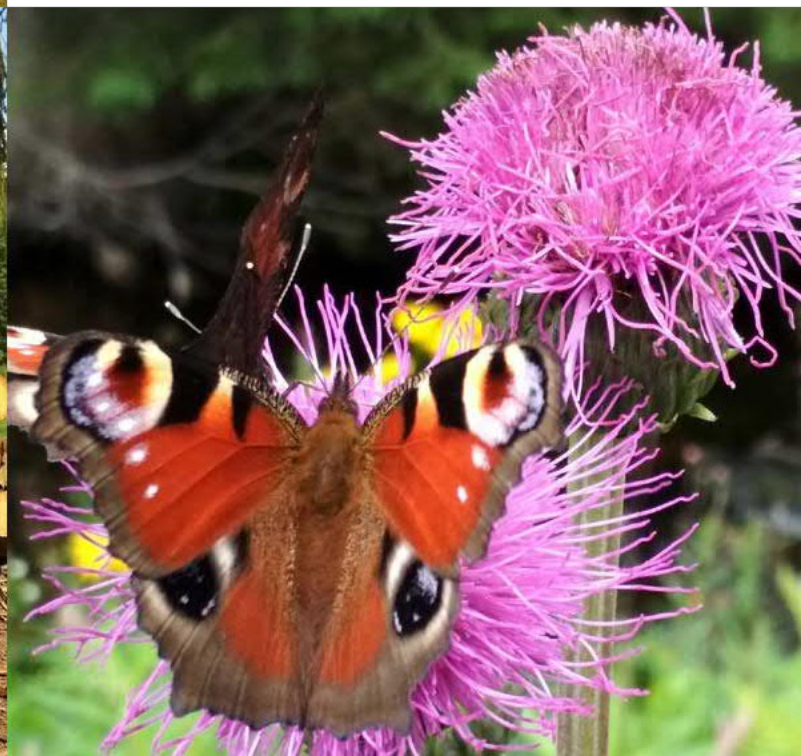


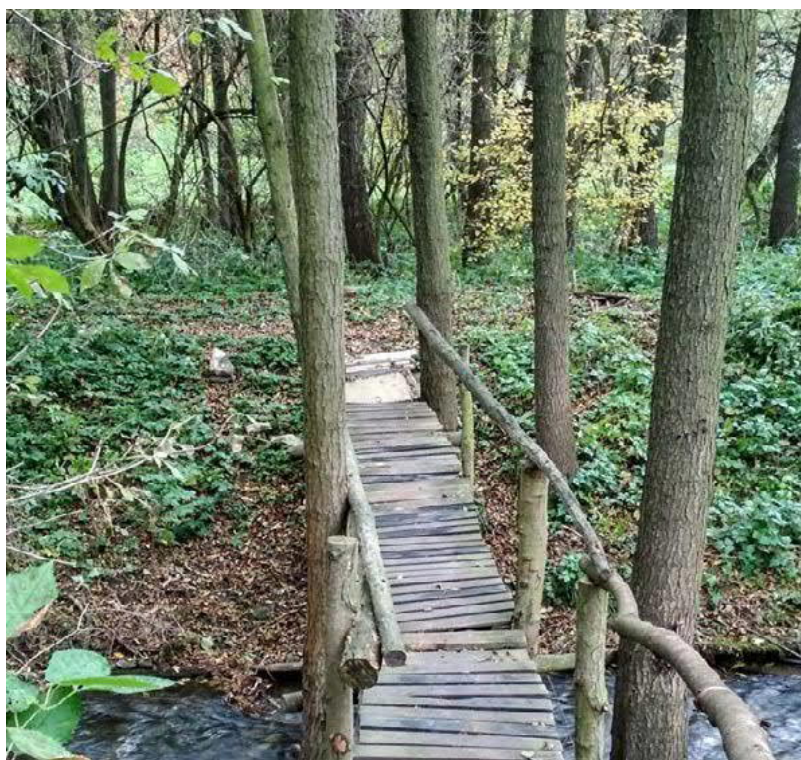


CZECH ENVIRONMENTAL INSPECTORATE

Annual Report 2018



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DIRECTOR'S FOREWORD



The year 2018 will be among the very good ones overall in the Czech Environmental Inspectorate (CEI) history. However, before I move on to the assessment itself, let me present the basic principles of the Inspectorate's functioning within the context of Czech public administration.

The role of the Czech Environmental Inspectorate (CEI) within the public administration system of the CR fully matches its legal definition. The principal mission of the Inspectorate is thus supervision over adherence to law in the environmental area, encompassing all environmental components (water, air, waste, nature, forest). By law, the CEI is a first-instance administrative authority, meaning that its administrative decisions are conclusive either on the expiry of the appeal period for entities against which proceedings are held or, in the case of an appeal, after the decision of the appeals authority; such authorities are so-called Public Administration Departments (territorial), integrated within the organisational structure of the Ministry of the Environment.

The Inspectorate's own activity is defined by annual Schedule of activities of the Czech Environmental Inspectorate for the year. The structured development of the Schedule reflects direct legal obligations (e.g., inspection of entities subject to so-called IPPC integrated permits), direct tasks imposed by the Ministry of the Environment, tasks arising from relevant international agreements and strategic governmental documents, etc.

The performance of the inspection work schedule is monitored and inspected. Another significant portion of our inspection work (over 40% of the output) is inspection work based on public suggestions, the number of which continued to grow in 2018. Each such suggestion has to be examined by law (typically in the form of an unannounced inspection on the site), and administrative proceedings are initiated or not based on an evaluation of the inspected reality.

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

- Acting as an open authority in the sense of "absolute transparency" in all of its activities, obviously with respect to legal restrictions (e.g., non-public nature of administrative proceedings as a strict requirement of the Rules of Administrative Procedure in force). The Inspectorate is open to every suggestion and all of the professional and general public / citizens.
- Within the CEI's legal defined areas of activity, understand our work primarily as a service to the public (communication, handling of suggestions) and direct support to emancipation of the public.
- Derive all external as well as internal activity from ethical rules and full moral and ethical integrity, including tenders.
- The CEI's "family silver" is its highly educated, expertly and professionally acting inspectors and other employees. Keeping these expert employees, their training and education and their occupational safety are our long-term priorities.
- In the last three years, we have perceived the CEI's transformation pursuant to the Public Service Act as an ongoing and high priority (mid-term). Tasks arising from this transformation are undoubtedly a burden beyond the CEI's ordinary activity and are, unfortunately, manifested in certain fluctuation of inspection work intensity.

In the coming years, it will be essential to maintain the processes described above and below, both qualitatively and quantitatively.

In 2018, we managed to meet all the monitored goals and parameters specified above in the following areas:

- Meeting of the inspection work schedule.
- Handling of all suggestions received.
- Meeting of other activities, notably expert statements (EIA, IPPC) and position statements under component law.
- As part of the Ministry of Finance-driven reduction in “vacant service positions”, the accelerated pace of tenders has led to a reduction in the number of temporarily vacant system positions from 50 to 40: this has been a constant, recurring situation, where admission of new employees after departure of existing ones (retirement, maternity leave, etc.) takes 3-5 months pursuant to the Civil Service Act.
- Implementation of other legal obligations in the area of “rear” activities of the CEI (electronic documentation service, internal information systems, GDPR, HR system, etc.) without disrupting proper inspection work.
- Meeting of requirements of the Civil Service Act and notably its continuously generated secondary standards (decrees, ordinances and MoI methodological instructions).
- Constant replenishment with qualified employees, particularly stabilisation of the team of senior civil servants.

Besides the above, we have managed the following in the evaluated three-year period of 2015-2018:

- Transformation of the Czech Environmental Inspectorate into a functioning civil authority pursuant to the Civil Service Act.
- Maintain standard performance of inspection work (meeting of all tasks and suggestions); average work intensity can be characterised by an average number in excess of 40 inspections per executive inspector throughout the period and across the departments. It should be emphasised that inspections of the largest sources of pollution are very demanding on our capacity; they are carried out periodically, once a year, by law; at the same time, investigation of every trivial suggestion (their numbers grow year-on-year) is demanding.

- Assure the authority’s information openness (provision of information pursuant to applicable laws without serious flaws, web site, communication with the public).
- Fundamental changes in media activity and public perception of the CEI. Periodic press information about completed administrative proceedings aimed at awareness raising and improving information among both professional and general public. Change the structure of “positive” and “negative” news, manifested in the overwhelming majority of information on successful inspection work over “defensive” explanation of our work.
- Fundamental changes in technical equipment of inspection work (new sophisticated equipment increasing the efficiency and effectiveness of inspection) and equipment of inspectors.
- Unification of inspection work methodology among territorial inspectorates, primarily by way of joint handling of some standardised problems in each environmental component, and clear methodological guidance by the CEI HQ.
- The above is related to the CEI’s clear orientation on a wide range of outcomes from administrative proceedings, including in connection with the new Offence Act and environmental component protection acts.
- Ethic, moral and public control rules are applied and integrated across all our inspection work, which can be documented, e.g., on the relatively very strictly (beyond legal requirements) managed area of the CEI’s public procurement and contracts.
- Coordination and collaboration with other institutions in the area of inspection at the national (Czech Police, Customs Administration, public prosecutors) and international level (IMPEL, Interpol, EUFJ, etc.) has improved significantly.

The most prominent restrictions to the CEI’s greater success include:

- Long-term undervaluation of pay for CEI employees, particularly executive inspectors. According to the 2017 table of average wages in all the organisations in the public service sector, the CEI is at the very bottom of the table. It is the worst-paid inspectorate (compared to the CTIA, vets, plant care and other similar inspection institutions), the second-worst-paid organisation under the MoE, and higher

average wages are reported by district archives and similar institutions. This is clearly the cause of the relatively high fluctuation, so that despite the very successful filling of vacancies caused by leaving employees, the total annual numbers of departures and admissions are almost equal.

- Moreover, the Government carried out a targeted coordinated reduction in so-called vacant positions in public administration in 2018, resulting in a reduction in the CEI wage budget by CZK 16 million. Despite the MoE's partial compensation for this budget reduction, the average CEI employee saw the first real annual income decrease since 2014.
- The characteristics of the inspection work itself, which is demanding particularly on psychic properties and overall resilience of the inspector and simultaneously requires highly specialised expertise. The lack of necessary experts is particularly felt in the area of lawyers, who are extremely difficult to pay satisfactorily under the CEI's salary conditions described above.
- The unclarity of enforced legal regulations, which is generally the result of the legislative negotiation process (various changes, additions, interventions during parliamentary consultations, results of lobbying, etc.).
- Lower level of social pressure on adherence to law in general, including environmental legislation.
- Incomplete development of a methodology for more objective monitoring of the CEI's performance, coming up against a number of logical and formal restrictions. It is possible to evaluate the meeting of tasks imposed by the superior body (MoE), and of annual and thematic plans and other clearly defined obligations. However, it is impossible to evaluate the CEI's performance based on numbers of inspections made or amounts of fees imposed. First of all, there is a degree of response to the indiscipline of polluters; secondly, individual inspections are incomparable in terms of temporal or professional extent; and thirdly, a number of important CEI activities are eventually not "inspections" but different activities, such as "field investigations" or expert statements/opinions. Year-on-year differences are also due to changes in legislation and priorities of superior bodies.
- There is still room for improvement in the methodological communication and unification of procedures with appeal authorities, although a lot has improved in this area.

In conclusion, it must be said that, in spite of the problems mentioned above, 2018 is clearly one of the most successful years in the twenty-years of the Czech Environmental Inspectorate's existence. The planned goals were met and the inspection work proceeded, despite the many new and one-off obligations in and outside the inspection area, at an intensity similar to previous years. Thus, it can be concluded that there are still individual challenges for 2019 in terms of work improvements, particularly elimination of the restrictions mentioned, while at the same time we are committed to back off from the high standards of our inspection work.

I am honestly grateful for the distinctively positive assessment of the CEI's work to all the CEI employees, from highly professionally acting inspectors to my colleagues at the CEI Headquarters.

Erik Geuss, CEI
Director

SUMMARY INFORMATION ON CEI WORK IN 2015-2018

Summary information on CEI work in 2015-2018

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

All decisions (fines and others, incl. charges) in legal force:	10,337	10,260	10,249	7,766
• All decisions on fines that entered into force	2,808	2,755	2,655	2,543
• Other conclusive decisions (other decisions, incl. on charges)	7,529	7,505	7,594	5,998
Total amount of fines in legal force (CZK)	135,719,214	130,717,343	113,051,685	100,274,621

Other conclusive decisions:	502	494	417	427
• No. of decisions in force – halting or restriction of operation, facility or parts thereof	44	23	22	38
• No. of decisions in force – seizing or confiscation	107	123	143	157
• No. of decisions on remedial measures in force	351	348	252	229

No. of decisions on charges and advances for charges issued:	7,027	7011	7,177	** 5,796
• No. of decisions on charges and advances for wastewater discharge	2,087	2,068	2,001	1062
• No. of decisions on charges and advances for groundwater consumption	4,940	4,943	5,175	4,734
• No. of decisions on charges for imports of controlled substances:	0	0	1	0
Amount of charges ordered by the CEI, CZK (charges for groundwater collection and wastewater discharge are collected by customs authorities)	843,017,177	908,180,824	900,828,457	916,483,401

** Decrease caused by the amendment of the Waters Act (113/2018 Coll.), after which the CEI no longer issued decisions on advance fees.

EIA statements (Act no. 100/2001 Coll.)	1,162	1,013	1,019	*** 610
Other expert statements issued	8,622	6,986	5,356	5,333

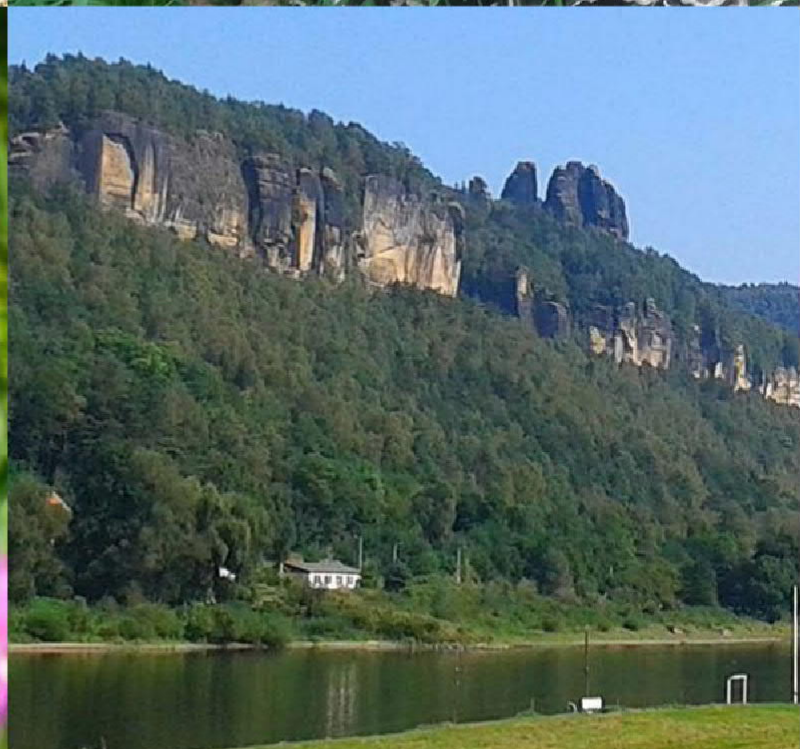
No. of suggestions and petitions received	2,746	2,759	2,781	3,044
No. of suggestions submitted to public authorities based on our inspection work	164	322	233	322
No. of crime reports	17	16	8	14
No. of accidents and emergencies	256	265	431*	413

No. of requests for information (Act no. 106/1999 Coll. and	332	309	295	325
No. of complaints about CEI work or inspectors (Section 175 of the Rules of Administrative Procedure)	70	54	54	43
No. of relevant notifications of illicit activity	0	0	0	0

Total number of employees as of 31 Dec	538	539	536	550
Education structure (% of university or college out of all employees)	76.41	77.9	77.8	77.8
Occupational safety/Injuries (Injuries per 100 employees)	0.18	0.37	0.19	0
Rate of unscheduled employee absence (sickness, injuries), (% of scheduled time allocation)	3.69	3.30	3.39	3.07
% of voluntary fluctuation (minus forced departures incl. due to reorganisation and retirement)	3.49	4.1	7.2	4.8
Total CEI budgetary funds, CZK	349,762,551.56	387,715,855.30	418,991,688.36	430,837,260.55

* Numbers of emergencies (accidents and failures) were not collected and reported in tables by the Air Protection Department in previous years; the numbers only gained importance after the amendment of the Air Protection Act in late 2016 and the EC's requirement for reporting coolant leaks.

*** The EIA Act was amended in 2018, leading to a decrease in the necessary statements.



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This CEI Annual Report is made to GRI Standards for non-financial reporting at the “GRI-referenced” level. A GRI indicator index is in Chapter 11, page 96.

1. DESCRIPTION OF ACTIVITIES

1.1 The CEI's role

CEI organisation

The Czech Environmental Inspectorate (CEI) was established in 1991 by Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and its powers in forest protection, as amended. The CEI is an organisational component of the State directly subordinated to the Ministry of the Environment of the CR and, under the CEI Act, is divided into a central Headquarters and Territorial Inspectorates (TI), of which there have been ten since 1995. They are Prague TI, České Budějovice TI, Plzeň TI, Ústí nad Labem TI, Hradec Králové TI, Havlíčkův Brod TI, Brno TI, Olomouc TI, Ostrava TI, and Liberec TI.

The Headquarters is a managing, organisational and methodological body within the CEI structure. The CEI Headquarters methodological work is done by so-called methodological departments, divided into two sections. One is the Technical Protection and Integrated Prevention Section, embracing the Air Protection Department, Water Protection Department, Waste Management Department and Integrated Agenda Department. The other is the Nature, Forest and CITES1 Protection Section, embracing the Nature Protection Department, Biodiversity and CITES Protection Department and Forest Protection Department.

The inspection work is done by CEI inspectors at the constituent inspectorates. Generally speaking, 40-45% of each inspector's working time for supervisory inspection work is planned ahead. The rest of our inspection work capacity is left for performing tasks that may occur in the course of the year and the CEI has to deal with (such as unscheduled inspections, including checks of performance of authorised emission measurement, suggestion by the public indicating environmental damage or threats, thematic sub-tasks operatively assigned by the MoE, etc.). Investigation of accidents is very time-consuming (combustion of dumps, chemical industry, etc.).

Legal framework for CEI work

The legal concept of environmental protection, of which the CEI is part, is based on the principle of separate definitions for individual environmental components under so-called environmental component acts (see introductions for each component in the Work Schedule for 2019 www.cizp.cz/Plany-cinnosti). In addition, it is necessary to list the general legal regulations that affect the activity of the CEI as a whole. As a specialised administrative authority that does preventive, inspection and sanction work in the area of environmental protection, the CEI is required to act in accordance with these general legal regulations.

The general legal regulations include Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended, which defines a general framework for administrative proceedings and is the fundamental legal regulation in the area of administrative law. Another general legal regulation for the CEI's work is Act no. 255/2012 Coll. on Inspection (Inspection Rules), as amended, defining the process of inspection work. Another, equally significant source of law is Act no. 250/2016 Coll. on Responsibility for Misdemeanours and Proceedings on Them, which has fully superseded Act no. 200/1990 Coll. on Misdemeanours, as amended, as defines the material and process aspects of acting on offences and violations. The right to a favourable living environment is also exercised by the public through the so-called Information Acts, namely Act no. 123/1998 Coll. on Right to Environmental Information, as amended, and Act no. 106/1999 Coll. on Free Access to Information, as amended. Due to the CEI's activity and position in environmental protection, the general legal regulations have to be complemented with Act no. 224/2015 Coll. on Prevention of Major Accidents Caused by Selected Hazardous Chemicals or Mixtures and on amendment of Act no. 634/2004 Coll. on Administrative Fees, as amended (Major Accident Prevention Act), as amended, Act no. 167/2008 Coll. on Prevention of Environmental Harm and its Remedy and on amendment of certain acts, and Act no. 40/2009 Coll., the Penal Code, as amended.

CEI prevention and sanction work

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

The prevention work in the broadest sense consists in the CEI's existence as such. The possibility of making an inspection and then sanctioning the entity for violation of legal regulations in the area of environmental protection is the expected and desired pressure on adherence to these regulations. Moreover, the CEI's prevention work is implemented in the form of communication with the public, whether by queries, provision of information or acceptance of suggestions notifying about environmental damage or threats.

Imposition of remedial measures is a boundary institute between the prevention and sanction work areas. From the point of view of administrative law, remedial measures are not a form of punishment, but they are always associated with illegal activity or situation and with restriction of the entity's rights and imposing an obligation on the entity to do or not do something. Their application prevents more extensive environmental damage or remedies a situation where environmental damage has occurred but can still be mitigated.

Another level of the CEI's work is the inspection/sanction area. This work is done mostly at the CEI territorial inspectorates. The inspection work is done by CEI inspectors based on powers defined in the component acts and is based on the planning and work arising from public suggestions, which are a very important category of cases. The inspection is done in accordance with the Inspection Rules. If a CEI inspector finds out in the course of an inspection that the inspected entity has violated legal regulations, the CEI is authorised to debate the illegal activity and commences a violation proceeding.

If the CEI is not authorised to debate the illegal activity, it shall report the violation to the applicable authority or hands the case over to it. Based on the powers defined by the component acts, such authorities include primarily municipal authorities, municipal authorities of municipalities with extended powers, regional authorities, State Navigation Authority, Ministry of the Environment, Regional Public Health Authorities, Nature Conservation Agency of the Czech Republic, National Park administrations, and others. If multiple authorities are applicable to hear a matter, typically the CEI and a municipality with extended powers or the CEI and another nature protection authority, it is decisive which of the authorities first initiated a violation proceeding. The administrative proceedings are performed in accordance with the Act on Responsibility for Misdemeanours and Proceedings on Them and the Rules of Administrative Procedure.

An appeal against decisions made by the CEI is possible, as it is a first-instance authority; the CEI forwards it and the dossier to the appeal authority, namely the Ministry of the Environment. It makes second-instance decisions at its specialised Public Administration Departments (OVSS), which are decentralised and located in Prague, České Budějovice, Plzeň, Chomutov, Liberec, Hradec Králové, Brno, Olomouc and Ostrava.

Following a review proceeding by the appeal authority, the first-instance decision issued by the CEI can be confirmed or revoked, then the matter is returned for a new hearing, or revoked and the proceeding halted, or changed, but never to the detriment of the accused party.

In case someone feels deprived in their rights by the decision of the authority (OVSS), they can demand an administrative court to revoke the decision or declare it void. Proceedings on administrative lawsuits are held by administrative courts pursuant to Act no. 150/2002 Coll., the Administrative Court Procedure, as amended.

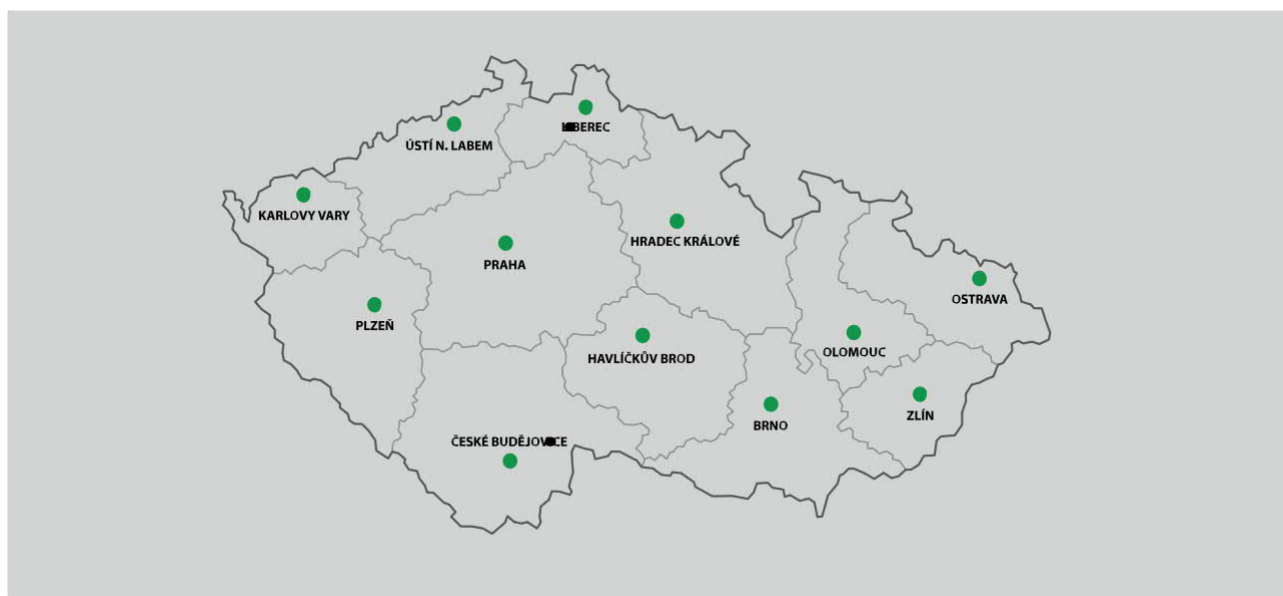
1.2 Organisational structure

The CEI is divided into 10 territorial inspectorates, two branch offices and headquarters. As of 31 Dec 2018, it employed 550 persons, including 437 professional employees.

Territorial inspectorates

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

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



Overview of powers by environmental component

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

1.3 Intensity of inspection work

In 2018, the CEI carried out a total of 16,572 inspections and issued 7,766 decisions in force (including 1,062 decisions on charges and advances for wastewater discharge and 4,734 decisions on charges for groundwater collection). Compared to 2017, the total number of inspections increased slightly (+ 708) and the number of conclusive decisions issued decreased (- 2,483). The total number of CEI inspectors in 2018 was 408. One inspector thus made 41 inspections on average. In 2018, the CEI issued 5,943 position statements and statements, including 610 on EIA processes.

No. of inspections by territorial Inspectorate

	2014	2015	2016	2017	2018
Prague TI	2057	2279	2,16	2200	2221
České Budějovice TI	966	1113	1,19	1146	1293
Plzeň TI	1437	1355	1,42	1667	1635
Ústí nad Labem TI	1378	1416	1,37	1393	1564
Hradec Králové TI	1427	1491	1,60	1682	1782
Havlíčkův Brod TI	1322	1262	1468	1408	1405
Brno TI	1743	2247	2,23	1962	2064
Olomouc TI	1567	1,54	1,32	1244	1227
Ostrava TI	1534	1572	1,63	1705	1705
Liberec TI	679	800	827	788	900
Headquarters	524	598	639	669	776

Year-on-year comparison of amount of awarded fines

	Number of awarded fines	Number of fines in force	Total amount of fines in force (CZK)
2014	2948	2948	148,022,282
2015	2941	2808	153,719,214
2016	2,887	2,755	130,717,343
2017	2712	2655	113,051,685
2018	2641	2547	100,274,621

2. OVERVIEW OF WORK OF TERRITORIAL INSPECTORATES

Overview of work

		Statements	Fines	Other decisions		
Territorial inspectorate		No. of inspectors	No. of inspections	No. of decisions on remedial measures in force	No. of emergencies (under Air Protection Act) and accidents (under Waters Act)	
			EIA statements (Act no. 100/2001 Coll.)		Charge agendas	No. of suggestions and petitions received
			Other statements			No. of suggestions submitted to public authorities based on our inspection work
			All decisions on fines issued in study period			No. of crime reports
			All decisions on fines that entered into force in study period			
			Total amount of fines in legal force (CZK)			
	Prague	54 2221	123 995	208 210		16,660,900
	České	29 1293	49 265	277 264	8 024 371	16 6 34 0 0 0 77 518 0 12 131 18 0
	Přezh	35 1635	42 499	287 268	8 883 479	0 1 19 0 0 0 64 529 0 4 134 12 2
	Usti	41 1564	73 751	185 171	6 312 140	10 0 15 0 0 0 125 319 0 24 240 7 1
	Hradec	36 1782	73 349	345 314	9 097 430	8 3 22 0 0 0 103 695 0 19 197 42 0
	Havlick	29 1405	54 328	293 289	7 867 225	2 0 18 0 0 0 64 544 0 8 169 27 2
	Brno	44 2064	76	306 311	15 801 140	0 2 22 0 0 0 219 657 0 28 220 37 2
	Olomou	26 1227	35 204	199 204	7 480 888	1 0 13 0 0 0 65 370 0 39 123 8 0
	Ostrava	38 1705	57 574	292 279	15 316 390	0 14 13 0 0 0 112 204 0 19 183 11 0
	Liberec	23 900	22 242	117 118	4 515 558	0 0 38 0 0 0 40 238 0 12 117 17 0
HO	53 776	6 62	132 119	315 100	0 129 0 0 0 0 0 0 0 0 0 0 6	
Total	408 16,572	610	2641 2547	100 274 621	38 157 229 0 0 0 1062 4734 0 220 1956 204 14	

3. DEALINGS WITH STAKEHOLDERS

3.1 Cooperation with the public – suggestions and provision of information

Handling of suggestions notifying about environmental damage or threats, and handling of requests for information and complaints is a cardinal component of the CEI's work. The suggestions, complaints and petitions agenda is an integral component of CEI work at all CEI territorial inspectorate departments. This activity is embedded in the CEI Organisational Rules.

