product was deposited in a disused brickfield in Ivanovice na Hané and a sand pit in Orlovce. The macerate from PRESTAB was found to contain an excessive amount of sulphates (10 times the permitted quantity for drinking water), which led us to commission a hydrogeological assessment of the suitability of the sites for depositing the product. According to the assessment, the deposits of PRESTAB at Ivanovice na Hané is not a risk to the environment, and the CEI issued a decision for this site ordering measures to minimize the macerate production. Endangerment to the infiltration area of a groundwater source cannot be ruled in for the Orlovce site, which is why the CEI issued a decision ordering termination of the activity. The body of appeal returned the decision to the CEI for a new discussion. As a result of the discussion, involving additional experts on hydrogeology, the decision ordering termination of the activity was annulled, and the entity shall establish a monitoring system to ensure protection of the infiltration area.

**SETRA, spol. s r. o**

This entity was shown to violate the Waters Act by operating composting plants in Větrný Jeníkov and Vyskytná nad Jihlavou. On both these sites, the operator had failed to implement measures to prevent macerate from the composting plants, which are substances harmful to waters, from leaking out of the sites and entering surface waters or groundwater and operated both the facilities without approved accident plans. Fines of CZK 70,000 for each of the sites were imposed on the entity for violating the Waters Act. The entity appealed against both the fines, and the body of appeal affirmed both the CEI decisions. SETRA, spol. s r. o., then brought a legal action against both the MoE decisions with the Prague Municipal Court.

Another two administrative proceedings against the entity are currently in progress due to its repeated violations of the Waters Act.

**CONCLUSIONS FROM INSPECTION ACTIVITY**

The focus and extent of the inspections in 2011 were identical to those in preceding years. Planning of our inspection activities put an emphasis on inspecting major polluters discharging wastewater plus major industrial and agricultural operations. Our inspection findings indicate that these major sources do not have continuous major problems with observing legislation. This is both due to these entities' responsible attitude towards environmental protection and the systematic activity of the CEI in this area. Most of the problematic cases were the result of non-scheduled inspections performed based on submissions received and accidents. In those cases, the investigation and collection of evidence and other information is much more demanding on both time and administration, and especially cases dealt with based on submissions tend to have less serious environmental impacts.

We continued monitoring and evaluating the current situation in remediation of old environmental burdens throughout the year. However, the eco-tender in preparation resulted in

**1. BALTOM, s. r. o. – Lagoons Ostramo****2. ZEPIKO, spol. s r. o. – PRESTAB****3. SETRA, s. r. o.**

a stagnation in the area; only the most urgent works for which funds are secured are being done.

## 5.3 WASTE MANAGEMENT, CHEMICAL SUBSTANCES AND BIOCIDAL PREPARATIONS

### INSPECTION ACTIVITY IN 2011

Our WMD inspectors performed 3,937 inspections, including 1,095 scheduled and 1,895 non-scheduled. We examined 219 entities operating their activities based on integrated permits. We investigated into 490 submissions received; the CEI forwarded 98 submissions to other state administration bodies and brought 1 criminal charge. Our WMD inspectors were involved in examination of 5 accidents in 2011.

We initiated 907 administrative proceedings for violations identified in our inspections; 894 decisions on fines became final and conclusive. The total sum of the decision on fines that became final and conclusive in 2011 was CZK 48,165,900. Compared to the year 2010, we performed fewer inspections and the total amount of final and conclusive fines was also lower. The chief reason for this situation is that the examined cases are more complex and dealing with them takes more time. Parties in proceedings make increasingly frequent use of the option of being represented by a lawyer. Another reason, of course, is the long-term reduction in the CEI staff.

When collecting information for the performance of all the inspections, all the WMD inspectors make maximum possible use of all the software available to the CEI, especially applications for editing country-wide data from annual reports on waste production and handling. In addition, our WMD staff issued 486 statements for other bodies, 189 position statements for the SEF and 127 audit assessments in 2011.

The good cooperation of the CEI WMD with other state administration bodies continued to grow in 2011. The CEI

WMD mostly cooperates with the MoE, followed by regional authorities, police, customs offices, Czech Trade Inspectorate, SEF, regional hygiene authorities, municipalities with extended powers, and trade licensing agencies. We cooperate on specific cases and make joint efforts at improving relevant legislation.

As concerns international cooperation, WMD representatives annually participate in both conferences held by the international non-profit organization IMPEL and events organized as part of projects in which the CEI WMD has long been actively involved. The CEI represents the Czech Republic in Enforcement Action III, a project aiming, among other things, at achieving a unified inspection procedure for inspection agencies in the EC member states and consistent punitive action against illegal transboundary transport of waste, as well as “Waste Sites”, a project focused on inspecting waste handling facilities. Concerning chemicals and the REACH Regulation, the CEI (thus the Czech Republic) has a representative in the Forum of the European Chemicals Agency.

The CEI WMD workers met the annual plan of inspection work for 2011. They performed a substantial portion of their inspection work in a non-scheduled fashion or based on hundreds of submissions. The number of initiated administrative proceedings on fines and the total amount of fines imposed attest that systemic inspection of waste management is indispensable, since many problems persevere in this area. The results of the inspection activity in 2011 indicate that adherence to legal regulations in force is a precondition for respectable and successful business in waste management.

### OVERVIEW OF PERFORMANCE OF DEPARTMENTAL TASKS

#### Waste disposal and processing facilities

As part of this departmental task, we inspected landfills, incinerators, waste reuse facilities and illicit dumps for

building and demolition waste and unpermitted ground shaping. We also inspected burning of waste.

We performed 320 inspections in 2011 (165 scheduled, 155 non-scheduled), including 79 based on submissions received. The amount of fines imposed as of the end of the last year was CZK 4,538,000. We inspected 159 landfills. We initiated 21 administrative proceedings and issued 15 final and conclusive decisions on fines. The total amount of fines as of the end of the year was CZK 1,705,000. We also inspected reclaimed landfills and disused landfills in follow-up maintenance. The most frequent violations include failure to perform monitoring, exposure of the seal layer in disused landfills, absence of a reclamation soil layer, and damaged geotextiles and seal sheets. In active landfills, we identified insufficient overlay and compaction of deposited waste, admission of unpermitted waste, waste elimination outside the secured landfill area, failure to sample seepage water, failure to transfer funds to bound accounts, and wrong deposits of asbestos-containing waste. We also imposed a penalty for failure to inform relevant bodies of a critical situation.

In addition, we inspected 21 waste incineration plants. We initiated 5 administrative proceedings imposing fines and issued 5 final and conclusive decisions. The fines totalled CZK 355,000. Our inspections of the waste incinerators only identified sporadic violations of legal obligations. Generally, they concerned failure to adhere to the facility operating rules.

Moreover, we checked 40 waste reuse facilities. We initiated 4 administrative proceedings imposing fines and 4 decisions became final and conclusive, totalling CZK 355,000. The CEI also focused on reviewing certificates on exclusion of hazardous properties of the waste.

Another 100 inspections were performed in other facilities. We initiated 31 administrative proceedings and imposed 25 conclusive fines totalling CZK 2,283,000. They mostly concerned cases of illegal waste disposal, unpermitted ground

shaping using waste, and burning of waste. Several fines were imposed in transgression proceedings.

### Waste reuse facilities

We inspected waste processing (reuse) facilities whose outputs are reported as “non-waste” (production of fuels from waste, production of recycled materials), as well as facilities reusing used tyres, processing biodegradable waste and reusing waste for ground surfacing. Out of the 279 inspected entities, 73 checks were performed based on submissions received. We initiated 69 administrative proceedings and 65 decisions became final and conclusive. The total amount of conclusive fines was CZK 6,571,000.

We identified frequent violation of the Waste Act in the sphere of waste reuse when inspecting the waste handling in reclamation projects, mostly failure to adhere to facility operating rules and transgression of limits for their use on the ground surface. Other major violation of the law was identified in handling sludge from municipal wastewater treatment plants in composting plants (failure to observe work procedures and keep records).

### Waste collection and repurchase facilities

Our inspections examined 231 stationary waste collection and repurchase yards, mobile waste collection facilities, collection points and municipal recycling yards. Among other things, the inspections focused on duties connected with the collection and repurchase of non-ferrous metals, plastics, paper, tyres, batteries, construction and infectious waste; illegal admission of car wrecks, electrical waste or parts thereof; and illegal dismantling of electrical devices and electrical waste.

Out of the total, 103 inspections were scheduled and 128 non-scheduled, including 62 based on submissions. We initiated 99 administrative proceedings imposing fines and 140 decisions and orders of fines, totalling CZK 13,465,000, became final and conclusive in 2011. There were two fines of CZK 1,000,000 each; the highest fine imposed was CZK 1,100,000.

The most common violations included operating waste collection and repurchase facilities in conflict with approved operating rules, waste handling in facilities and locations that are not designed for waste handling under the Waste Act, illicit acceptance of waste, failure to keep mandatory records, and failure to furnish complete reports on waste production and handling. We found out again that some regional authorities approve some entities' operating rules that are not entirely in compliance with the Waste Act. It is difficult to penalize such cases as the entities act in good faith, unaware of their violation.

### **Facilities for collection, repurchase and processing of car wrecks**

In 2011, the inspectors of all our territorial offices performed 94 on-site examinations; 42 entities were inspected based on the schedule and 52 outside it, including 24 examinations based on submissions received. We initiated 34 administrative proceedings imposing fines and 49 decisions and orders of fines, totalling CZK 2,503,500, became final and conclusive.

Our inspections found out that there is a very widespread method where natural persons licensed as entrepreneurs dismantle car wrecks, often on a large scale, in facilities that are not designed for this operation under the Waste Act; in many cases, passenger cars were even dismantled by natural persons without a trade licence. A major recent finding is that some facilities for collection of car wrecks issue hundreds of confirmations of environmentally friendly wreck disposal without admitting any of the cars in question for disposal. The wreck disposal confirmations are frequently issued on admission of an incomplete car or only a part. The current methods of car wreck handling are substantially aided by the unclear formulation of duties of operators of facilities for collection and processing of car wrecks in the Waste Act.

### **Collection of used products**

We performed 144 inspections of collection of used products: electrical devices, batteries, tyres and oils. The inspections were scheduled based on our findings in previous years and generally focused on the performance of the collection duty by individually performing manufacturers of electrical devices and batteries and entities obliged under Section 38 of the Waste Act, and the performance of the collection duty by end sellers. We conclusively ordered 23 fines totalling CZK 347,000.

### **Electrical devices and electrical waste**

The CEI again dealt with cases of free riding (entities that fail to contribute to the electrical device collection and processing system alongside the other manufacturers) and manufacturers' failure to contribute towards collection of so-called historical electrical devices. We performed 74 examinations and initiated 21 administrative proceedings on fines. The total amount of final and conclusive fines was CZK 187,000.

### **Collection of other used products: batteries, tyres and oils**

Our inspections focused primarily on battery manufacturers' and sellers' duty associated with the transposition of the Battery Directive. The inspectors also collected samples of batteries and storage batteries (AA and D cells and button cells) with the objective of verifying whether they meet the legislative requirements on heavy metal content. The analyses confirmed that batteries non-compliant with the requirements on cadmium or mercury still arrive on the market sporadically, mostly from Asia. However, it is sometimes difficult to identify the importers.

We performed standards inspections of obliged entities and end sellers of tyres and oils as well as entities processing these commodities. We performed 83 inspections of entities obliged to perform a system of collection of used batteries, tyres and oils. We performed 13 inspections of battery manufacturers, 6 inspections of obliged entities (tyres, oils), 62 inspections of end sellers of these commodities, and

2 inspections of tyre processing entities. We initiated 12 administrative proceedings and imposed final and conclusive fines totalling CZK 160,000. The most common violation concerning portable batteries was inappropriate information to consumers about the possibility to bring used batteries to a collection point or the shop itself. The system for collection of used portable batteries is very well-implemented and widespread in most cases. Our on-site inspections indicate that the system for collection of used tyres in tyre garages is the least functional; often they will only exchange them “piece for piece”. This long criticized situation is partly the result of poor legislation and partly caused by the fact that there is no collective system for this commodity.

### Inspections of industrial facilities and other waste originators

Inspections of waste originators focused on a wide range of business activities and plans. We inspected large companies as well as medium-sized and small ones. We performed 1,037 inspections, including 183 based on submissions. We initiated 290 administrative proceedings on fines for all the violations identified. The total amount of the 286 conclusive fines was CZK 9,548,000. The highest fine imposed was CZK 500,000.

The inspections primarily focused on originators of hazardous types of waste, originators of large quantities of waste, and we also performed checks in follow-up on discrepancies identified in the data from annual waste production and handling reports. We also inspected large retail chains, focusing chiefly on their adherence to the Waste Act, especially waste separation, production of hazardous waste and conferring waste to authorized entities. Municipalities were another category of waste originators on which the CEI focused in 2011. We inspected the duties of municipalities as the originators and holders of waste and their handling of collected used products.

Based on a request of the MoE, we performed an especial inspection project, limited in time, focusing on obliged entities

and their duties concerning PCB handling. The purpose of the inspection project was determine the real performance of the obliged entities’ duties concerning the disposal of PCB-containing devices or their decontamination by the end of 2010. We inspected 52 entities under this project. It resulted in 14 administrative proceedings, and the final and conclusive fines imposed so far have totalled CZK 110,000. However, a number of these cases are still being investigated.

### Inspections of performance of duties under the Packaging Act

We examined 155 entities dealing with importation, transboundary transport or manufacturing of packaged goods. We conducted 73 administrative procedures for the violations identified; 68 decisions became final and conclusive. The total amount of the penalties imposed conclusively was CZK 1,840,000.

The highest penalty of CZK 445,000 was imposed conclusively for failure to perform duties in importation and transboundary transport of packaged parts for automotive manufacturing. According to CEI findings, the company introduced thousands of tonnes of packaging to the market in this way, while failing to submit an application for the List of Entities on time, keep records pursuant to the Decree, and arrange reuse of the waste from the packaging.

Our inspections identified serious violations concerning the setting of the packaging waste handling system – their reuse, to be precise. We imposed two penalties for these violations of CZK 250,000 each. We imposed penalties of tens of thousands of CZK as a result of submissions made by customs offices concerning importation of packaged goods. We also inspected retail chains that sell packaged goods to consumers (chemists, groceries). The goods are largely imported from Germany.

We can conclude that our inspections of performance of duties under the Waste Act identify ever more serious violations.

### Inspections of adherence to the Chemicals Act

We inspected 658 entities for compliance with the Chemicals Act in 2011. The selection of entities to inspect was made by territorial inspectorates. The inspections under the Chemical Act involved supervision over the classification, packaging and labelling of dangerous chemical preparations (367 entities), supervision under the Detergent Regulation (18 entities), and supervision under the REACH Regulation (273 entities).

In addition, the CEI performed inspection as part of the RAPEX system (155 entities). The inspections were performed based on notifications provided by the Ministry of Industry and Trade. Out of the 16 notifications examined, the CEI identified two products sold to consumers in the Czech Republic: a product called “Super Glue” containing excessive toluene and chloroform, and a glue in a car tyre repair kit.

The CEI focused some of its inspections in 2011 directly on classes products that pose a chemical risk to consumers. They were mostly caustic products designed for household cleaning and swimming pool chemicals. Our inspectors imposed 12 fines totalling CZK 280,000.

In the second quarter of 2011, our territorial inspectorates performed checks of duties to inform on SVHC content in objects (“substances of very high concern” identified as carcinogenic, mutagenic, toxic to reproduction, persistent or bioaccumulative; see <http://echa.europa.eu/web/guest/candidate-list-table> for a list). We inspected 27 entities that mostly supplied plastic products containing phthalates. We identified violations of Art. 33 of the REACH Regulation in 5 of the entities. We imposed 5 fines totalling CZK 50,000.