3.1.1 Suggestions

The Czech Environmental Inspectorate handles suggestions pointing at damaging or endangering of the environment under

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

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

CEI and the citizen public

Suggestions, complaints and petitions are an important element in the CEI communication with the public. The citizens often point at violations of laws that would otherwise remain hidden. Suggestions and petitions are a starting point for the CEI's further steps (external inspection work). If CEI investigation finds grounds for commencing official proceedings, we commence either a sanction administrative proceeding or a proceeding on remedial measures. Another important purpose of handling suggestions is to improve the legal awareness of the public concerning environmental protection. If the CEI is not applicable, some suggestions are forwarded to other public authorities of factual jurisdiction for investigation.

Numbers of suggestions received

In 2018, the CEI received 3,044 suggestions. The numbers of suggestions received by CEI territorial inspectorates in 2018 are shown in the table below. As in previous years, Prague CEI Territorial Inspectorate handled the most suggestions in 2018. Occasionally the CEI receives a suggestion for the investigation of which it does not have the legal powers. The CEI forwards such suggestions to a public authority of factual and local jurisdiction for investigation. This was the case of 322 suggestions in 2018.

A single suggestion may draw attention to endangerment or damage to multiple environmental components. It is thus often the case that several departments act on the same suggestion. Information about how the different departments contributed to handling of suggestions received in 2018 is shown in the table below.

No. of suggestions received by TIs in 2018

Territorial inspectorate	received suggestions	forwarded due to malassignment
Praha	704	53
České Budějovice	209	16
Plzeň	232	21
Ústí nad Labem	367	48
Hradec Králové	299	35
Havlíčkův Brod	236	16
Brno	331	25
Olomouc	153	17
Ostrava	274	28
Liberec	158	11
Headquarters	81	52
Total	3,044	322

Principal suggestion topics in 2018

The CEI Air Protection Department most commonly dealt with suggestions relating to annoyance with emissions of odorous substances polluting the air. Besides, it dealt with unpermitted operation of stationary facilities with increased dust levels.

The Water Protection Department most commonly investigated suggestions on danger to waters as a consequence of discharge of wastewater, both surface waters and groundwater; it also dealt with suggestions in connection with keeping or grazing of livestock (dung leaks, unsecured pastures by watercourses) and suggestions pointing out handling of harmful substances.

The Waste Management Department dealt with citizens' suggestions relating to waste management, packaging, chemicals and mixtures (including biocidal products). They related mostly to operation of landfills, illegal waste dumping and unpermitted landscaping using waste, recollection of products and illicit operation of car wrecking facilities.

The CEI Nature Protection Department most commonly handled suggestions to investigate cutting of non-forest trees, damage to trees (intentional or unintentional pruning, interventions in the root system, covering of aboveground parts of trees during earthworks) and other forms of damage to nature. We also handled interventions in natural evolution of specially protected animal and plant species and interventions in prominent landscape features (particularly watercourses and their floodplains).

The Forest Protection Department dealt mostly with legitimacy of felling and unauthorised uses of forest land for purposes other than forest functions, including unauthorised land occupation. In addition, we handled suggestions on inactivity of forest owners during bark beetle outbreaks and missing or insufficient removal of woody plants infested with bark beetles.

Toll free number

Effective as of 1 Sep 2008, the CEI has operated a toll free telephone number (800 011 011). It is a direct and free telephone contact between the CEI and citizens. The hotline is primarily used for receiving citizens' suggestions, handling citizen's queries relating to environmental issues and informing citizens about the CEI's legitimate powers. The number is in operation on weekdays between 8 am and 4 pm. We handle 1-2 telephone calls a day on average.

3.1.2 Provision of information

In 2018, the Czech Environmental Inspectorate (CEI) handled 325 requests for information, including 15 pursuant to Act no. 106/1999 Coll. on Free Access to Information, as amended, and 310 pursuant to Act no. 123/1998 Coll. on Right to Environmental Information, as amended. Besides information provided by the CEI pursuant to the above Acts, it also informs the public in its own initiative in the form of press releases and annual reports, brochures, leaflets, etc.

Information provision helps establish a stronger public feedback for the CEI. The main objectives are to maintain contact with both professional and general public and the media, answer queries relating to the CEI's inspection and supervisory powers as far as possible, and provide objective information on results of the CEI's inspection work.

Numbers of suggestions in 2010-2018 by TI

Territorial Inspectorate	2010	2011	2012	2013	2014	2015	2016	2017	2018
Prague	653	534	503	521	572	611	580	597	704
České Budějovice	240	223	184	211	240	257	282	223	209
Plzeň	261	157	138	196	214	169	176	235	232
Ústí nad Labem	257	297	305	230	247	254	300	265	367
Hradec Králové	266	163	188	204	196	227	282	266	299
Havlíčkův Brod	188	161	158	189	213	217	236	233	236
Brno	284	257	262	264	306	346	336	322	331
Olomouc	144	174	177	158	178	180	133	136	153
Ostrava	237	291	291	262	290	294	283	300	274
Liberec	179	167	161	190	161	182	147	159	158
Headquarters	0	0	0	0	3	9	4	45	81
Total	2709	2424	2367	2425	2620	2746	2,759	2781	3044

The CEI departments contributed to handling of suggestions received in 2018 as follows

Territorial Inspectorate	Air Protection	Water Protection	Waste Management	Nature Protection	Forest Protection	Integrated Agendas	TI total
Prague	150	143	148	308	42	1	792
České Budějovice	20	43	42	88	14	2	209
Plzeň	45	43	65	80	14	0	247
Ústí nad Labem	90	89	134	112	16	0	441
Hradec Králové	50	94	89	94	30	2	359
Havlíčkův Brod	65	83	56	100	12	63	379
Brno	67	81	100	120	20	0	388
Olomouc	49	40	43	69	12	9	222
Ostrava	34	39	68	102	13	18	274
Liberec	34	41	43	58	16	0	192
Headquarters	11	2	0	0	0	2	15
Total	615	698	788	1,131	189	97	3518

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

Pursuant to Section 18 of the Act, the CEI publishes on its web site the 2018 Annual Report on its activity in provision of information, which also contains the mandatory information shown in the table below on this page.

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

	Number
No. of requests for information	15
No. of issued decisions on refusal	6
No. of appeals against the decision	0
Duplicate of substantial parts of each judgement on review of legitimacy of authority's decision on refusal of request for information and overview of all expenditures by the authority in connection with judicial proceedings on rights and obligations hereunder, including costs of own employees and costs of legal representation	\
List of exclusive licences granted, including justification of necessity of granting of exclusive licence	\
No. of complaints filed under Section 16a, reasons for filing and brief description of their handling	0
Other information relating to enforcement of this Act	In two out of the three cases, only a part of the request was rejected.

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

Pursuant to this Act, 310 requests were received in 2018. Prague Territorial Inspectorate handled the most requests; Olomouc TI the fewest.

Overview of numbers of requests for information in 2018 by TI

TI	Total number of requests	No. of requests under Act no. 106/1999 Coll.	No. of requests under Act no. 123/1998 Coll.
Prague	60	0	60
České Budějovice	29	0	29
Plzeň	20	0	20
Ústí nad Labem	33	0	33
Hradec Králové	38	0	38
Havlíčkův Brod	29	0	29
Brno	26	0	26
Olomouc	8	0	8
Ostrava	16	0	16
Liberec	18	0	18
Headquarters	48	15	33
Total	325	15	310

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

Numbers of requests for information in 2010-2018

The total number of requests for information increased slightly in 2018. Compared to 2017, the CEI received 33 more requests pursuant to Act no. 123/1998 Coll. and 3 fewer requests pursuant to Act no. 106/1999 Coll. Nevertheless, the public is still highly interested in provision of information. Public requests on the CEI discussion forum are not included in the records pursuant to the above Acts.

Discussion forum

The Czech Environmental Inspectorate runs a discussion forum on its website (www.cizp.cz/Diskuse), where citizens

can turn with various questions relating to the environment. These requests are not included in the records pursuant to the above Acts. In 2018, the Czech Environmental Inspectorate received 72 queries and comments, which was 1 more compared to the year before. As in 2017, the questions aimed mostly at waste management, water protection and air protection issues. The most common discussion topics were recollection of electrical appliances and tyres, methods of wastewater disposal and odour emissions from various air pollution sources. Some of the questions related to issues outside the CEI powers.

Numbers of requests for information in 2010–2018

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

3.2 Cooperation with state institutions, professional and interest organisations

The Czech Environmental Inspectorate cooperates with a number of organisations in performing its tasks, consults professional institutions and collaborates on joint education projects with non-profit organisations.

See

<http://www.cizp.cz/Institute-verejne-spravy>,

<http://www.cizp.cz/Vedecke-a-vzdelavaci-institute>,

<http://www.cizp.cz/Neziskove-organizace>

implementation and enforcement of EU environmental law by building capacity, sharing good practice, provision of handbooks and tools, promoting cooperation and provision of feedback to legislators and regulators on practicality and enforceability of environmental legislation. The core of the network's work is projects.

The IMPEL held an Extraordinary General Assembly in Brussels and a General Assembly in Vienna and CEI inspectors participated in work of expert groups: air and industry, water and soil, transboundary waste transport and waste, nature and overlapping tools and approaches. As every year, our inspectors participated in the projects "Meeting of contact persons for transboundary waste transport", "Improving implementation and enforcement of Electronic and Electrical Waste Directive", the IMPEL waste and transboundary waste transport conference and the conference "Enforcement Action 2018". The project on implementation of the Industrial Emissions Directive continued, and our inspector was involved in the project "Landfills and Circular Economy". In addition, our inspector worked as part of the project "Catchment Area Plans" and we had an important involvement in the meetings of the project "Use of satellite observation and drones in inspections".

3.3 International collaboration

In 2018, there were 47 trips abroad, involving 76 employees. One of our most important international activities is collaboration in the IMPEL, an organisation dealing with implementation and enforcement of environmental law and representing organisations of EU member states, accession and candidate countries, EEA and EFTA countries dealing with implementation and enforcement of environmental law. The IMPEL's mission is to contribute to environmental protection by involvement in effective

The most important event in the IMPEL was the IMPEL conference "Next Generation IMPEL", held in Zwolle, the Netherlands, on 26 September 2018. At the conference, the IMPEL presented its future ambitions, development and path for continued work in the network. The conference was attended by 170 environmental experts, including Erik Geuss, Ph.D., CEI Director, and RNDr. Helena Kameníčková of Ostrava TI for the Czech Republic. The conference discussed new challenges and experience relating to practical implementation of EU legislation. It presented tried-and-tested procedures, case studies and know-how for improving work in environmental protection. The participants were introduced to innovative methods of inspection work using satellite monitoring systems and drones and application of the IRAM system for environmental risk assessment. It evaluated the present state of IMPEL activities and, based on the discussion of the implementation of the document "Next Generation IMPEL", it proposed the direction and ambitions in accordance with the European Commission's initiative ECA (Environmental Compliance Assurance), with an emphasis on cooperation under the ECA Action Plan and efficiency of cooperation with strategic partners, particularly networks active in environmental protection EUFJE, ENPE and EnviCrimeNet. It also presented the plan to increase knowledge and skills and build a knowledge and training centre which would be accessible to the general public as well. It was emphasised that, in addition to application of new technologies, it is necessary to increase public involvement in terms of adherence to environmental protection legislation.

Based on MoE nomination, the CEI Director attended a high-key EC meeting on the European Commission communication "EU actions to improve environmental compliance and governance" – the ECA Forum in Brussels. In the area of the international CITES treaty, CEI employees represent the Czech Republic at meetings of expert groups and boards focused on promotion of laws on protection of endangered species. Our inspector attended a meeting as part of a mixed MoE and MoIT delegation in Vietnam, where she presented Czech activities in the area of wildlife crime; the meeting also discussed cooperation regarding investigation into illegal trade in tigers. In addition, she attended the Environmental Crime Inter-Regional Meeting as part of the EnviCrimeNet and was asked to make a presentation on EU-TWIX and its benefits for inspection work and law enforcement for CITES inspection and executive authorities in Southern African countries. She also attended the 29th meeting of the Interpol group on wildlife crime. Our inspector attended the 2nd ECA workshop on the 4th measure of the ECA Action Plan, which intends to develop a handbook on environmental crime. As every year, we attended two meetings under the EU Wildlife Enforcement Group.

In the forest protection area, a CEI inspector attended an Interpol meeting, where participants exchanged experience of illegal forest felling and timber trade, and a meeting of specialists in combating environmental crime in the Visegrad Group.

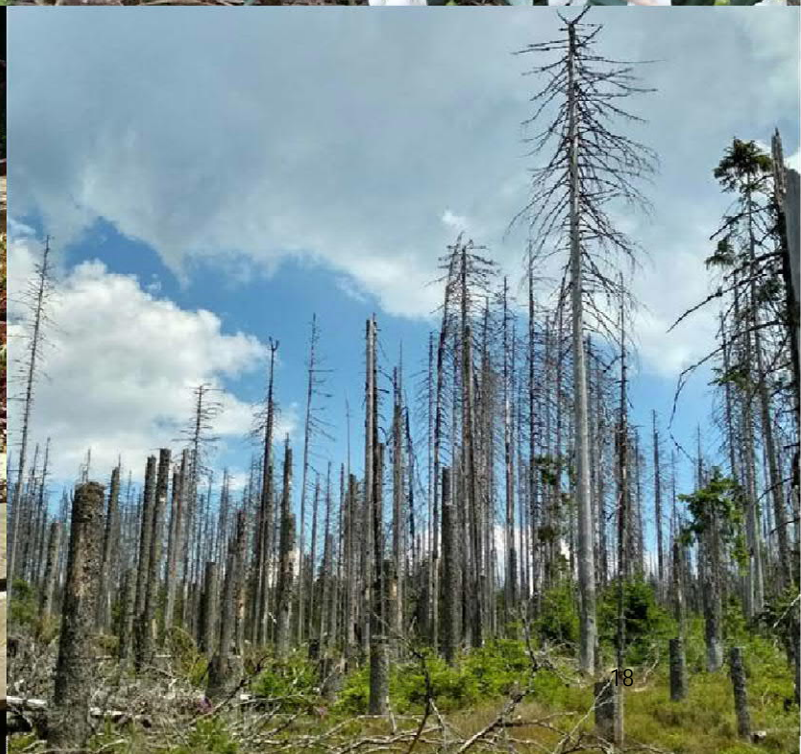
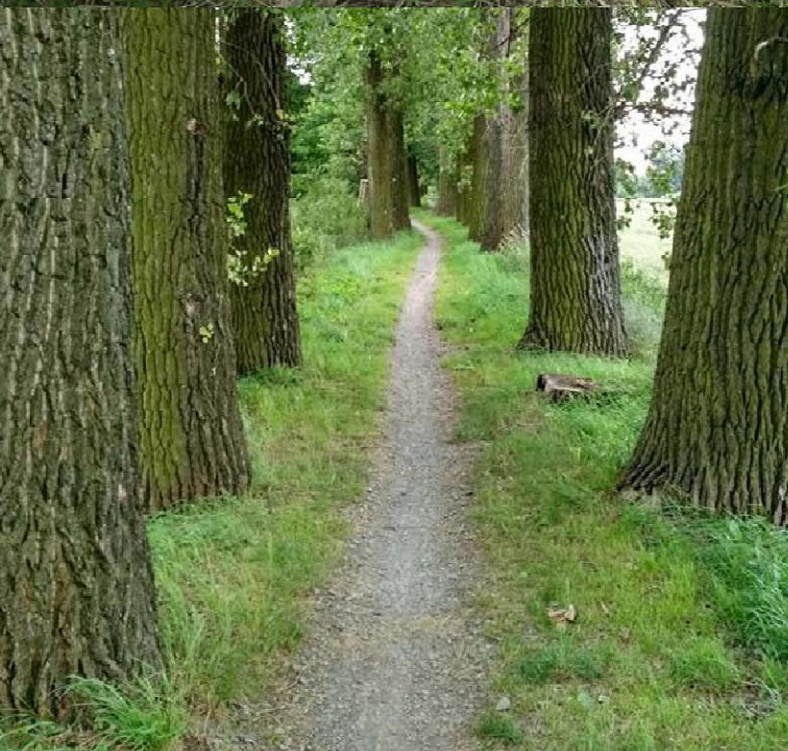
A CEI inspector regularly attended the Forum of the European Chemicals Agency (ECHA), used for exchange of information on enforcement of the REACH Regulation. Based on a treaty with Slovakia, we made a trip abroad dealing with IPPC.

Under so-called executive international relations, our inspectors represented the Czech environmental department at meetings of international boards for the protection of boundary waters and big rivers (International Commission for the Protection of the Oder and Elbe, Danube Commission, Austrian Boundary Waters). Most of the trips abroad were made in order to secure the CR's contractual commitments under international organisations, treaties and protocols on the one hand and activities connected with our EU membership on the other. In total, the CEI expended CZK 348,521.93 on the trips abroad; a large part of the costs was funded directly from the EU budget.

3.4 Communication with the public and media

The CEI systematically communicates with the public and media. In 2018, we issued 96 press releases and replied to 264 questions from the media. The CEI organised 10 press conferences: one at the CEI Headquarters in Prague and 9 at territorial inspectorates. According to the company Newton, the CEI was mentioned in 2,509 media items. Out of that, 277 items were broadcast over radio and television, 739 articles were published in print dailies and regional papers, 1,430 in online papers, and 63 in professional papers (e.g., Odpady, Průmyslová ekologie, Moderní obec, Zemědělec, Komora.cz, Technický týdeník, Veřejná správa, Agrobaze zpravodaj, Svět motorů, etc.). However, not all the news items, particularly in electronic media, are monitored by Newton. These include the show K vašim službám on Czech Radio 2.

The media were most interested in the following topics in 2018: bark beetle outbreak, Ostrava lagoons, groundwater consumption inspections – ski resort snowing, inspections at small hydropower plants, red boxer shorts burning at Prague Castle, illegal handling of tiger bodies and their processing into traditional Chinese medicinal products.



4. CEI WORK IN 2018 BY DEPARTMENT

Among the decisions in legal force, Chapter 4 selects cases of the heaviest fines awarded by the CEI inspectorates on legal entities and natural persons doing business, and decision where we ruled restriction or halt of operation/ These decisions are listed by environmental component protected (air, water, waste, forest, nature) and by CEI inspectorates. Examples of decisions on integrated agendas are listed for the CEI as a whole.

Overview of CEI work in 2018 by department

		Air protection	Water protection	Waste management	Nature protection and CITES	Forest protection	Integrated agendas	2018 TOTAL
No. of inspectors (Heads of Departments,								
Heads of Units +		81	86	95	81	48	17	408
Inspectors, as of 31 Dec)*								
No. of inspections		4,428	3,387	3,544	3,341	1,344	528	16,572
EIA statements (Act no. 100/2001 Coll.)		Reported by IAD	Reported by IAD	Reported by IAD	Reported by IAD	Reported by IAD	610	610
Other statements		2,679	752	138	520	365	879	5,333
Fines	All decisions on fines issued	390	566	891	602	143	49	2,641
	All decisions on fines that entered into force	392	533	855	583	136	48	2,547
	Total amount of fines in legal force (CZK)	14,375,000	21,173,621	43,596,500	8,421,800	10,151,700	2,556,000	100,274,621
Other decisions	No. of decisions in force – halting or restriction of operation, facility or parts thereof							
		2	2	0	21	13	0	38
	No. of decisions in force – seizing or confiscation	X	X	X	157	X	X	157
	No. of decisions on remedial measures in force	2	74	10	14	126	3	229
No. of decisions on charges and advances for charges issued		0	5,796		x	x	x	5,796
No. of emergencies (under Air Protection Act) and accidents (under Waters Act)		175	220		x	x	x	395

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

4.1 Air protection

4.1.1 Inspection work in 2018

Inspectors of the Air Protection Department did their inspection work in the areas of air protection proper, ozone layer protection and Earth's climate system in 2018 to the full extent of their powers defined by legal regulations in force and effect relating to said areas of environmental protection. We inspected performance of obligations imposed by generally binding national legal regulations and EU regulations as well as performance of obligation specified in permits for operation of stationary sources of air pollution. In total we made 4,428 inspections, including 39% scheduled and 61% unscheduled.

The numbers and distribution of inspections carried out in 2018 among the areas of jurisdiction corresponded to the seriousness of the activities operated and their environmental impact. Most of the inspections concerned facilities with stationary sources of air pollution (3,584 inspections) and the related activities of persons authorised to measure emissions and develop expert assessments (441); we made fewer inspections of adherence to requirements on climate protection (334, including 54 at facilities participating in the greenhouse gas emission permit trading scheme) and the ozone layer (35 inspections). In connection with inspections of adherence to requirements when handling controlled substances and fluorinated greenhouse gases, we inspected 13 entities doing activities requiring certification by the Ministry of the Environment.

The results of the inspections in 2018 were 364 decisions in force on fines for violation of obligations in air, ozone layer and climate protection initiated in 2018. In 2018, a total of 392 decisions on fines entered into force, including 364 initiated in 2018 and 28 initiated in the previous year, totalling CZK 14,375,000. Said decisions in force on fines handled a total of 498 violations. Two more violations were resolved with reprimands. Besides separate inspections on adherence to obligations of operators of stationary sources of air pollution, the Air Protection Department inspectors were involved in 324 inspections of facilities with integrated permits (integrated inspections), inspecting adherence to all environmental protection requirements. In six cases, fines for violation of air protection requirements were awarded, totalling CZK 490,000.

The total amount of fines awarded by the Air Protection inspectors in proceedings carried out separately by the Department inspectors was CZK 13,357,000 for violations of air protection requirements,

CZK 916,000 for violation of requirements for handling of fluorinated greenhouse gases and CZK 102,000 for violation of requirements for handling of controlled substances. No fines were awarded to operators of facilities participating in the greenhouse gas (carbon dioxide) emission permit trading scheme.

4.1.2 Overview of fulfilment of departmental tasks

Departmental tasks in the area of air protection were performed as part of four categories of departmental tasks, namely (I) inspection of operation of facilities based on and in accordance with air protection authority permits; (II) adherence to set pollution limits (emission limits and emission ceilings) and technical requirements replacing or complementing emission limits and emission ceilings; (III) identification of air pollution levels; and (IV) record-keeping and reporting duties.

I.

In 131 cases, the inspections found out that operators or stationary sources of air pollution listed in Annex 2 to the Air Protection Act whose operation requires a permit from an air protection authority operated the facilities without a permit or failed to adhere to requirements set in the permits. Fines totalling CZK 5,863,000 were awarded for the proven violations. Compared to previous years, the number of identified cases of operation of facilities without a permit decreased in 2018.

In two cases, the Czech Environmental Inspectorate proceeded to halt the operation of stationary sources of air pollution. The reason for the decision to halt the operation of the first one – two boilers for combustion of non-contaminated wood material operated by MALINA – VRŠE s.r.o. in Zachrašťany – was failure to carry out remedial measures, consisting in an obligation to adhere to an emission limit for particulate matter. The other stationary source – plastic and metal blasting surface treatment, operated by a natural person doing business, Lukáš Kabelík in Litovel – was halted due to absence of an air protection authority permit and with a view to the facility location. We identified one case of combustion of unpermitted fuels in stationary combustion facilities, and two cases of waste combustion in an open fireplace. Two of the violations were fined, totalling CZK 90,000; the third one, less serious, was resolved with a reprimand. The unpermitted fuel combusted in contravention of requirements of manufacturer of the combustion equipment and permit requirements was particleboard waste. Likewise, the open fireplaces combusted particleboard waste along with wood, and a discarded railway sleeper in one case. One operator of a stationary facility was awarded a fine of CZK 50,000 for not permitting inspection.

Since 2012, operating permits include operating requirements for the event of exceedance of air pollutant thresholds

(smog warning and regulation system), approved by the CEI before 2012 as regulatory rules. All the smog warning and regulation situations due to exceedance of pollutant thresholds in 2018 occurred due to exceedance of thresholds for PM10 (volatile dust) and ground (tropospheric) zone (O3).

Smog situations due to exceedance of PM10 threshold were declared for one agglomeration, two areas and one zone for 775 hours, and regulations for one agglomeration and one area for 259 hours; see the table below.

Number of smog situations and regulations for PM10

Area	Smog situations number duration		Regulations number	
O/K/FM agglomeration excl. Třinec	4	336	2	156
Třinec agglomeration	3	227	2	103
Zlín Region	2	92	0	0
Moravian-Silesian zone	1	120	0	0

In the regulation signal periods, our APD inspectors carried out 15 inspections on facilities with operating requirements for exceedance of air pollutant thresholds. Among the above inspections, one concerned the facility "Ostramo lagoons - remedial measures", which has requirements for work restriction during smog situations specified in its integrated permit. None of the inspections identified any violations of the requirements.

Smog situations due to exceedance of ground ozone thresholds were declared for two agglomerations, four areas and one zone for 378 hours. No warning signal was declared in 2018. Information on concentrations of ground ozone and exceedance of its thresholds are only intended for information to the population and have no effect on operating conditions for stationary sources of air pollution, and make no requirements on the CEI inspection work.

II.

Exceedance of pollutant emission limits and technical requirements replacing or complementing them was identified in 83 cases; fines totalling CZK 5,302,000 were awarded for these violations in 81 cases in separate proceedings led by our Air Protection inspectors. The two remaining cases were handled in joint proceedings with other violations. Out of that number, 12 cases identified exceedance of specific pollutant emission limits, for which we awarded fines totalling CZK 685,000 in separate proceedings. The most numerous were exceedances of specific emission limits for carbon monoxide (four cases,

– combustion processes) and volatile organic compounds (four cases, – painting surface treatment), as well as particulate matter (three cases, blasting surface treatment) and one case of exceedance of a specific emission limit for polychlorinated dibenzofuranes and polychlorinated dibenzodioxines (PCDD/PCDF) in a hazardous waste incinerator. We did not find any exceedance of emission ceilings.

Inspection of adherence to prescribed pollution levels (specific emission limits) was also done by means of measurements carried out by Air Protection Department employees of the Czech Environmental Inspectorate Headquarters. In the five inspections made, accompanied with emission measurements in order to check adherence to specific emission limits, we found one case of exceedance of volatile organic compound emission limit. In order to identify the influence of facilities emitting substances annoying by odour on air quality, air protection inspectors collected 36 air samples and analysed them by dynamic olfactometry. All the cases concerned facilities for which no specific emission limits for substances annoying by odour. Some of the measurement results were used as arguments in the CEI's statements in the facility permitting process at regional authorities, other were used to objectivise the pollution levels when handling suggestions.