A total of 161 decisions on fines for violating the Chemicals Act became final and conclusive in 2011. The total amount of fines was CZK 3,965,500. The highest conclusive fine was CZK 480,000. The fines were imposed for non-compliance with the requirements of the Chemicals Act, chiefly classification of chemical preparations and inappropriate packaging and labelling of dangerous chemical preparations.

Some of the companies failed to perform their duties under the REACH and Detergent Regulations. The CEI plans to perform inspections under the Chemicals Act on a predefined class of products again in 2012 because the inspection method has proven effective.

### Inspections under the Biocidal Preparations Act

The CEI inspected 50 entities under the Biocidal Preparations Act in 2011, and identified 9 violations of the Act. Failure to perform the requirements of the Act mostly consisted in inadequate labelling of biocidal preparations. Thirteen decisions on fines became conclusive in 2011, totalling CZK 160,500.

## OVERVIEW OF PERFORMANCE OF SPECIFIC TASKS – SUMMARY

The territorial inspectorates focused on how municipalities, medical and care facilities, agricultural and food processing operations and logistics centres handled their waste.

We performed 106 on-site examinations and initiated 42 administrative proceedings on fines based on the violations identified; 46 fines totalling CZK 1,815,500 became final and conclusive.

### MAJOR CASES

Like every year, our WMD inspectors handled a number of cases deserving of special commentary in 2011. All the cases which resulted in the impositions of fines of CZK 100,000 and more can be regarded as significant. Here, let us only mention a few of the most significant cases; you can find all the others on the CEI website.

#### ALFA GREEN POWER, s.r.o.

This company – an entity not authorized to handle waste in the Ústí nad Labem Region – had at least 800 tonnes of plastic and rubber waste trucked from Germany to a disused cow house in Libčevěves between January and March 2011, and handled

the waste without permission on the site until July 2011. Approximately 100 tonnes of the waste was stored in a locked building on the site; the remaining approx. 700 tonnes were deposited in a disused silaging pit. Among other things, the company failed to secure the waste from catching fire (which had occurred on the site repeatedly in 2006), posing an environmental hazard. The company failed to cooperate duly with the CEI, failed to furnish required documentation upon being invited to, and its proxy resorted to rude abuse of the CEI staff in his utterances. A final and conclusive fine of CZK 1 million was imposed on the company. All the waste has been trucked back from the site to Germany.

#### KOHOUT invest v. o. s. – “Závrbek” ground shaping

An inspection identified that a massive extraction of thick layers of bedrock gravel had taken place in the facility (frequently up to 5 metres deep under the natural ground surface) resulting in exposing the groundwater level, although the operating rules permitted removal of a gravel layer 50–60 cm thick. In consequence of violating the facility operating rules, an administrative delict pursuant to Section 66, Para. 3, item d) of the Waste Act, a decision ordering KOHOUT invest v. o. s. to pay a fine of CZK 5 million was issued on 29 June 2011; State Administration Executive Department VIII later reduced the fine to CZK 4.5 million in an appeal procedure, and its ruling became final and conclusive on 31 December 2011.

#### CONCLUSIONS FROM INSPECTION ACTIVITY

The WMD inspectors fulfilled the inspection work schedule for 2011 and, in addition to the scheduled checks, they performed numerous others based on submissions made by the public and other administrative bodies. The evaluation of both the departmental and specific tasks shows that, in spite of an improvement in the adherence to regulations in force, it is still necessary to perform continuous and periodic supervision over all types of waste handling facilities and a wide range of waste originators. The fines imposed, amounting to several million CZK in some especially serious

#### 1. LIBČEVES



#### 2. ZÁVRBEK



cases, show that some business entities do not intend to respect legislation in force properly. In serious cases, the CEI does not hesitate to employ the institute of so-called coercive fines pursuant to the Rules of Administrative Procedure in the events of neglect of remedial measures ordered. A fine imposed in this way may reach up to the estimated costs of implementing the remedial measure. On the other hands, these procedures are only applicable in certain cases.

Compared to 2010, we performed fewer inspections and the total amount of final and conclusive fines was also lower. The chief reason for this situation is that the examined cases are more complex and dealing with them takes more time. Parties in proceedings make increasingly frequent use of the option of being represented by a lawyer. Another reason is the long-term reduction in the CEI staff.

Business in the area of waste management is still economically attractive. However, set rules always have to be observed. Our inspection practice in 2011 showed that a considerable portion of businesses adheres to legislation in force in spite of its frequent amendments. Nevertheless, the potential profits sometimes motivate businesses to conduct activities outside the legal scope. The CEI has always attempted, and will attempt to apply in its administrative punishment the fundamental principle that criminal activity must not pay off for anyone.

## 5.4 NATURE PROTECTION AND CITES

### INSPECTION ACTIVITY IN 2011

The NPD performed 945 scheduled and 1,346 non-scheduled inspections of entities in 2011; the complete inspection activity comprised 2,628 examinations. The scheduled work involves the performance of departmental and specific tasks. The non-scheduled work is the result of submissions received and own findings from our inspection work.

Compared to previous years, the noticeable trend of increasing numbers of submissions examined was halted in 2011 for the third year in a row. The number of submissions received decreased from 1,140 to 951, representing a 17% decrease. In spite of that, the amount of the work is massive and it limits our capacities for other activities. The structure of the cases remains almost invariable; it still comprises almost all of the interests protected by the law. With certain regional deviations, the legitimacy of the submissions was 30 to approx. 50%, meaning the CEI proceeded to investigation into the submissions in nearly one half of the cases; transgression or administrative proceedings followed. The reduction in the total number of submission was often offset by the complexity of the ensuing dealing with the unlawful conduct identified. A minor portion of the submissions were handled by the NPD in cooperation with other CEI units.

As is customary, most of the submissions concerned protection of trees outside forests, involving unauthorized felling and harmful tree cutting. The second most numerous category of submissions concerned species protection, with a significant increase in issues of swift and bat protection when lagging prefabricated buildings. Another substantial category included various harmful activities on specially protected nature sites and suspicion of harm to prominent landscape features.

The NPD issued 616 administrative decisions in 2011, including 415 on penalties, 35 ordering remedy, and 108 ordering restriction or discontinuation of activities. The total amount of the fines imposed was CZK 11,005,550, including CZK 9,832,000 to corporate entities or entrepreneurs and CZK 1,173,550 to natural persons. We issued 58 decisions on confiscation of unlawfully kept specimen and 24 preliminary measures. The number of criminal charges also decreased.

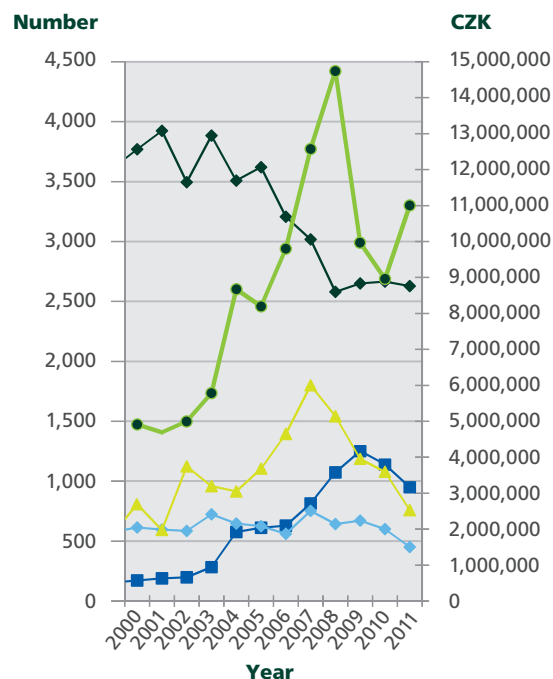
The total amounts of fines imposed by the territorial inspectorates is influenced by the total numbers of decisions issued, the nature of the cases, the quality of state administration execution and, last but not least, the steps taken by the MoE in the appeal proceedings. The consistent

preventive work of our NPD inspectors is no less important. In 2011, the NPD developed 748 position statements on the issues of assessing the environmental impacts of plans. Although the EIA agenda has been transferred to the Integration Department, which reports on this activity, the time and expert demand remains on the expert departments. Almost each of the documentations has to be studied closely regardless whether the project is simple and to occur in a place with little natural wealth or will affect a lot of natural wealth. Plans concerning the development of industrial facilities, wind power plants and linear transport and energy structures are among the most complex. Their most common deficiency is the absence of biological surveys or their professional or temporal incompleteness, as well as disrespect to the requirement on preserving landscape character. Another recurrent problem is the division of certain major investment projects into smaller components to achieve assessment of the environmental impact of its components rather than the complete project, or to avoid the assessment altogether. The NPD furnishes comments to approximately one half of the projects submitted; sometimes they are quite fundamental or require the extension or reworking of the documentation. To a lesser extent, the CEI also furnishes position statements on documentations pursuant to the Building Act, for which the CEI admittedly is not a relevant authority but often it can prevent violation of law during the construction. The NPD also forwards submissions to other relevant state administration bodies. These mostly include requests for reviews of decisions made by municipal authorities, requests to remedy or provide protection in specially protected sites, and submissions for building authorities and agricultural land fund protection agencies.

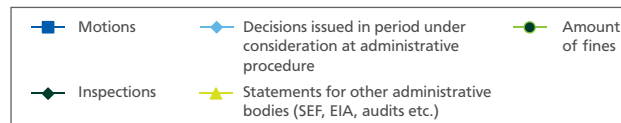
The CEI issued 18 criminal charges for the Czech Police concerning nature and landscape protection in 2011. In addition to cooperating with the Czech Police, the CEI most often turns to the Agency for Nature Conservation and Landscape Protection (ANCLP), chiefly as part of on-site investigations and consultations and when commissioning professional assessments. Moreover, the CEI cooperates with

other nature protection agencies at the municipal and regional level as well as the MoE bodies of appeal (State Administration Execution Departments) and various scientific agencies, the Ministry of Agriculture, and customs offices. The NPD runs international cooperation mostly in connection with handling CITES and GMO-related cases.

### Development of performance index of NPO



Caption



## TRADE IN ENDANGERED SPECIES – CITES

CEI inspectors performed 435 checks pursuant to Act no. 100/2004 Coll. (CITES) in 2011. 66% of the checks were related to importation and exportation via international airport and customs mail, i.e., international trade in endangered species. Concerning imported and exported CITES specimens, 29.5% of the checks identified legal violations, meaning one in every 3–4 shippings were not in order. The CEI conducted 118 proceedings on fines; the total amount of fines (final and conclusive) imposed for CITES was CZK 501,100. In addition, we conducted 56 proceedings on confiscation of specimens, and we confiscated 389.

The CEI assisted in 9 house searches and actions performed by bodies involved in criminal proceedings; CEI inspectors were involved as expert consultants. This series of actions dealt with illegal trade in rare parrot species, which has been investigated into in the Czech Republic for several years.

The CEI Headquarters International Biodiversity Protection and CITES Inspection Department primarily deals with the international segment of the CITES Treaty (inspecting imports, exports and international cooperation), investigation into serious violations of law, and cooperation with bodies involved in criminal proceedings; it also provides other CEI inspectors with expert services. At present, it runs 63% of all the CITES inspection work of the CEI.

We continue our successful cooperation with the Customs Directorate as part of the Permanent Special Working Group, which was set up in 2007. We have been attempting at intensifying our cooperation with the Czech Police and establish contact with the judiciary segment of state administration – public prosecutors and judges. In 2011, we organized the 4<sup>th</sup> year of the seminar on Enforcing the CITES Treaty in the Czech Republic, intended for inspectors, police, customs officers, public prosecutors and judges. The seminar presented major current cases, new trends in the CITES area, applicable forensic methods, etc. We also developed a

teaching textbook Enforcing the CITES Treaty, to be distributed among state bodies enforcing the law in this area. In addition, we also produced a short film about the CITES Treaty and the CEI work, which was translated into English as well.



### Genetically modified organisms (Act no. 78/2004 Coll.)

We performed 39 inspections of 2011, including 17 focusing on field trials and 22 on entities handling GMOs in the closed cycle regime in the 1<sup>st</sup> and 2<sup>nd</sup> risk categories. In addition, we made 19 examinations based on submissions concerning failure to report the growing of MON 810 maize, permitted for circulation, for which we imposed 12 fines for failing to perform the reporting duty towards the MoE pursuant to Section 23, Para. 3 of the GMO Act, totalling CZK 60,000. We also handled with a submission concerning the existence of so-called “green-eyed rats” with a proven presence of GM modification among private keepers. This submission is still being investigated. We also performed two examinations as part of monitoring the occurrence of Amflora GM potatoes (permitted for circulation), which were flushed off some fields in 2010. These inspections were performed in cooperation with ÚKZÚZ staff.

The inspection activity was governed by internal schedules of the CEI TIs based on CEI HQ recommendations. The inspections focused on entities which had not been checked for three or more years and new entities that handled GMOs based on notifications or applications. In addition, we inspected almost all of the MoE-permitted field trials in progress. They were mostly field trials of transgenic maize, potatoes, Stanley plum trees, flax, peas, barley, sugar beet, and tobacco. Some of the field trials of GM maize had been cancelled or halted by the respective companies.

The checks, both scheduled and non-scheduled, performed in 2011 did not identify any deficiencies that would pose a threat to the environment or be serious legal violations. Our inspections mostly identified minor administrative shortcomings pursuant to Act no. 78/2004 Coll. or Decree no. 209/2004 Coll., which the inspected entities typically eliminated either immediately or by the deadlines set by the CEI.

We continued our cooperation with the Slovak Environmental Inspectorate (SEI) Biological Safety Department on GMO issues in 2011. A CEI representative participated in the

joint conference of EEP (European Enforcement Project on Contained Use and Deliberate Release of GMOs), an association of GMO inspectorates of the EU countries, in Lucerne, Switzerland. The conference is held annually in order to unify GMO inspection procedures as well as propose possible changes or amendments to legislation within the EU and exchange information on inspection practice in the EU countries.

### Zoological gardens (Act no. 162/2003 Coll.)

The CEI performed inspections in zoological gardens in connection to periodic inspections in licensed zoos organized by the MoE IPBD along with the MoE Zoo Committee. We inspected 10 zoological gardens in 2011. One of the zoo inspections identified deficiencies in conflict with Act no. 114/1992 Coll. and Act no. 100/2004 Coll., thus de facto with the conditions of the licence for the zoo operation, and Act no. 162/2003 Coll., which all fall within the jurisdiction of the CEI inspection work. The zoo kept tens of species of animals without exemptions, and a fine was imposed on it. The CEI also inspected a zoo that had applied for a licence, as part of the licensing proceedings. The inspection identified several shortcomings, but the MoE awarded the licence for two years after they were eliminated.

#### Elephants in ZOO Lešná



## OVERVIEW OF PERFORMANCE OF DEPARTMENTAL TASKS

### Supervision over observance of the Nature and Landscape Protection Act by municipalities with extended powers in executing devolved state administration

The CEI's supervisory power in this area is based on Section 80, Para 1 of Act no. 114/1992 Coll. on Nature and Landscape Protection. The task was included in the CEI work schedule based on findings of insufficient quality of execution of state administration by municipal authorities, which eventually has a major impact on protected interests, especially in the sphere of general nature and landscape protection with an impact on the functions and form of landscape. We performed 20 instances of supervision over the work of the authorities. The overwhelming majority of the authorities accepted the supervision results, only Uherské Hradiště Municipal Authority filed objections to the report; Brno TI later decided on them by dismissing them as unjustified.

The quality of execution of state administration in nature and landscape protection by municipal authorities with extended powers can be evaluated in two ways. From the point of view of their ability to execute state administration properly, we can say that the authorities lack the fundamental understanding that nature and landscape protection, being a public interest, is among the fundamental human rights and cannot be subordinated to the rights of individuals or groups that would conflict it. In addition, the authorities fail to observe some basic principles of work of administrative bodies anchored in the Rules of Administrative Procedures, primarily the principle to proceed in a way to identify all the circumstances important for protecting public interests. Most of the administrative deeds issued are purely formal and there can be legitimate doubt about proper protection of public interest. Also, most of the administrative deeds fail to contain justification, information leading to their issuance and considerations made by the administrative authority, meaning they cannot be reviewed. In addition, the authorities violate the principle of applying their powers only for purposes and

to the extent for which they are granted the powers by law or by virtue of law. These deficiencies are influenced by the absence or insufficient quality of methodological guidance from superordinate agencies.

From the point of view of their ability to execute state administration properly, we can say that especially in smaller towns, the positions of nature protection officials are often cumulated with other positions, resulting in these employees having little time to execute nature and landscape protection properly. In addition to the above shortcomings, this results in a purely formal nature of the state administration execution, which is most seriously demonstrated in summary statements within proceedings performed by other administrative bodies. We have also registered adverse effects of the public administration reform, consisting in a systemic bias towards nature protection officers as employees of municipal authorities, again manifested as insufficient protection of public interests chiefly in projects approved by the municipal self-governments. On the other hand, it must be noted that these conclusions do not apply in a blanket fashion to all the supervised authorities, because the quality of nature and landscape protection quality in towns such as Jablonec nad Nisou, Rakovník and Český Krumlov is very good, for which largely the respective officials must be credited. This quality is manifested not only in the administrative deeds issued but chiefly in the landscape as such.

Following the MoE, being the superior authority, the CEI will continue this departmental task in 2012; we will consistently apply the above findings chiefly by making requests to review defective administrative deeds. It is necessary, however, that the MoE above all makes adequate conclusions from the deficiencies identified so that the unified approach of all the methodological, inspection, review and appeal bodies progressively achieves an improvement to the execution of public administration in nature and landscape protection.

### **Inspections of agricultural businesses as part of the Cross Compliance process with a focus on the inspection requirements defined**

In 2011, we performed 270 so-called “cross checks” in 254 agricultural businesses, where we assessed their adherence to the legislative requirements on their business in order to maintain favourable farming and environmental conditions as per the common agricultural policy of the European Communities. Within that number, 185 inspections concerned the adherence to requirements of Directive 79/409/EEC on the conservation of wild birds, where we assess the observance of the legal protection of trees, prominent landscape elements of watercourses and flood plains, and nesting birds, which are also protected from disturbance and killing. The remaining 85 inspections concerned the arrangements for protection of the objects of protection in Special Areas of Conservation, being a requirement of Directive 92/43/EEC on the conservation of natural habitats. As is customary, the inspections focused on land plots with trees outside forests, areas connected to watercourses and flood plains, and areas defined in the LPIS as nesting areas for corn crakes and waders. We deliberately chose plots with free-range cattle grazing and grassland with special management regimes according to the settings of the AEO EAFRD subsidy scheme. Increased attention was paid to plots overlapping with SACs and SPAs.

None of the entities inspected was proven to have committed violations so serious as to propose a subsidy reduction for violation of set rules. The less serious deficiencies were handled by way of recommendations and requirements in the inspection findings reports, setting out the method and deadline for eliminating them. Specifically, representatives of several of the businesses were warned about the risk of free-range cattle grazing concerning protection of trees and watercourses on their plots. The CEI recommended the businesses to take measures to prevent direct contact of farm animals with the watercourses, trees and wetland enclaves. Implementation of these measures should prevent excessive damage to the trees and prominent landscape features

of watercourses and flood plains. We have occasionally performed follow-up checks of implementation of these recommended measures. Analogously, the CEI pointed out other potential risky activities which might result in violations of the Nature and Landscape Protection Act or proposals for subsidy reductions. Sporadically, we registered harmful interference with trees outside forests, but this was mostly outside the farmed plots. In one case, the CEI filed a suggestion to an Agricultural and Rural Agency to examine the legitimacy of drawing on a subsidy in connection with the premature scything of about one third of a meadow defined as a corn crane nesting ground.

### **Inspections of taxidermists and goshawk keepers**

We inspected 19 taxidermists in all of the Czech Republic. During these checks, we seized or confiscated 29 animal specimens from 3 entities. We imposed one fine amounting to CZK 1,000. The current legislation concerning taxidermy is absolutely unclear when it comes to relevant authorities issuing exemptions for cadavers of specially protected species and European birds found in the Czech Republic. We will therefore initiate dealings with the MoE as to the procedure in such cases.

This departmental task also involved inspection of 26 goshawk keepers. Only one specimen was confiscated from one keeper because of failure to prove its origin (open ring with symbols different from those shown in the specimen's papers furnished), but the decision on confiscation had not become final and conclusive by the end of 2011. The inspections of the keepers were comprehensive, focusing not only on goshawks but on other birds of prey kept as well. We identified three cases of neglect of the period for re-registration of falcons and some deficiencies in breeding records and failure to return to the issuing authority a confirmation of exemption on the ban of commercial activity concerning perished or nonexistent falcons. We imposed fines totalling CZK 5,500 for these legal violations. We will continue inspecting goshawk keepers for records of their breeding achievements.

**Inspections of preliminary and basic protection of SACs (pursuant to Sections 45b and 45c of the NLPa) with selected objects of protection in connection with inspections of compliance of management and other human activities with Act no. 114/1992 Coll., especially Section 45b, Para 1 and Section 45c, Para 2 of the NLPa**

We inspected 107 Special Areas of Conservation and sites with the presence of selected species of European importance in 2011. Most of them concerned sites with amphibians as the object of protection; some of them were re-examinations of SACs inspected in the previous year. Other numerous inspections involved SACs with the presence of bats, Bohemian dwarf gentian, stone crayfish, hermit beetle, and yellow lady's slipper. We also inspected sites declared to protect plants bound to serpentinities (the mouse-ear chickweed, ladder spleenwort, and Sudeten bedstraw), the moss grass, *Rosalia longicorn*, and the dusky large blue butterfly. Sites with the presence of the Jersey tiger, *Hamatocaulis* moss, large white-faced darter, brook lamprey, freshwater pearly mussel, and tartar sea kale were relatively less represented. All the inspections focused on ascertaining the condition of the sites, identification of potential adverse impacts on the objects of protection, and examination of the compliance of management and other activities with the law. The plan prioritized sites and objects of protection potentially endangered by human activity.

The inspections of sites for amphibians led to conclusions similar to those in the previous year. Most of the were proven to support the respective objects of protection, but adverse impacts resulting in decreased populations of the species in questions were registered. Most often, we registered increased eutrophication due to fertilizers or municipal waste discharges, excessive predatory pressure from the fish population, proofs of breeding, feeding or hunting semi-wild ducks, backfilling of pools, and construction or dumps near watercourses. With few exceptions, we failed to identify the responsible entities. In one case, we found a fishpond built without the approval of the relevant nature protection authority, for which we imposed a fine of CZK 10,000

on the natural person. Another administrative proceeding on a fine and ordering remedial measures was initiated in connection with an illegal construction of a cycle path in an SAC. In another case, we managed to agree with the owner to catch out the fish that was proven to adversely affect the object of protection. One inspection identified management without a relevant water management permit and became the basis for another investigation by the Water Protection Department. Some of the on-site examinations resulted in proposals to perform management interventions and add newly identified species to the objects of protection.

The results of the inspections of SACs with the presence of bats were relatively favourable concerning the winter and summer colonies in Moravia. However, the condition of the summer colonies in North Bohemia is rather alarming: all the three SACs with home colonies inspected were not populated at all in 2011. A number of other regularly populated colonies in the Liberec Region fared similarly; the reason for the changed preference of the species in question (chiefly the greater mouse-eared bat) is unknown to date. Nevertheless, the inspections identified no actual legal violations.

One of the two sites for the *Hamatocaulis* moss inspected is in an absolutely inconvenient condition. The condition of the site does not comply with the biological demands of the object of protection and is also in conflict with the ANCLP management recommendations. The absence of signs and strip markings will be the subject matter of our dealings with the relevant regional authority. During one of the inspections focusing on the stone crayfish, a road breast wall was being renovated without possessing an exemption from the ban or a binding statement of the nature protection authority. In conflict with the law, the regional authority issued the exemption from the ban on the completed construction later on. The authority's action will be discussed in a separate process.

Most of the other inspections identified convenient conditions on the sites; there were several cases of slightly adverse or only potential impact of management on the presence of

the objects of protection in SACs, but no illegal action was identified. The target species was not present in some of the sites. In general, the inspections resulted in certain measures against the managing entities and respective regional authorities.

## OVERVIEW OF PERFORMANCE OF SPECIFIC TASKS

### General protection

The CEI regards inspections of state administration execution in municipal authorities, especially inspections of proceedings permitting felling of trees and substitute plantings (within the jurisdiction of České Budějovice, Liberec, Brno, Havlíčkův Brod, and Prague TIs), as an important component of prevention. The inspections found out that many of the decisions issued showed more or less serious formal deficiencies. Decisions concerning tree felling tend to be insufficiently specific (trees to fell, applicants and parties to the proceedings), and sometimes unjustified and impossible to review. There have also been problems with documenting proprietary titles, permits for felling only by means of informal letters, and tree shaping, which is also not a proper method. The overwhelming majority of municipal authorities does not make use of Section 9 of the Act, failing to impose substitute planting. The authorities inspected were invited to remedy the deficiencies and provided with methodological assistance in performing their powers pursuant to Act no. 114/1992 Coll. The CEI is going to inform the respective superordinate nature protection authorities about some of its findings. We initiated one administrative proceeding based on an inspection, but it had not been concluded by the end of 2011.

Inspections of implementation of the substitute planting orders (50 checks by Liberec, Ostrava, Brno and Prague TIs) showed that most of the substitute plantings inspected had been implemented. There were 4 instances of violation of the law, and 3 resulted in fines. Based on a request by the HQ, we performed inspections of tree felling in selected urban parks. The choice was based on information obtained from the

media. The instances of felling in question had been based on valid decisions on felling; some of the projects are under preparation and will be implemented in 2012.

Inspections of performance of remedial measures and requirements on activities defined in CEI decisions issued pursuant to Section 66 and 86 of Act no. 114/1992 Coll. (10 checks within the jurisdictions of České Budějovice, Liberec and Ostrava TIs) found out that the overwhelming majority of requirements defined in CEI decisions had been met. The deadline was not adhered to in one case; the CEI initiated a transgression proceeding against the entity.

Inspections of OPENV subsidies (6 entities checked by Brno TI) focused on adherence to the NLPA when implementing projects, i.e., felling of trees outside forest in compliance with Section 1, Para. 1, approvals to intervention in prominent landscape features pursuant to Section 4, Para. 2, and any other approvals or statements by relevant nature protection authorities, including the ANCLP. The subsidized projects involved the building of wetlands, desilting and renovation of ponds, including construction of littoral zones, renewal of avenues, renewal or construction of landscape structures, and renovation of municipal greenery as part of regeneration of the urbanized landscape. No legal violations were identified.

Inspections of SHP (15 entities checked by Brno and Olomouc TIs) focused on respecting the minimal residual flow below the power plant weirs, i.e., in the segment of the watercourse affected by the SHP operation; no legal violations were identified.

We also performed two scheduled inspections of photovoltaic power plants (under Olomouc TI). One of the inspections identified a legal violation in connection with building the PVP, where some trees outside forest had been felled. A decision imposing a penalty was issued.

As part of our specific task of inspecting the Moravian Karst caves (Brno TI), we performed an inspection in two publicly

accessible caves managed by the Cave Administration and one publicly inaccessible cave. No violations of Act no. 114/1992 Coll. were identified. Neither did we find any violations of the law while inspecting the registered prominent landscape features (Brno, Plzeň and Prague TIs).

### Special protection (territory and species-related)

As part of the task “Inspection of small-scale specially protected sites” assigned to Brno, Havlíčkův Brod, Ostrava, Olomouc, Ústí nad Labem and Prague TIs, we performed inspections of National Nature Reserves, Nature Reserves and Nature Monuments; some of them were joined with inspections of prominent landscape features. Some of the inspections identified insufficient markings and disagreement between the delineation of the sites in the cadastre and in reality; we informed the relevant nature protection authorities thereof. The management interventions were performed in compliance with approved management plans. Some of the inspections proved installation of hunting facilities, farming, recreational exploitation and entrances of motor vehicles. No major legal violations were found. Brno and Plzeň focused their inspections in small-scale specially protected sites on plant damage by deer grazing. The trend of the previous years was confirmed on the inspected sites: up to 20% of the total saplings were damaged. The overall evaluation of the task will be performed once the young trees grow out of the damage-prone height.

Our inspections of preliminary and basic protection of SACs (Brno, Hradec Králové and Ústí nad Labem TIs) mostly examined whether there were any activities that might endanger the objects of protection as specified in the SAC characteristics. None of the inspections identified activities that would be in conflict with the conditions of preliminary protection of Special Areas of Conservation. The inspection content was identical to those under the departmental task but their selection did not follow HQ requests.

Our inspections of compliance with the NLPA in constructing the D8 motorway in České Středohoří PLA (9 examination by

Ústí nad Labem TI) did not find any legal violations. Based on the current stage of the construction project, we decided to terminate this long-term specific task.

Our inspections of memorial trees (23 checks by Brno, Liberec, Olomouc, Ostrava and Ústí nad Labem TIs) found no damage to the trees and unpermitted interference with their buffer zones. In connection with these inspections, we arranged a number of measures with the respective nature protection authorities to improve the trees’ conditions, including safety and remedial cuts. In addition, the CEI found out that some of the memorial trees were not marked properly, and the protection of one of them had been discontinued based on a decision of a municipal authority.

The CEI performed 25 inspections (Brno, Ústí nad Labem and Havlíčkův Brod TIs) focusing on specially protected animals bound to aquatic environments. The inspections examined the protection of amphibians in fire brigade reservoirs and pools, observance of requirements set and operation of privatized reservoirs, prominent landscape features as biotopes of specially protected species bound to aquatic and wetland environments, and decisions issued in connection with interference with protection of specially protected species, chiefly with desilting of ponds that are biotopes for specially protected species. Most of the inspections found no violations of the NLPA, but two administrative proceedings on negligence to exemption requirements were concluded conclusively (totalling CZK 30,000) and one proceeding was terminated.

We performed 8 inspections of winter colonies of bats (Ústí nad Labem and Olomouc TIs) in cooperation with PLAs and the ANCLP. All of the inspections identified sufficient entrance openings to tunnels and no disturbance to wintering animals on the sites or violation of the NLPA. We also focused on monitoring the WNS (white nose syndrome: an infectious fungal disease in bats), which was not confirmed.

We inspected specially protected species under CITES, i.e., taxidermists, keepers and breeders of perching birds, parrots and turtles, trade in animals, caviar and traditional Asian

medicines (Brno, Ostrava, Plzeň, Prague, Ústí nad Labem and Olomouc TIs). See above for the CITES assessment. A substantial part of the inspections under the NLPA concerned common swift biotopes, i.e., compliance with conditions for protection of the species in projects planned, in progress or completed in the previous year. Deficiencies identified were handled by means of reproof and setting of conditions for project completion; we conducted a few proceedings on restriction of activities pursuant to Section 66 of the NLPA and issued one preliminary order.