In addition, we found 71 cases of violation of technical operating requirements for stationary sources of air pollution replacing or complementing emission limits. For these violations, our Air Protection inspectors awarded fines totalling CZK 4,617,000 in 69 separate proceedings, and two violations were handled in joint proceedings with other violations. The requirements not met were differences from the set requirements in operation of pollutant traps, exceedance of design production capacity, exceedance of design consumption of volatile organic compounds or solvents, failure to meet requirements for pollutant trapping and discharge into the air and requirements for physical operating conditions, such as temperature. Violations of air protection requirements were also found in integrated inspections attended by our Air Protection inspectors. In six cases, fines with an air protection component were awarded, totalling CZK 490,000.

III.

In 2018, the CEI inspected adherence to the obligation to identify and assess the air pollution level by way of either one-off direct measurements made by authorised entities or continuous measurement made by the operator. It was an obligation of facility operators to submit reports with measurement results to the Inspectorate within the set period. In 67 cases, we identified violation of the obligation to carry out one-off emission measurement. Fines totalling CZK 1,255,000 were awarded for these violations in 49 separate proceedings. The 18 remaining violations were handled in joint

proceedings with other violations. In 51 cases, operators of facilities did not adhere to the obligation to submit the report with measurement results to the Inspectorate, for which we awarded fines totalling CZK 212,000 in 39 separate proceedings. The 12 remaining violations were handled in joint proceedings with other violations. In addition, we proved one case of failure to operate a system for continuous measurement of sulphane in coking plant gas, for which the facility operator was awarded a fine of CZK 20,000.

In 2018, the CEI inspectors made 441 inspections of adherence to requirements at entities authorised by the Ministry of the Environment to develop expert assessments and make one-off emission measurements. The inspections made found no serious violations of obligations of authorised entities that would lead to a proceeding on revocation of authorisation. Minor errors in writing the report on authorised emission measurement, which had no effect on measurement results, were found in one case.

IV.

Failure to adhere to the obligation to keep operating records or submit summary operating records and report to the IPR was proven to operators of stationary sources of air pollution in 103 cases. Fines totalling CZK 500,000 were awarded for these violations in 50 separate proceedings. The 53 remaining violations were handled in joint proceedings with other violations. Among the cases of failure to adhere to the recording and reporting obligations was one case of failure to report to the IPR releases of pollutants to the air.

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

The result of the 290 inspections of operators of facilities containing fluorinated greenhouse gases was 52 proven administrative violations, for which we awarded fines totalling CZK 916,000. The 16 remaining cases were handled in joint proceedings with other violations. The cases of violation of obligations consisted in failure to make checks of equipment tightness (29 cases, fines of CZK 665,000), violation of reporting duty (9 cases, fines of 5,000; eight handled in joint proceedings with other violations), failure to operate a leak detection system (two cases, handled with other violations), failure to report to the Ministry and the EC (5 cases, fines of CZK 26,000), failure to remedy a defect (one case, fine of CZK 120,000) and failure to recycle dismantled car air-conditioning equipment (one case, fine of CZK 90,000). In 2018, we made 54 inspections of stationary facilities included in the greenhouse gas (carbon dioxide) emission permit

trading system. Only in one case did we find a violation of requirements for carbon dioxide emission detection and reporting, but the operator was not fined due to absence of an applicable authority to handle the violation in law.

Ozone layer protection (stratospheric ozone) from effects of substances that deplete it ("controlled substances") represents prevention of release of controlled substances from facilities containing them, typically as coolants. Controlled substances such as coolants are gradually replaced with substances with lower ozone layer depletion potential (ODP) and the numbers of facilities in operation containing them are decreasing. In spite of that, one type of controlled substances is still used for critical purposes as a fire extinguishing agent (halons). Due to the general reduction in their use, we carried out relatively fewer inspections in the area than in facilities containing fluorinated greenhouse gases. The 35 inspections of adherence to obligations when handling controlled substances resulted in 5 cases of violation, for which we awarded fines totalling CZK 102,000 in separate proceedings. Entities handling controlled substances committed two violations by not having tightness checked by entities with a Ministry of the Environment certificate and there were two cases of failure to hand the controlled substances to a certified entity for disposal. One violation – failure to keep a facility log book – was handled in a joint proceeding with another violation. The CEI assessed no charges for production and importation of controlled substances in 2018.

We also inspected 13 entities doing activities requiring Ministry of the Environment certification, particularly tightness checks, servicing and maintenance of equipment containing coolants based on controlled substances and fluorinated greenhouse gases, entities processing discarded cooling equipment and certification and assessment entities. We identified three cases of neglect of the reporting duty before organisation of training and examinations. One violation was resolved with a reprimand, one was handled in a joint proceeding, and one was awarded a fine of CZK 10,000.

4.1.3 Overview of fulfilment of specific tasks

Due to the extent of the departmental tasks, covering all of the air protection inspector's inspection work in the areas of air protection, climate and ozone layer protection, no specific tasks were assigned for 2018.

4.1.4 Important cases in terms of fine amount

Prague TI

The CEI awarded a fine of CZK 400,000 to Pražské vodovody a kanalizace, a.s., for operating a facility without a permit – pumping of sludge from the CWWTP to sludge fields not approved for the purpose.

České Budějovice TI

In a joint proceeding, the CEI awarded a fine of CZK 290,000 to BILLA, spol. s r.o., facilities in Strakonice, Hořice, Čestlice, Přerov and Turnov, for not arranging tightness checks of cooling equipment containing fluorinated greenhouse gases, failure to keep equipment logs and run a coolant leak detection system and failure to check coolant leak detection functionality.

The CEI awarded a fine of CZK 290,000 to DIAMO, state enterprise, settling lagoon at Divčice for failure to reduce dustiness during reclamation work.

Plzeň TI

The CEI awarded a fine of CZK 280,000 to TONER RL, operator of a paint shop, for operating a facility without an air protection authority permit, failure to arrange emission measurements and to report summary operating data.

Ústí nad Labem TI

The CEI awarded a fine of CZK 120,000 to HP Pelzer for operating a facility for processing of synthetic polymers at Žatec without an air protection authority permit.

Hradec Králové TI

The CEI awarded a fine of CZK 450,000 to Chrudim IRON & STEEL for violating requirements for operation of pollutant separators.



Wet surface-level separator operated by IRON & STEEL without water in contravention of approved operating rules.

The CEI decided to halt operation of facilities – stationary facilities for combustion of non-contaminated wood materials – operated by MALINA - VRŠE in Zachrašťany, for failure to adopt remedial measures.

Liberec TI

The CEI awarded a fine of CZK 360,000 to GRUPO ANTOLIN BOHEMIA for failure to adhere to operating requirements for a facility for reducing volatile organic compound emissions in an adhesive application process.

Havlíčkův Brod TI

The CEI awarded a fine of CZK 100,000 AVE Žďár nad Sázavou for operating a facility for reducing emissions of organic substances and substances annoying with odour in biogas production in contravention of requirements specified in an air protection authority permit.

Brno TI

The CEI awarded a fine of CZK 300,000 to Slovácké strojírny, paint shop in Uherský Brod, for operating a facility for reducing emissions of particulate matter in contravention of permit requirements.

Olomouc TI

The CEI awarded a fine of CZK 350,000 MEGAWASTE-EKOTERM, hazardous waste incinerator in Prostějov, for operating a facility in contravention of permit requirements and failure to verify data from continuous pollutant monitoring.

The CEI decided to halt operation of a facility – surface treatment of plastics and non-metallic objects – operated by a natural person doing business Lukáš Kabelík without an air protection authority permit in Litovel.

Ostrava TI

The CEI awarded a fine of CZK 185,000 to ODLAKOVNA SILVER for operating a facility for chemical paint removal in Brušperk without an air protection authority permit.

Headquarters Air Protection Department

The CEI awarded a fine of CZK 50,000 to EAF Protect for failure to hand over prohibited controlled substances for disposal and failure to report organisation of exams for applicants for certificates for servicing fire prevention systems containing fluorinated greenhouse gases and controlled substances.

4.1.5 Conclusions from inspection work

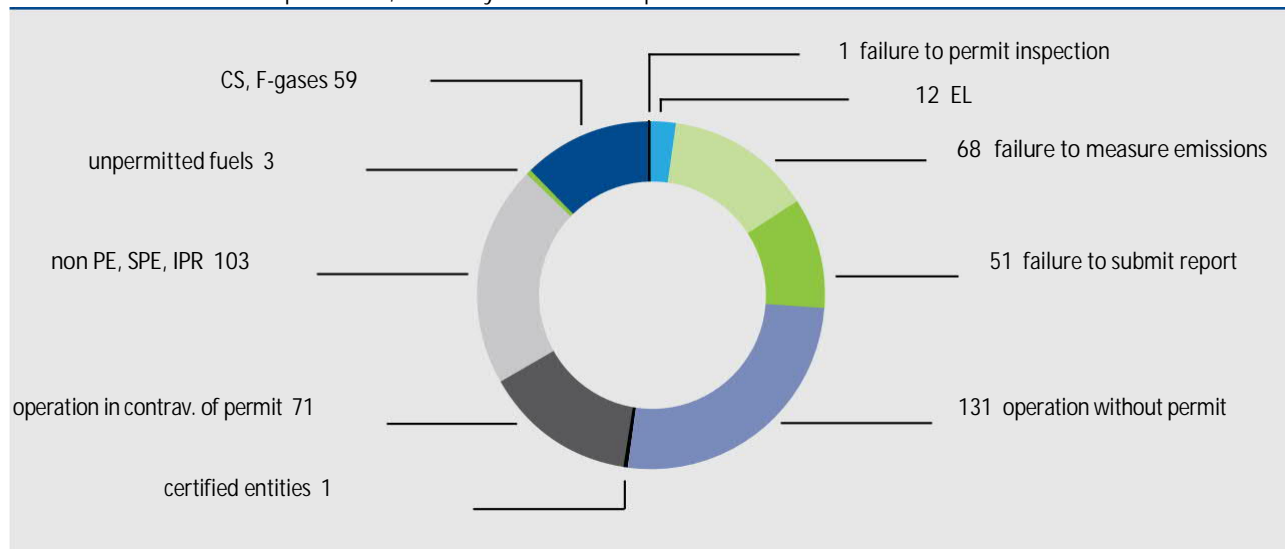
The Czech Environmental Inspectorate's inspections covered the entire scope of its powers in the areas of air protection, ozone layer and climate protection, defined in both national generally binding legal regulations and EU regulations in force.

In 2018, the number of inspections made increased compared to 2017 (from 4,103 to 4,428), and equalled the long-term average. The number of decisions on fines that entered into force in 2018 decreased compared to 2017 from 394 to

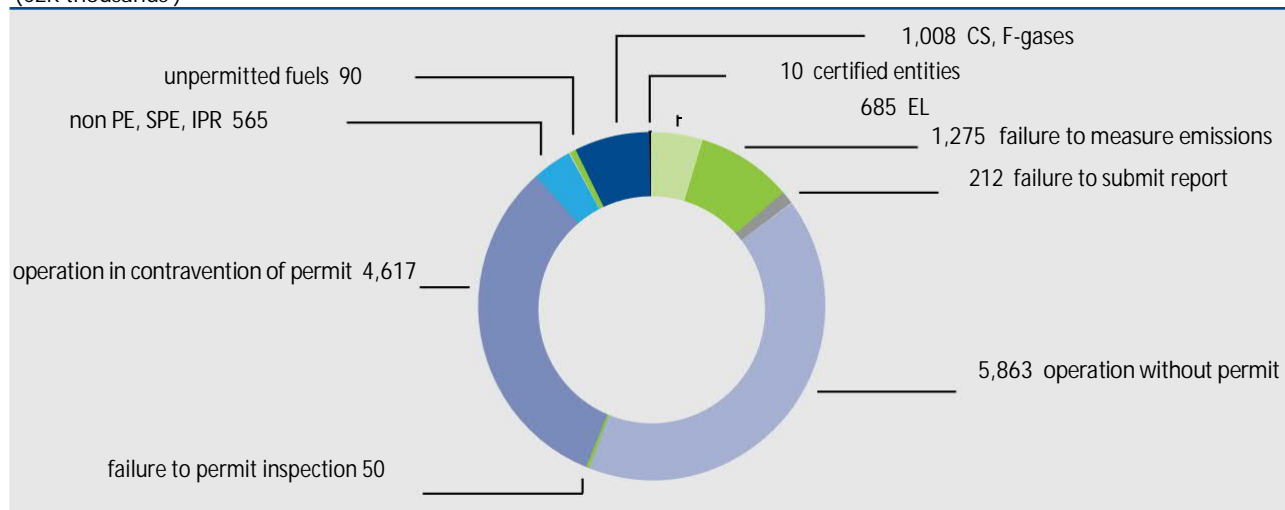
392. Likewise, the number of violations handled decreased slightly from 514 violations in 2017 to 500 in 2018.

Among other areas, the focus of the Air Protection Department in 2018 emphasised inspections of adherence to requirements when handling substances damaging the ozone layer (controlled substances) or affecting the climate (fluorinated greenhouse gases). The inspections in the area focused on more serious violations. With the increase in violations handled (from 36 in 2017 to 59 in 2018), the total amount of fines awarded increased from CZK 491,000 in 2017 to CZK 1,008,000 in 2018.

Numbers of violations – air protection, ozone layer and climate protection – handled in 2018



Fines awarded for violations of air protection, ozone layer and climate protection requirements in 2018, by type of violation (CZK thousands)



4. 2. Water protection and prevention of major industrial accidents

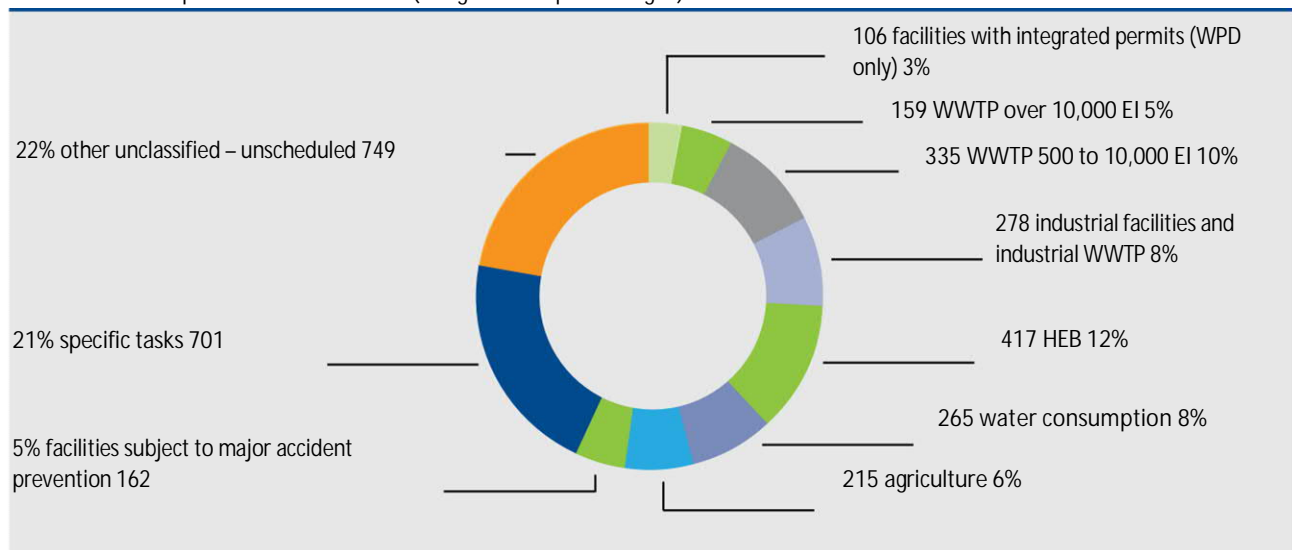
4.2.1 Overview of inspection work in 2018

The inspection work in 2018 was carried out to the full extent of powers in the area of water protection and prevention of major accidents. We inspected performance of obligations arising from Act no. 254/2001 Coll. on Waters and Act no. 224/2015 Coll. on Major Accident Prevention as well as obligations imposed by water management authority decisions. In 2018, the WPD made 3,387 inspections under the Waters Act or the Major Accident Prevention Act. Out of that number, 43% were scheduled (1,471) and 57% were unscheduled (1,916) inspections.

In terms of performance of obligations arising from Act no. 76/2002 Coll. on Integrated Prevention, Water Protection Department inspectors made another 312 inspections in cooperation with other departments.

The basis of Water Protection Department (WPD) inspector's work is inspections made under scheduled main and departmental tasks, which are focused on priority problems in water protection throughout the country as well as inspections under specific tasks, which are focused on regional problems. A significant part of activities are unscheduled inspections, made based on suggestions or resolution of extraordinary situations.

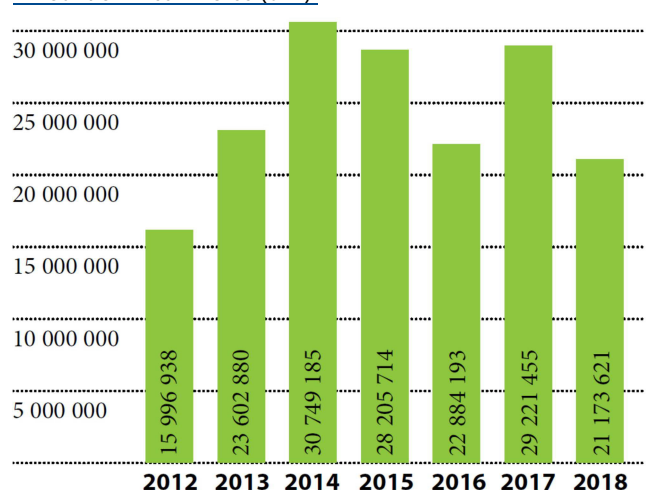
Breakdown of inspections made in 2018 (in figures are percentages)



Based on inspection work results, the identified violations of legal regulations led to the initiation of 575 misdemeanour proceedings and issuance of 566 decisions on sanctions and 75 decisions on remedial measures to eliminate the identified shortcomings and failures. By the end of 2018, 533 decisions on fines entered into force, totalling CZK 21,173,621, as did 74 decisions on remedial measures. Water Protection inspectors issued 19 decisions on violations of integrated permits separately pursuant to the Integrated Prevention Act, which are registered in Chapter 4.7 Integrated Agendas.

Moreover, WPD inspectors issued 2 decisions in force on halting of operation.

Amount of fines in force (CZK)



A separate chapter is the charges agenda, where we issued 5,796 decisions. Within that, there were 1,062 decisions on charges for 2017 setting charges for wastewater discharge into surface water totalling CZK 198,932,532, and 4,586 decisions setting charges for groundwater collection for 2017 to CZK 717,550,869. In addition, we issued 138 decisions in 2018 in connection with new consumers or changes or revocation of advance assessments, and 10 resolutions on halting proceedings.

The amended Waters Act no. 113/2018 Coll. transfers the complete charge agenda to the State Environmental Fund. For this reason, the CEI no longer issues any decisions on advances for wastewater discharges into surface waters or for groundwater collection for 2019.

A significant part of the WPD inspector's inspection work concerns handling of suggestions; see Chapter 3 for details. In addition to inspection work, the WPD inspectors developed 1,754 statements, both separately for the WPD (752) and as part of aggregate statements (e.g., on EIA, integrated permits, etc.).

The Water Protection Department inspectors cooperate with other public authorities and institutions (water management authorities of all levels, SEF, Ministry of Finance, Povodi enterprises, Fire Rescue Service, TGM Water Management Research Institute, regional authorities, etc.); as part of international cooperation, they meet with environmental protection authorities from neighbouring countries and participate in meetings of international committees for protection of waters. This is specified in more detail in 3.2 and 3.3.

4.2.2 Overview of fulfilment of main and departmental tasks

(H1) Inspections of sources of environmental pollution with integrated permits in force

Inspections of facilities with integrated permits (IP) were made in accordance with the inspection plan in cooperation with other CEI environmental protection departments so as to meet the requirements on frequency of inspections specified by the Integrated Prevention Act. Besides, where needed, the WPD also carried out unscheduled inspections. Beyond the scope of scheduled inspections, we checked mainly facilities on which the CEI had received a suggestion for inspection, and made repeated inspections of facilities where violations of IP conditions were identified in previous periods. The most important sources of pollution from the point of view of water protection fall under the Integrated Prevention Act. The extent of inspections, their focus and inspection period were chosen based on specific conditions of the facilities.

Inspections made by the WPD focused on adherence to requirements of the water management section of the IP, primarily adherence to permits for groundwater and surface water collection, wastewater discharge, handling of potential pollutants, verification of IP validity, inspection of operating rules, currency of accident plans and their elaboration pursuant to Decree no. 450/2005 Coll. WPD inspectors in cooperation with other CEI departments made 312 integrated inspections, and made 106 inspections on their own (on behalf of the WPD only). Based on the results of these inspections, we initiated 20 proceedings on fines and issued decision in force on fines totalling CZK 2,621,680.

Detailed information relating to inspections made under the Integrated Prevention Act is provided in Chapter 4.7 Integrated Agendas.

(S1) Inspection of most important municipal wastewater treatment plants for over 10,000 EI

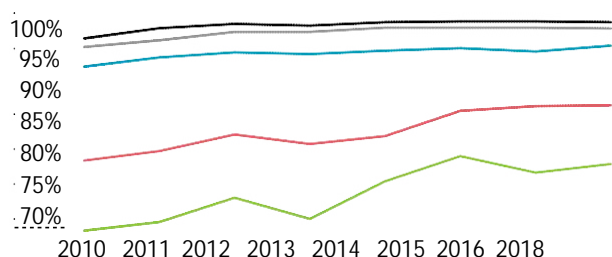
Checks of the most important municipal wastewater treatment plants (WWTP) focused on adherence to water management authority permits, meeting of Council Directive no. 91/271/EEC on municipal wastewater treatment, inspection of documents on hydraulic structures and their operation in accordance with approved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

We made 159 inspections of municipal WWTP over 10,000 EI and imposed 8 conclusive fines totalling CZK 360,000. There were six cases of exceedance of permitted pollutant emission limits set in water management authority permits and two cases of exceedance of quantities of water discharged. The inspection results indicate clearly that intensifications and renovations of both structural and process equipment of WWTP using best available techniques in order to meet requirements of the European legislation implemented has resulted in improved quality of wastewater discharged and, thus, to a significant reduction in the pollution discharged into surface waters. This conclusion is based on the observable trend of improving wastewater treatment efficiency, particularly for the frequently debated indicator P (more than 8% improvement in 2010-2017; see schematic chart of average efficiency of pollutant removal).

Average efficiency of pollutant removal

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

Average efficiency of pollutant removal



- BOD₅
- COD_{Cr}
- BL
- N total
- P total

For all the municipal WWTP of this category, we inspected balance data for 2017, which indicate that the WWTP had treated 484 million m³ of wastewater. The wastewater treatment efficiency in these WWTP was 98.4% for BOD₅, 95.4% for COD_{Cr}, 97.6% for BL, 79.5% for N_{tot}, and 87.1% for P_{tot}.

In September 2018 the Central Wastewater Treatment Plant in Prague started a one-year trial operation for the new wastewater treatment water line.

(S2) Inspection of municipal wastewater treatment plants for 500 – 10,000 EI

We made 335 inspections as part of this component task. Inspection results led to the initiation of 54 violation proceedings. As a consequence, 46 decisions on fines entered into force, totalling CZK 1,989,000; eight of the administrative proceedings on fines have not been concluded yet. The most common violation is exceedance of permitted pollutant emission limits and quantities of wastewater discharged, failure to meet the inspection sample collection frequency, sample collection by unauthorised persons, and wastewater discharge without a water management authority permit. We also imposed sanctions

for a leak of sludge from a WWTP into surface waters. The overview of inspection results indicates that major shortcomings in WWTP operation occur constantly and regularly in smaller WWTP, which are run by smaller municipalities and voluntary associations of municipalities. Based on expertise of their staff, mostly with many years of experience, and due to the scope of work and availability of technical resources, water treatment utilities run larger treatment plants without major shortcomings and quality fluctuations with an impact on the quality of wastewater discharged. It is obvious that wastewater handling in smaller municipalities may pose a significant future environmental risk and requires resolute CEI inspection supervision.



WWTP outfall – insufficiently treated wastewater

(S3) Inspection of industrial entities handling potential pollutants

Inspections at industrial facilities focused on adherence to obligations set by the Waters Act and Executive Decree no. 450/2005 Coll. The main subject matter of the inspection work was to check that handling of potential pollutants involves adequate measures to prevent their leaks into the rock environment, surface waters, groundwater or sewers. The inspections focused mostly on larger entities working in mechanical engineering, petrochemical industry, processing and food processing industry. The task included inspections of industrial WWTP (industrial treatment plants in chemical facilities, deemulsifying stations, neutralising stations, etc.). These inspections focused primarily on meeting of requirements of wastewater discharge permits for surface waters and sewers. We made 278 inspections and found 37 cases of violations of legislative regulations; we issued conclusive decisions on fines for the identified violations totalling CZK 1,461,040. The most frequent shortcomings were identified in industrial WWTP, which exceeded emission limits in the discharged wastewater and did not meet

obligations for handling of potential pollutants (not securing reservoirs against leakage of stored substances, missing reservoir tightness tests, etc.).

It can be said based on the inspection results that the quality of handling of potential pollutants by larger entities is improving significantly.

(S4) Inspection of implementation of remediation of historic environmental burdens and long-term groundwater accidents

The subject matter of this task is to provide constant supervision over the progress of elimination of failures on so-called historic environmental burden (HEB) sites, which were contaminated as a consequence of stay of Soviet Army troops and long-term groundwater accidents, including inspections of meeting of deadlines set by remedial measures. The inspection work focuses primarily on priority projects with problematic performance, which pose significant risks for the environment and the population. Remediation of HEB is funded by the State based on an environmental contract. Supervision over these sites takes place as field days in connection with physical tours of the site and filing of CEI position statement on the progress and results of the remediation works. Although, compared to the previous period, the pressure of the CEI on the acquirer by means of enforcement of the remedial measure decisions in the case of missed deadlines has led to a certain positive effect in the form of accelerated remediation, the need for continuous remediation work remains a big problem affecting the timely meeting of CEI decisions. Last but not least, interruption or suspension of remediation poses a risk of regressive contamination of remediated areas. There are additional problematic sites where remediation is not in progress or is about to be halted due to having spent the guaranteed funds under the environmental contract (e.g., SAP Mimoň, KastorEko Rohatec-Kolonie, FARMAK Olomouc, BENZINA Vítkovice). It is evident that completion of remediation by the original deadlines set by CEI decisions is difficult on some of the sites. In some of these cases, the remediation completion is thus moving towards 2030.

In 2018, our inspectors made 417 inspections under this departmental task and issued 23 decisions on remedial measures, mostly extending the deadlines of existing decisions on the acquirers' request.

In 2018, environmental contracts with the acquirers Aircraft Industries, Festool and Ing. Dan Matoušek (Železářny Štěpánov) were terminated.

A significant assistance in funding long-term accidents is the SEF subsidy schemes, which have helped eliminate failures where the CEI cannot impose remedial measures due to absence of a polluter.



Remediation works involving removal of contaminated earth.



Remediation works involving structural safeguarding of excavations.

(S5) Inspection of (mostly surface) water collection

Based on experience of previous periods, the inspection schedule for 2018 again included inspection of collections of mostly surface water used in energy generating facilities, with a focus on adherence to requirements set in water management authority permits, specifically adherence to minimum residual watercourse flow rates. In winter, we made inspections of adherence to requirements of permits for collection of surface water and groundwater in ski resorts, which use water for artificial snowing of skiing slopes.