## MAJOR CASES

### České Budějovice TI

Between May and October 2011, we performed several inspections in the Šumava National Park (NP) based on 16 submissions received. We issued a decision ordering restriction to activities for the Smrčina site in June 2011 pursuant to Section 66 of Act no. 114/1992 Coll., defining conditions for minimizing the disturbance to the wood grouse (*Tetrao urogallus*) when intervening against the spruce bark beetle. In August 2011, we initiated a joint administrative proceeding under the NLPA together with Šumava NP and PLA administrations concerning the disturbance to the wood grouse during nesting and young raising and causing changes to some of its biotopes within the Šumava NP and managing on NP land in ways requiring intensive technology, which may cause significant changes to the biodiversity, structure and functioning of the ecosystems. We commissioned an expert assessment by Charles University Faculty of Science in this matter. The deadline for the assessment was set to January 2012. The CEI's further steps will depend on the findings of the expert assessment.

### Liberec TI

The company SOLARBEN s. r. o. committed an administrative delict in November 2009 when it hired some people to fell approx. 800 trees with a trunk circumference of over 80 cm at 130 cm above ground without a required permit by a relevant

nature protection authority in order to build a photovoltaic power plant. The felling contractors demonstrably did the work in good faith that the client had arranged all the required permits. The company had allegedly supposed that no permits were required for felling self-seeded trees outside forests and therefore did not try to ascertain the sizes of the trees.

#### 1. NP Modrava Prášily, Na Ztraceném, Modrava Srní



#### 2. Solarben, s. r. o.



Although this was an large-scale instance of illegal conduct (trees were felled in an area of approx. 1.3 ha) and the CEI assessed its social dangerousness as evident, we took into account a number of extenuating circumstances and imposed a fine of CZK 300,000, representing 30% of the legal rate. The entity cooperated with the CEI, admitted its responsibility for the violation, and showed readiness to compensate its act by implementing a remedial measure in the form of planting substitute broadleaf trees.

### Ústí nad Labem TI

An instance of unlawful conduct occurred when the company CPI Park Žďárek rented its land, primarily intended for developing a logistics centre, for farming. Originally, the land satisfied the ethological and ecological demands of the species assemblages of wild birds and other animals naturally present there, including specially protected animal species (the Eurasian skylark, lapwing, cross adder, corn crane, common quail, sand lizard, slow worm, brown-headed stonechat, bumblebee, *Formica cunicularia* and *Formica fusca* ants). The company had been demonstrably aware of the fact that the site was a habitat for the specially protected species and well aware of its legal duties, as attested by the fact that it had applied with the relevant nature protection authority for exemptions from bans pursuant to Section 50, Para. 1 and 2 of the NLPA concerning the sand lizard (*Lacerta agilis*), slow worm (*Anguis fragilis*) and ground beetle (*Carabus auratus*) in order to implement its project to construct a logistics centre.



Locality close to Žďárek



Carabus auratus

However, the company had no exemptions or statements of the nature protection authority permitting any interference with the natural evolution of the specially protected animals in connection with farming when the ploughing and application of liquid organic fertilizer took place. It therefore committed an unpermitted adverse interference with the biotopes of specially protected animal species, including the critically endangered ground beetle *Carabus auratus*.

### CONCLUSIONS FROM INSPECTION ACTIVITY

The results of the inspections performed by the NPD in 2011 confirmed conclusions partly drawn in previous years as well:

- information on registration of prominent landscape features is commonly not included in the cadastre, resulting in reduced public information about this special type of territorial protection and its frequent harm (e.g., felling of so-called undersized trees without permit or notification),
- some building companies that do excavation works in immediate vicinity of live trees do not know, thus do not respect work procedures defined by applicable standards, resulting in irreparable damage to the trees,
- The CEI continues to think it necessary to pay attention to inspect the implementation of substitute plantings, especially in cities and towns, which face a risk of losing greenery as a result of considerable tree felling,
- enduring illegal operation of motocross vehicles in protected areas,
- major legislative violators concerning species protection have a wealth of experience with CEI inspections and will make various excuses to not permit inspections that are not announced in advance,
- major violations of CITES legislation are repeatedly committed by the same people. Fines imposed by the CEI, even repeated fines at almost the maximum possible amounts, have not been able to discourage them from their unlawful conduct,

- inspections of small-scale protected areas indicate that the intensity of their protection is decreasing; some nature protection authorities tolerate minor transgressions of the protection regime, resulting in progressive degradation of the areas. Some decrees promulgating protected areas, especially older ones, are legislatively insufficient. The same applies to SACs, where due management is not considered harmful to the SACs even where it is not entirely in compliance with the demands of the objects of protection,
- results of inspections of agricultural businesses under the Cross Compliance process indicate that no serious violation of legal regulations in nature and landscape protection occurs in the area based on which we would have to impose fines or other measures. The CEI therefore sees their chief importance in awareness raising among farmers leading towards the maintenance and improvement of the state of the environment,
- entities have also shown more efforts to handle their issues in compliance with the law, but the great complexity of the national legislation often results in essentially administrative defects which in turn lead to environmental damage,
- we find out that building companies have begun to accept the need to protect the common swift and performed measures ordered by the CEI as part of the inspections. This method, where the procedure under Section 66 of the NLPA is not applied but the company cooperates, currently seems to be the most effective,
- the amended Criminal Code, in force as of 1 November 2011, extended the range of punishable offences to unpermitted handling of critically endangered and endangered animal and plant species. Newly, it also institutes the responsibility of corporate bodies for punishable offences against environmental protection. A number of acts that the CEI previously handled as administrative delicts are now punishable offences, meaning that the outcomes of our inspection and supervision activities will be more frequently submitted to the Czech Police,

- the Nature Protection Department will continue to inspect municipal authorities in 2012, because our supervision there appears to be necessary due to recurring errors which are not only formal. Given the high proportion of legal violations by both corporations and natural persons concerning tree protection, the flawless execution of state administration in this area seems imperative.

## 5.5 FOREST PROTECTION

### INSPECTION ACTIVITY IN 2011

The CEI performed 1,589 inspections in the forest protection sector in 2011. Our FPD inspectors performed 1021 scheduled and 568 non-scheduled checks. They performed another 74 multi-departmental inspections together with the NPD, mostly in specially protected areas. The number of inspections performed in 2011 was 24 more than in the previous year 2010 (with 1,565 checks).

A considerable portion of the inspections focused on the properties of small forest owners. The scheduled inspections were mostly comprehensive, dealing with the overall condition of forest properties and their compliance with the applicable legislation. The legal framework for our inspection activities included chiefly Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and its competencies in forestry protection; Act no. 289/1995 Coll. on Forests and on the amendment of certain laws (the Forestry Act); Act no. 149/2003 Coll. on the circulation of reproductive materials of tree species significant for forests and artificial hybrids, intended for reforestation or afforestation, and the amendment of certain laws; and Act no. 114/1992 Coll. on Nature and Landscape Protection.

The Forest Protection Department employed 55 inspectors in 2011. Field inspection activities were performed by 51 inspectors. Given the forest covering approx. 34% of the Czech Republic, one inspector faces more than 52,000 ha of

land intended for fulfilling the forest functions on average. The number of penalties imposed in administrative proceedings for endangering or damaging the forest environment decreased in 2011 compared to the previous year, but the total amount of fines imposed was higher. We issued 133 administrative decisions on fines, and 128 became final and conclusive. The total amount of fines was CZK 9,929,400. In addition, we ordered 305 remedial measures. The most common penalties concerned unlawful logging, exploitation of land intended for fulfilling the forest functions (LIFFF) for other purposes, damage to LIFFF, negligence of legal deadlines for reforestation, and insufficient protection of forest against biotic agents.

We issued 6 preliminary measures and 1 decision ordering discontinuation of activity. We handled 137 submissions, an number identical to that in 2010. Out of this number, 96 submissions were legitimate. The submissions mostly concerned unlawful logging, unpermitted dumps on forest land, unlawful reforestation status, building development on forest land, and forest land occupation. The legitimate submissions were followed by administrative proceedings on fines and ordering remedial measures. The CEI lodged to criminal charges for unlawful logging in 2011.

We developed 354 statements for EIA proceedings. The CEI Forest Protection Department issued a total of 411 statements, expert assessments and position statements for other authorities and joint position statements on EIA in 2011. That is a slight decrease compared to the previous year. The most numerous categories were EIA position statements and expert statements for the Czech Police concerning cases of damage to forest functions, unlawful logging and failure to process bark beetle infested timber. In addition, we issued statements and positions for regional and municipal authorities, state administration bodies and PLAs. The CEI maintains active cooperation with the Ministry of the Environment, the Ministry of Agriculture, and the Czech Police. At present, we most commonly cooperate with professional forest managers, mostly by their involvement in CEI inspections.

The inspection activity concerning circulation of reproductive material of forest trees pursuant to Act no. 149/2003 Coll. is performed in cooperation with the Forest Management Institute. We established cooperation with the Mendel University in Brno in 2001 as part of the project CSS (Complex Sustainable Systems in Agriculture 2012-2018) concerning the damage to LIFFF (application of certification methodology no. 423-1/2012). The objective of the methodology is to improve protection in exploitation of the forest land fund. It should achieve a verification of the soil protection technology and a certified methodology for assessing the degree of damage to forest soil. The adoption of the methodology should therefore result in a unified attitude to this branch of forestry activity. The methodology was offered for application to Czech Forests, Czech Military Forests, Municipal and Private Forest Owners Association, and the MoE.

**The major inspection findings are similar to those in previous years, including:**

- iunlawful logging,
- iexploitation of LIFFF for purposes other than forest functions,
- idevelopment of biotic factors in forests (decreased in 2011),
- idamage caused by game,
- inegligence of deadlines for reforestation, incl. after unlawful logging,
- idamage to LIFFF by logging, log dragging and stand stability disruption,
- idamage to forest soil by forest work,
- idevelopment of Cucurbitaria fungus in blue spruce stands in the Ore Mountains,
- itrouble protecting LIFFF as a result of recreation activities in forests not permitted by law.

### The worst administrative delicts, resulting in the highest fines:

- a fine of CZK 1,500,000 to forest owner for excessive damage to LIFFF (Ústí nad Labem TI),
- a fine of CZK 1,200,000 to a corporation for repeated unlawful logging (Plzeň TI),
- a fine of CZK 450,000 to a corporation for illegitimate exploitation of LIFFF (Liberec TI),
- a fine of CZK 300,000 to a natural person for repeated unlawful logging (Plzeň TI),
- a fine of CZK 200,000 to a corporation for unlawful logging (České Budějovice TI),
- a fine of CZK 200,000 to a corporation for causing conditions for the work of harmful biotic and non-biotic factors (Ústí nad Labem TI),
- a fine of CZK 160,000 for neglecting duties relating to reforestation (Brno TI),
- fines of CZK 150,000 and 50,000 for significant damage to the soil by forest transport in Šumava NP and PLA (České Budějovice TI),
- a fine of CZK 150,000 to a natural person for unlawful logging (Plzeň TI),
- fines of CZK 100,000 and 60,000 for not reforesting clearings left after unlawful logging (Hradec Králové TI),
- fines of CZK 120,000 and 50,000 to natural persons for damage to LIFFF (Olomouc TI),
- a fine of CZK 115,000 for circulation of seedlings of an origin different than declared (Olomouc TI).

### OVERVIEW OF PERFORMANCE OF DEPARTMENTAL TASKS

Based on a request of the MoE National Park Management Department, we arranged two departmental tasks for 2011 with the CEI HQ Forest Protection Department in 2010.

The first of the CEI departmental tasks was to collect objective information on the state of the forest in relation to forest land fund protection. This task was a follow-up on the findings from the departmental task in 2010.

The other departmental task concerned reforestation of larger clearings in relation to timely reforestation and tree species composition compliant to Act no. 289/1995 Coll. on Forests.

We performed 215 inspections concerning LIFFF and 188 inspections of reforestation of large clearings with respect to timeliness and species compositions, categorized by the forest ownership types as shown in Table 1.

**Table 1: Summary of entities inspected**

TYPE OF OWNERSHIP	Constituent task S1 – LPF	Constituent task S2 – renewal
	NUMBER OF INSPECTIONS	
State – LČR s. p.	50	54
State – VLS ČR s. p.	3	5
Municipalities, cities	72	49
Private properties	38	41
ORP – minor owners	40	37
Others	12	2
<b>Total</b>	<b>215</b>	<b>188</b>
<b>Inspected entities</b>	<b>403</b>	

### Departmental task 1: Protection of land intended to fulfil forest functions

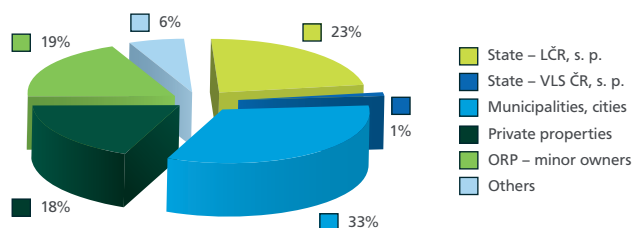
The performance of this departmental task was based on our findings in 2010; we cooperated with other entities under the respective TIs. The total area of forest inspected was 402,139 ha. Out of the 215 inspections, 199 we scheduled and 16 non-scheduled. We identified 181 deficiencies, resulting in 44 remedial orders and 32 fines.

Administrative delicts caused by forestry are usually exceptions. The findings concerned damage to forest soil and tracks by log dragging and timber transport. There was a major increase in the burden on forests by recreational activities, including both summer and winter sports, which do not always pay due respect to legal regulations (bicycles, motor sport, suspension rope parks). We also identified administrative deficiencies associated with large investment projects: incomplete, and often unperformed changes of land type under built structures. There were also cases of exploitation of forest land for farming and vice versa.

Generally speaking, investor pressure on exploiting LIFFF for different purposes continued to grow as in previous years.

The situation with illegal dumps is gradually improving; forest owners now remove them even though they are not the originators. In contrast, dispersed scattering of garbage in the forest is an increasing common phenomenon.

#### Departmental task S1 – PUPFL protection



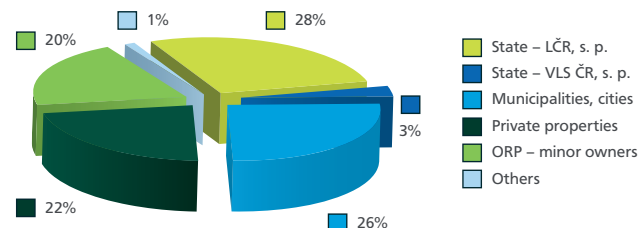
### Departmental task 2: Reforestation of larger clearings with respect to timeliness and species composition

The inspections focused primarily on clearings made after calamities, cleared by large-scale accidental logging following wind breeches, and clearings left after large-scale deliberate logging, largely in 2008, 2007 and earlier. The total area of forest stands checked under this departmental task was 479,949 ha. We performed 188 checks under this departmental task, including 187 scheduled and 1 non-scheduled. These 188 checks identified 221 deficiencies, leading to 32 decisions ordering remedy and 13 fines. Sixteen entities were found to have used pioneer trees.

Many of the large-scale entities inspected do apply natural reforestation on suitable sites. A number of the entities (LČR, s. p., VLS ČR, s. p., municipalities) create conditions supporting natural reforestation: making stands less shady, soil ploughing, etc. The application of natural reforestation is gradually increasing and is largely applied both when adding amelioration and reinforcing trees (ART) and in reforestation.