We made 265 inspections and found 28 cases of violations of law, for which we issued decision in force on fines totalling CZK 2,163,215. The most common violation was exceedance of the permitted quantity of water for collection. The most common violation at small hydropower plants was violation of requirements set for facility operation regarding minimum residual watercourse flow rates.



Dry weir.

(S6) Inspection of agricultural businesses for compliance with the Waters Act

In selected facilities, we focused on inspections of hydraulic security in stores of mineral and farm fertilisers, bulk fodders, petroleum products, including operation of internal fuel filling stations, stores of plant protection preparations, field repositories, stabling areas and dung dumps. These inspections also focused on water management (accumulation of wastewater in dead-end pits, water from farmland drainage systems, etc.). Our water management supervision concerned 181 agricultural entities, where we made 215 inspections. Based on these inspections, we issued decision in force on scheduled remedial measures and 34 decision in force on fines totalling CZK 2,862,000. The most common shortcomings identified were unpermitted handling of potential pollutants as well as operation of hydraulic structures in contravention of the Waters Act and unpermitted groundwater collection.

The level of knowledge of legal regulations on water protection and the resulting obligations were traditionally better among agricultural businesses than farmers. Among small-scale farmers, our inspectors also focused on awareness raising and introduced the inspected persons to the most important obligations under the Waters Act and its executive decrees.

(S7) Inspection of adherence to Act no. 224/2015 Coll. on Major Accident Prevention

The inspections were made based on the annual inspection plan approved by the MoE in cooperation with integrated inspection bodies (State Labour Inspection Office, fire prevention authorities, civil protection authorities, the integrated rescue system, the Czech Mining Authority and regional public health offices) and regional authorities pursuant to Act no. 224/2015 Coll., which incorporates latest European regulations, particularly Directive 2012/18/EU of the European Parliament and of the Council on the control of major-accident hazards involving dangerous substances.

The objective of the inspection was to check all entities in class B and selected entities in class A. We made 151 inspections. We made another 11 inspections beyond the annual plan. The inspections focused primarily on assessment whether information contained in safety documentation match the actual conditions in the buildings, whether measures adopted to prevent major accidents are adequate, whether devices mitigating potential consequences of a major accident are appropriate, and whether precautions specified in the safety scheme or safety report and internal accident plan are adhered to. Some facilities did not have the approved safety documentation available due to lengthy approval processes.

The MoE set priorities for the annual inspection plan, including the main risk description, scenarios, quantities of hazardous substances, changes in facilities, specification of the domino effect, continuous integration of lessons learnt from major accidents, and accident planning.

Inspections made in 2018 did not find any violations of the Major Accident Prevention Act. One conclusive fine was awarded by an order in 2018 based on the results of inspections made in 2017. Seven major accidents occurred in the course of 2018, namely in Karlovy Vary, Pardubice, Zlin and Central Bohemian Regions and in the Capital City Prague. They included leaks of hazardous substances, explosions and fires. The operators reported the occurrence of the major accidents to the respective regional authorities and the CEI.

The majority of operators meet the set targets, which are assessed in companies' final reports, and improve their accident prevention management systems.

Prevention of accidental leaks observed as part of this task can be regarded as positive in terms of environmental impacts.

4.2.3 Overview of fulfilment of specific tasks – Summary

Inspections of fulfilment of specific tasks are focused on issues corresponding to the specific features of the territories of each of the CEI TIs. In 2018, Water Protection Department inspectors made 701 inspections as part of specific tasks and 749 other inspections, which could not be assigned to any of the tasks.

More than one half of the specific tasks followed thematically from those in the last year, due to the experience of previous periods, because particularly smaller entities still show little operational awareness of requirements of the Waters Act or deliberately ignore them. For instance, we made inspections at WWTP up to 500 EI, unprotected sewer outlets, municipal sewerage, safety features of fuel filling stations, holiday, restaurant and accommodation facilities in the Šumava PLA and NP, biogas stations, pollution sources in the Bílé Karpaty PLA, etc. An assessment of the most important tasks follows.

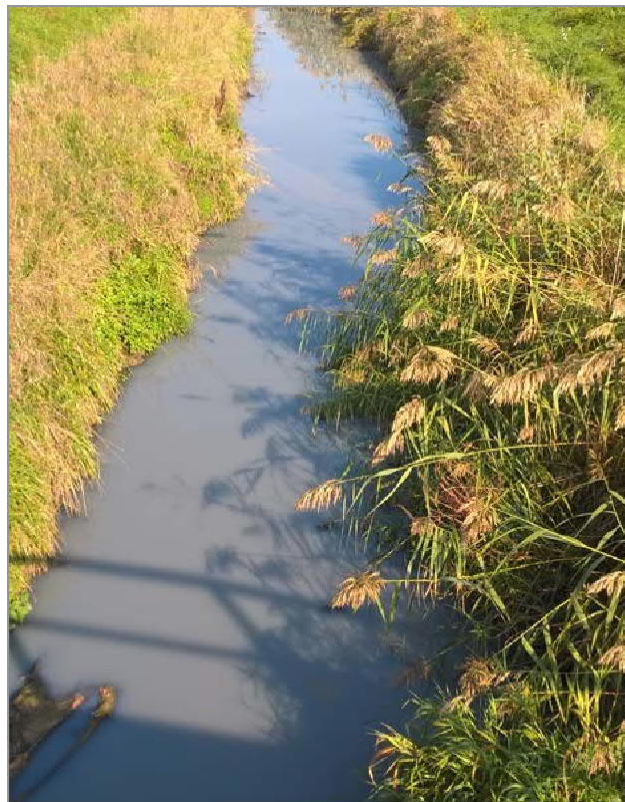
Inspection of holiday, restaurant and accommodation facilities in the Šumava PLA and NP – South Bohemian section One of the main specific tasks due to its extent and importance was the inspections of holiday facilities in the area of the Šumava PLA and NP – South Bohemian section, made by inspectors of multiple CEI TIs. We made a total of 65 checks, finding 29 cases of legal violations, for which we awarded fines totalling CZK 268,020 by means of decision in force. The most common violation was wastewater and groundwater handling without a water management authority permit and failure to document septic tank wastewater disposal. The project results indicate that legal awareness in the area of water management is still low among these small-scale operators, and we will need to focus more on these inspections in future.

Inspection of municipal wastewater treatment plants up to 500 EI The inspections under this specific tasks focused on adherence to requirements of the Waters Act on municipal wastewater treatment plants in the category up to 500 EI. We made priority checks at plants not inspected so far. We made 48 inspections of WWTP in this category and awarded fines totalling CZK 125,000.

Checks of wastewater discharges from unprotected sewer outlets

The aim of the check was to inspect handling of surface water and groundwater and methods of wastewater disposal in municipalities, i.e., the current situation in wastewater disposal and completeness of water management and operating documentation. We inspected 46 municipalities under the jurisdiction of Plzeň and Brno TIs. Based on the inspection results, we made 18 misdemeanour proceedings, awarding

fines totalling CZK 164,000. It follows from the ratio of inspections to misdemeanour proceedings that more than a third of the inspected municipalities failed to adhere to the Waters Act. The most common violation was failure to measure the degree of contamination of wastewater discharged, discharging wastewater without a permit, failure to analyse wastewater samples at the prescribed frequency, and exceedance of limits set by permits. It is evident from the results of the inspections made that the issue will have to be followed in future as well.



Surface water contaminated with wastewater.

Inspection of pollution sources in Bílé Karpaty PLA

We inspected 27 entities operating potential sources of pollution within the Bílé Karpaty PLA (agricultural operations, filling stations, holiday facilities, small food processing and industrial facilities). The inspections focused primarily on safety of stores of mineral and farm fertilisers, bulk fodder, petroleum products including fuel filling stations, plant protection products and accident plans. At the same time, we inspected water management systems (water supply, wastewater disposal, rainwater drainage), operating rules, etc. We found eleven cases of violations of the Waters Act. We initiated 11 misdemeanour proceedings on fines. Nine of the decisions on fines are conclusive, totalling CZK 240,997.

The most common violation was groundwater consumption without a permit.

Highest conclusive fines awarded by the Water Protection Department by TI

Territorial Inspectorate	Entity	Conclusive fine awarded	Entered into force
Ústí nad Labem TI	SKIAREÁL KLÍNOVEC s.r.o.	1,018,250	27 Feb 2018
Plzeň TI	Bílovská zemědělská a.s.	601,445	10 July 2018
Olomouc TI	Město Moravský Beroun	521,825	20 Feb 2018
Prague TI	KLIO, s.r.o.	350,000	3 May 2018
Brno TI	Metaldyne Oslavany, spol. s r.o.	350,000	29 Nov 2018
České Budějovice TI	Zemědělské družstvo Kovářov	264,576	1 Mar 2018
Hradec Králové TI	AVON AUTOMOTIVE a.s.	200,000	11 Aug 2018
Ostrava TI	Lyžařský klub Svinec z.s.	124,830	8 Apr 2018
Liberec TI	VVISS a.s.	100,000	12 Sep 2018
Liberec TI	CIKAUTO CZ s.r.o.	100,000	20 Mar 2018
Havlíčkův Brod TI	Tábor Náměšť, z.s.	97,290	24 Oct 2018

4.2.4 Major cases

Ústí nad Labem TI

SKIAREÁL KLÍNOVEC s.r.o.

Without permission, the company consumed 97,825 m³ of surface water from the Háj 1 water reservoir situated on the Bílá Voda watercourse. Its permit to consume surface water had expired in 2005. CEI inspectors also found failure to maintain the minimum residual watercourse flow rate downstream of the Háj 2 hydraulic structure. The CEI awarded a fine of CZK 1,018,250 in aggregate to the company (fine calculated based on the quantity of water consumed without permission applying the lowest legal rate and penalty for failure to maintain the minimum residual flow rate). The company did not appeal against the CEI decision, which therefore entered into force on 27 Feb 2018.



Snowing in the ski resort.

Plzeň TI

Bílovská zemědělská a.s.

Bílovská zemědělská a.s. failed to use devices and handling methods in its facilities at Sedlec, Řemešín and Bílov that would be appropriate in terms of water protection. Storage of hazardous substances led to a leak onto the ground followed by infiltration into groundwater, endangering its quality. A similar violation was found in the facility at Vysoká Libyně. The company did not make a single tightness test throughout the operation of the storage tanks for potential pollutants. In addition to the above, the company collected groundwater from existing boreholes at Sedlec and Řemešín without a necessary water management authority permit. For the above violations, a fine totalling CZK 601,445 was awarded to the company (the calculated portion of the fine being CZK 401,445). The company did not appeal against the CEI order, which therefore came into force on 10 July 2018.

Olomouc TI

Město Moravský Beroun

The municipality consumed 20,873 m³ of groundwater for supplying its citizens with drinking water without a valid water management permit. When determining the fine amount of CZK 521,825, our inspectors applied the lowest possible rate for unpermitted groundwater consumption. The municipality did not appeal against the CEI decision, which therefore came into force on 20 Feb 2018.

Prague TI KLIO, s.r.o.

The CEI awarded a fine of CZK 350,000 to the company for violation of its obligation for handling of potential pollutants, namely having stored liquid potential pollutants in its wastewater treatment plant in Prague 5 in an open-top steel container and sludge beds without securing them against mixing with rainwater and leaking onto surrounding ground. The release of the

potential pollutants was documented with analyses of earth samples collected around the sludge beds (concentration of C10-C40 was 7,600 to 46,000 mg/kg of dry matter). The CEI first issued an order, against which KLIO appealed. Afterwards, the CEI issued a decision on a fine in an administrative proceeding, against which KLIO appealed as well. The appeal authority did not accommodate the appeal requirements and confirmed the decision. The MoE decision entered into force on 8 Apr 2018.

Brno TI

Metaldyne Oslavany, spol. s r.o.

The company discharged wastewater from its neutralizing stations into the Oslava watercourse in contravention of requirements of its integrated permit. It also failed to sample wastewater in 2017 and the discharged wastewater exceeded the "m" limit repeatedly in 2018. A fine amounting to CZK 350,000 was awarded to the company for said violations. The company did not exercise its right to appeal, so the decision entered into force on 29 Nov 2018.

České Budějovice TI

Zemědělské družstvo Kovářov

From 1 Jan 2016 to 19 Sep 2017, Zemědělské družstvo Kovářov made unpermitted consumption of 10,176 m³ of groundwater from sources situated in Kovářov and Chrást. The company appealed against the CEI decision on a fine of CZK 508,800. The appeal authority changed the CEI decision and reduced the fine amount to CZK 254,400 by applying the lowest possible legal rate. The MoE decision entered into force on 1 Mar 2018.

Hradec Králové TI

AVON AUTOMOTIVE a.s.

The insufficiently treated wastewater from the compound WWTP exceeded emission limits "m" under the water management authority permit, namely in BOD₅, COD_{Cr} and BL. We found that the sludge was not sedimented correctly and that unsedimented sludge was pulled into the Čistá river with the discharge water. There were not records on the negative WWTP operating status in the operating log, and none of the concerned authorities were informed about the situation (endangerment of the Čistá surface water). An order decision awarded a fine of CZK 200,000 to the company for the violation. The company did not appeal against the order, which therefore came into force on 11 Aug 2018.

Ostrava TI

Lyžařský klub Svinec z.s.

From 30 Nov 2016 to 1 Jan 2017, the registered association consumed 12,483 m³ of surface water from the Čerták water reservoir for snowing in the Svinec ski resort without a valid water management authority permit. The CEI awarded a calculated fine of CZK 124,830 to the association for the violation,

applying the lowest legal rate. The association appealed against the decision. The appeal authority confirmed the CEI decision and rejected the appeal. The MoE decision entered into force on 8 Apr 2018.

Liberec TI

VVISS a.s.

The investigation of a suggestion concerning contamination of the surface water of an unnamed left-hand-side tributary of the Václavský brook checked a single larger potential source of contamination: the storage facility of VVISS a.s. in Žerno. The inspection found that the surface water had been contaminated with pollutants from this facility for approximately two months. It involved washout of an odorous, fermenting and diversely discoloured liquid from open-top containers with waste fruit situated in an unsecured area into a storm sewer inlet. It resulted in continuous contamination of the surface waters of both the unnamed left-hand-side tributary and the Václavský brook itself. The CEI awarded a fine of CZK 100,000 to the company for the violation of the Waters Act, against which it did not appeal. The decision entered into force on 12 Sep 2018.

CIKAUTXO CZ s.r.o.

An inspection of performance of measures ordered by a CEI decision found that the company had failed to make all the remedial measures. They consisted in a tightness test of channels draining a mixture of water and lubricant to a collection tank in the water treatment plant, drainage of condensate from the chimney to tanks in the crushing plant, and emptying the contents of the sewer and all the tanks. The CEI awarded a fine of CZK 100,000 to the company for the violation, against which it did not appeal. The decision entered into force on 20 Mar 2018.

Havlíčkův Brod TI

Tábor Náměšť, z.s.

The association, operator of the JISKRA holiday resort in Náměšť nad Oslavou, consumed groundwater and surface water without permission and discharged, without permission, sewage wastewater from an outlet of a concrete pipe downstream of a non-functioning WWTP into a branch of the Oslava river at Březník. The CEI awarded a fine totalling CZK 97,290 for said violations (calculated fine based on the quantity of unpermitted water consumption and penalty for unpermitted wastewater discharge into surface waters). The decision entered into force on 24 October 2018.

Cases where the Water Protection Department decided on halting operation:

ASAP s.r.o. – details on the violation of the integrated permit are specified in 4.7.2 below; only a brief history of the decision to halt operation follows.

On 5 July - 6 July 2018, the company outlet discharged severely contaminated water containing fine sediment (sludge), which polluted the Perlový brook from the outlet to its confluence with the Sázava river, a stretch of more than 11 km. Havlíčkův Brod TI Water Protection Department issued a decision prohibiting the operation, namely discharge of wastewater from a biological pond (part of a wastewater treatment plant), which had occurred as part of the WWTP maintenance. The Water Protection Department initiated a misdemeanour proceeding as the entity had failed to take precautions preventing the sludge from reaching surface waters. In a letter dated 6 Nov 2018, Czech Police informed the CEI that it has initiated a penal proceeding on the same matter. The CEI's misdemeanour proceeding was halted based on that.



Perlový brook contaminated with sludge.

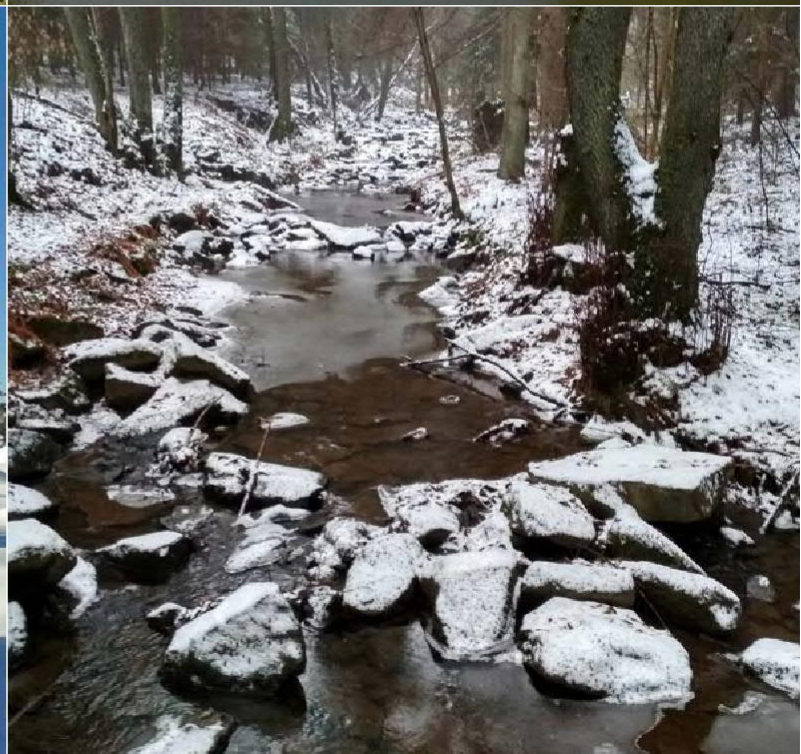
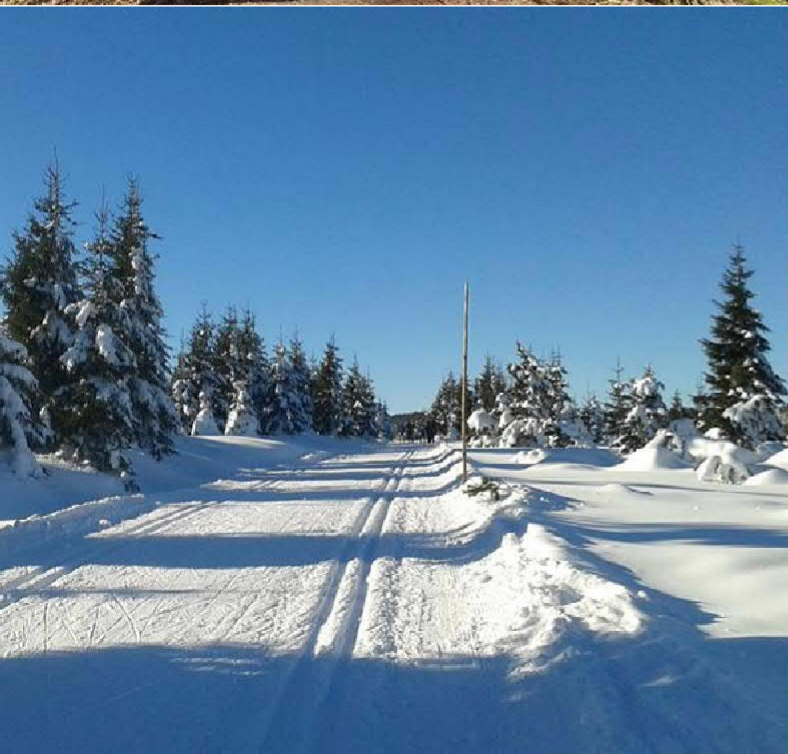
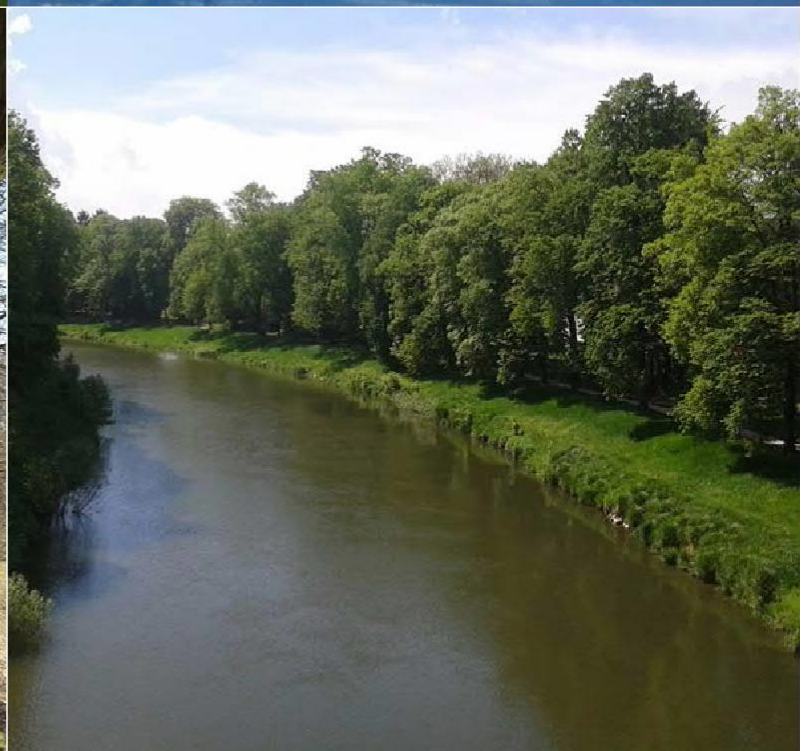
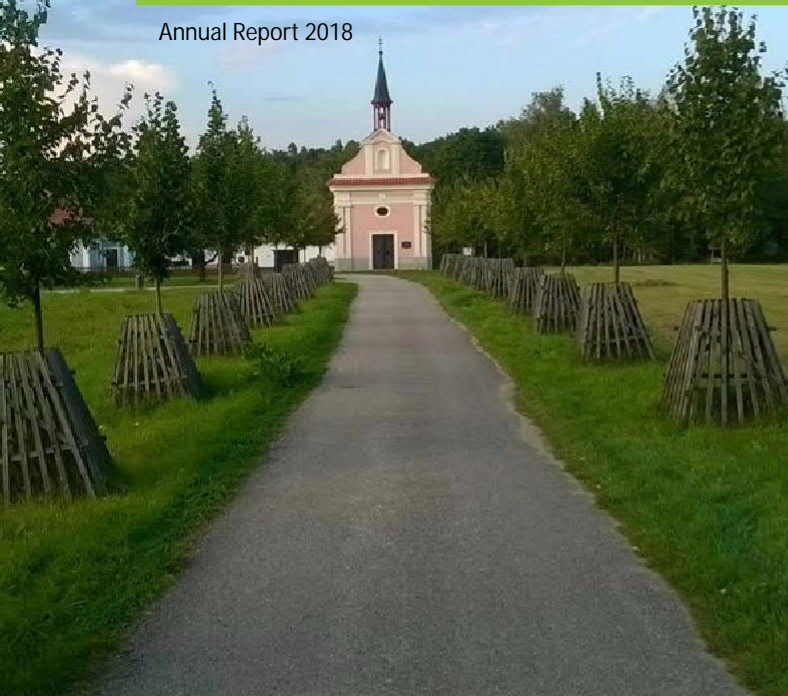
FEMME a.s. (Femme Plus, a.s.)

Based on a suggestion on illegal waste handling at FEMME a.s. in Bezděkov u Žatce, the CEI made an unannounced inspection, finding a pit at the back of the compound sized approx. 30 x 5 m, 3 m deep, which tank trucks had been filling with liquid waste of unknown origin and a fire hose was used to pump liquid waste from a retention reservoir in the company compound. On 15 Apr 2016, the CEI issued a decision ordering remedial measures with deadlines in order to prevent further spreading of the potential pollutants and carry out remediation works to remove environmental contamination. The facility was sold to Witcombe Real, a.s., in February 2017, including all rights and obligations, receivables and debts. Witcombe Real, a.s., renamed itself on 14 Apr 2017 to



Retention reservoir with potential pollutants in Femme Plus facility.

Femme Plus, a.s. A CEI inspection on 29 Aug 2018 found that all the measures ordered had not been fully adopted, and that there were dozens of IBC containers filled with petroleum emulsions in several areas of the facility with no water management security measures. The CEI awarded a fine amounting to CZK 250,000 to the company for its failure to adopt the remedial measures, which became conclusive on 23 Nov 2018. On 16 Nov 2018, the CEI issued a decision on halting operations in the compound and its close vicinity, because continuation of any activity except that aimed at elimination of the defects could lead to additional very serious risks to the public interest and the environment. Femme Plus, a.s., appealed against the decision, and the decision has not entered into force yet. The case, which the CEI qualified as an accident pursuant to Section 40 of the Waters Act, is being investigated by Czech Police, concerning the penal liability of the companies' former and current management. For this reason, the CEI cannot award a penalty to the company for the proven violation of several provisions of the Waters Act.



4.2.5 Conclusions from inspection work

Water Protection Department inspectors made a wide range of inspections arising from applicable legal standards. The focus and amounts of the inspections in 2018 were identical to previous years. Planning of the inspection work emphasized checks of major polluters discharging wastewater as well as handling of potential pollutants, particularly in major industrial and agricultural businesses. It followed from the inspection findings that these major facilities do not have significant difficulty adhering to legislation. This is both because of these entities' more responsible attitude to the environment (they often have adequate expert capacity) and the systematic work of the WPD focused on this area.

Most of the problematic cases arise from unscheduled inspections made based on suggestions or accidents. In these cases, the investigation, finding of evidence and other information are much more time-consuming. However, many of the cases based on suggestions have less significant environmental impacts.

The overall results of WPD inspection work in 2018 showed that the most violations concerned unpermitted wastewater discharge into surface waters from WWTP for 500 to 10,000 EI, often operated by municipalities, and groundwater collections. The inspection results indicate that we will have to supervise proper wastewater handling even at relatively small WWTP, which often process wastewater from local facilities (holiday resorts, hotels, small-scale industrial and agricultural production, services, etc.). Long-term problems still include insufficient sewerage in villages and methods of wastewater disposal, particularly by holiday resorts in mountain and submountain areas.

Treatment plants over 10,000 EI have been renovated both structurally and technically and have implemented best available techniques, resulting in a significant reduction of pollution discharged into surface waters. It followed from the inspection findings that these major facilities do not have significant difficulty adhering to legislation. Violations of the Waters Act consisting in exceedance of emission limits set in permits issued by water management authorities were only registered sporadically among the larger WWTP.

The long-term results of the inspection work in the area of handling of potential pollutants indicate the necessity to focus, in the coming years, on medium and smaller legal entities as well, as they have a lower legal awareness of the legislation in force in the area of water management. The inspections mostly found shortcomings in the form of absence of tightness tests and absence or incompleteness of accident plans.

We continued to monitor and evaluate the current status of elimination of historic environmental burdens (HEB). An ongoing problem is the incompleteness of remediation, i.e., failure to meet target limits on sites which lack funding and in cases where the deadlines for performance of remedial measures ordered by CEI decisions in force are drawing near without achieving the set remediation targets.

An important part of WPD work in 2018 was cooperation with the SEF on transferring the charge agenda from the CEI to the SEF.

Results of inspection work across the specific tasks indicate that the most frequent violations of the Waters Act occurred in the area of holiday resorts, where the legal awareness is still low, and operation of WWTP up to 500 EI as a consequence of unprofessional operation. It is advisable to continue these inspections in years to come.

4.3 Waste management, chemicals and biocidal preparations

4.3.1 Overview of inspection work in 2018

In 2018, inspectors of the CEI Waste Management Department (WMD) made 3,544 inspections across the Czech Republic. The inspections dealt with waste management, packaging and chemicals. The total number of inspections includes both ones scheduled by the CEI WMD (1,450) and unscheduled ones (2,094), including those made based on suggestions received. In addition, Waste Management Department inspectors also made 291 inspections under Act no. 76/2002 Coll. on Integrated Prevention (IPPC).

Based on legal violations found in the inspections, we initiated 880 misdemeanour proceedings in 2018 and issued 891 decisions on fines. A total of 855 decisions on fines entered into force in 2018. Decisions totalling CZK 43,596,500 entered into force. In addition, we ordered 10 cases of remedial measures and made two crime reports in 2018. CEI WMD inspectors issued 138 position statements and statements.

4.3.2 Overview of fulfilment of departmental tasks

Waste disposal facilities

Inspectors checking adherence to the Waste Act made 436 inspections focused on waste disposal facilities in 2018. Among those, 240 investigations were made based on suggestions received.

In 2018, we found 91 cases of violation of the Waste Act or the Integrated Prevention Act or violation of the Inspection Rules in connection with waste management (failure to admit inspection). 76 decisions totalling CZK 3,681,000 entered into force.

Under this departmental task, we made mostly inspections at landfills, both in active operation (all hazardous waste landfills, selected mixed and inert waste landfills) and in the process of reclamation or follow-up management, as well as hazardous waste incinerators, combined waste combustion facilities and facilities for physical and chemical processing of waste.

The overwhelming majority are facilities operated based on integrated permits; therefore, the most frequent violations were against the Integrated Prevention Act, namely failure to meet integrated permit requirements or requirements of approved facility operating rules.

Another frequent conclusion of the inspections regarding illegal waste storage was violation of the obligation to handle waste in facilities where it is permitted by law. We awarded a few sporadic fines under the Inspection Act, where entities failed to create conditions for inspection, to admit inspection or to provide necessary cooperation.

Landfills

The violations of legal regulations found in landfills include the following shortcomings: admission of waste without a basic waste description, insufficient waste description that failed to describe properties of waste admitted in terms of appropriateness of its admission, or admission of waste without applicable chemical analyses. There were several cases of admission and storage of waste not permitted by the operating rules, inadequate keeping of the operating log and failure to observe the size of the active waste storage area, failure to divide the landfill area into sections, and higher compacted waste layers than permitted. In addition, we found that waste was not periodically covered over and outer drainage ditches were clogged up, thus non-functioning. We also registered admission of loose asbestos-containing waste, which was handled improperly when storing it in the landfill.

Additional specific shortcomings included failure to make prescribed monitoring, to carry out proper waste admission procedures, secure the landfill with waste optimal for technical securing, record all major events in the operating log (e.g., fencing checks, covering over with inert waste, operating malfunctions and method of their elimination, emergencies such as trespassing of entrance gates). We also awarded fines for submitting annual reports with false data.

Operators of landfills in the first operating stage were also fined for shortcomings in connection with financial backup, and remedial measures were ordered for mistakes when generating reclamation backup (replenish the financial backup). Some landfill operators continue to try to store waste in excess of the permitted quantity in the first stage, for which no charges are paid (construction of landfill structural elements using waste). Therefore, inspections traditionally focused on the structural elements, their reporting and reporting of waste used as technical landfill securing (TZS).

We also paid attention to storage of waste based on gypsum (drywall) in respective sectors and storage of inert waste (due to reuse of waste from construction and demolitions for landscaping gradually replacing landfilling of inert waste).

In the case of landfills in the second stage of operation (reclamation), our inspectors checked reclamation methods (quantity and quality of waste, layer thickness), compliance with the executive decree and approved operating rules, meeting of requirements on drawing the financial backup. We found several cases of failure to do the second operating stage in accordance with decisions and operating rules.

There were several landfill fires in 2018. In such cases, the CEI closely cooperates with the Fire Rescue Service, both on stopping the fire and, most importantly, on preventing waste fires.

Waste incinerators

Inspections of hazardous waste incinerators and waste energy recovery facilities only found sporadic cases of violation of legal obligations. An operator of a hazardous waste incinerator was awarded repeated conclusive fines for exceeding the capacity of the combustion equipment, resulting in unpermitted mixing of hazardous waste from healthcare with other waste.

The CEI also focused on inspection of assessment of exclusion of hazardous waste properties pursuant to Decree no. 94/2016 Coll., particularly for waste with changeable composition, such as waste incinerator cinders.

Other facilities

A serious fact identified in waste processing facilities was insufficient verification of quality of processed waste at the facility outlet so ensure that the waste cannot endanger or damage the environment. We also found violations consisting in mistakes in reporting. Our supervision activity also focused on verification of hazardous waste flows.

Waste reuse facilities

In the course of 2018, our inspectors checked various types of waste reuse facilities in 354 inspections. They focused on adherence to obligations mostly of facilities for reuse of construction and demolition waste, particularly landscaping and construction waste recycling, as well as waste oil recovery and combustion, waste reuse as substitute for raw materials, recycling facilities (e.g., plastics, paper), land reclamation, facilities for processing of biodegradable waste such as composting plants, and application of sludge to soil.

We received 162 suggestions in connection with waste reuse in 2018. The suggestions received primarily related to landscaping and unpermitted waste storage.

Violations of obligations in waste management were found at 95 waste reuse facilities. A total of 62 decisions on fines entered into force in 2018, totalling CZK 3,628,000. Some of the penalties were awarded for failure to adopt remedial measures. In addition, the CEI issued several decisions on remedial measures, largely ordering removal of waste (for disposal in accordance with law). We also initiated misdemeanour proceedings for violations of the Inspection Rules, consisting of lack of cooperation with the CEI.

It can be concluded based on the inspection results that the most common violations of the Waste Act consisted in handling of waste in places not intended for the purpose (unpermitted landscaping), operation of facilities in contravention of approved operating rules, and submission of waste to unauthorised entities (or unauthorised entities accepting waste).

Additional cases of violation of the Waste Act included the following: failure to keep or present continuous waste records, failure to report, exceedance of set facility capacity, depositing of waste of forest or farm land, storage of soil with undesirable additions, collection of unsorted waste, depositing above the permitted height, admission of waste (foundry sand, furnace cinders, blasting waste, wastewater treatment plant sludge), failure to document qualitative parameters of admitted waste, storage of waste soil with unpermitted contents of construction waste and other additions (brick, concrete, asphalt plates, ceramics, wood, plastics, etc.).

Handling of demolition and construction waste

For many years, our inspectors have found serious shortcomings in the area handling of demolition and construction waste. Suggestions received concerned illegal transport and storage of construction and demolition waste on open ground.

It can be concluded from the inspections made that the same problems recur in the area of waste reuse, mostly consisting in waste handling in places not intended for the purpose, i.e., unpermitted landscaping and reclamation, essentially comprising illegal waste storage and disposal.

In the cases of large-scale heaping with a suspicion that the heaps do not conform to project documentation, zoning decisions and requirements set in facility operating rules, the CEI had the heaps checked by a geodesy survey made by an authorised surveyor. Based on the results of the surveys, we often proved violation of facility operating rules and awarded fines. At the same time, the geodesy surveys were presented to the applicable building authorities.

Biodegradable waste reuse facilities

In the area of biodegradable waste (BDW) reuse, the CEI inspects composting plants, biogas stations admitting BDW, and obligations relating to application of sludge on farmland. An overview of the numbers of inspections and suggestions received broken down by facility type is in the table below.

Biodegradable waste reuse facilities

Total inspections	77
Total suggestions	20
Composting plant inspections	51
Composting plant suggestions	8
Biogas station inspections	7
Biogas station suggestions	1
Sludge on ALF	19
Sludge on ALF suggestions	11

Composting plants

In 2018, WMD inspectors checked 51 composting plants, including 8 checks based on suggestions received. In the course of 2018, we initiated 14 proceedings on fines against composting plant operators and 14 decisions entered into force, awarding fines totalling CZK 838,000.



Composting in strip heaps.

The CEI composting plant inspections mostly find violations of facility operating rules (e.g., exceedance of facility capacity, insufficient heap temperature measurement, insufficient frequency of compost analysis, compost product failing to meet requirements for facility output product) and record-keeping errors.

Besides cases of record-keeping errors, which do not have a direct effect on the composting process and final product quality, the CEI has also come across cases of significant violation, resulting in the composting plant operation not in accordance with recommended work procedures. An important factor for correct composting process is suitable composition of the input raw material (BDW, auxiliary waste and materials as the case may be), performance of process operations (wood chipping and crushing as necessary when preparing the waste and materials, digging and wetting of heaps, sifting of compost product, etc.) and monitoring of the composting process (temperature, humidity, oxygen content, etc.).

Specifically in 2018, the CEI dealt with a composting plant where it found based on sampling that the compost product does not meet quality requirements specified in the operating rules and MoE Decree on Details of Biodegradable Waste Management. Above all, microbiological parameters of the compost product were exceeded. According to the operating rules, non-compliant compost should have been mixed with new heaps and the composting process repeated, which was not the case here. The compost product was used for reclamation of a sand quarry, which might have resulted in a water endangerment and contamination. The CEI awarded a fine amounting to CZK 450,000 to the composting plant operator, which was confirmed by the appeal authority. That was the fourth CEI fine for the operation of that particular composting plant in the past 8 years.

The CEI sees it as a problem that some composting plants, particularly those operated as part of landfills, produce low-quality, non-compliant compost, which is then stored in the landfill, which misses the point of composting plants – to process and reuse biodegradable waste as a source of organic material and avoid storage of biodegradable waste in landfills.

Biogas stations

The CEI inspected 7 biogas stations (BGS) admitting BDW in 2018. Only one of the inspections focused on investigation of a suggestion received. In the course of 2018, we initiated 3 proceedings on fines against BGS operators and 4 decisions entered into force, awarding fines totalling CZK 159,000. For example, the CEI awarded a fine of CZK 100,000 to a biogas station that had repeatedly violated the Waste Act by admitting and reusing waste in spite of not being approved to do so.

Use of sludge on farmland

Most of the suggestions (11) received in 2018 concerning BDW reuse was related to handling of sludge on ALF. We made 19 inspections in the area, meaning that more than half of the inspections were made based on suggestions received. This is a significant increase compared to 2017, when the CEI dealt with 5 cases of application of sludge on ALF and received 3 suggestions. In 2018, we initiated 3 proceedings on fines, and 1 decision entered into force, awarding a fine of CZK 80,000 for handling of sludge in contravention of the rules for application of sludge on ALF.

Waste collection and repurchase facilities

CEI WMD inspectors made 195 checks of waste collection and repurchase facilities in 2018. Violations identified resulted in 89 administrative proceedings in 2018. 86 decisions entered into force, awarding fines totalling CZK 11,602,000.

An ongoing problem is inspections of mobile waste collection and repurchase facilities, which permit only subsequent document checks by nature. The launch of the Hazardous Waste Transport Record System (SEPNO) in 2018 appears to be helpful.

One of the most frequently violated provisions of the Waste Act in the area of waste collection and repurchase was operation of facilities in contravention of their approved operating rules. This involved, in particular, admission of unpermitted waste, wrong classification of waste repurchased under the Waste Catalogue, collection of waste in areas not intended for the purpose by the operating rules, and exceedance of capacity. There were additional violations consisting in late, false or incomplete reports on waste production and management and failure to secure waste leaks into the environment.

One of the cases the CEI WMD dealt with in 2018 was an ongoing investigation of interconnected cases of fictitious transfer of waste among waste collection and repurchase companies, including mobile facilities. The CEI found that these entities generated documentation on the fictitious waste transfers containing false (fabricated) information in order to obscure factual waste handling. The fines awarded were near the upper legal bound with respect to the serious nature of the illicit activity.

Car wreck collection, repurchase and processing facilities

In 2018, CEI inspectors made 98 checks focused on car wreck handling. Among them, 37 inspections were made based on suggestions received. This is an increase in both inspections and suggestions compared to 2017, when

the CEI received 32 suggestions of potential illegal handling of car wrecks and made 66 inspections in the area. Inspectors of Hradec Králové and Ústí nad Labem TIs handled the most suggestions. 43 proceedings on fines were initiated in 2018 and 38 decisions entered into force in the course of the year, awarding fines totalling CZK 1,906,500.

Illegal handling of car wrecks

Almost half of the fines awarded was related to illegal handling of car wrecks (dismantling and storage of car wrecks in places not intended for the purpose, admission of car wrecks by unauthorised entities, etc.).

The CEI sees a great problem of transboundary transport and importation of cars to the CR in order to dismantle them for spare parts. These vehicles are not transported as waste but are often sold to buyers in the CR as cars complete with a foreign registration papers (the CEI most frequently comes across cars purchased in the United Kingdom and Germany). These vehicles are not registered in the CR, meaning that their owners do not require a confirmation of environmentally friendly disposal for removal from the register. These cars are then found by CEI WMD inspectors in illegal car scrap yards, where they are dismantled into spare parts, sometimes even in unsecured areas. Dismantling of cars for spare parts necessarily produces waste and components that cannot be reused. It is primarily for this reason that it is necessary that dismantling of spare parts from these car wrecks, which will obviously never be used for their original purpose, be done by entities authorised under the Waste Act (car wreck processing facilities). Such entities are then liable for reuse/removal of less profitable car parts.

Permitted car wreck collection, repurchase and processing facilities When inspecting facilities operated based on regional authority approval under the Waste Act or an integrated permit, as the case may be (so-called approved facilities), the CEI most commonly finds violations of facility operating rules (exceedance of capacity, incorrect wreck storage, car wreck dismantling outside places defined by operating rules, etc.) and record-keeping errors. In 2018, the CEI also dealt with several cases of transferring entire car wrecks as so-called "sets of spare parts" from permitted car wreck facilities, which is not permissible and has been confirmed by an MoE Waste Department position statement, published on the MoE website.

In addition, the CEI deals with cases of permitted car wreck collection and processing facilities issuing confirmation of environmentally friendly disposal to vehicle owners and then finding the same car wrecks outside of permitted facilities, where they are frequently dismantled into spare parts by unauthorised persons. In such cases, the CEI fines both the unauthorised persons and the operators of the permitted car wreck facilities, as they violate their approved operating rules.

Specifically in 2018, the CEI dealt with a case of more than 150 car wrecks in various stages of dismantling stored in an illegal scrap yard, most of them with erased or cut-out VIN codes. Based on these findings, the CEI suspected that these were the car wrecks admitted "on paper" to a nearby permitted car wreck collection and processing facility. For this reason, the CEI made an inspection using the services of an external company dealing with verification of vehicle origin, which helped the CEI, using various identification marks (engine numbers, product plates or finding another VIN stamp) identify the car wrecks with removed VIN codes with the car wrecks for which the permitted facility had issued the confirmations of environmentally friendly disposal. In this way, they proved 11 car wrecks entered into the MA ISOH system by the operator of the permitted facility. The CEI awarded a fine amounting to CZK 300,000 to the operator, and since it was a repeated fine, the CEI made a motion for the regional authority to repeal its permit. The CEI awarded a fine of CZK 200,000 to the operator of the illegal scrap yard, which was fully confirmed by the appeal authority.



Illegal dismantling of car wrecks found by a CEI inspection.

Recollection of used products

The inspections focused on both performance of the recollection duty by required entities/manufacturers of tyres, electrical appliances and batteries, and actual recollection practice at recollection facilities and subsequent processing.

In the area of tyres, the inspections focused primarily on the recollection duty in places marked by required entities as such, the obligation of registration (free-riding importers not registered yet), the end-seller information duty and obligations relating to showing information on the costs of tyre recollection on sales bills.

Inspections in the area of electrical appliances and batteries focused primarily on identification of free-riding, i.e., entities not fulfilling their legal obligations in respect of these commodities. We also verified functionality of recollection points.

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

Recollection of used products

Total inspections	193
Suggestions	26
Electrical appliances (manufacturers and retailers)	44
Tyres (required entities, recollection points, incl. retailers)	81
Batteries (manufacturers and retailers)	30
EEA processors	16
Joint recollection system operators	2
Electric waste and battery recollection points	31

As shown above, we made 193 inspections under this departmental task. 26 were made based on suggestions, pointing out mostly failure to do recollection of tyres. We initiated 53 proceedings, and issued 55 decisions on fines in 2018. Some proceedings from the previous period were completed, including appeals. Fifty-nine decisions totalling CZK 1,460,000 entered into force in 2018. The highest conclusive fines for violating the Waste Act in this area were awarded for:

- failure to meet EEA end-seller duties pursuant to Section 37k, Para. 4, item a) (CZK 180,000),
- failure to meet joint recollection system operator duties in the area of solar panels pursuant to Section 37p, Para. 2 (CZK 80,000),

- false information in a joint recollection system annual report pursuant to Section 37h, Para. 2 (CZK 50,000),
- failure to cooperate or permit inspection (CZK 200,000).

Tyres

A total of 21 proceedings were initiated in the area of tyre recollection; the total amount of conclusive fines was CZK 199,000.

The CEI repeatedly came across violations of the Waste Act in the area of recollection of tyres by both required entities and end sellers and at recollection points. The required entities failed to meet the tyre recollection rates (min. 35% of the marketed quantity). This type of violation was fined much less in 2018 than in the year before: we only found 3 cases of violation. Likewise, the rate of free-riding identified in 2018 was only a marginal issue: we only awarded penalties for this violation in 3 cases. This indicates a positive trend, and many entities applied for registration in the list of manufacturers or joined a tyre joint recollection system based on our inspections. It is unfortunately still the case that particularly importers of cars and machinery, farm machinery and individually performing tyre importers (e-shops) and their retailers sometimes do not pay appropriate attention to their recollection duties, particularly setting up recollection points and transport from such points, including meeting the minimum required recollection rates. In 2018 as well, the CEI has essentially repeatedly dealt with suggestions of non-functioning recollection points listed in the MoE register for individually registered tyre importers. The points specified by manufacturers in the register are not always up to date; dealers often do not know that they are tyre recollection points or they condition admission of used tyres on purchase of new ones. Thus, the CEI awarded penalties for non-functioning or non-existing tyre recollection points in 13 cases. On the contrary, the CEI practically did not see any refusals at tyre services where a joint recollection system has a recollection point. It thus remains a problem that tyre sellers that recollect tyres from individually performing manufacturers are frequently erroneously and illegitimately informed by their suppliers (required entities) about their operating a recollection point (they typically only do in-exchange recollection, which is a practice not permitted by law for recollection points). Retailers are also frequently unaware of the fact they can refer their customers, if they do not run a recollection point, to another recollection point set up by the tyre supplier (i.e., they do not always have to run a recollection point if their tyre service size or facilities do not permit it).

In several cases, the CEI awarded fines to tyre distributors who failed to show costs of tyre recollection on their sales bills.

Electrical appliances, batteries

In the area of recollection of these commodities, we initiated 30 misdemeanour proceedings and 37 decisions on fines entered into force, totalling CZK 1,199,500. Free-riding is still relatively frequently identified in this area. The most common violation of law in this area relates to free-riding of importers of electrical appliances and batteries and the associated failure to submit an annual report on imports and recollection to the MoE; we made 12 proceedings on this. The CEI also focused on inspecting adherence to information duty on recollection and mandatory recollection of electrical appliances free of charge by e-shops. Here, the CEI awarded fines in 6 cases totalling CZK 235,000, because some e-shops did not offer the service and did not inform end users; in some cases, they required payment for collection of old appliances from customers in contravention of the law (this cost must not be charged separately).

In 2018, the MoE confirmed fines for 3 joint recollection system operators in the area of electrical appliances. In two of the cases, they had failed recollection in municipalities over 2,000 inhabitants to the lawful extent. For these violations, we awarded fines of CZK 80,000 and 50,000 respectively. In one case, the joint recollection system operator did not submit a true annual report specifying complete data on quantity of light sources marketed, although manufacturers had reported such data and paid their contributions duly. Moreover, it failed to include information about recollection of the light sources in its report, thus factually failing to demonstrate the rate of efficiency of the recollection system.

Industrial businesses and other waste producers In 2018, the CEI made 935 inspections focused on performance of waste producers' duties. Violations identified led to initiation of 246 proceedings on misdemeanours. 231 decisions totalling CZK 6,832,000 entered into force in 2018.

A considerable part of the CEI WMD scheduled inspections focused on performance of waste producers' duties concerns large industrial businesses, which are typically facilities with integrated permits. Such entities operating integrated permit facilities are frequently significant waste producers. In most cases, we found that they adhere to their obligations in the area of waste management, and that company managements care for environmental policy, often by means of environmental officers.

Violations of the Waste Act are therefore more frequently found among small to medium-sized entities. The most frequent violations of the Waste Act among waste producers in 2018 included failure to sort waste into types and categories, which is often the result of employee indiscipline. There were also cases of failure to keep continuous records on waste production and submission of late, incomplete or false reports on waste production and management.

As in previous years, we inspected retail chains in 2018, as they are large-scale waste producers. The results included a fine awarded to a retail chain for not classifying expired meat products as a waste type and category. This waste was collected in a mixed municipal waste skip and also wrongly disposed of as mixed municipal waste. Moreover, the inspection found that the skip was leaking a stinking liquid, proving failure to secure leakage of waste into the environment.

Municipalities

In 2018, the CEI inspected adherence to the Waste Act in 89 municipalities, 21 of the inspections being made based on suggestions received. In the course of 2018, we initiated 22 proceedings on misdemeanours and 19 decisions entered into force, awarding fines totalling CZK 272,000.

Inspections in municipalities focus primarily on finding whether municipalities operate points for separate collection of municipal waste components, namely hazardous waste, paper, glass, metal and biodegradable waste (BDW) and whether they have the system set in a generally binding municipal ordinance. In exceptional cases, the CEI has found that a municipality does not have a generally binding municipal ordinance defining the system or that the ordinance does not specify points for some municipal waste components (e.g., BDW a metals). After the CEI inspection, such municipalities typically make remedies.

CEI inspections made in 2018 found one municipality without a set point for separate collection of BDW and one without a point for at least biannual separate collection of hazardous municipal waste components.

In addition, our municipality inspections in 2018 found mostly violations of record-keeping duties, handling of construction waste in places not intended for the purpose, and failure to secure waste against degradation and leakage.

Transboundary waste transport

The CEI made inspections focused on performance of obligations related to transboundary waste transport particularly among waste senders and recipients pursuant to the Waste Transport Regulation no. 1013/2006

(hereinafter, the Regulation). These are waste producers or facilities trading in waste. In cooperation with customs authorities, we also made joint inspections on roads, particularly at former border crossings. The inspections went in accordance with the transboundary waste transport inspection plan for 2017-2019 and also included ad-hoc cases (suggestions by the MoE and other applicable authorities, international collaboration). The purpose of the inspections was to verify adherence to the Regulation (bans and restrictions, waste classification), including transport administration (paperwork). Close cooperation with the MoE was necessary, as it is the applicable authority for transboundary waste transport, as well as continuous cooperation with applicable authorities abroad.

Inspections of waste facilities and producers

We inspected 63 waste senders and recipients. In most cases, these were scheduled inspections, mostly at entities transporting waste on the Green List. 7 of the inspections were made based on requests of applicable authorities abroad and suggestions. In total, 11 administrative proceedings were initiated under this departmental task and 10 conclusive fines were awarded totalling CZK 320,000.

The inspections mostly involve identification of shortcomings in documentation – incorrect or false information in Annex VII to Regulation no. 1013/2006 on Waste Transport. Documentation accompanying transboundary transport provided by the inspected entities for the CEI (primarily completed Annex VII to the Transboundary Transport Regulation) and contracts pursuant to Art. 18 of the Regulation were frequently found to be in contravention of Art. 18. Usually, the waste senders or recipients are identified wrongly (outside the jurisdiction of the waste origin or destination country) or loading point data are incorrect (waste producer or waste collection facility), sometimes the quantity of waste being transported is not shown. Contracts are frequently missing or vague, lacking necessary minimum requisites pursuant to the Regulation, or ineffective. In addition, contracts tend to specify only the carrier instead of the destination facility, and to not specify actual waste reuse methods. Another frequent finding is that continuous facility records show waste under several catalogue numbers (e.g., paper and plastics), while the transport document only specifies one catalogue number. In more serious cases, the documents contain purely fabricated data relating to the place of import and waste type; shipment documents are then deliberately altered once in the CR so that the actual recipient does not know the actual (transboundary) origin of the waste. This circumvents requirements such as the prohibition on waste import for the purpose of landfilling or energy recovery of mixed municipal waste. It also completely circumvents the notification duty for so-called unclassified waste to applicable authorities in order to obtain necessary approval for waste transport, which in some cases

may constitute the facts of a crime. These cases are difficult to discover and expose, and providing evidence is also difficult. In spite of that, we have managed to stop or reduce some illegal waste importing operations in cooperation with applicable authorities abroad and the Customs Administration, followed by crime reports or misdemeanour proceedings.

For the second year in a row, we have also observed a change in the direction of waste exportation, notably plastics, to markets other than previously dominant China. In some EU countries, this reduction has led to adverse excessive storage of waste and, unfortunately in some cases, fires. This type of fires of waste storage have also been registered in the CR to a limited extent, and are mostly handled by the FRS.

Major conclusive fines

The CEI awarded the highest fine (CZK 150,000) to the operator of a waste collection and repurchase facility for unpermitted waste transport (crushed GSM aerials – a mixture of GSM aerials containing crushed fibreglass reinforced plastic); this was back in 2017. It was a shipment that the applicable authority in Germany had assessed as unpermitted with respect to the waste type and destination and returned to the CR. After an appeal, the fine for the sender entered into force in 2018.

Another example case handled under this departmental task was an inspection at a waste collection, repurchase and reuse facility. The documentation provided by the inspected entity on CEI request regarding transboundary waste transport pursuant to the Green List was checked and found to contravene Art. 18 of the Regulation. Specifically, Annexes VII to the Regulation accompanying the shipment being exported were not completed in accordance with Art. 18. In addition, some of the contracts were ineffective pursuant to Art. 18, Para. 2 of the Regulation, as they did not specify a contract date. The CEI awarded a fine to the inspected authority of CZK 50,000 for the shortcomings.

Inspections of waste transport outside stationary facilities The CEI made joint inspections at or near former border crossings to Austria as well as several joint inspections with customs authorities in the hinterland. In total, we made 12 autonomous inspection projects focused on waste transport. Several dozens of vehicles transporting waste were checked during the inspections. The inspections only found certain administrative errors relating to wrongly completed documents, which were then handled in misdemeanour proceedings against the waste senders.

Inspection of compliance with Packaging Act

In 2018, CEI inspectors made 105 inspections focused on adherence to Act no. 477/2001 Coll. on Packaging, as amended (hereinafter, the Packaging Act). Among them, 6 were made based on suggestions received (2 of them by a customs authority) and 11 were made based on MoE requests. In the course of 2018, we initiated 70 proceedings on fines and 70 decisions entered into force, awarding fines for violations of the Packaging Act and the Inspection Rules totalling CZK 3,904,500.

In this area, the CEI inspects notably entities that are suspected of not performing their obligations under the Packaging Act. They include importers and transboundary transporters of packaged goods as well as packaging manufacturers ("packaging fillers") not registered in the List of Entities and without a contract with an authorized packaging company (APC). The CEI inspections frequently find that the inspected entities are completely unaware of their obligations under the Packaging Act, and they often make remedies after the CEI inspection. For example, in 2018, we inspected operators of fast-food restaurants, beverage sellers, importers of packaged goods (electrical appliances, textiles, footwear, etc.) and operators of e-shops.

A fine amounting to CZK 580,000 awarded to a meat manufacturer entered into force in 2018. The packaging producer completely failed its obligations under the Packaging Act.