Generally, we can conclude that post-calamity sites are reforested by the legal deadlines in most state-owned and municipal forests, including the prescribed proportion of ART. Especially LČR, s. p. and VLS ČR, s. p., uses ART on larger territories than prescribed by forest management plans, benefiting the forest functions.

#### Departmental task S2 – renewal of forest vegetation



The impact of wild game on ART maintenance is cardinal. In spite of repeating protection, mostly paint coating, animals still reduce trees, chiefly firs, oaks, beeches, ashes, maples, etc. Where the forest owner applies natural reforestation properly, the proportion of ART is higher and the game impact is not as huge. In some regions of the CR, the condition of forests damaged by game is improving as the game numbers are being reduced and natural reforestation with all kinds of broadleaved trees, including the rowan in the mountains, is increasing. Nationwide, the proportion of ART decreases several years after reforestation due to the adverse impacts of weed and game gnawing.

Our scheduled inspections of forest properties identified mostly less significant deficiencies in smaller properties. Most of the entities were proven to observe the legal reforestation deadlines, and reforestation mostly proceeds duly and within legal deadlines. In addition, the inspections found out that forest owners do not make profound use of exemptions from reforestation deadlines and most clearings are reforested in due time.

### OVERVIEW OF PERFORMANCE OF SPECIFIC TASKS – SUMMARY

CEI inspection activity in 2011 focused on current specific regional issues and was carried out both as thematic checks and comprehensive inspections (alongside departmental tasks). Both the scheduled and non-scheduled inspections in the forest protection sector handled the following specific issues above all:

- development of biotic factors: harmful insect pests, fungi, rodents,
- damage by game,
- forest harmed by logging, log dragging, stand stability encroachment,
- LIFFF protection, including exploitation of surroundings of logging areas,

- circulation of reproductive material of forest trees,
- reforestation, including stands after illicit logging,
- observance of binding provisions of forest management plans and forest management outlines,
- implementation of remedial measures under administrative decisions,
- thinning in stands under 40 years of age.

Due to increasing demand and growing prices, illicit logging increases along with the violation of clearing limits, improper clearing location, clearings next to unstable stands, improper logging and log dragging techniques, resulting in damage to standing trees, their root systems, paths, watercourses, etc. Another major problem is owner shifting in brief time periods, resulting in difficult identification of originators of logging interventions. The CEI identified 4,558 m<sup>3</sup> of illicit logging on 15.44 ha in 2009. It was more than 15,076 m<sup>3</sup> of illicit logging on 48.39 ha in 2011. The number of cases had more than doubled (14 cases in 2009 to 32 cases in 2011).

According to our findings, there is a serious problem with the use of harvester technology in inappropriate weather conditions, resulting in serious damage to the soil surface, disruption to the hydraulic cycle and subsequent soil erosion. In addition, trunks and root feet of unfelled trees are damaged not only along the log dragging lines; the trees are infected by pathogenic fungi that cause tree rot unless they are treated with a fungicide on time. Although the use of harvester technology is going to continue rising in the forests, operators have to be trained and work has to be done in appropriate weather conditions. Only then can this technology be beneficial without harming the environment.

We did not identify any substantial tree damage by the bark beetle in the inspected areas with the exception of the Šumava NP. We found no serious cases of stand damage by other insect pests. We identified cases of disrespect to binding provisions of forest management plans and adopted

forest management outlines (total amount of logging, minimal proportion of amelioration and reinforcement trees, and areal extent of thinning in stands under 40 years of age) mostly where unauthorized deliberate logging occurred.

Our inspectors identified unauthorized exploitation of forest land for purposes other than fulfilment of forest functions and littering of forests with waste and garbage repeatedly all across the country. Only in exceptional cases did we identify the use of mineral oils in chainsaws, wheeled tractors and other machinery. Thanks to the long-term pressure by the CEI, the use of biodegradable oils and hydraulic fluid has become nearly the norm in most companies providing forestry services.

Disrespect to remedial measures ordered by the CEI previously in administrative proceedings mostly concerned cases of failure to reforest clearings chiefly after illicit logging, and failure to process bark beetle-infested timber. These cases were then handled in administrative proceedings and mostly concluded with the imposition of fines.

The trend of CEI checks of circulation of reproductive material of forest trees (inspection of forestry material production and suppliers) under Act no. 149/2003 Coll. continued in 2011. Our inspections found both administrative and factual deficiencies, such as circulation of large numbers of seedlings of different origin with a single pass bill. Yet the seedlings came from two natural forest territories at different altitudes and of different quality of stands.

### MAJOR CASES

Soil cover damaged by forest transport when clearing away bark beetle-infested material at Modrava near Filipova Huť in the Šumava NP. Soil cover damaged by ruts 0.5–1.2 m deep, approx. 400 m long, resulting in an areal damage on 0.12 ha. The company that provided the forest transport – Foreign s.r.o. – was fined CZK 150,000. It became final and conclusive without appeal. The client – Šumava NP and PLA Administration – was fined CZK 50,000; it appealed against



the decision, but MoE OVSS II confirmed it in February 2012.

Between mid 2009 and mid 2001, MR-ENVI s. r. o. organized large-scale illicit logging operations at Klenčí pod Čerchovem (Domažlice District) and Strašín u Sušice (Sušice District). The administrative proceeding concluded in 2011 by imposing a fine of CZK 1,200,000 on the business.

Unpermitted ground shaping beyond the scope of the building permit and threat to forest stand stability. Ground shaping performed in an area 46 m long, 8–8.5 m wide and up to 4.5 deep on a slope. The case was handled in 2009–2011 and resulted in a conclusive fine of CZK 450,000.

### CONCLUSIONS FROM INSPECTION ACTIVITY

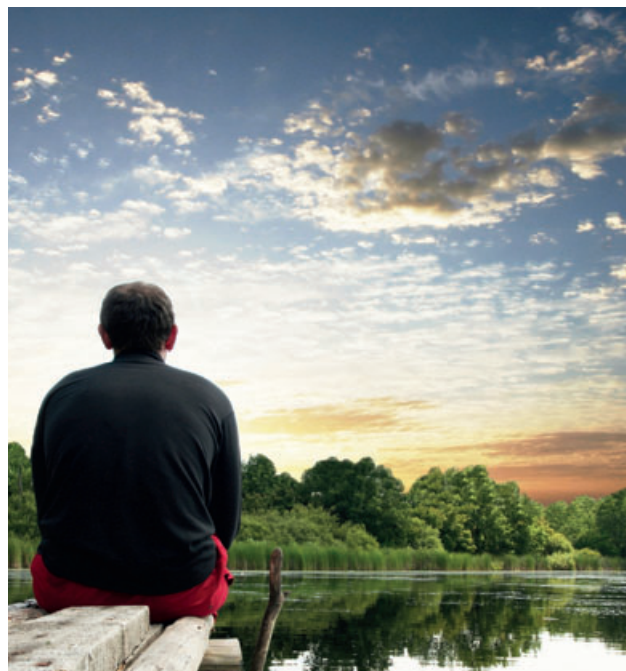
The results of our inspection activity in 2011 confirm an increasing trend in good forest management in most of the regions. Periodic monitoring of forest condition and consistent reviews of previously issued remedy orders have proven effective and led to observance of law in forest management. We will continue this activity in the coming years.

Our inspection activity is always scheduled to evenly cover the entire supervised territory of the Czech Republic and all types of forest ownership. We have paid and will pay increased attention to problematic forest property owners. The frequency and extent of legal violations identified in proportion to the number of inspections performed is not alarming. The institute of orders with deadlines for eliminating the deficiencies identified has proven effective in cases of less serious violations.

Fine amounts increased mostly for habituals, notorious to the CEI, who have violated the law repeatedly in their effort to maximize their profits. Most commonly, they will purchase forest land all across the country, log it and then transfer it to so-called “white horses”. This is how both corporate bodies and natural persons try to dodge their reforestation duty and subsequent care for young forest stands.

Favourable weather – the rainy summer above all – reduced the development of bark beetles all over the country in the last year (the Šumava NP remaining an exception). Sporadic instances of bark beetle epicentres were cleared by foresters in a timely manner. The CEI inspectors will continue to thoroughly monitor the health of forest stands, seek trees already populated by bark beetles and then draw attention to them. The phenomenon of exploiting LIFFF in violation of law has been on the rise recently. This will be another of the priorities for the CEI in 2012.

Last but not least, we will focus our attention on illicit loggers; the FPD will cooperate with district authorities and the Czech Police to try to identify risk locations and employ all available means of discouraging the perpetrators from their illegal activity.





# 6 INTEGRATED AGENDAS

(IPPC, IPR, EIA)

The CEI activity in the area of integrated agendas can be divided into supervision (inspection) and non-supervision (issuance of statements and positions on EIA etc.).

#### BASIC ELEMENTS OF INSPECTION ACTIVITY IN THE AREA OF INTEGRATED AGENDAS ARE:

- The inspection work in the area of integrated agendas is based on Act no. 76/2002 Coll. on integrated prevention and pollution reduction, the integrated pollution register and amending of certain acts (the Integrated Prevention Act)
- Act no. 25/2008 Coll. on the integrated pollution register and integrated system of compliance with environmental reporting duty and amending of certain acts (the IPR Act) in connection with the EU Regulation establishing E-PRTR

#### THE NON-SUPERVISION CEI ACTIVITY IN THE AREA OF INTEGRATED AGENDAS INVOLVES THE DEVELOPMENT OF POSITIONS AND STATEMENTS:

- as part of the environmental impact assessment (EIA/SEA) process,
- on applications for integrated permits or amendment of integrated permits, on subsidies under the OPENV announced by the SEF,
- on the environmental management and audit system (EMAS),
- as part of the Safe Enterprise scheme,
- on environmental audits, etc,

In 2011, the CEI actively cooperated on drafting of new legislation within MoE working groups, chiefly on the draft amendment to the Integrated Prevention Act and Governmental Regulation on the list of pollutants and threshold values and data required for reporting to the Integrated Pollution Register.

#### INSPECTION ACTIVITY IN 2011

The CEI Integration Departments closely cooperated with the sectoral departments on 702 inspections in 578 facilities and operations. This number includes checks under both the Integrated Prevention Act and the Integrated Pollution Register Act. The Integration Departments initiated 100 administrative proceedings in the reporting period. A total of 134 decisions on fines (including orders) became final and conclusive in 2011; the fines imposed in 2011 ranged between CZK 2 thousand and 1 million, and the total amount of final and conclusive fines was CZK 8,165,000. The average conclusive fine amount per decision (order) was CZK 60.9 thousand.

The CEI work is not simply the imposition of fines; we also actively cooperate with mostly regional authorities, which permit the operation of facilities pursuant to the Integrated Prevention Act. The aim of this mutually voluntary cooperation is to improve the quality of the integrated permits, thus a good quality of environmental protection. However, increasing numbers of amendments to integrated permits results in growing complexity of inspections. Inspections in

the area of integrated prevention therefore call for accuracy and enough time.

An example of cooperation between the CEI Integration Department and an applicable regional authority is the case of inspection of the operator of a facility for surface finish treatment of metals using electrolytic and chemical processes. The inspection found out that the operator's permits for discharging wastewater into a watercourse had just expired (it had been limited to 4 years), and although the operator did not apply for an extension of the permit, the regional authority issued an amendment to the integrated permit conditioning the start of validity of a new permit on building and commissioning of a new wastewater treatment plant, which had been planned already when the original integrated permit had been issued. Since the WWTP in question had not been put into operation, the operator agreed with the regional authority orally that another amendment to the integrated permit would be issued which would set new emission limits not bound to the installation of the new process wastewater treatment equipment so that the unlawful situation of unpermitted wastewater discharged would be remedied.

Concerning the inspection work carried out by the CEI in the area of the Integrated Pollution Register, the interesting fact is that operators of facilities with integrated permits fulfil their obligations under application legislation much better than others (i.e., entities that do not operate facilities with integrated permits). Based on the results of our inspections in the area of the IPR, we can conclude that the awareness of the duties arising from the applicable legislation is gradually improving. Most of the violations of the IPR legislation concerned failure to report on time or reporting of wrong data. As in the previous years, the penalties imposed were near the lower limit of the legal range. Specifically, the fines for legal violations in the area of the Integrated Pollution Register ranged from CZK 1,000 to CZK 30,000.

CEI Integration Department staff were actively involved in handling 125 submissions and petitions, most often in cases

concerning the jurisdiction of multiple sectoral departments. The chief task of the Integration Department staff was to organize a coordinated approach to handling these cases. A substantial case in which the Integration Department handled numerous submissions was the case of remediation works on the Ostramo Lagoons, which received wide media coverage. Between September and October 2011, the CEI received about 20 submissions concerning the intense oily odour in the Ostrava districts of Mariánské Hory, Přívoz and Fifejdy. The odour even annoyed the inhabitants at night. These submissions were accompanied by complaint calls on the same issue nearly every day. Both the submissions and the phone calls often pointed out the health hazards associated with the odour. The CEI identified the remediation works on the Ostramo Lagoons as the cause of the odour. For this reason, the CEI inspected the Ostramo Lagoons Remedial Works facility. The inspections led to the initiation of an administrative proceedings on the imposition of a fine for violating the Integrated Prevention Act against the facility operator.

The CEI Integration Departments coordinated and developed 46 statements for the SEF and 644 other position statements on ISO 14001, under the Safe Enterprise scheme, on registration applications for the EMAS scheme, on environmental audits, etc.

## OTHER INTEGRATED ACTIVITIES

### EIA/SEA

The CEI issued 1,266 opinion statements on plans, documentations, expert reviews, concept announcements and concept drafts as part of the EIA/SEA process in 2011. Compared to the previous years, the number of statements decreased by 9% (from 1,386).

As in previous years, the quality of the announcements submitted in 2011 was not exceptionally good. In particular, they failed to include information on inputs and outputs and their evaluation.

The major cases of environmental impact assessment handled by the CEI include the plan to develop “Háje–Nad přehradou Sports Ground”.

The objective of the plan was to develop a sports ground, consisting of a sports complex with accompanying facilities and numerous additional features: shopping malls, restaurants, offices, rent areas, service flats, accommodation facilities (hotel), surface and underground parking, and more.

The sports ground was supposed to be located inside the Hostivař – Záběhlice Nature Park, one of the most important recreational areas in Prague. According to the CEI, the plan had not been assessed sufficiently, meaning that the impacts on the interests protected under Act no. 114/1992 Coll. on Nature and Landscape Protection could not be assessed objectively. The other CEI departments found similar deficiencies. The CEI therefore requested additional assessment of the plan under Act no. 100/2001 Coll. With respect to the disapproving conclusions of other affected administrative authorities and civic associations, the MoE issued a conclusion from its indicative proceedings that the plan would have a significant environmental impact and would further be assessed under Act no. 100/2001 Coll. In consequence, the developer informed the MoE that it was withdrawing the “Háje–Nad přehradou Sports Ground” project announcement.

### Applications for integrated permits

As mentioned above, the CEI actively cooperates with regional authorities in the area of integrated prevention; this cooperation also involves issuance of position statements on integrated permits.

We developed 636 position statements on applications for the issuance or amendment of integrated permits in 2011. In addition, CEI representatives participated in 50 oral negotiations on the issuance of integrated permits.

### EXAMPLES OF CEI COOPERATION WITH REGIONAL AUTHORITIES ON ISSUING INTEGRATED PERMITS INCLUDE:

In December 2010, CEI received a notification on the commencement of proceedings concerning the application for the issuance of an integrated permit to ZEVO, spol. s r.o. for the installation of a biogas station in Velký Karlov. In addition, the CEI received the resolution of the South Moravian Regional Authority, inviting ZEVO, spol. s r.o. to complete the application with an environmental impact assessment for the facility by 30 September 2011, and suspending the proceedings concerning the issuance of the integrated permit. The operator appealed against the resolution suspending the proceedings on 11 January 2011, and the MoE ruled that the operator had to furnish documentation of the environmental impact assessment for the project within 30 days of the effective date of the resolution. On 1 April 2011, the application for the issuance of the integrated permit was completed with a notification that the EIA documentation was being development. Based on the MoE position statement, the two processes (EIA, IPPC) can take place simultaneously, but the EIA process has to conclude with priority and its conclusions have to be reflected in the decision on issuing the integrated permit. The CEI issued a position statement on the application for the integrated permit. An oral negotiation concerning the application for the issuance of the integrated permit took place in June 2011 (attended by CEI staff), and based on the statements presented and the comments included in them, the proceeding was terminated because the operator withdrew its application during the oral negotiation.

## MAJOR CASES

### CELIO, a.s. landfill compound

The CEI performed a number of sub-inspections in a facility operated by CELIO a.s. in 2011. Among other aspects, the inspections focused on handling of hazardous waste classified as 19 02 05 Sludge from physical and chemical processing containing dangerous substances, generated by treatment of acidic waste sludge from the Ostrava Lagoons in Ostrava. The CEI performed both an inspection of the operator's fulfilment of its reporting duties arising from its integrated permit and environmental legal regulations, and an inspection of the factual handling of the waste in question. As part of the inspections, the CEI commissioned an accredited laboratory to make an inspection sampling and analysis. The analyses performed did not identify any violation of set qualitative limits by the waste in question. Based on the examination, the CEI therefore concluded that no violation of the requirements of the integrated permits relating to the subject matter – handled of Ostrava Lagoon sludge – was identified.

### Ostrava Lagoons



### SP Poběžovice, a.s.

The CEI imposed a fine of CZK 400,000 on this company for an administrative delict under the Integrated Prevention Act, committed by the facility operator by failing to operate its facility "Poběžovice piglet production and pig feeding station" at Sedlec u Poběžovic in compliance with the binding requirements of its integrated permit on the days of inspection and accidents identified, by:

- failing to furnish documentation, or prove otherwise that it applied a reducing technique of fodder with a biotechnological preparation that reduces the emissions of ammonia, methane and odorous substances in compliance with Annex 2 to GD no. 615/2006 Coll. and the approved proper agricultural practice plan,
- failed to cover up the digestate pumping tank in biogas station II, resulting in releases of odorous substances into the air,
- failed to arrange measurements of emissions (e.g., ammonia), making it impossible to compare actual measurements with the emission limits set by the integrated permit,
- failed to furnish documents proving submission of sewage water for disposal outside the facility. It also failed to adhere to the deadline for amendment no. 3 to the integrated permit, stipulating that process and sewage wastewater is to be treated in a newly built wastewater treatment plan by 1 July 2009,
- failed to adhere to some other binding requirements of the integrated permit concerning the protection of human health and the environment, chiefly air, soil, forest, groundwater and surface water, nature and landscape protection, and measures for preventing accidents and mitigating their potential consequences.

The company appealed against the CEI decision. The body of appeal declined the appeal and confirmed the CEI decision; it became final and conclusive on 27 April 2011.

### **C-Energy Bohemia, s. r. o.**

In late June 2011, the CEI inspected a facility operated by AES Bohemia spol. s r.o. based on an integrated permit (the company changed its name to C-Energy Bohemia, s.r.o. in the course of the administrative proceeding). The inspection identified failure to adhere to some of the requirements of the integrated permit and report the transfer of a pollutant into wastewater, representing a violation of the IPR Act.

The CEI regarded the violation of emission limits in wastewater discharged into public-use sewerage as the most serious transgression. A factor that was substantially to the operator's detriment when assessing the fine amount was that the CEI had identified the same violation before, during an inspection performed in September 2008 and completed in February 2009.

Based on the findings from the inspection, the CEI imposed a fine of CZK 216,000 on C-Energy Bohemia, s.r.o. for operating a facility in conflict with the integrated permit, plus a fine of CZK 2,000 for violating the IPR Act. The operator did

not appeal against the decision, and a fine became final and conclusive on 26 November 2011.

### **ACCIDENTS**

We dealt with 16 accidents in facilities under the IPPC in 2011; the most significant ones include:

#### **Explosia, a. s.**

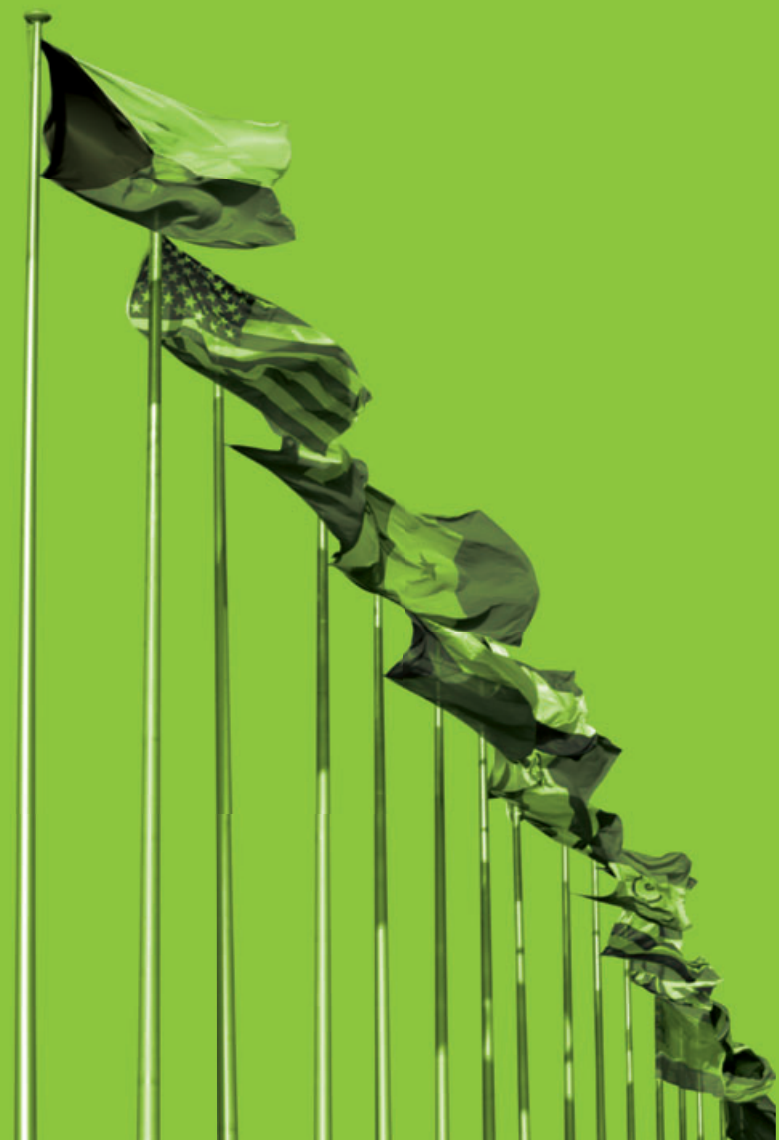
A nitroglycerin explosion in Explosia, a.s., building A 55 (mixing of semi-plastic gelatine-based explosives) and A55/1 (weighing unit) on 20 April 2011. Building A55/1 is part of the "Nitration" plant, for which an integrated permit is issued, Territorial Mining Authority in Trutnov examined the causes. The accident was not caused by a violation of the integrated permit requirements. The manufacturing of liquid nitro-esters (mostly nitroglycerin) was resumed on 27 May 2011.

#### **SZP Těšnovice, a. s.**

This accident involved a leak of semi-liquid manure from a Facility for intensive rearing of slaughter pigs and intensive rearing of sows into the environment. Based on an inspection, CEI imposed a fine on the operator pursuant to the Integrated Prevention Act for violating integrated permit requirements and another for violation of the Waters Act.



# 7 INTERNATIONAL COOPERATION



We made 58 trips abroad, involving 118 employees, in 2011. One of the CEI's most important international activities is cooperation within the IMPEL, a network for implementation and enforcement of environmental law and an international association of environmental organizations in Europe. The network is committed to contributing to effective application of EU environmental legislation by capacity building, good practice sharing, provision of guidelines and tools, promotion of collaboration, and provision of feedback for legislators and regulators about the convenience and forceability of environmental legislation. Constituent projects are the core of the network activity.

The General Meetings were held under the IMPEL in 2011: one in Hungary, another in Poland. The CEI was involved in the work of the preparatory group for the next IMPEL conference, to be held in Malta in 2012. The conference is organized once every three years with the purpose to inform the public, staff of NGOs, the European Commission and the European Parliament about the work of the IMPEL, especially the results and conclusions of its constituent projects. This conference will also include a celebration of the 20th anniversary of the network.

CEI inspectors were involved in the work of Cluster I (permit improvement and enforcement), Cluster II (transboundary waste transport), and the TFS conference, like every year. In addition, our inspectors were involved in the following IMPEL projects: development of a simple and flexible tool for risk assessment in permitting and inspection; "Legislative compliance achieved through corporate managerial systems", meeting of contact persons for transboundary waste transport, exchange days, the landfill project, the conference "Lessons learnt from industrial accidents", and the project "Permit

and inspection improvement". We also performed a joint inspection focusing on transboundary waste transport.

Concerning the CITES international treaty, the CEI inspectors represent the Czech Republic in sessions of expert groups and committees focusing on enforcement of law on protection of endangered species. Above all, they include the EU Wildlife Enforcement Group, which met twice in Brussels in 2011. Our involvement in the Interpol Wildlife Working Group, helping to solve major international cases, is also very important. Our inspector participated in an international training session held by the UNEP-WCMC (World Conservation Monitoring Centre) in Cambridge, dealing with working with the global trade database and the endangered species database. Another two employees of the CITES Department participated in a meeting on the new CITES system for identification of products made from CITES species with an emphasis on traditional Chinese medicines.

A CEI representative participated in a forum organized by the European Chemicals Agency (ECHA) for information exchange and enforcement of the REACH Regulation. Based on a treaty with Slovakia, we made several trips abroad dealing with water, nature and forest protection and waste management issues. We also held the first meeting under the newly established treaty with Poland, and we agreed on further cooperation.

As part of so-called executive international relations, our inspectors represented the Czech Republic's environment department in meetings of the international commissions on protection of boundary waters and great rivers (the International Commissions for the Protection of the Oder and the Elbe, the Danube Commission, the Austrian Transboundary Waters).

Most of the trips abroad were made in order to fulfil the Czech Republic's commitments under international organizations, treaties and protocols on the one hand, and activities directly related to our EU membership on the other hand. In total, the CEI spent CZK 462,746.75 on its trips abroad; a large portion of the costs was financed directly from the European Commission budget.

# 8 HUMAN RESOURCES



## 8.1 PERSONNEL

### PERSONNEL MANAGEMENT

Number of employees was decreased of 30 working positions. Wage funds in CEI were decreased of 10% and therefore salaries of all CEI employees were adjusted since 1 January 2011.

Organizational Rules of the Czech Environmental Inspectorate were adopted as of 14 March 2011. Main change in the Organizational Rules is establishing units of integrated agendas in regional inspectorates.

### ESSENTIAL PERSONNEL DATA

#### EMPLOYEES DISTRIBUTION ACCORDING TO AGE GENDER-SITUATION AS AT 31 DECEMBER 2011

Age	Male	Female	Total	%
Up to 20 years	0	0	0	0
20–29 years	29	46	75	12,5
30–39 years	82	73	155	25,7
40–49 years	62	95	157	26,1
50–59 years	96	85	181	30,1
60 years and more	24	10	34	5,6
<b>Total</b>	<b>293</b>	<b>309</b>	<b>602</b>	<b>100,0</b>
<b>%</b>	<b>48,7</b>	<b>51,3</b>	<b>100,0</b>	<b>x</b>

#### OVERALL INFORMATION ON AVERAGE PAYS AS AT 31 DECEMBER 2011

	Total
Average gross monthly pay	25 383,–

#### EMPLOYEES DISTRIBUTION ACCORDING TO ADUCATION AND GENDER-SITUATION AS AT 31 DECEMBER 2011

Achieved education	Male	Female	Total	%
Elementary	0	0	0	0
Skilled	0	0	0	0
Secondary specialist	3	2	5	0,8
Secondary complete	0	7	7	1,1
Secondary specialist complete	22	93	115	19,1
College specialist	1	2	3	0,5
University	267	205	472	78,5
<b>Total</b>	<b>293</b>	<b>309</b>	<b>602</b>	<b>100</b>

#### OVERALL INFORMATION ON ORIGINATION AND TERMINATION OF OCCUPATIONAL AND OFFICIAL RELATIONS OF EMPLOYEEYS IN 2011

	Number
Assumed office	37
Left office	49

#### DURATION OF THE OCCUPATIONAL AND OFFICIAL REALTIONS OF EMPLOYEES-SITUATION AS AT 31 DECEMBER 2011

Duration	Number	%
Up to 5 years	237	39,4
Up to 10 years	133	22,0
Up to 15 years	116	19,2
Up to 20 years	85	14,2
More than 20 years	31	5,2
<b>Total</b>	<b>602</b>	<b>100,0</b>

## 8.2 TRAINING

Employee training was implemented in compliance with CEI Directive no. 7/2011, effective as of 1 January 2011. The greatest change compared to previous standards was the inclusion of methodological instructions for specialization tests and returning the on-arrival initial training to the Headquarters.

Mandatory training for newly admitted employees took place based on Government Resolution no. 1542/2005. This initial on-arrival training was taken by 33 employees in four sessions. The CEI Headquarters organized and provided trainers for this full-day training for both the territorial inspectorates and the Headquarters. The chief objective was the familiarization with the specific CEI issues, basic knowledge and legal standards for work in state administration. Another mandatory component of the training is follow-up on-arrival training, provided by the Ministry of the Interior, being the expert guarantor for the reporting period. Its four e-learning courses were passed by 13 employees. The contents consist of basic legal awareness, the rules of administrative procedure, public administration in the CR, public finance, the EU basics, etc. Expert officials and inspectors took theoretical and practical specialization as part of their profound training. It was completed by 21 employees in 8 sessions.

Language education was pursued by 58 employees in English courses. Unlike in previous years, German courses were not given in 2011. In cooperation with other state administration bodies, initial training on integrated agendas was organized in a two-day session, attended by 31 employees. Ongoing employee training made use of the services of the Institute for Public Administration, our own trainers and external agencies. These events were attended by 653 persons in total. The number was affected by the fact the training provided by the Institute for State Administration is now paid; it was gradually integrated into the Institute for Local Administration, now renamed to the Institute for Public Administration. State authorities were previously provided with training free of charge, enabling maximum exploitation of training opportunities. CEI training activity also takes place as part of the EU project “Making CEI Inspectors Work



More Effectively”, funded by the MoI under the OP Human Resources and Employment and the state budget, and focusing in 2011 primarily on basic training for CEI staff in the Newton Dictate software in follow-up on the blanket installation of 140 licences and work of the testing group, which customized the software for the CEI. In total, 477 employees in all the CEI departments were trained by the end of the year. At the same time, there were two pilot workshops on the practical application of Newton Dictate: in April 2011, Newton Dictate was tested in an interrogation in the presence of Czech Customs and Czech Police representatives; in September 2011, it was again tested in examination of the finding of a dead bird of prey in the presence of Czech Police, Regional Veterinary Administration and regional authority officials.