Based on an MoE request, we inspected 11 entities registered on the List of Entities that were suspected of not performing their obligations under the Packaging Act. These inspections frequently confirmed the shortcomings pre-announced by the MoE. The most frequent findings were failure to arrange reuse packaging waste (meet reuse and recycling percentage) and to do record-keeping duties. The CEI sees the mandatory packaging waste reuse as an instrument to prevent pointless landfilling and incineration of an important source of raw material (recyclable packaging material) and ensure its material reuse.

The highest conclusive fine in 2018 of CZK 1,800,000 was awarded to a company that failed to prove correctness of data shown in its records and annual packaging and packaging waste reports and to ensure the required rate of recycling and overall reuse of packaging waste from its marketed products. In this case, the quantity of packaging waste was significant and the violation repeated. It was the third fine awarded to the company.

Inspections of adherence to the Chemicals Act and the Biocides Act

Regulations concerning chemicals include the Chemicals Act no. 350/2011 Coll., the Biocides Act no. 324/2016 Coll. and related or directly applicable European regulations – Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (CLP), Regulation (EC) No 648/2004 on detergents, Regulation (EC) No 528/2012 on Biocides, and more. The CEI made 629 inspections pursuant to the above regulations. A larger part of the inspections focused on the REACH (registration of chemicals, material safety data sheets, regulated and permitted chemicals, totalling 278 inspections), part on obligations under the CLP Regulation (classification, packaging and labelling of substances, totalling 258 inspections), and a smaller part on the Detergents Regulation (24 inspections). Biocidal products were inspected in 61 cases (we checked 73 biocidal products). Another 350 inspections were made based on 155 notifications received from the EU rapid warning information system on dangerous consumer products of non-food nature (RAPEX/Safety Gate). In the study period, we made 23 inspections based on suggestions received. The CEI also made 13 inspections based on notifications of the Poison Centre – it was a case of an accident involving a hazardous chemical mixture, which was not reported to the Ministry of Health register.

7% of the REACH inspections concerned manufacturers in the CR, 4% importers from third countries (outside the EU), 21% subsequent users (including end users), and 60% distributors of chemical substances and mixtures.

54% of the chemicals or mixtures inspected in 2018 originated from the European Union or third countries. In the long run, we have found more violations of chemical regulations in these products than in products of the CR. A total of 60% of the chemicals and mixtures originating from the EU failed to comply with the chemicals regulations (it was 33% in products of the CR).

In 2018, 140 fines under the Chemicals Act, Biocides Act and Inspection Rules (Act no. 255/2012 Coll.) entered into force, totalling CZK 3,301,500. We initiated 142 misdemeanour proceedings and proceedings on remedial measures. The majority of the violations were connected with wrong labelling of chemicals, failure to report mixtures in the Ministry of Health register, MSDS quality, Internet advertising and restricted substances.

The CEI was involved in the work of the European Chemicals Agency (specifically its forum for exchange of enforcement information and a subgroup on biocides). Three CEI employees were actively involved in several working groups of the forum.

Thematic inspections

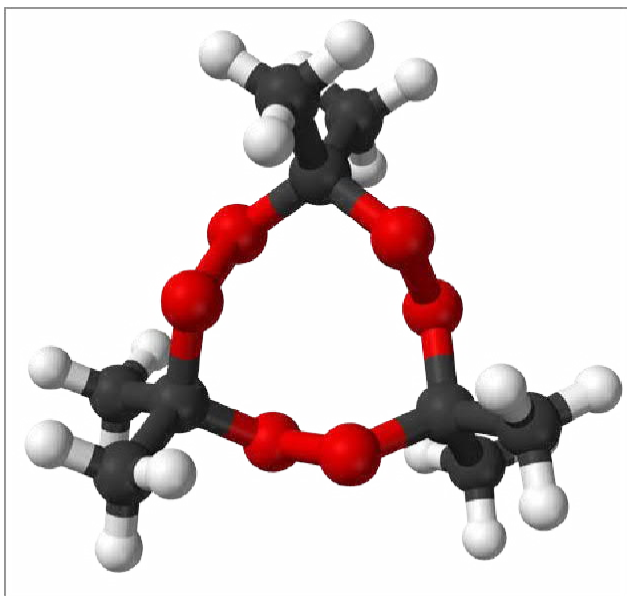
As part of the pan-European inspection project REF6, we inspected entities marketing hazardous chemical mixtures throughout the year 2018. We checked these products in terms of correct classification, packaging and labelling. We inspected 36 entities. Out of that, 12 inspections involved labelling and packaging exemptions, 3 dealt with soluble capsules, and 9 with biocidal products.

Another project, taking place in the second half of 2018, was a series of inspections focused on items treated with biocidal products and use of biocidal products. As for the treated items, we inspected primarily obligations relating to their labelling (each treated item should be labelled with the name of the active ingredient, its biocidal properties and instructions on use of the item). We inspected 20 treated items and found shortcomings in 11 of them. Due to the problems identified in this market segment, we will continue these inspections.

Inspections under the European project “Chemicals in Items” focused on entities marketing or importing items containing chemicals from the ECHA Candidate List for inclusion in Annex XIV to REACH. Manufacturers or importers of items containing these chemicals have to make reports to the ECHA, and suppliers of the items have to inform the recipients about their chemical contents. The inspections continued throughout the year 2018 and a unified European questionnaire was completed for each one. The CEI employed screening measurements of product composition on the spot. For this purpose, we use the mobile analytical tools ED XRF, FTIR and a Raman spectrometer. Therefore, we only collected samples with probable contents of the monitored chemicals (which were determined accurately in an accredited laboratory). We inspected 79 products of 21 suppliers.

Based on information from the Institute of Criminology, we made an awareness-raising and inspection campaign in 2018 focused on suppliers of isopropanol (CAS number 67-63-0). The reason is that cylinders containing this common-use solvent may suffer from auto-oxidisation, producing explosive triacetone triperoxide. There have been several explosions with severe consequences in laboratories in the CR. This substance, also known as TATP, is a very unstable explosive and a tiny mechanical stimulus is sufficient to start the explosion. It is manifested on storage cylinders as white crystals or a white coating. The information about the potential formation of TATP in isopropanol was given to its distributors, who were recommended to include it in their MSDS and include the phrase “EUH019: May form explosive peroxides” on the labels. In most cases, the information was not provided in MSDS and the phrase EUH019: was missing on labels.

We made inspections at 15 isopropanol suppliers and checked 18 isopropanol packaging units.



A triacetone triperoxide (TATP) molecule.

4.3.3 Overview of fulfilment of specific tasks – Summary

Specific or priority tasks were chosen by territorial inspectorates in 2018 based on inspectors' experience of ordinary practice. They involved either environmentally and socially important topics or continuously negatively trending cases or interesting entities from previous years.

In 2018, CEI WMD inspectors dealt in detail with medical waste and monitoring its flow via entities authorised for waste handling, waste producers who have been permitted to stop sorting waste, and handling of municipal wastewater treatment sludge. In addition, our inspectors monitored the construction of a railway corridor, mining activity, waste from titanium dioxide production as well as waste left on a site after a company ended work there.

4.3.4 Major cases

Highest conclusive fines awarded by TI

Prague TI

Kalibo s.r.o.

The Prague TI inspectors awarded a fine of CZK 5,000,000 to Kalibo s.r.o., which had violated the Waste Act by admitting large quantities of miscellaneous and hazardous waste although it was not authorised to do so. In total, Kalibo s.r.o., admitted thousands of tonnes of various waste types. Besides, Kalibo s.r.o. had violated the Waste Act by submitting a false waste production and handling report. It was not clear from the report what actually happened to the waste. In addition, the company was fined CZK 300,000 for violating the Inspection Rules by not providing the CEI with cooperation during inspection. Moreover, the CEI made a motion to the applicable trade office, which then repealed the company's trade licence.

České Budějovice TI

Natural person authorised to do business

The CEI decision awarding a fine of CZK 350,000 to a natural person authorised to do business for violating the reporting duty when operating a mobile waste collection and repurchase facility came into force in 2018. Specifically, the company had reported the transfer of a large quantity of both miscellaneous and hazardous waste to a company that did not in reality accept the waste, thus obscuring the actual waste handling. The fine was confirmed by the authority of appeal.

Plzeň TI

AHOLD Czech Republic, a.s.

When inspecting AHOLD Czech Republic a.s. facility at Gerská 1247/34, Plzeň, the CEI inspectors found that the company had not collected waste separated by type and category and had failed to secure the waste against degradation and leakage pursuant to the Waste Act. Specifically, it had collected waste such as plastic packaging, wooden fruit and vegetable crates, biodegradable waste (unpacked discarded fruits and vegetables, unpacked baked goods and mixed municipal waste in a skip for mixed municipal waste. In addition, the inspection found that the high-capacity skip with a press intended for collection of mixed municipal waste was leaking decaying matter. For these violations of the Waste Act, AHOLD Czech Republic s.r.o. was awarded a conclusive fine of CZK 200,000.

Ústí nad Labem TI

DEMONTEX CV s.r.o.

The fine of CZK 400,000 awarded by Ústí nad Labem TI inspectors to DEMONTEX CV s.r.o. for waste handling in areas not intended for the purpose and confirmed in full by the appeal authority, entered into force in 2018. During an inspection based on a suggestion, the CEI found that DEMONTEX CV s.r.o. had made repairs and maintenance of local roads in Orasín u Boleboře using waste aggregated cinders although the land in question was not intended for waste reuse. In its fine assessment, the CEI applied not only the inspection findings but also laboratory analyses carried out and testimonies by citizens.



Waste cinder, used by DEMONTEX CV to repair roads in and around Orasín.

Hradec Králové TI

Obalovna Týniště s.r.o.

Obalovna Týniště s.r.o. was awarded a conclusive fine amounting to CZK 350,000 for having handled large quantities of processed construction waste (produced as part of bitumen topping construction) in areas not intended for the purpose. In addition, the fine calculation considered the fact that Obalovna Týniště s.r.o. had simultaneously violated the Waste Act by transferring construction waste (waste soil with additions of concrete, brick, slag, etc.) to an entity not authorised to admit it, which then use the waste to backfill an illegally mined area.

ZETEON s.r.o.

The fine of CZK 350,000 awarded by Hradec Králové TI inspectors to ZETEON s.r.o. for violating two provisions of the Waste Act entered into force in 2018. Specifically, ZETEON s.r.o. had handled waste sludge recovered when cleaning a reservoir at Trnávka on three different sites in Pardubice Region, although the sites were not

intended for waste handling. In addition, ZETEON s.r.o. had violated the law by failing to keep proper continuous records on the waste sludge recovered when cleaning a reservoir at Trnávka. The CEI decision on the fine was confirmed by the appeal authority.

Prague TI awarded an additional fine of CZK 2,000,000 to ZETEON s.r.o. for having transferred waste to Kalibo s.r.o., which was not authorised to admit it, and for failing its reporting duty.

Havlíčkův Brod TI

Ekometal Šrot s.r.o.

Havlíčkův Brod TI awarded a fine of CZK 130,000 to Ekometal Šrot s.r.o., operator of a car wreck collection, repurchase and processing facility, for having committed violations of several provisions of the Waste Act (e.g., storing car wrecks in multiple layers, failure to identify hazardous waste, failure to keep records on some waste and incomplete waste reports, incorrect classification of some waste, and failure to present a contract with an accredited representative).

Brno TI

CG Komunální servis s.r.o.

The CEI awarded a fine of CZK 1,000,000 to CG Komunální servis s.r.o. for violation of the Waste Act. Specifically, the company failed to submit a waste production and handling report in 2016 although it had admitted thousands of tonnes of hazardous waste and tens of thousands of tonnes of miscellaneous waste from various entities. The destination of the waste could not be established because CG Komunální servis s.r.o. did not cooperate on the inspection. For a violation of the Inspection Act (failure to cooperate on inspection), the company was awarded another conclusive fine of CZK 500,000 in 2017.

Olomouc TI

MAKOVEC a.s.

The fine of CZK 580,000 awarded by Olomouc TI inspectors to MAKOVEC a.s.

for violation of several provisions of the Packaging Act entered into force in 2018. MAKOVEC a.s. manufactures meat and smoked meat products, both heat-processed and not, and it marketed, between 2015 and March 2017, tens of tonnes of mostly paper and plastic packaging without performing its obligations under the Packaging Act. Specifically, MAKOVEC a.s. had failed to arrange reuse of the waste packaging marketed by it in the CR, to make an application for registration in the List of Entities, and to submit annual packaging reports. The fine was confirmed by the authority of appeal.

Ostrava TI

ArcelorMittal Ostrava a.s.

The fine of CZK 1,800,000 awarded to ArcelorMittal Ostrava a.s. for repeated violations of the Packaging Act entered into force in 2018. It was the third fine awarded to the company for failing the same obligations, namely failing to prove correctness of data shown in packaging and packaging waste records which it had reported to the MoE, and failing to arrange the required recycling rate and overall reuse of waste from packaging marketed by it in the CR in accordance with requirements of the Packaging Act. The repeated violation of the same provisions was reflected in the increased fine amount. In addition, the CEI considered the fact that ArcelorMittal Ostrava a.s. is a company marketing significant quantities of packaging in the CR. ArcelorMittal Ostrava a.s. appealed against the decision on the fine within the legal period. The appeal authority confirmed the fine.

Liberec TI

Purum, s.r.o.

The CEI awarded a conclusive fine of CZK 450,000 to Purum, s.r.o., for operating a municipal waste landfill in Osečná in contravention of the operating rules, thus also the integrated permit. Purum s.r.o. had violated the waste laying method in the landfill (terracing) and admitted loose asbestos-containing waste which it then handled around the landfill. The fine was confirmed by the authority of appeal.

Kompostárna CL s.r.o.

Liberec TI also awarded a fine of CZK 450,000 to Kompostárna CL s.r.o., operator of a composting plant, for repeated violations of the Waste Act, which was confirmed by the appeal authority. Specifically, the CEI found based on sampling that the compost product does not meet quality requirements specified in the operating rules and MoE Decree on Details of Biodegradable Waste Management. Above all, microbiological parameters of the compost product were exceeded. According to the operating rules, non-compliant compost should have been mixed with new heaps and the composting process repeated, which was not the case here. Instead, the compost product was used for reclamation of a sand quarry, which might have resulted in a water endangerment and contamination. That was the fourth CEI fine for the operation of that particular composting plant in the past 8 years.

4.3.5 Conclusions from inspection work

The Czech Environmental Inspectorate met its inspection work plan for 2018 in the area of waste management and chemicals. The number of inspections increased slightly compared to 2017. The numbers of proceedings initiated and decisions issued in 2018 was almost identical to those in 2017.

It follows from the conclusions of the departmental tasks that the situation in the area of adherence to legal regulations in waste management and the chemicals agenda is comparable to 2017.

It also follows from inspection work findings that the most important problems in the area of waste management from the CEI point of view continue to be illegal handling of construction and demolition waste, incorrect reporting of waste handling methods when landfilled, which is closely related to circumvention of economic regulatory instruments defined by law, and last but not least, non-transparent handling of hazardous waste.

In connection with non-transparent handling of hazardous waste, it can be concluded unfortunately that this illegal activity, which is organised in a highly sophisticated manner in some cases according to CEI findings, is very difficult to grasp for inspection authorities. The CEI then has to turn to authorities of criminal proceedings, for which waste handling issues are one of the many areas that they handled under their jurisdiction. This can be one of the reasons for most of the cases being transferred back for misdemeanour proceedings. However, the CEI is going to continue its inspection work to maximise the utilisation of its powers to cooperate with authorities of criminal proceedings.

In contrast, there has been positive response from some representatives of inspected entities (environmental officers) indicating that conclusions from our inspections have positively influenced the decision-making of the companies' management, who then emphasise environment protection aspects (incl. in terms of investment in proper waste management and organisational changes in their waste management systems).

4.4 Nature protection and CITES

4.4.1 Overview of inspection work

In 2018, Nature Protection Department inspectors made 3,341 inspection investigations, largely unscheduled based on suggestions received. 775 decisions issued by the NPD entered into force. Among those, 583 were decisions on fines (including 252 on violations by legal entities and natural persons doing business and 331 on violations by natural persons), 21 decisions on halting or restriction of operations, 157 on seizing or confiscation, and 14 decisions on remedial measures. In addition, we issued 10 preliminary orders. This represents an increase in the work by approximately 6% compared to 2017.

The total amount of conclusive fines in 2018 was CZK 8,421,800. Out of that amount, CZK 7,092,300 were fines awarded to legal entities and natural persons doing business; natural persons not doing business represented CZK 1,329,500 worth of penalties. In this respect, there was a year-on-year decrease by almost 35% compared to 2017, matching the normal fluctuation in the numbers of major cases and the current status of fine proceedings by appeal authorities. In addition, we made 12 crime reports and 40 motions to public authorities in 2018. The Nature Protection Department handled 1,131 suggestions received, an increase of more than 8% compared to the previous year.

Traditionally, the greatest part of the inspection work of the Nature Protection Department concerns enforcement of Act no. 114/1992 Coll. on Nature and Landscape Protection. In the long run, a large portion of our work concerns protection of non-forest trees, particularly inspection of legitimacy of tree felling and proceedings on violations connected with tree damage. We also deal significantly with damage to prominent landscape features, particularly watercourses and their floodplains by unpermitted landscaping as well as inspection of observance of general and special protection of plants and animals. This area includes administrative and preventive work on protection of birds and bats in connection with construction or renovation, including thermal insulation of residential buildings.

A specific chapter is inspections of farming businesses as part of the cross compliance process, the outcomes of which are part of the information for SZIF decision-making on allocation of agricultural subsidies. These inspections are important due to their preventive effect rather than amounts of fines; they represent a statistically significant part of the CEI inspection work.



Unpermitted felling of trees in a golf course at Janov u Hřenska.

Another significant part of the Department's work is inspections pursuant to provisions of Act no. 100/2004 Coll. on Protection of Wild Animals and Plants regulating trade in them, which are made by a separate CITES Department besides territorial inspectorates. Other departmental acts (Act no. 78/2004 Coll. on Handling of Genetically Modified Organisms and Genetic Products and Act no. 162/2003 Coll. on Requirements for Operation of Zoological Gardens) are well-defined areas with relatively limited numbers of concerned entities, which are inspected periodically or as necessary.

The share of inspection work focused on adherence to Act no. 334/1992 Coll. on Agricultural Land Fund Protection is continuously growing, particularly as a consequence of suggestion received (25 in 2018). The suggestions concerned mostly heap storage on farmland, landscaping, storage of contaminated soil and exceedance of indicative values of pollutants. ALF protection inspections are among the most difficult. Analyses of farmland and their interpretation require cooperation with accredited laboratories, and seeking for sources of pollution, which is often residual, is troublesome. Inspection processes are carried out and respective proceedings are initiated according to their results.

Handling of suggestions received is a very significant part of the Nature Protection Department inspection and administrative work. In accordance with long-term trends, the largest part of suggestions received in 2018 dealt with felling of and damage to non-forest trees. A large part of the suggestions were related to

interventions in prominent landscape features and suspicion of unpermitted landscaping. Suggestions concerning agricultural land fund again increased year-on-year, and were handled in cooperation with the ÚKZÚZ and other public authorities. A larger part of the received suggestions are justified and are a source of information for administrative and misdemeanour proceedings. As traditionally, some suggestions were assessed as unjustified; their investigation is excess workload more than anything. Conversely, many of the suggestions work fully or partly overlapped with our scheduled. However, that does not change the fact that public suggestions reflect on the status of some environmental components and are an indispensable source of information.



Large-scale unpermitted dumping at Číkov, home of biotopes for specially protected species.

Trade in endangered species – CITES

Following is a summary of the CEI Headquarters CITES Department work and part of territorial inspectorates' work pursuant to Act no. 100/2004 Coll. The following figures are a summary of the CITES work across the entire CEI.

In 2018, CEI inspectors made 593 inspections under Act no. 100/2004 Coll. (CITES). At present, most of the CITES inspection work is done by the International Biodiversity Protection and CITES Department of the CEI Headquarters, which deals primarily with international issues of the CITES treaty (inspection of imports and exports, international cooperation), investigation of serious cases of violation of laws and cooperation with authorities of criminal proceedings, and provides professional services for other CEI inspectorates and state authorities.

Import and export inspections in 2018 made up 66% of all the CITES inspections (i.e., 390 inspections). These inspections continue to identify a significant proportion of citizens of Vietnamese nationality in the violations of the law in the area of imports and exports of CITES specimens. CEI inspectors cooperated

with other public authorities, notably the Customs Administration and Czech Police, including telephone consultations during inspections: there were 777 cases, including 153 consultations during stand-by duty outside working hours. Eight cases required a field intervention; otherwise, most were resolved via telephone and e-mail (thanks to the possibility of electronic transmission of photographs and data) and agreement of next steps. Inspections in the national hinterland focused on breeders, growers and holders of dead individuals made up 28% of the inspection work (168), and inspections of traders and companies 6% (36). We also made inspections at 2 swap meets. The CEI carried out 206 fine proceedings; fines totalling CZK 649,400 were awarded in the CITES area (decision in force); serious cases are forwarded to authorities of criminal prosecution, with which the CEI actively cooperates on investigation of the cases. Legitimate confiscation of CITES specimens proceeded in 148 cases:
– 2,208 CITES individuals were confiscated (163 living and 2,045 dead).

In 2018, the CEI made 8 crime reports in the CITES area, and our inspectors assisted in 15 house searches and interventions by authorities of criminal proceedings (as expert consultants and with expert statements). The most important action was execution of the TROFI dossier, focused on illegal trade in tigers and tiger products. CEI inspectors made 39 expert statements for authorities of criminal proceedings.

In 2018, the CEI did the departmental task Parrot Inspection. The inspection work focused on selected parrot species in Annex A to Regulation (EC) No 338/97. The departmental task planning included assessment of data from the CITES Register and development of a detailed methodological instruction. Task coordinators then selected approx. 5 entities for each TI to check. Special attention was paid to the species Hyacinth Macaw, Palm Cockatoo as well as the Cacatua, Ara and Amazona genera. We carried out 63 inspections under the project. Under the departmental task in 2018, we made 42 inspections of breeders, and physical inspections of approx. 500 parrots. The inspections found numerous legal violations, notably in the area of identification of individuals, documentation of origin, registration duties, etc. Only 18 inspections have been concluded so far, because investigation and verification of facts are still in progress. The remaining inspections will be concluded in 2019.

4.4.2 Overview of fulfilment of departmental tasks

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

In the past year, the CEI made 342 conditionality inspections in 337 businesses in connection with disbursement of agricultural subsidies. In 230 cases, we assessed adherence to statutory management requirements (PPH) arising from Council Directive no. 79/409/EEC on the protection of wild birds; and in 112 cases, we checked adherence to the requirement arising from Council Directive no. 92/43/EEC on habitat protection (PPH 3). Five entities were inspected with a focus on both the European Directives.

The purpose of the inspections was to assess observance of mandatory economic requirements of said European Directives and applicable provisions of Act no. 114/1992 Coll. The inspections focused on potentially risky areas with the greatest risk of conflict between farming and interests protected under the Act. PPH 2 inspections dealt primarily with farming on soil block sections characterised by presence of trees or prominent landscape features in the form of watercourse and floodplain, or are situated in an area with selected specially protected species (blues, corncrake). Requirement PPH 3 was inspected in connection with existence of Sites of Community Importance within or in the vicinity of farmed land.

The overwhelming majority of inspections followed a centralised inspection plan, including the minimum inspection scope defined by legislation. Specifically, each applicable supervisory organisation should verify at least 1% of all applicants for agricultural subsidies. Extraordinary inspections were only made in 7 cases based on suggestions or own findings, including additional integration of the other Directive. In each inspection, map information was used to identify risk areas with a higher probability of conflict between farming and nature protection.

Violation of Act no. 114/1992 Coll. and the respective Cross Compliance requirement was only found in once case, it was a violation of protection requirements for a watercourse prominent landscape feature. Cattle grazing in the watercourse bed and the adjacent floodplain resulted in a reduction of ecological stabilisation function of the prominent landscape feature, thus failing requirement PPH 2/1. In addition to initiating a misdemeanour proceeding, the CEI made a motion to reduce the subsidy by 1% based on the finding. The other inspections resulted in no findings that would be a reason for initiating a proceeding or proposing subsidy reduction.

Inspected entities usually cooperate with the CEI and respect its instructions by adopting precautions to prevent potential conflicts between farming and public interest in the form of nature and landscape protection. During inspections, the CEI repeatedly points out selected protected interests and potential risks of farming, including potential impacts in the form of agricultural subsidy reduction.

In terms of nature protection interests, the SZIF subsidy policy appears to be problematic in the long run as it fails to consider, e.g., the need for natural regulation of water in landscape, including the existence of so-called field wetlands. Farming entities are not sufficiently informed about the importance of these landscape features by the Ministry of Agriculture, and there is no motivation to conserve them within the subsidy policy. This often results in their drainage or overgrowing as a consequence of exclusion from farming. Among other things, the strict and technical approach to setting of requirements and inspections by the subsidy agency motivates farmers to do contour pruning of trees in the landscape features and along soil blocks, which cannot be seen as an appropriate maintenance method in terms of natural functioning of landscape features in cultural landscape.

2. Inspection of adherence to NLPA in connection with interference with watercourses

In 2018, we made 55 inspections focused particularly on construction projects such as landscaping and renovations of watercourse beds and hydraulic structures, emptying of water bodies, water level manipulation and felling of bank vegetation. Some of the planned projects were not implemented by investors and their inspection is therefore expected in the next year. These thematic inspections can still be regarded as effective.

Legal violations were found in six cases, usually in connection with specially protected species, the natural evolution of which was harmed without valid exemptions from protection requirements for specially protected species of Act no. 114/1992 Coll. on Nature and Landscape Protection. Misdemeanour proceedings were initiated in connection with the backfilling and relocation of the bed of a small watercourse, emptying of a small water reservoir (home of the specially protected species Swan Mussel), and felling of nine non-forest trees without permit at Liptál. As regards modifications to the watercourse Senice at Lidečko in connection with road repairs without permit, we also found a reason to initiate a misdemeanour proceeding due to the presence of five specially protected animal species in the watercourse section. In one case, the CEI halted excavation of sediments from a watercourse that was a specific biotope for specially protected species, ordering the entity to arrange development of a biological assessment. In another case of modification to the Boberský brook in Cvikov, we found a violation of

the requirements of the exemption from basic protection requirements for the specially protected species European Bullhead. We found a legal violation in another case, but the liable entity has not been identified due to an ongoing ownership lawsuit.



Construction of Boberský brook fortification in contravention of protection requirements for the European Bullhead.

3. Inspection of Internet trade in dead individuals of specially protected species

Monitoring of Internet servers followed up on previous monitoring. The relocation of illegal trade to social networks was reflected by the CEI with a special emphasis on offers of dead individuals of endangered species for sale without an exemption from the ban on commercial activity required under Art. 8 of Regulation (EC) No 338/97, sale of individuals of specially protected species without an exemption under Section 56 of Act no. 114/1992 Coll., and sale of wild birds without an exemption under Section 5b of Act no. 114/1992 Coll. The previous period proved the efficiency of this monitoring, leading to notifications to authorities of criminal proceedings.

One of the most important inspection achievements in this area was the crime report for the sale of a mounted individual of the severely endangered Eurasian lynx.

4. Inspectorate-wide check

The inspectorate-wide check, taking place in the first half of 2018, focused on violations of protection requirements in the Beskydy PLA. We inspected 27 restaurant and accommodation facilities. The check was evaluated as effective. The inspections were partly motivated by a suspicion of legal violation in relation to unpermitted entries to the PLA territory. Three of the cases have been concluded with decisions on fines; fifteen are still in progress. In addition, the inspectorate-wide check inspected meeting of set requirements in execution of investment projects subject to environmental impact assessment (EIA). In two cases (Bezručova chalet on Lysá hora and SKI park Gruň), we found violations of the requirements and made notifications to applicable public authorities.