On 31 December 2011, we published an information booklet on the innovated product project, summing up the experience and processes of implementation and use of Newton Dictate in the CEI. The subsidy provider has assessed the ongoing project as successful, approving 2 monitoring reports and passing two interim audits.

# 9 ECONOMICS





## BUDGET

Adjusted budget as of 31 Dec 2011 (CZK thousand)

Indicator	Adjusted budget as of 31 Dec 2011
I. OSS incomes	1 783
II. Total expenditures	358 059
1. Current expenditures total:	335 765
OSS wage funds	185 283
Insurance premiums	62 877
CSF transfer	1 838
Other current expenditures	85 767
* ISPROFIN 315 – MoE	16 423
2. Investment expenditures	22 293
within that: *ISPROFIN 315 – MoE	22 293
<b>Limit for wage funds and no. of employees in orgs. remun. pursuant to Act no. 143/92 Coll.</b>	
Wage funds total	185 283
within that: * limit for wage funds	183 813
* other payments for work (other personnel costs)	1 470
b) no. of employees	643
c) average wage in CZK	23 822
* OSS - wages + OPC + PSZ	358 059

## OVERVIEW OF EXPENDITURE DRAWING

## A) Drawing of non-investment expenditures for 2011

Indicator	Adjusted budget	Drawing	Balance
Wages	183 813 000,00	183 813 000,00	
Extra-budgetary: wages		1 634 000,00	
OOV	1 120 000,00	1 120 000,00	
Extra-budgetary: OOV		1 266 237,00	
Severance pay	350 000,00	350 000,00	
Insurance: health and social security	62 877 000,00	62 877 000,00	
Extra-budgetary (NAR): insurance		818 936,00	
Wage expenditures total	<b>248 160 000,00</b>	<b>251 879 173,00</b>	

Indicator	Adjusted budget	Drawing	Balance
Other current non-inv. exp.	69 344 000,00	67 536 096,89	1 807 903,11
Transfer to Culture and Social Fund	1 838 000,00	1 860 000,00	
Transfer to CSF from extra-budgetary sources		22 000,00	
CEI extra-budgetary source			
Extra-budgetary: increment for insurance premium			
Total current non-investment expenditures	<b>71 182 000,00</b>	<b>69 418 096,89</b>	

Indicator	Adjusted budget	Drawing	Balance
Non-investment expenditures	16 423 780,76	10 019 425,15	6 404 355,61
Extra-budgetary (NAR): ICT		1 568 279,24	3 775 111,76
Total non-investment expenditures ISPROFIN	<b>16 423 780,76</b>	<b>11 587 704,39</b>	<b>10 179 467,37</b>
Total non-investment expenditures	<b>335 765 780,76</b>	<b>332 884 974,28</b>	<b>10 179 467,37</b>

## INVESTMENT

Under unspent expenditures, CZK 15,330,330 was drawn in 2011; CZK 5,162,960 was transferred to the 2012 budget.

### B) Drawing of investment expenditures for 2011

Indicator	Adjusted budget	Drawing	Balance
Investment costs	22 293 813,40	20 120 348,69	2 173 464,71
Extra-budgetary from NAR		5 297 062,00	0
<b>Total investment expenditures: ISPROFIN</b>	<b>22 293 813,40</b>	<b>25 417 410,69</b>	<b>2 173 646,71</b>

Scheme	1st quarter		CZK drawn
115010/33	Project		
	115V01300D005	České Budějovice TI building renovation	1 215 019,54
<b>Total</b>			<b>1 215 019,54</b>

Scheme	2nd quarter		CZK drawn
115010/33	Project		
	115V01300D005	České Budějovice TI building renovation	5 386 261,84
<b>Total</b>			<b>5 386 261,84</b>

Scheme	3rd quarter		CZK drawn
115010/33	Project		
	115V01300D005	České Budějovice TI building renovation	6 355 241,63
	115V01300D019	IT corridor storeroom in CEI building	70 212,00
	115V01300D016	Liberec TI parking lot construction	58 680,00
<b>Total</b>			<b>6 484 133,63</b>

**B) Drawing of investment expenditures for 2011**

Scheme	4th quarter		CZK drawn
115010/33	Project		
	115V01300D005	České Budějovice TI building renovation	5 430 688,68
	115V01300D019	IT corridor storeroom in CEI building	12 689,00
	115V01300D020	EFS and ESS delivery and installation in K. Vary	449 440,40
	115V01300D016	Liberec TI parking lot construction	405 201,00
	115V01400D016	Purchase of colour multifunction appliance	380 880,00
	115V01300D015	Power line renovation at Ústí n. Labem TI	1 204 463,60
	115V01300D018	Roof and facade renovation at Hradec Králové TI	1 241 095,20
	115V01300D022	Passenger elevator delivery and installation at CEI HQ	192 480,00
	115V01300D023	Flooring renovation at CEI HQ	315 307,00
	115V01400D031	CEI car repairs in 2011	1 298 000,00
	115V01400D017	Server room air conditioning renovation at CEI HQ	159 860,00
	115V01100D025	Server renewal at TIs and HQ	1 241 890,80
<b>Total</b>			<b>12 331 995,68</b>
<b>2011 Total</b>			<b>25 417 410,69</b>

**C) Income fulfilment in 2011**

Indicator	Approved budget	Adjusted budget	Drawing
2132 income from renting other real estate and parts thereof	280 000,00	280 000,00	496 188,62
2133 income from rental of chattels	3000,00	3000,00	3 600,00
2141 income from interest	0	0	13 709,26
2310 income from sales of short-term and petty long-term assets	0	0	18 610,00
2322 insurance compensation received	50 000,00	50 000,00	463 451,00
2324 non-capital allowances and compensations received	1 430 000,00	1 430 000,00	2 495 979,78
2329 other non-taxable income not shown elsewhere (CITES proceeding costs, etc.)	20 000,00	20 000,00	113 700,00
<b>Non-taxable income – subtotal</b>	<b>1 783 000,00</b>	<b>1 783 000,00</b>	<b>3 605 238,66</b>
4132 transfers from other own funds	0	0	472 269,00
4135 transfers from funds of state agencies	0	0	50 351,06
<b>Received (transfers from own funds) – subtotal</b>			<b>522 620,06</b>
<b>Total</b>	<b>1 783 000,00</b>	<b>1 783 000,00</b>	<b>4 127 858,72</b>

## Overview of territorial inspectorate activity in 2011

Department	Number of inspectors	Inspection activity	EIA statements and positions	Other statements and positions	Fines			Other decisions								Charge agendas							
					All decisions and fines issued in reporting period	All decisions on fines final and conclusive in reporting period	Total amount of final and conclusive fines (CZK)	No. of final and conclusive decisions: discontinuation or restriction of activity, operation or part thereof	No. of final and conclusive decisions: seizures / confiscations	No. of decisions ordering remedy final and conclusive in reporting period	No. of decisions ordering remedy to comply with emission limits	No. of decisions setting emission limits for multiple fuel combustion	No. of approvals to regulatory rules issued	No. of decisions on source category issued	Certificates of hazardous waste properties taken away or suspended	No. of decisions on charges and advances for wastewater discharge issued	No. of decisions on charges and advances for groundwater consumption issued						
PH	58	2 424	291	2 491	290	271	14 767 015	0	3	36	2	0	0	15	0	343	794	47	548	37	0		
ČB	37	1 181	70	708	213	205	7 079 430	5	0	87	0	0	0	1	0	158	584	21	210	24	0		
PL	36	1 567	72	539	266	262	12 077 209	5	2	24	2	0	0	7	0	126	528	6	140	7	2		
UL	48	1 792	139	1 150	238	223	16 394 250	20	0	19	5	0	5	8	0	259	397	37	304	30	1		
HK	41	1 544	117	1 196	204	196	6 773 600	6	0	17	2	0	0	9	0	198	695	23	184	38	1		
HB	32	1 345	88	808	282	279	6 371 592	1	0	25	0	3	0	2	0	160	531	10	175	19	2		
BR	50	2 750	188	2 024	312	308	16 768 734	4	4	47	0	0	6	40	0	369	675	25	247	30	4		
OL	30	1 681	80	568	218	225	9 719 345	63	5	77	5	0	0	13	0	145	386	5	162	23	0		
OV	44	1 807	163	1 291	233	224	10 853 169	7	11	42	0	0	19	0	0	230	236	20	286	24	0		
LI	24	1 161	58	415	123	120	7 681 025	2	0	39	0	0	0	2	0	91	280	8	167	9	1		
HQ	49	324	0	92	49	42	595 700	0	33	0	0	0	0	0	0	0	0	0	0	9	11		
Total	449	17 576	1 266	11 282	2 428	2 355	109 081 069	113	58	413	16	3	30	97	0	2 079	5 106	202	2 423	250	22		

## CONTACT INFORMATION

Directorate	Address	E-mail	Phone/fax: +420
<b>Czech Enviromental Inspectorate</b>	Na Břehu 267 190 00 Praha 9	public@cizp.cz	tel.: 283 891 564 fax: 283 892 662
Regional Inspectorate	Address	E-mail	Phone/fax: +420
<b>PRAHA</b>	Wolkerova 40 160 00 Praha 6	public@ph.cizp.cz	tel.: 233 066 111 fax: 233 066 103 <b>disaster reporting:</b> 731 405 313
<b>PLZEŇ</b>	Klatovská tř. 48 301 22 Plzeň	public@pl.cizp.cz	tel.: 377 236 783, fax: 377 237 289 <b>disaster reporting:</b> 731 405 350
<b>HRADEC KRÁLOVÉ</b>	Resslova 1229 500 02 Hradec Králové	public@hk.cizp.cz	tel.: 495 773 + linka fax: 495 211 175 <b>disaster reporting:</b> 731 405 205
<b>ČESKÉ BUDĚJOVICE</b>	Dr. Stejskala 6, P. O. BOX 32 370 21 České Budějovice	public@cb.cizp.cz	tel.: 386 109 111, fax: 386 357 581 <b>disaster reporting:</b> 731 405 133
<b>ÚSTÍ NAD LABEM</b>	Výstupní 1 644 400 07 Ústí nad Labem	public@ul.cizp.cz	tel.: 475 500 547, fax: 475 500 042 tel.: 353 221 140
<b>branch office KARLOVY VARY</b>	Drahomířino nábřeží 197/16 360 01 Karlovy Vary	public@kv.cizp.cz	<b>disaster reporting:</b> 731 405 378
<b>HAVLÍČKŮV BROD</b>	Bělohradská 3304 580 01 Havlíčkův Brod 1	public@hb.cizp.cz	tel.: 569 496 111, fax: 569 429 822 <b>disaster reporting:</b> 731 405 166
<b>BRNO</b>	Lieberzeitova 14 614 00 Brno	public@bn.cizp.cz	tel.: 545 545 111, fax: 545 545 100 tel.: 577 690 462
<b>branch office ZLÍN</b>	Tř. Tomáše Bati 3792 760 01 Zlín		<b>disaster reporting:</b> 731 405 100
<b>OLOMOUC</b>	Tovární 41 772 00 Olomouc	public@ol.cizp.cz	tel.: 585 243 410, fax: 585 243 410 <b>disaster reporting:</b> 731 405 262
<b>OSTRAVA</b>	Valchařská 15/72 702 00 Ostrava	public@ov.cizp.cz	tel.: 595 134 111, fax: 596 115 525 <b>disaster reporting:</b> 731 405 301
<b>LIBEREC</b>	Tř. 1. máje 858/26 460 01 Liberec 1	public@lb.cizp.cz	tel.: 485 340 888, fax: 485 340 712 <b>disaster reporting:</b> 723 083 437

## ABBREVIATIONS AND EXPLANATIONS

BCD	Alkaline catalytic decomposition	MŽP	Ministry of the Environment
BSK	Biochemical oxygen consumption	NL	Undissolved substances
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora	OI	Regional inspectorate
CEI	Czech Environmental Inspectorate	OkÚ	District Authorities
ČHMÚ	Czech Hydrometeorological Institute	OOH	Waste Management Department
ČOV	Waste water treatment plant	OOL	Forest Protection Department
ČSPHM	Fuel filling station	OOO	Air Conservation Department
ČR	Czech Republic	OOP	Environmental Protection Department
EIA	Assessment of environmental impacts	OOV	Water Conservation Department
EK	European Commission	OÚ	Municipal Authorities
EO	Equivalent population	RAPEX	European information system of products dangerous for consumers
EU	European Union	PPO	Trans-border transport of wastes
EVL	European significant locations	PUPFL	Plots intended for forest function
GMO	Genetically modified organisms	SFŽP	State Environmental Fund
HZS	Fire and Rescue Corps	SRS ČR	State Phytosanitary Administration of the Czech Republic
CHSK	Chemical oxygen consumption	ÚČOV	Central waste water treatment plant
CHKO	Natural reserve	ÚKZÚZ	Central Institute for Supervising and Testing in Agriculture
CHÚ	Conservation area	VKP	Significant landscape element
IMPEL	Network of environmental inspection authorities of EU countries	VZCHÚ	Large-area specially protected territories
IPPC	Integrated prevention and pollution elimination	ZCHD	Specially protected species
LHP	Forest economy plan	ZCHÚ	Specially protected area pursuant to Act no. 114/92 Coll.
LHO	Forest management framework		
MZCHÚ	Small-area specially protected areas		



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Photography: archives CEI

# ANNEX – 2011 TABLES

Overview covering the period: 1 January 2011 – 31 December 2011

## Overview of activity of territorial inspectorates in 2011 – air protection

Territorial inspectorate	No. of inspectors	Inspections	ACT NO. 76/2002 COLL.			STATEMENTS AND POSITIONS ISSUED			DECISIONS IN ADMINISTRATIVE PROCEEDINGS											No. of SPE verifications	EMISSION MEAS. AND ANALYSES			
			Involvement in inspections under Act no. 76/2002 Coll.	Collaboration on administrative proceedings on fines	Amount of fines for air protection final and conclusive in reporting period	SEF	Regional Authorities	Others	Fines					Measures			Approvals							
									All decisions issued in reporting period	All decisions final and conclusive in reporting period	Decisions on fines final and conclusive issued in reporting period	Decisions on fines final and conclusive from previous years	Total fine amount (CZK)	Observance of emission limits	Discontinuation or restriction of activity	Others	Multiple fuel type combustion	Regulatory rules			Source category			
PH	11	474	33	0	0	16	704	286	38	38	36	2	2 510 000	2	0	2	0	0	15	377	0	0	0	66
ČB	7	231	34	0	0	21	226	6	36	36	34	2	1 190 000	0	0	1	0	0	1	161	0	0	0	17
PL	7	399	6	0	0	11	238	36	22	20	19	1	925 000	2	1	3	0	0	7	345	0	0	0	12
ÚL	10	550	17	4	207 000	13	276	220	25	26	25	1	837 000	5	0	0	0	5	8	479	0	0	0	34
HK	9	607	36	0	0	29	405	35	37	34	31	3	892 000	2	0	0	0	0	9	374	0	0	0	31
HB	5	312	19	5	18 000	63	356	6	53	49	48	1	869 000	0	0	2	3	0	2	477	0	0	0	19
BR	10	1 332	26	0	0	65	723	468	70	73	60	13	5 494 500	0	0	3	0	6	40	1 054	0	0	0	54
OL	7	583	18	0	0	17	264	21	70	63	61	2	686 500	5	0	0	0	0	13	473	0	0	0	15
OV	11	428	32	0	0	18	470	202	25	22	22	0	996 000	0	0	2	0	19	0	173	0	0	0	41
LI	5	306	6	1	4 000	2	90	15	22	21	20	1	569 000	0	0	2	0	0	2	172	0	0	0	11
HQ	9	50	0	0	0	0	0	55	2	2	2	0	224 000	0	0	0	0	0	0	1 060	1	35	7	0
Total	91	5 272	227	10	229 000	255	3 752	1 350	400	384	358	26	15 193 000	16	1	15	3	30	97	5 145	1	35	7	300