5. ALF inspections

In connection with the CEI's powers in the area of ALF protection, we initiated four scheduled inspections and more than 20 unscheduled investigations and inspections. The scheduled ALF inspections were based on data provided by the ÚKZÚZ. No legal violation was proven in one of the cases; another inspection found a legal violation outside the CEI's powers, leading to a notification to the applicable public authority. In the two remaining inspections, initiated by the CEI due to a suspicion of violation of Act no. 334/1992 Coll., soil sampling will be done in cooperation with the ÚKZÚZ in a suitable period (spring-summer of 2019). In 2018, the CEI awarded a fine amounting to CZK 30,000 to the municipality of Klokočov for dumping soil (waste) on a plot that belongs to the ALF. The intervention was a violation of Section 3, Para. 2 of the ALF Protection Act.

6. Inspections of parrots kept in private breeds

We initiated several dozens of inspections under this task in 2018. The chief problems of the inspection work consisted in the absence of identification of individuals (microchips difficult or impossible to read, rings difficult or impossible to read or missing). Many of the cases will therefore have to be resolved using a DNA analysis. In addition, we found inconsistencies in documents, typically those issued by executive CITES authorities abroad, which have to be verified via the MoE. Most of the inspections have not yet been concluded for these reasons.

Legal violations were found at seven entities in 2018. We ordered on-the-spot fines in three cases, and misdemeanour proceedings will be initiated in the remaining four. Inspections of another ten entities are expected to conclude soon with misdemeanour proceedings.

4. 3 Overview of fulfilment of specific tasks

1. Inspections of handling of genetically modified organisms

Inspections of handling of genetically modified organisms proceed according to a plan that reflects the obligation to inspect each GMO user at least once every two years. In 2018, we made 24 inspection in this area, including 2 inspections of GMO release into the environment (field trials) and 22 of closed-circuit GMO handling in risk categories 1 and 2. The field trials proceeded under conditions properly defined by MoE decisions and in accordance with legal regulations. They concerned genetically modified (GM) plum tree and soya. The inspections of closed-circuit GMO handling checked adherence to legal regulations on GMO and conditions set by MoE decisions depending on the risk category. The CEI inspections dealt with seemingly

trivial obligations, which have far-reaching consequences, such as documentation keeping, method and observance of the set periods for training for employees handling GMO, and procedures for GMO handling waste disposal. The scheduled inspections in 2018 did not find any violations of Act no. 78/2004 Coll. on Genetically Modified Organisms and Genetic Products. Minor administrative shortcomings were remedied immediately.

In addition, we received a suggestion from the ÚKZÚZ on the identification of soya seeds with detectable contents of genetically modified material. Further analyses showed that the quantity of the GM component was at the threshold for GM identification pursuant to EU regulations. Having found that the seeds were not permitted for another reason (an unapproved variety), the sown areas were partly ploughed in and the seeds were partly processed. The occurrence of GM aquarium fish and GM petunias, which constituted major subject matter of administrative proceedings leading to the CEI banning their marketing, was not reported by retailers in 2018.

2. Zoological garden inspections

In the course of 2018, we inspected 10 facilities in terms of observance of obligations pursuant to Act no. 162/2003 Coll. on Zoological Gardens, and we also inspected handling of CITES individuals pursuant to Act no. 100/2004 Coll. and specially protected animal species under Act no. 114/1992 Coll. In addition, the CEI cooperated with the MoE, which we provided with information and data necessary for its own inspection work. Errors found, particularly in respect of proving legitimate origin of individuals and their unique identification, were handled by conclusive confiscation. Since these were CITES A individuals, we made respective notifications to authorities of criminal proceedings. One misdemeanour proceeding will be initiated in 2019 based on inspection work in 2018 regarding operation of a zoo without a licence, and at least one proceeding for illegitimate handling of CITES individuals.

3. Inspections of potentially serious threats to nature protection interests

The TI Nature Protection Department work was based on specific issues in each region. It focused on areas, activities and entities that could be expected, based on current own findings, past experience or repeated suggestions, to constitute potential serious threats to nature protection interests in landscape.

4. Inspections of preservation status of specially protected area Specially protected areas are a major factor contributing to landscape diversity and are of an indisputable importance as refuges for disappearing, rare and specially protected species.

Therefore, the CEI regards inspections of specially protected areas an important part of its work in relation to potential adverse impacts of agricultural or other uses on environmental preservation status. In 2018, the CEI made more than 100 inspections in small-scale and large-scale specially protected areas.

The large-scale specially protected areas inspected included the Protected Landscape Areas of Beskydy, Orlické hory, České středohoří, Labské pískovce and Broumovsko and the České Švýcarsko National Park. The primary objective was to map visitor behaviour (camping, campfires, movement outside permitted zones, adherence to requirements for climbing and caving activities) and behaviour of inhabitants (unpermitted landscaping, waste dumping, hunting right exercise). Another aspect, of no less importance, was an assessment of public administration performance by the respective Administrations, which are departments liable to the regional NCA office (safeguarding objects of protection, issuance of permits and approvals, field marking) and municipal authorities (issuance of felling permits, ordering substitute planting). Another area of inspection concerned interventions in natural evolution of specially protected species in specially protected areas (e.g., interruptions while hibernating). Legal violations, which were usually handled by on-the-spot fines or in misdemeanour proceedings, were found particularly in the area of vehicle entrance bans, camping, unpermitted bouldering methods and unpermitted waste dumping. Shortcomings in field marking were consulted with the respective Administrations.

The inspections of small-scale specially protected areas (nature monuments, national nature monuments, nature reserves and national nature reserves) were made in relation to currency of and adherence to management plans, proper marking, compliance with protection requirements for the area and its buffer zone. The most common findings were violations of bans on entry outside defined areas and campfires (NNR Adršpašsko-teplické skály and NNR Broumovské stěny), which the CEI punished typically with on-the-spot fines.

The specially protected area inspections also included 17 Sites of Community Importance with a special regard to protection of specially protected and rare species, including objects of protection of each SCI.

5. Veteran tree inspections

Veteran trees and their groups are dominant landscape features of an indisputable cultural and historical importance; moreover, they provide environment for rare and specially protected animal species. Veteran tree inspections took place mostly in the South Moravian, Zlín, Plzeň, Ústí nad Labem and Vysočina Regions. The inspections found numerous shortcomings in marking and management, and some inconsistencies in

establishing regulations in terms of tree location (plot identification). In some cases, the veteran tree could not be found at all, without a clear explanation whether it had died, is no longer protected or has been felled. These cardinal shortcomings are gradually assigned for handling to applicable authorities. We awarded an on-the-spot fine in one case of violation of the buffer zone of a veteran tree by dumping of construction debris.

6. Inspections of registered prominent landscape features The CEI proceeded to planning and execution of inspections of registered prominent landscape features, i.e., sites registered by applicable nature protection authorities for their ecological, geomorphological or aesthetic value. These are therefore not parts of the landscape generally protected as prominent landscape feature by law, but parts of the landscape deliberately declared as protected. Several dozens of inspections, made primarily in South Moravia, Vysočina and South and West Bohemia, specified the practical shortcomings of this type of protection. The majority of the PLF inspected admittedly perform their respective ecological stabilisation function, but in some cases the present state does not agree with that at the time of declaration. The cases are handled ad-hoc in cooperation with applicable public authorities. In several cases, the inspections exposed damage to registered PLF (damage to trees, unpermitted felling, unpermitted afforestation, construction waste dumping), for which we awarded two conclusive fines; other cases remain to be concluded.

7. Inspections of major investment projects and large managers

In this area, the CEI focused on inspections of entities associated with construction, renovation and maintenance of infrastructure and management of roads, railway infrastructure, transmission systems and utility networks. In connection with regional socioeconomic activity, we inspected investors and executors of major construction projects and managers in connection with application of intensive techniques. When designing the inspections, the CEI worked with findings from EIA/SEA processes, own past experience and information actively gained from regional public authorities.

An inspection at the Šlapanov SHP found that the entire flow of the Šlapanka river had been directed into the SHP raceway. This resulted in the bed of the river, a prominent landscape feature, part of a Site of Community Importance and a biotope for several specially protected species, remained almost waterless in a section of about 1 km. For this violation, we awarded a conclusive fine of CZK 50,000 to the operator. On the other hand, our inspection at the music festival "Fest pod parou", a mass visitor event taking place at the Marchanice airfield near Vyškov (site for SPS European Ground Squirrel, SCI and SAC) did not find any violation of Act

no. 114/1992 Coll. In addition, we made inspections in the South Moravian Region concerning maintenance of bank vegetation and technical modifications along the Dyje river. Again, we found no violations of the Nature and Landscape Protection Act. We made inspections of thermal insulation of large-panel buildings across the CR, particularly in connection with protection of SPS of swifts and bats.

The CEI also did preventive work in this area. In the restoration of two fishponds at Chrastava, we successfully moderated the definition of nature protection requirements for further steps. In the case of renovation of the weir in the Dolní Sázava SCI, the CEI reviewed the full documentation for the two-stage renovation and defined requirements for project implementation with respect to SCI protection. In connection to the "Vltava Hillside Butterflies" project, the CEI initiated a departmental debate on promotion of entomological diversity by targeted damaging or felling of trees.

A separate chapter of a nation-wide importance is the issue of large glazed areas (noise barriers along roads, building lobbies, public transport stop shelters) in connection with bird deaths. The legal enforcement of glass pane surface transparency modification in this area is problematic, so the CEI work is awareness-raising, educational and preventive. Responsible entities usually cooperate with the CEI and respect its recommendations.

8. Substitute planting inspections

Inspections of managers were also made in connection with compliance with existing requirements, such as definition of exemptions for bird protection, exemptions for interventions in natural evolution of SPS, ordering substitute planting and bans on harmful activity, or definition of requirements for performance of activity. In one case, where the CEI had so far failed to enforce the substitute remedial measure ordered (renovation of a hydraulic structure at Ludvíkovice), the further steps were transferred to a distraintment proceeding. In addition, we registered several cases of failure to do substitute planting, for which we awarded to fines in order proceedings. Another seven more complicated cases of failure to do substitute planting, to follow set requirements for activity, to observe exemption requirements for SPS, and to carry out set remedial measures, are still in misdemeanour proceedings.

9. Inspections of performance of public administration in tree protection The inspections of performance of public administration focused on compliance with legal regulations and decisions on nature and landscape protection by public authorities, within their powers in nature and landscape protection, particularly in connection with protection of non-forest trees and permitting their felling. The inspected decisions permitting felling of trees very often lacked the mandatory evaluation of functional and aesthetic importance of the trees, and nature protection authorities often did not pay adequate attention to the factual importance of the reasons for the felling. In many cases, substitute planting is not ordered as part of the felling permit proceedings, or the order lacks enforceable specific requirements, such as the tree species and size, place and date of the substitute planting and length of follow-up management. Our inspectors even came across cases of municipal authorities issuing retroactive tree felling permits. Representatives of inspected municipal authorities were instructed on requisites of the decisions and suitability of substitute planting. In our inspections of municipal authority performance, we often see a formalist attitude to public administration in the area of nature protection. In some cases, authorities had approved of projects under conditions that could not be met without violation of nature and landscape protection interests. The nature protection authorities are aware of virtual impunity in cases where violation of the respective process or material principles does not account for the social danger of a criminal act. In several cases, the CEI met with a reluctance to cooperate or even refusal to cooperate on explaining cases of environmental damage.

4. 4. 4 Major cases

A number of major cases handled in 2018 concerned the traditional sphere of the CEI work, which is protection of non-forest trees. Equally important are the landscaping projects, typically in connection with large-scale investment, often in specially protected areas and prominent landscape features, frequently overlapping with special protection of species. Specifically, we see relatively frequent cases of harmful interventions in prominent landscape features as very important as they may lead to destruction of entire societies, including rare and specially protected plant and animal species.

Havlíčkův Brod TI

Based on the finding of a large-scale soil dumping on an area of approx. 10,000 m² originating from D1 motorway renovation on plot no. 227/3 in Čikov, a biotope for specially protected animal species, the CEI issued a decision on a preliminary

measure and then a final decision, ordering COLAS CZ, a.s., to refrain from expanding the dump. In spite of that, more soil was dumped during the proceeding. Therefore, the CEI awarded the company with a fine of CZK 800,000. An appeal was made against the decision, but the appeal authority rejected it and confirmed the fine. The appeal authority's decision was then contested by a lawsuit, which the court had not decided by the end of 2018.

Hradec Králové TI

For destruction of a part of the Krkonoše National Park, a wetland meadow with the specially protected plant species Willow Gentian, in connection with soil dumping, we awarded a fine of CZK 300,000 to CONMACO MÍSEČKY s.r.o. and ordered remedial measures consisting in removal of the dumped soil.



Meadow in Krkonoše National Park destroyed by a dump.

Plzeň TI

For extensive felling of individual trees and tree stands without a permit at the former Hochperk manor at Kříše, we awarded a fine of CZK 200,000 to KŘÍŠE s.r.o.

Liberec TI

For modifications to the bed of the Kněžmostka watercourse on a stretch of some 320 m in the Český ráj Protected Landscape Area at Branžež and Suhrovice, we awarded a conclusive fine of CZK 130,000 to Rybářství Chlumec nad Cidlinou, a. s.

České Budějovice TI

For disrupting the landscape character by felling 42 trees at Kardašova Řečice and Pleše without a nature protection authority approval, we awarded a fine of CZK 100,000 to the Road and Motorway Directorate. In addition, we ordered a substitute remedial measure consisting in planting 90 deciduous trees.

For a serious damage to the prominent landscape feature Lomský brook, consisting in damming the watercourse, diverting it and damage to its banks without a nature protection authority permit, and for damage to trees, we awarded a conclusive fine of CZK 100,000 to Berthold Leibetseder spol. s r.o.

For felling bank vegetation on a stretch of some 250 m along the Hodslavský brook at Lipno nad Vltavou, which was interpreted as a harmful intervention in the prominent landscape features of the floodplain and watercourse type, we awarded a fine of CZK 100,000 to CONDUKO a.s., the client, and 1. CZK 75,000 to Písecká lesní a dřevařská a.s., the contractor.

For damage to eleven trees inside the village by repeated pruning, the municipality of Zhoř u Tábora was fined CZK 100,000.

Prague TI

For felling 65 trees without a nature protection authority permit, we awarded a fine of CZK 100,000 to Povodí Vltavy, state enterprise. The company had felled the trees with reference to Section 8, Para. 4 of Act no. 114/1992 Coll. on "extreme emergency" without meeting the requirements for obvious and immediate danger to life or health or threat of considerable damages that would permit the immediate felling. From this perspective, the case is a precedent. The MoE confirmed the CEI decision as the appeal authority.

For failing the reporting duty on felling 38 trees in a power line buffer zone, we awarded a fine of CZK 100,000 to EUROSPEED Czech s.r.o.

Brno TI

For unpermitted imports of individuals of species classified in category CITES B, hyacinth orchid (*Bletilla striata*), used for digestive system treatment and a natural glue in silk yarn manufacturing, and *Aquilaria malaccensis* (agarwood), used in making of fragrant essences and products (oil, incense), we awarded a fine of CZK 90,000 to ATLANT SNAB – Moravia s.r.o.

Ostrava TI

For failure to report acquisition, sale or death of more than 30 individuals of species under Annex A to Regulation (EC) No 338/97 to the applicable registration authority, to keep records on trade and for sale without an exemption from the commercial ban, we awarded a fine of CZK 100,000 to AGROPET s.r.o.

For damaging 19 spherical maples by inadequate pruning and 18 trees by inadequate pruning and unpermitted felling of two trees, we awarded a fine of CZK 100,000 to the Statutory City of Ostrava (former case) and Municipality of Osoblaha (latter case).



Damaged trees in Osoblaha.

Ústí nad Labem TI

For unpermitted felling and damaging of trees in a golf course at Janov u Hřenska, we awarded a fine of CZK 90,000 to KREDIT DĚČÍN, a.s.

Olomouc TI

For damaging 88 tall non-forest trees while machine-dredging of road ditches at Repechy, Bousín, Drahany, Otínoves and Niva, we awarded a conclusive fine of CZK 75,000 to Olomouc Region Road Administration.



Damage to root systems of road-lining trees while machine-dredging of road ditches at Repechy, Bousín, Drahany, Otínoves and Niva.

4.4.5 Conclusions from inspection work

The inspection work of the Nature Protection Department involves primarily nature and landscape protection, CITES issues, genetically modified organisms, zoological gardens and agricultural land protection. The scope and variation of the agenda is manifested by interdepartmental overlaps (Cross Compliance) and sharing of powers with municipal authorities and national park and PLA administrations. Moreover, the year 2018 was a breaking point in terms of meeting of process requirements of the new Misdemeanour Act and with a view to application of its requirements in misdemeanour records.

The core of the Department's work consists in inspection of adherence to Act no. 114/1992 Coll. on Nature and Landscape Protection. As in previous years, public suggestions were an important source of information, and a considerable part of our misdemeanour and administrative proceedings were based on them, particularly in terms of unpermitted felling of trees and interventions in prominent landscape features (dumps, emptying of water bodies).

The most common violations concerned protection of non-forest trees (unpermitted felling and damaging). Compared to previous years, we dealt with more unpermitted landscaping, constituting unpermitted interventions in prominent landscape features and natural evolution of specially protected species.

Within our powers under Act no. 114/1992 Coll., the CEI continued inspecting public authorities. In this area, we conclude ongoing great differences in the levels of their employees' legal awareness and quality of their work performance. The common problematic areas include inconsistent ordering, or even lack of ordering, of substitute planting as compensation for ecological harm due to tree felling, and ignorance of obligations in the administrative process of tree felling permitting. The decisions contain formal errors, and remedy of the consequences is mostly impossible once the decision is executed. Therefore, based on suggestions, the CEI frequently dealt with factual or imminent damage to legally protected interests, which would not occur or would be less significant with proper public administration performance.

On the contrary, the CEI registered greater efforts of some legal entities and natural persons to achieve legal compliance in nature protection. Environmental damage frequently occurred as a consequence of administrative errors of entities incapable of grasping the complex legal system.

Cross Compliance inspections are a relatively great workload for the Department, as they are a fixed commitment towards the Ministry of Agriculture. Due to their number,

it cannot be said that their yield in the form of violations identified and misdemeanour proceedings made is very high. One of the reasons is insufficiently targeted selection of entities to be inspected. Above all, the inspection plan contains a mandatory share of random selection, set by the European Union Regulation, but the risk analysis used to complete the plan is not sufficiently effective. The greatest numbers of findings are commonly made in inspections additionally included based on suggestions, which is reflected in their methodology. In order to further increase the inspection efficiency, the CEI is going to focus on identification and application of new risk factors that could be included in the centralised risk analysis in the MoA information system to improve the targeting on actual problematic farming businesses. Generally, the CEI sees a radical change to the MoA subsidy policy as a necessary precondition for actual improvement in the landscape status, including the hydraulic regime. It should aim at forming sustainable cultural landscape, including promotion of tree planting in intensively farm landscapes, prevent destruction of old orchards, creation and maintenance of wetlands and other landscape features that will help increase habitat and species diversity, thus ecological stability of the cultural landscape. The CEI is involved in this task – formulating of a future common agricultural policy – as far as possible.

ALF protection is a dynamically evolving part of the CEI work. Here, we are expecting a great increase inspection and administrative work, not only due to the extent of farmland, but also because we handle suggestions by the public and public authorities efficiently despite their variety.

4.5 Forest protection

4.5.1 Overview of inspection work in 2018

A team of 43 inspectors did inspection work in the Forest Protection Department (FPD) in 2018. We had one more inspector in comparison with 2017. Thus, each inspector was in charge of 62,116 ha of supervised forest.

The inspection work in forests proceed based on a legal framework similar to that in the previous years. It comprised primarily Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and its powers in forest protection, Act no. 289/1995 Coll. on Forests and on amendment of certain acts (Forest Act), Act no. 149/2003 Coll. on Circulation of reproductive material of tree species and artificial crossbreeds important to forestry intended for forest restoration and afforestation, and on amendment of certain acts (Forest Tree Reproductive Material Trade Act), Act no. 114/1992 Coll. on Nature and Landscape Protection, Act no. 255/2012 Coll. on Inspection (Inspection Rules), Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended by Act no. 413/2005 Coll., Act no. 250/2016 Coll. on Liability for Misdemeanours and Proceedings on Them, and internal management orders of the CEI.

The Forest Protection Department inspectors made 1,344 inspections in the assessment year. This included 461 scheduled, 288 unscheduled and 595 other inspections. Again, they were field activities in the form of operations preceding inspection, which was not initiated after that, various investigations as part of verification of suggestions and information, as well as applications by other public authorities, Czech Police and others. Besides, the FPD inspectors participated in 53 multi-departmental inspections organised by other departments of CEI TIs.

Numbers of inspections in 2018

Total inspections	1,344
Scheduled inspections	461
Unscheduled inspections	288
Other inspections	595

The total number of inspections in 2018 was 7 more than in 2017.

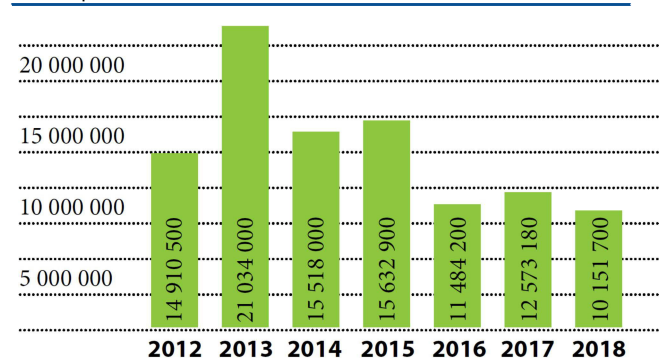
Again, the inspections concerned all types of ownership with an emphasis, particularly in some areas due to bark beetle development, on LČR properties (Moravian-Silesian Region) and small-scale properties (Moravian-Silesian Region, Zlín Region, Olomouc Region, Vysočina Region and Plzeň Region). The primary purpose of these inspections was a preventive and educational effect, particularly relating to small and uninformed owners' obligations. Administrative proceedings only ensued after repeated or gross legal violations.

As part of our other inspection work, we made one expert assessment, 177 EIA statements and 364 other statements for natural persons and legal entities and Czech Police.

We issued 143 decisions on fines as part of administrative and misdemeanour proceedings in 2018. Out of that, 136 decisions entered into force, including 11 concerning previous periods. The total amount of the fines was CZK 10,151,700, which is CZK 2,421,480 less than in 2017.

The Forest Protection Departments contributed to the fines as follows: Prague CZK 43,000, České Budějovice CZK 813,100, Plzeň CZK 813,100, Ústí nad Labem CZK 70,000, Hradec Králové CZK 788,700, Havlíčkův Brod CZK 1,135,100, Brno CZK 560,000, Olomouc CZK 250,000, Ostrava CZK 5,732,800, Liberec CZK 230,000.

Development of conclusive fines in CZK in 2012-2018



Violations for which the fines were awarded are similar to those in previous years, notably: outbreaks of biotic agents, violation of forest renewal regulations, damage to land intended for forest functions by forest traffic, unpermitted land occupation, waste and litter in forests, etc.

We also made administrative proceedings on remedial measures, issuing 127 administrative decisions. Altogether, 126 decisions entered into force, including 122 issued in the assessment year. Subsequent inspections of performance of remedial measures again indicated that they were adequately responded to by forest owners in most cases and were generally performed.

Out of the total number of 270 administrative decisions issued (143 on fines and 127 on remedial measures), 27 cases were appealed against and either confirmed, halted, revoked or returned for new consultation. The data shown can again be used to easily infer the efficiency and quality of administrative decisions issued by CEI TI FPD inspectors.

Courts handled 10 cases of Prague TI concerning failure to do remedial measures (afforestation), landscaping on forest land, unpermitted occupations of LIFFF and damage to LIFFF by forest traffic. In one case (Hradec Králové TI), the fine was reviewed by a court.

We did not order any preliminary measures in 2018, and there were 13 cases of halting or restriction of operations under České Budějovice TI.

We also made use of the institute of calls for remedy in 2018 where it was obvious that a legal violation would occur or where a minor violation had occurred. It is more effective in terms of environmental impacts to allow the forest owner to make remedies shortly than to make a lengthy administrative proceeding with uncertain results (2 calls by Prague TI, 19 by Ostrava TI). This instrument thus partially replaced administrative proceedings on remedial measures. It is applied mainly with small forest owners, who are thus notified of existing shortcomings and their obligations arising under a specific legal regulation. An administrative proceeding on a fine or remedial measures is only initiated if the order is not performed or after repeated legal violations.

TI FPD inspectors handled 175 suggestions compared to 152 in 2017. Plzeň TI forwarded one suggestion to public authorities.

The most suggestions were received and settled by Prague TI (34), followed by Hradec Králové TI (27) and Brno TI (17).

Again, suggestions were settled within set terms. In cases of unjustified suggestions, it proved effective to explain in the reply the basic principles of forest management and legal limits on forest exploitation.

The suggestions concerned the following in particular:

- forest protection from pests – bark beetles (Prague, České Budějovice, Plzeň, Hradec Králové, Havlíčkův Brod, Brno, Olomouc, Ostrava TIs),
- forest land fund protection (Prague, Hradec Králové, Havlíčkův Brod, Brno, Olomouc, Liberec TIs),
- illegal uses of forest land (Prague, Brno TIs),
- failure to afforest within legal time (Prague, Liberec TIs),
- damage to forest soil by forest traffic (České Budějovice, Ostrava, Liberec TIs),

- review of harvesting (České Budějovice, Hradec Králové, Brno, Olomouc, Ostrava, Liberec TIs),
- waste and litter in forests (Plzeň, Ostrava TIs),
- damage by game (TI Ostrava).

Only one notification to public authorities was made (Plzeň TI).

No crime reports were filed in the past year.

4.5.2 Overview of fulfilment of departmental tasks

The departmental task for 2018 was Development of biotic agents and forest damage due to forest traffic. Besides an evaluation of the forest owner's approach to fighting pest calamities and potential associated forest damage by forest traffic (Section 34 of the Forests Act), its aim was to provide objective information on random harvesting in terms of utilisation of full available capacity to reduce the processing time for bark beetle timber in all types of forest ownership. Monitoring under this departmental task made use of all forms of field inspections, i.e., ordinary inspections under the Inspection Act as well as investigation of suggestions, pre-inspection activity, etc. The uniform approach to inspection under this departmental task was covered by internal regulations, so-called standard programmes, namely no. 2/2008 on outbreaks of biotic agents – insect pests, fungi and rodents, no. 6/2008 on forest damage by harvesting, skidding and upset stand stability, and Methodological Instruction 1/2016 on procedures of inspection, investigation and evaluation of departmental tasks.

The following findings can be summarised based on the departmental task inspections in 2018:

- A significant outbreak of the spruce bark beetle occurred in Central Bohemian Region, falling under Prague TI, in 2018. The expectation for future is a worsening up to calamity status. The processing of infested timber, particularly by small forest owners, is a problem. No serious problems were registered in LIFFF protection from forest traffic.
- The area managed by České Budějovice TI suffered an increase in insect pests, notably the spruce bark beetle and spruce wood engraver, as well as the double-spined bark beetle in Dačice ORP. Their occurrence in the inspected forest properties was high or even calamitous. The occurrence was calamitous in the Jindřichův Hradec, Dačice, Vimperk, Vodňany and Český Krumlov ORP. The problem is delayed decontamination due to delays in arrangement of contractual partners for processing. The situation in the Šumava National Park is stabilised. The problems here also include timber processing by small owners, timely decontamination and removal of timber.