## Overview of activity of territorial inspectorates in 2011 – water protection

Territorial inspectorate	No. of inspectors	Inspections	ACT NO. 76/2002 COLL.			STATEMENTS AND POSITIONS ISSUED			DECISIONS IN ADMINISTRATIVE PROCEEDINGS										WATER ACCIDENTS		
			Involvement in inspections under Act no. 76/2002 Coll.	Collaboration on administrative proceedings on fines	Amount of fines for water protection final and conclusive in reporting period	SEF	Audits	Others	Fines					Remedial measures					Total no. of water accidents registered	Accidents investigated by CEI	
									All decisions issued in reporting period	All decisions final and conclusive in reporting period	Decisions on fines final and conclusive issued in reporting period	Decisions on fines final and conclusive from previous years	Total fine amount (CZK)	All remedial measures ordered in reporting period	All remedial measures final and conclusive in reporting period	Remedial measures final and conclusive issued in reporting period	Remedial measures final and conclusive from previous years				
PH	12	626	32	5	165 000	22	122	677	26	25	18	7	3 093 215	11	11	11	0	0	47	12	115
ČB	6	260	25	0	0	6	0	101	23	22	20	2	944 930	6	6	6	0	0	16	16	32
PL	8	288	22	1	40 000	1	2	166	87	82	77	5	2 038 709	15	14	14	0	0	6	1	17
UL	11	407	16	1	220 000	2	27	250	25	25	22	3	1 943 850	8	8	6	0	0	30	5	54
HK	9	267	35	6	0	15	0	253	18	18	16	2	840 000	3	3	3	0	0	20	12	29
HB	6	257	11	4	62 000	2	0	133	42	37	37	0	758 742	9	8	8	0	0	10	5	52
BR	11	447	27	5	260 000	9	0	364	84	83	75	8	3 516 734	18	17	16	1	3	24	4	43
OL	6	285	24	7	185 000	3	0	123	43	42	40	2	1 184 845	2	1	0	0	0	5	1	28
OV	9	401	25	0	200 000	0	0	223	48	39	37	2	1 814 669	3	2	2	0	0	20	8	20
LI	5	210	24	3	328 000	2	3	72	12	11	11	0	486 525	9	9	9	0	0	3	6	30
Total	83	3 448	241	32	1 460 000	62	154	2 362	408	384	353	31	16 622 219	84	79	75	1	3	181	70	420

## Water Protection Department – Charge Agendas – 2011

Territorial inspectorate	CHARGES														
	Wastewater discharge						Groundwater consumption								
	Decisions altering advances issued	Advance decisions issued for 2012	Advance amount set for 2012	Charge decisions issued for 2010	Charge decisions for 2010 final and conclusive	Amount of charges for 2010 final and conclusive (CZK)	Additional decisions on advances for 2011	Additional advance amount for 2011 (CZK)	Charge decisions issued for 2010	Charge decisions for 2010 final and conclusive	Amount of charges for 2010 final and conclusive (CZK)	New and altered advance decisions issued in 2011	Amount of advances set by decisions issued in 2011 (CZK)	Advance decisions revoked in 2011	Resolutions to halt proceedings in 2011
PH	0	165	36 100 278	178	178	33 678 209	56	8 173 586	667	667	137 358 706	46	7 913 311	25	215
ČB	9	77	13 573 529	72	72	9 368 432	9	399 382	516	516	36 341 764	27	5 478 090	32	0
PL	1	63	5 692 335	62	62	4 516 071	32	2 304 487	454	452	28 735 969	35	3 418 413	7	0
UL	0	123	70 414 529	136	136	64 581 557	4	670 797	340	340	70 799 988	50	16 701 517	3	47
HK	2	97	26 085 323	99	99	29 446 789	40	3 235 223	623	623	179 696 703	25	757 791	7	0
HB	0	80	9 116 592	80	80	8 899 571	10	554 388	488	488	29 276 120	28	1 660 972	5	42
BR	3	177	15 924 746	189	189	15 531 181	37	2 598 921	583	583	106 669 514	48	22 567 120	7	175
OL	1	68	13 935 087	76	76	13 030 223	1	160 000	355	355	66 164 446	27	5 023 128	3	0
OV	4	111	55 719 725	115	115	44 514 622	3	279 000	195	195	36 253 566	25	5 855 544	13	44
LI	0	46	6 240 123	45	45	3 918 255	14	955 905	233	233	39 738 772	32	16 509 840	1	0
<b>Total</b>	<b>20</b>	<b>1 007</b>	<b>252 802 267</b>	<b>1 052</b>	<b>1 052</b>	<b>227 484 910</b>	<b>206</b>	<b>19 331 689</b>	<b>4 454</b>	<b>4 452</b>	<b>731 035 548</b>	<b>343</b>	<b>85 885 726</b>	<b>103</b>	<b>523</b>

## Overview of activity of territorial inspectorates in 2011 – waste management

Territorial inspectorate	No. of inspectors	Inspections	ACT NO. 76/2002 COLL.			STATEMENTS AND POSITIONS ISSUED			No. of administrative proceedings initiated in reporting period	DECISIONS IN ADMINISTRATIVE PROCEEDINGS										Certificates taken away	Total no. of accidents registered	No. of submissions and petitions handled	No. of submissions forwarded to other admin. bodies	No. of criminal charges made
			Involvement in inspections under Act no. 76/2002 Coll.	Collaboration on administrative proceedings on fines	Amount of fines for waste management final and conclusive in reporting period	SEF	Audits	Others		Fines					Remedial measures				Suspended certificates of hazardous properties of waste					
										All decisions issued in reporting period	All decisions final and conclusive in reporting period	Decisions on fines final and conclusive issued in reporting period	Decisions on fines final and conclusive from previous years	Total fine amount (CZK)	All remedial measures ordered in reporting period	All remedial measures final and conclusive in reporting period	Remedial measures final and conclusive issued in reporting period	Remedial measures final and conclusive from previous years						
PH	14	571	31	3	270 000	32	121	6	132	126	122	116	6	7 289 500	3	1	1	0	0	0	0	85	17	0
ČB	8	272	24	8	240 000	19	0	16	69	64	65	61	4	2 170 000	0	0	0	0	0	0	0	39	13	0
PL	7	519	18	3	100 000	14	0	1	118	120	119	115	4	5 964 500	0	0	0	0	0	0	0	40	6	0
ÚL	11	448	17	5	525 000	6	6	40	131	130	126	124	2	7 610 400	1	1	1	0	0	0	0	84	1	0
HK	9	372	38	8	530 000	17	0	174	86	87	81	66	15	3 017 000	3	1	1	0	0	0	2	39	16	0
HB	8	287	13	0	0	15	0	5	96	98	98	94	4	2 058 000	0	0	0	0	0	0	0	14	5	0
BR	10	485	28	0	325 000	45	0	10	97	101	99	89	9	5 770 000	0	0	0	0	0	0	0	57	20	0
OL	5	233	9	3	20 000	21	0	0	36	43	43	38	5	6 458 000	0	1	0	1	0	0	0	27	5	0
OV	9	442	29	4	35 000	18	0	130	92	88	94	83	11	5 531 000	2	2	2	0	0	0	0	73	8	0
LI	4	308	12	3	288 000	2	0	104	50	47	47	41	6	2 297 500	0	0	0	0	0	0	3	32	7	1
Total	85	3 937	219	37	2 333 000	189	127	486	907	904	894	827	66	48 165 900	9	6	5	1	0	0	5	490	98	1

## Overview of activity of territorial inspectorates in 2011 – nature protection

Territorial inspectorate	No. of inspectors	Inspections	Involvement in multi-sector inspections	STATEMENTS AND POSITIONS ISSUED			DECISIONS IN ADMINISTRATIVE PROCEEDINGS															No. of submissions and petitions handled	No. of submissions forwarded to other admin. bodies	No. of criminal charges made
				SEF	Audits	Others	FINES										No. of decisions final and conclusive: discount. or restriction of activity, operation or part thereof	No. of final and conclusive decisions: seizures/confiscations	No. of decisions ordering remedy final and conclusive in reporting period	No. of preliminary measures issued				
							Illegal activities of corporations and entrepreneurs					Transgressions by natural persons												
							All decisions issued in reporting period	All decisions final and conclusive in reporting period	Decisions on fines final and conclusive issued in reporting period	Decisions on fines final and conclusive from previous years	Total fine amount (CZK)	All decisions issued in reporting period	All decisions final and conclusive in reporting period	Decisions on fines final and conclusive issued in reporting period	Decisions on fines final and conclusive from previous years	Total fine amount (CZK)								
PH	12	472	0	0	6	163	18	12	12	0	220 000	41	40	40	0	50 300	0	3	4	5	242	2	0	
ČB	7	183	0	2	0	71	23	20	15	5	283 000	17	17	15	2	121 500	5	0	4	0	102	4	0	
PL	6	152	0	0	0	32	19	17	17	0	197 000	4	4	4	0	3 000	4	2	1	0	60	1	1	
ÚL	7	210	9	0	2	98	27	22	20	2	3 034 000	17	13	13	0	259 000	20	0	2	3	104	3	0	
HK	7	115	9	0	0	124	15	15	11	4	306 500	10	9	9	0	22 100	5	0	1	0	59	14	0	
HB	5	323	11	0	0	65	31	32	22	10	1 220 500	31	32	29	3	130 450	1	0	5	3	62	9	2	
BR	9	287	21	0	0	37	22	21	17	4	690 000	17	15	13	2	137 500	1	4	8	0	85	5	4	
OL	5	224	22	0	0	24	15	17	12	5	580 000	21	19	19	0	41 500	63	5	3	10	60	3	0	
OV	7	263	17	0	0	60	31	27	25	2	1 811 000	22	22	22	0	28 500	7	11	4	3	98	6	0	
LB	4	125	3	0	0	37	9	9	9	0	1 429 000	14	12	12	0	69 000	2	0	3	0	79	2	0	
HQ CITES	14	274	0	0	0	37	8	5	5	0	61 000	39	35	35	0	310 700	0	33	0	0	0	9	11	
Total	83	2 628	92	2	8	748	218	197	165	32	9 832 000	233	218	211	7	1 173 550	108	58	35	24	951	58	18	

## Overview of activity of territorial inspectorates in 2011 – forest protection

Territorial inspectorate	No. of inspectors	Inspections	Involvement in multi-sector inspections	Statements and positions issued	DECISIONS IN ADMINISTRATIVE PROCEEDINGS											No. of submissions and petitions handled	No. of submissions forwarded to other admin. bodies	No. of criminal charges made
					Fines					Remedial measures				No. of preliminary measures issued	No. of decisions final and conclusive: discount. or restriction of activity			
					All decisions issued in reporting period	All decisions final and conclusive in reporting period	Decisions on fines final and conclusive issued in reporting period	Decisions on fines final and conclusive from previous years	Total fine amount (CZK)	All remedial measures ordered in reporting period	All remedial measures final and conclusive in reporting period	Remedial measures final and conclusive issued in reporting period	Remedial measures final and conclusive from previous years					
PH	6	240	14	34	25	23	21	2	930 000	22	20	20	0	0	0	34	1	0
ČB	6	194	9	210	21	18	17	1	910 000	75	77	72	5	0	0	14	5	0
PL	4	95	0	4	11	11	10	1	2 036 000	9	9	9	0	0	0	6	0	1
ÚL	6	143	11	4	4	3	3	0	2 000 000	10	8	8	0	0	0	23	16	0
HK	4	114	5	0	15	13	10	3	757 000	13	12	11	1	0	1	14	5	1
NB	5	111	6	106	19	18	16	2	1 053 900	16	12	11	1	0	0	3	2	0
BR	6	87	13	4	5	7	5	2	545 000	21	22	21	2	0	0	6	0	0
OL	5	267	8	48	13	18	13	5	492 500	73	72	70	2	0	0	7	4	0
OV	4	167	0	0	11	9	9	0	395 000	37	34	34	0	6	0	19	3	0
LB	4	171	8	1	9	8	7	1	810 000	29	27	25	2	0	0	11	0	0
Total	50	1 589	74	411	133	128	111	17	9 929 400	305	293	281	13	6	1	137	36	2

## Overview of activity of territorial inspectorates in 2011 – integrated agendas

Territorial inspectorate	No. of inspectors	Inspections	Within that, checks whether facility falls under Act no. 76/2002 Coll.	Active in checks, reviews and inspections reported by other departments	STATEMENTS AND POSITIONS ISSUED					Applications received under Act no. 167/2008 Coll., Section 8	Administrative proceedings initiated	DECISIONS IN ADMINISTRATIVE PROCEEDINGS AND ORDERS										Discontinuation of operation of facility or part thereof	Fine imposition waiver	No. of accidents registered (facilities subject to IPPC)	No. of submissions and petitions handled	No. of criminal charges made (IPPC agenda)	No. of submissions forwarded to other admin. bodies
					Applications for issuance and amendment of integrated permits	SEF	EIA	Oral negotiation on issuance of IP, incl. those mandatory under Act no. 76/2002 Coll.	Other negotiations, statements and positions			Fines under integration and expert department legislation						Within that, combined AP									
												Decisions issued in reporting period	Decisions final and conclusive in reporting period	Decisions final and conclusive issued in reporting period	All decisions and orders final and conclusive issued in reporting period	Within that, combined decisions (IPPC + expert departments or IPR) final and conclusive	Total amounts final and conclusive	Fines imposed under air protection legislation final and conclusive in reporting period (CZK thousand)	Fines imposed under water protection legislation final and conclusive in reporting period (CZK thousand)	Fines imposed under waste management legislation final and conclusive in reporting period (CZK thousand)							
PH	3	41	3	3	153	5	291	6	138	0	11	16	9	2	11	3	674 000	0	0	0	0	0	0	6	0	17	
ČB	3	41	1	20	1	0	70	0	29	0	17	29	23	4	27	8	1 460 000	0	0	210	0	0	5	6	0	2	
PL	4	114	0	1	2	3	72	4	25	0	3	3	3	4	7	2	913 000	0	0	150	0	0	0	5	0	0	
ÚL	3	34	0	9	75	23	139	8	100	0	5	10	9	0	9	3	710 000	0	0	330	0	0	7	5	1	10	
HK	3	69	1	9	91	7	117	7	39	0	10	22	21	2	23	4	939 000	20	0	0	0	0	1	12	0	3	
HB	3	55	0	11	53	0	88	2	2	0	7	8	8	1	9	9	281 000	18	20	0	0	0	0	25	0	3	
BR	4	112	5	4	105	7	188	4	183	0	13	13	12	1	13	1	615 000	0	0	325	0	1	1	2	0	5	
OL	2	89	0	15	46	0	80	1	0	0	15	13	13	3	16	0	276 000	0	0	0	0	0	0	25	0	11	
OV	4	106	1	11	64	1	163	6	99	0	9	8	6	2	8	1	277 000	0	0	10	0	0	0	35	0	7	
LB	2	41	1	0	46	0	58	12	29	0	10	10	9	2	11	0	2 020 000	0	1 010	0	0	0	2	4	0	0	
Total	31	702	12	83	636	46	1 266	50	644	0	100	132	113	21	134	31	8 165 000	38	1 030	1 025	0	1	16	125	1	58	