Bark beetle logging in Šumava NP in 2010-2018

Year	Quantity, m ³
2010	343,000
2011	235,000
2012	75,500
2013	40,770
2014	22,900
2015	21,050
2016	29,000
2017	50,000
2018	50,900

- The bark beetle logging is increasing in Plzeň Region primarily due to climate change and insufficient processing capacity. Plzeň TI reports insufficient OLH performance by LČR forest wardens for private entities.
- Ústí nad Labem TI did not handle major bark beetle problems in 2018.
- Hradec Králové and Pardubice Regions report increased numbers of bark beetle-infested trees compared to 2017. The stands are endangered by insufficient inspection by small forest owners.
- Vysočina Region reports swarming and establishment of parallel generations, making the defence and protective measures in the form of traps and trap trees ineffective or even impossible. The increasing density of bark beetle populations shift to younger tree stands as well as basal portions of the trunk and branches of infested trees. The high population density also affects spreading from the Norway spruce to the Scots pine and European larch. The double-spined bark beetle was reported by several entities. The spruce wood engraver was reported in the majority of forests. It often accompanies the spruce bark beetle. Big problems with insect pests are suffered particularly by small forest owners up to 50 ha, lacking processing capacity and market for timber.

Inspections regarding forest damage by forest traffic focused on existence of harvesting furrows. Consequences of timber harvesting and transport were not identified.

- The situation in the South Moravian Region shows signs of an advanced calamity. Unfavourable climate conditions and inflexibility in public tendering in forestry have led to large-scale as well as local dying of spruce stands. Large forest owners are criticised for lengthy decontamination of detected trees.

- The situation in Zlín Region has long been critical. The bark beetles have infested both submontane forests and, recently, plateaux. Again, the problem consists in unfavourable climate conditions and inappropriate choice of inadequate devices (ropeways) and lack of professional workforce. Small forest owners complain about lack of state-level solutions and gradually give up their efforts.
- Olomouc TI reports that the bark beetle outbreak affects even lower-altitude forests on a large scale, with no ownership differentiation. It is difficult to identify the liable entity in an area split amongst multiple owners. It can be concluded that the disintegration of stands with a high proportion of spruces is nearly complete in ORP Hranice, Lipník nad Bečvou, Olomouc, Šternberk and Uničov ORP. VLS ČR, state enterprise, Lipník nad Bečvou division, has achieved a significant reduction of spruce due to random bark beetle timber harvesting. The positive news is that VLS ČR continuously and quickly reforests its clearings.

There is again the problem that processing companies are fully utilised or not interested in such timber. Bark beetle timber is almost unmarketable due to the low prices, and is often left at pickup points.

As for forest damage by forest traffic, there were no cases that would have to be handled by means of remedial measures or fines.

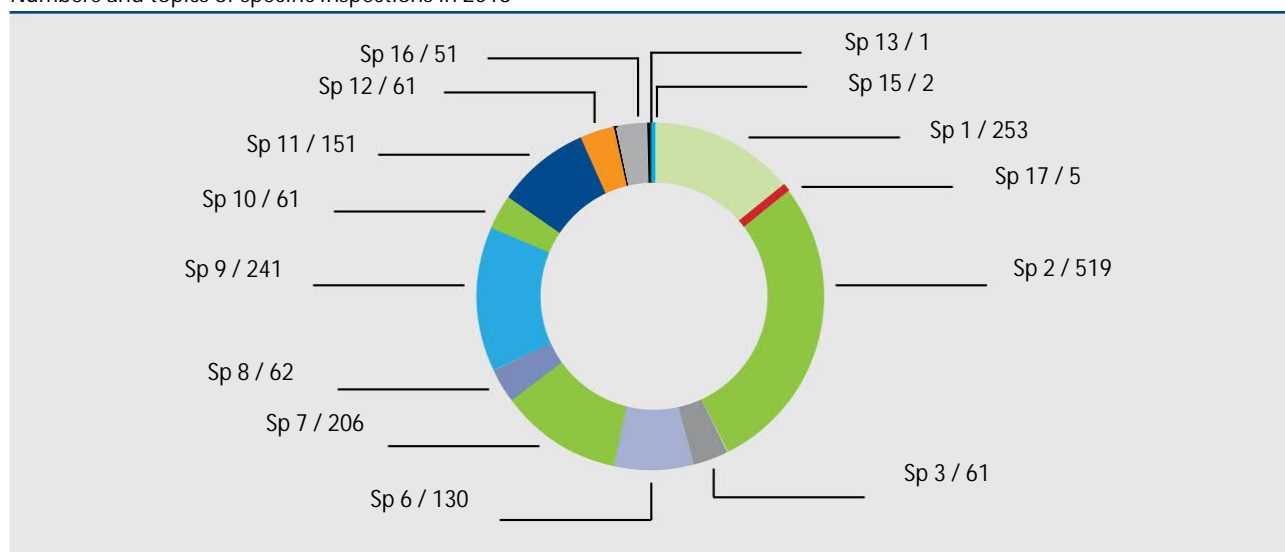
- Ostrava TI FPD, having identified bark beetle situations in contravention of law, did not announce inspections but sent written calls for processing of infested trees to at least 19 owners. In the case of forest properties at Tyra, owners of the entire set of forest properties protested, probably inspired by their OLH. For a number of years, Ostrava TI FPD had handled at least one case annually of inadequately upset soil cover, followed by proceedings on fines. There was no such case in 2018. Another problem is insufficient workforce and frequency of forest inspections.
- The bark beetle outbreak on several site in the Liberec Region was also critical after August 2018. Shortcomings were found entirely among natural persons, including in forest traffic.

4.5.3 Overview of fulfilment of specific tasks

Both the scheduled and unscheduled TI FPD inspections concerned 14 topics, namely:

Inspection topic abbreviation	Inspection topic	No. of
inspections Sp 1	Comprehensive checks	253
Sp 2	Outbreaks of biotic agents	519
Sp 3	Damage by game	61
Sp 6	Forest damage by harvesting, skidding and upset stand stability	130
Sp 7	protection of forest land fund, including use of surroundings of mining areas	206
Sp 8	Circulation of reproductive material of forest trees	62
Sp 9	Forest stand restoration, including stands after illicit logging	241
Sp 10	Adherence to binding provisions of FMP and FMG	61
Sp 11	Implementation of remedial measures from administrative decisions	151
Sp 12	Forest land protection – recreational activity	61
Sp 13	Environmental harm in forests	1
Sp 15	Afforestation of agricultural land fund	2
Sp 16	Pruning in stand age groups up to 40 years	51
Sp 17	Inspections in cooperation with NPD under Act no. 114/1992 Coll.	5

Numbers and topics of specific inspections in 2018



4.5.4 Major cases

Prague TI

We awarded a fine of CZK 15,000 to Real Innovation s.r.o. for failing to reforest.

České Budějovice TI

For illicit logging on forest land at Černýšovice (ORP Tábor), owned by a natural person, we awarded a fine of CZK 250,000. The logging resulted in an unforested clearing of 2.29 ha.



Illicit logging at Černýšovice.

Plzeň TI

A case of repeated failure to do remedial measures in the form of reforestation of three clearings totalling 2.39 ha at Chanovice and Dobrotice u Chanovic by SKOGAR, s.r.o., with a conclusive fine of CZK 239,000. The specific feature of this case is that the legal entity had changed the company name and managing director, who is has permanent residence in Romania. The company has already been investigated by other CEI TIs (Prague, České Budějovice, Hradec Králové, Ostrava).

Ústí nad Labem TI

The case of Děčín municipal service corporation. The corporation was fined CZK 50,000 for failure to do remedial measures aimed at stabilising a slope that is land intended for forest functions to allow forest regeneration and recovery of all its functions.

Hradec Králové TI

A fine of CZK 250,000 for New Dobrawitz, s.r.o., for neglecting forest protection against calamity insect pests around Doubravice u České Skalice.

Havlíčkův Brod TI

A fine of CZK 422,000 for SAARLES s.r.o. for not reforesting and area and failure to do remedial measures.



Forest renewal neglected by SAARLES.

Brno TI

A conclusive fine of CZK 250,000 for a natural person for a violation in the form of neglecting proper forest renewal leading to conditions for harmful biotic and abiotic factors.



Neglected forest restoration.

Olomouc TI

A conclusive fine of CZK 150,000 for Sport4you s.r.o. for outbreak of biotic agents.

Ostrava TI

The case of LČR, s.p., and inspection focused on forest protection against bark beetles in six selected forest administrations (3 regional offices). A misdemeanour proceeding was initiated in May and a decision on a fine of CZK 3,500,000 was issued in July. A decision confirming the CEI decision was issued in October. It entered into force in October.

Liberec TI

A conclusive fine of CZK 140,000 for FORESTMAN s.r.o. for failure to do remedial measures leading to outbreak of biotic and abiotic factors.

4.5.5 Conclusions from inspection work

- The expected bark beetle outbreak took place. The unprecedented increase in damaged, often utterly destroyed forest areas in the Moravian-Silesian, Zlin and Olomouc Regions expanded to the Vysočina, South Bohemian, Plzeň and Central Bohemian Regions.
- The CEI has reason to believe that the outbreak of biotic agents will continue to escalate in 2019.
- Although the CEI Forest Protection Department devotes a lot of its work to the bark beetle issue, the situation in some parts of the country is unmanageable in terms of inspection. The reason is that, as of 1 Jan 2018, there was one inspector per 63,801 ha of forest.
- There was continuing legislative insufficiency and frequent problems in decision-making and permitting by some authorities (building authorities, forest public authorities).
- The option of distraintment and other alternative instruments (non-pecuniary performance) is non-functioning.
- The remote access to the Cadastre and implementation of the ForesterWin application and tables with the Forest GPS application are effective tools for the inspection work and planning.
- Cooperation with the ÚHÚL on inspections of reproductive material of forest trees is successful in the long run.
- There is an increasing share of findings of changes in ownership for logging and sale of forests after logging to avoid the reforestation duty.
- There are repeated problems with finding current owners (sales, inheritance) due to ORP not reporting.
- The ORP procedure when approving logging reported by forest owners is problematic: with few exceptions, logging is approved to the full reported extent, meaning on the brink of legitimacy.
- Cooperation with Czech Police, MLF Brno and the VÚLHM is seen as functional.
- The situation in cooperation with public forest and hunting authorities is differentiated, for both personnel and capacity reasons.
- The considerable prestige of the CEI's inspectors can be regarded positively, as often the mere announcement of an inspection or sending of an invitation to eliminate shortcomings in a forest, particularly among small owners, has operatively led to the achievement of the desired condition.
- We can be satisfied with the CEI FPD proactive consultation and awareness-raising work towards small, poorly informed forest owners.
- The work meeting with representatives of all the MoE appeal authorities in 2018 was repeatedly praised, as it contributed to a unification of their practice.
- The need for an amendment of the Forest Act and the Hunting Act has not changed compared to 2017.
- There are problems of availability and correctness of data necessary for the inspection work (incomplete data and errors in public registers and availability of data before inspection, typically FMP, which the inspected entities frequently do not have available in mid-year).
- There are also problems of delivery of letters to natural persons' data boxes, as authorities have a priority obligation to deliver letters to natural person's data boxes if they have them set up.
- The constant unavailability of complete FMP data (private owner and municipalities), which works for SSL authorities – secured access to the ÚHÚL data server – complicates planning, execution and effectiveness of inspections.
- We regard it as important to ensure reconnaissance flights to monitor the bark beetle status before the end of the first generation, which identifies the status better than checks in late August or in September, when the calamity culminates but measures are no longer effective enough due to the high proportion of abandoned trees.
- We see it as advisable to consider a meeting of the CEI and the MoE concerning MoE requirements for CEI inspection work in 2019.
- We see it as necessary to carry out at least one joint meeting with representatives of MoE supreme state supervision on coordination of inspection work focused on current forest and bark beetle status.
- FPD inspection work would be improved by legislative changes in the form of a definition of responsibilities of professional forestry managers, setting a deadline for reforestation of land newly defined by the Forest Act as land intended for performance of forest functions, and resolution of the binding nature of remedial measures in relation to transfer of forest property to legal successors of proceeding parties subject to the measures.
- There is still room for improvement in cooperation with Czech Police regarding motorcycle and ATV rides in forests.

4.6 CEI involvement in accident resolution

Central register of water accidents in 2018

Pursuant to Act no. 254/2001 Coll. on Waters, the CEI has managed the central accident records since 2002. In 2018, we registered 220 accidents that met the description of accidents pursuant to Section 40 of the Act. In the course of 2018, the CEI was informed about other accidents as well, but did not include them in the central accident register due to their minimal extent without impact on water quality.

Traffic accidents are still among the most frequent. In 2018, we registered 64, representing 29% of the total number of cases. Fish deaths accompanied 31 cases in this year, representing 14% of the total number of accidents. Besides, we registered only six accidents caused by agricultural activity. There were seven cases of groundwater contamination. The accident originator was known in 123 cases.

Major accident cases

Dead fish in water reservoir, Strážovice u Pačejova

On 23 Mar 2018, there was a major accident caused by unpermitted handling of potential pollutants at a biogas station. The surface water of a nameless fishpond in Strážovice u Pačejova was contaminated. The accident was caused by both technical and human error. We awarded a fine of CZK 400,000 to the originator, Priorit energo s.r.o., which entered into force on 6 Sep 2018.



Dead fish in fishpond at Strážovice u Pačejova.

Pollutant category	Accidents	%
petroleum products	107	48.6
wastewater	26	11.8
chemicals except heavy metals	18	8.2
sludge and solids	9	4.1
oxygen deficit	8	3.6
waste from animal husbandry	4	1.8
heavy metals	2	0.9
food products	1	0.5
other substances	27	12.3
unidentified	18	8.2
TOTAL	220	100



Firefighting water leaked into surface water from a landfill operated by CELIO a.s.

CELIO a.s. landfill – Firefighting water leaked into surface water
On 10 July 2018, the CEI issued a decision on a fine of CZK 100,000 for Litvínov-based CELIO a.s., which had operated a landfill compound in contravention of integrated permit requirements. Wastewater was released without treatment, its quality unsatisfactory. It was contaminated firefighting water used when extinguishing a fire in a miscellaneous waste box in the landfill. Two of the samples of wastewater released from the retention reservoir into surface water at the time of the accident exceeded the COD_{Cr} indicator of the “m” limit set by the integrated permit. The accident originator also did not follow its accident plan. CELIO a.s., did not appeal against the decision, which entered into force on 27 July 2018.

Accident cause	Accidents	%
human error	62	8.2
technical cause	54	24.5
nature	18	8.2
unidentified	86	39.1
TOTAL	220	100

4.7 Integrated agendas

Integrated Pollution Prevention and Control (IPPC) is an advanced method of regulating industrial and agricultural activity in relation to the environment that overcomes the departmental approach and end-technology strategy, which removed existing pollution mostly traps, filters and other cleaning equipment, which frequently led to simply transferring pollution from one environmental component to another. The primary emphasis is on a preventive approach, avoiding pollution before it is produced by choosing appropriate production methods known as Best Available Techniques (BAT) and, if possible, using more environment-friendly materials.

This integrated approach to protecting the environment as a whole is ensured by the CEI's expert environmental protection departments (Air Protection, Waste Management, and Water Protection) under coordination and collaboration of experienced inspectors specialised in these agendas, i.e., coordinators of integrated agendas. Supervision (inspection) is the foundation of this area. Another important, largely preventive work, is non-supervision, consisting in matters such as issuance of expert statements (on EIA, IPPC, etc.).

4.7.1 Legal foundation of work on integrated agendas

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

- Act no. 76/2002 Coll., on Integrated Prevention and Pollution Reduction (IPPC), the integrated pollution register and on amendment of certain acts (Integrated Prevention Act). The purpose of this central Act for the integrated agendas area is to achieve maximum possible prevention of industrial pollution to all environmental components and its protection as a whole,
- Act no. 100/2001 Coll. on Environmental Impact Assessment and on amendment of certain acts,
- Act no. 167/2008 Coll. on Prevention of Environmental Harm and its Remedy and on amendment of certain acts,
- Act no. 25/2008 Coll. on the Integrated Environmental Pollution Register, the integrated system of reporting obligations on the environment, and on amendment of certain acts (the IPR Act), in connection with
- Regulation of the European Parliament and the Council (EC) no. 166/2006, establishing the European Pollutant Release and Transfer Register (E-PRTR).

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

Summary data for CEI – Integrated Agendas

The work related to integrated agendas itself, done by CEI expert departments or with their cooperation, is also contained in previous points of this Section 4 – CEI Work in 2018 by departments (4.1, 4.2 and 4.3 in particular).

The priority of inspections at facilities pursuant to the Integrated Prevention Act is acceptance of provisions of Sections 19 b, 20 b, 34 and 37 of the Act, implementing Directive of the European Parliament and of the Council 2010/75/EU of 24 Nov 2010 on industrial emissions.

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

In total, the CEI made 1,300 inspections in the area of integrated agendas (IA) in 2018, initiated 115 administrative/misdemeanour proceedings, issued 135 decisions on fines and orders, and 117 decisions on fines in force (including from past periods) led to the awarding of conclusive fines totalling CZK 9,289,000. Out of that, two decisions on reprimands and 5 decisions on remedial measures entered into force.

The amounts of conclusive fines in light of integrated agendas ranged from CZK 2,000 to 980,000 (awarded to SUEZ Využití zdrojů a.s.

- Ostrava facility for failure to report an accident and violation of obligations in handling of potential pollutants at its industrial waste incinerator).

The average amount of fine per decision (order) in force in the period was about CZK 84,445.

The plan and schedule for ordinary inspections at IPPC facilities for 2018 (645) in relation to compliance with the Integrated Prevention Act and observance of integrated permits (IP) was met handsomely (851 inspections made). These figures include inspections made based on suggestions, media cases, accidents or non-standard operation, as well as repeated inspections based on gross violations of binding requirements of IP (approx. 12% in total).

Integrated Agendas Department – IAD

In close cooperation with the other CEI departments, specialised coordinators of integrated agendas (CIA) of the CEI Integrated Agendas Department (IAD) made, participated in, cooperated on and

coordinated 617 inspections at 528 facilities. This number includes both inspections under the Integrated Prevention Act and the IPR Act as well as the Act on Prevention of Environmental Harm. In the study period, the CIA themselves initiated 46 administrative/misdemeanour proceedings. The number of decisions on fines (including orders) that entered into force in 2018 was 48; the total amount of fines in force was CZK 2,556,000. In addition, one reprimand and three decisions on remedial measures entered into force.

Here, the conclusive fines ranged from CZK 2,000 CZK 500,000 (awarded to KLIO, s.r.o., Chrástany, operator of the wastewater treatment plant in Praha 5, Zličín, for operation without a valid IP).

The average amount of fine per decision (order) in force in the period was about CZK 58,091 thousand.

Departmental tasks

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

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

Specific tasks for IAD

The MoE Environmental Impact Assessment and Integrated Prevention Department had requested in 2016, by arrangement with the IAD, besides priority performance of our mandatory obligations, the inclusion among our specific tasks for the next period of more frequent inspections, if possible, of foundries for non-ferrous metals such as aluminium, with a focus on the smaller ones, which may be using contaminated scrap metal for remelting (assumed contamination with dust, petroleum products, plastics, etc. – complaints about odour), as well as inspections depending on current issues in the region (e.g., inspections at facilities that have historically committed gross violations of the Integrated Prevention Act, experienced non-standard operation or accidents covered by the media, etc.).

The CEI accepted that and in addition to many inspections made in foundries, i.e., IP facilities in categories 2.4., 2.5.a) and 2.5 b) of Annex 1 to the Integrated Prevention Act made in 2017 (e.g., Brembo Czech s.r.o., PSP Slévárna a.s.

– Přerov, SCB Foundry, Ing. Matas - Slévárna Strašice spol. s r. o., Slévárny přesného lití KDYNÍUM a.s., Slévárna MESIT & RODE- RS v Uherském Hradišti, Slévárna hliníkových slitin v Modřicích and Tavárna Hliníku v Brně, etc.) all our TIs made several additional inspections (3-5 per TI), such as:

- KŘÍŽ RECYCLING, s.r.o. (lead and tin) – quality of waste lead and tin admitted tested by a spectrometer (each piece) and waste not conforming to the required parameters is submitted to the operator's collection and repurchase facility. Waste with verified qualitative is smelted, castings are made, and smelter slag is collected in containers. The castings are not further processed, only casting spills are removed and castings are sold to customers as (semifinished) products;
- Moravské železářny, a.s. – foundry operated by UNEX a.s., where we found a violation of the Waste Act (failure to submit separate reports for the waste originator and the authorised entity);
- AISIN EUROPE MANUFACTURING CZECH s.r.o. (aluminium) – the manufacturing uses exclusively primary raw material (aluminium ingots) and contaminated scrap aluminium is not used;
- MOTOR JIKOV Slévárna a.s. (aluminium and zinc) – the operator uses a briquette press for processing aluminium shavings and tooling chips, the press separates emulsion, which is intercepted in a collecting vessel (IBC container), and the aluminium briquettes are handed to an authorised entity and not used in the production;
- Aluprogess a.s. (aluminium) – the manufacturing uses exclusively primary raw material (aluminium ingots). The plant operates a central tooling emulsion filtering unit, which separates the emulsion from the aluminium chips, which are then pressed into briquettes, classified as waste and handed to an aluminium scrap processor, not used in the production.

It can be concluded from the inspections made so far that these facilities were not found to seriously violate any IP requirements; nevertheless, they are frequently problematic facilities reported in suggestions and inspection work at these facilities has to continue consistently. For example, based on our inspection findings at REMET s.r.o., we agreed with the operator that it would implement certain measures (and include them in the integrated permit) to reduce the dustiness (incl. secondary).

In 2018, there was no reason for a specific inspection to check whether an activity falls under the Integrated Prevention Act, compared to 2017 (11 inspections).

Major inspection findings

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

- exceedance of pollutant limits (e.g., carbon monoxide), failure to update operating rules of stationary sources of air pollution,
- failure to carry out one-off emission measurement within 3 months of start of operation of a stationary source, relocation of emission measurement points,
- wrong handling of hazardous waste, handing of waste to unauthorised entities, failure to keep records, wrong waste production and management reports, failure to report transfer of substances in waste,
- landfilling of waste types other than those permitted, insufficient completion of basic descriptions of admitted waste, failure to measure dust levels,
- improper handling of potential pollutants,
- when handling water, exceedance of limits for wastewater discharge, failure to do tightness tests, exceedance of permitted quantity of groundwater consumption, failure to update accident plans,
- containers with potential pollutants located in hydraulically unsecured areas,
- failure to observe operating rules (technical operating requirements, etc.) and others.

Formal findings:

- disagreement of approved documents with facility descriptions,
- failure to report emission measurement by required dates.

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

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

Additional violations were not meeting requirements defined for liquidating facilities or even operation without IP.

Changes to departmental acts of law and their reflection in IP are a separate chapter.

Integrated Pollution Register

In 2018, the IAD inspected 198 facilities for adherence to the IPR Act (292 inspections), including 176 facilities (255 inspections) as part of integrated inspections (under the IPR Act). A total of 24 IPR inspections were separate. One inspection was made in a letter form – comparison against environmental reports in the integrated system for reporting obligations (ISPOP). The total amount of the fines in force awarded by the IAD for not observing the reporting obligations for the IPR was CZK 125,000. Given 10 decisions in force, the average fine was around CZK 12,500 thousand. Note: Several additional IPR violations were absorbed in decisions on IPPC violations.

Like in previous years, the penalties awarded were near the lower bound of the legal range (up to CZK 500,000 thousand), namely from CZK 5,000 (HP-Pelzer k.s., Lightweight PUR foam facility in Žatec, for stating wrong data in IPR report on formaldehyde quantity) to CZK 65,000 (Svojšovice facility of AHV ekologicky servis, s.r.o., particularly for failure to keep records on pollutant transfer in wastewater and repeated failure to keep records on pollutant transfer in waste).

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

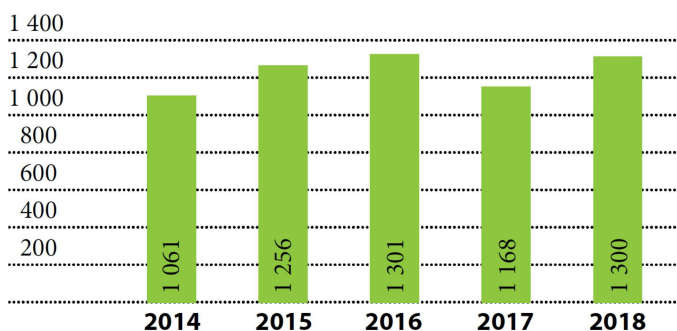
These are largely formal misdemeanours or misunderstanding and delayed reports with little environmental impact, and the CEI treats them as such. It is almost a rule that large operators of facilities with an IP perform their obligations under respective legislation much better than others, i.e., particularly small and medium agricultural operations and facilities. These smaller entities typically still lack sufficient information about the IPR. Based on the progressive results of the CEI inspection work in the area of IPR, it can be concluded that generally the awareness of obligations under the legislation and adherence to it has been improving, with the numbers of administrative violations decreasing.

Environmental harm

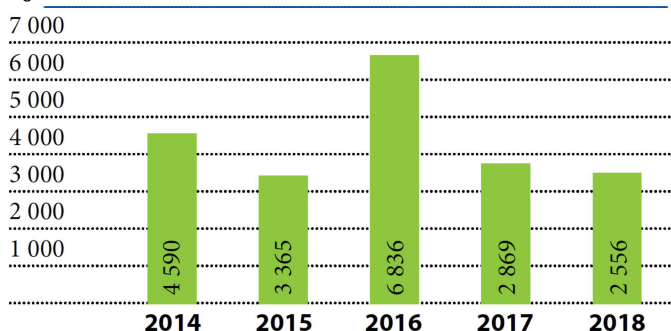
Misdemeanour proceedings in connection with Act no. 167/2008 Coll. on Preventing Environmental Harm and its Remedy and on amendment of certain acts, have not been initiated so far, either based on requests or by official power.

In 2018, the CEI made 157 inspections of adherence to the Act on Preventing Environmental Harm. At least 48 inspections were planned – met. Basic risk assessments were submitted – 50 points were only exceeded in two cases, where detailed risk assessments were thus submitted. There were no misdemeanours.

Numbers of inspections under integrated agendas



Amounts of fines awarded by CEI IAD (CIA) under integrated agendas, thousand CZK



Accidents

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

Havlíčkův Brod TI – In 2018, we registered a major accident at the Věž decontamination facility with an IP belonging to ASAP s.r.o. The company committed a violation by discharging wastewater into the surface water of the Perlový brook, containing 170 mg/l of BOD₅, exceeding the “m” set limit of 45 mg/l, 331 mg/l of COD-Cr (limit 200 mg/l), 80 mg/l of BL (40 mg/l), 140 mg/l of N-inorg (90 mg/l), and 74.1 mg/l of N-NH₄⁺ (40 mg/l). For this violation, we awarded a fine of CZK 70,000. In connection with emptying of a biological pond and failure to do adequate measures, leading to sediment release into surface waters, we also initiated, on 15 Aug 2018, a proceeding on restriction of operation against the company, because the violation of IP requirements posed a risk of immediate serious adverse environmental impact pursuant to Section 19b, Para. 5 of Act no. 76/2002 Coll. The proceeding on restriction of operation was halted by a restriction of 11 October 2018, because the commissioning of a biological pond as the final stage of wastewater treatment eliminated the risk of immediate serious adverse environmental impact of the wastewater discharge, meaning that the cause for the proceeding ceased to exist.

In 2018, České Budějovice TI handled two fires at landfills of CLAY CB, spol. s r.o. and Odpady Písek s.r.o., but these accidents did not have a major environmental impact. In October 2018, there was an accident on a separator device at MOTOR JIKOV Slévárna a.s. non-ferrous metal foundry, which was still non-functional as of 6 Dec 2018, when we inspected, and the APD will deal with the situation.

Hradec Králové TI deal with an accident at KORADO, a.s. (heater surface treatment facility), where process indiscipline during a night shift had led to an overflowing of a degreasing bath and a phosphating bath via a pipeline to a retention reservoir for concentrated wastewater at the neutralizing station, which then also overflowed into an adjacent reservoir for rinsing wastewater (approx. 30 m³), which again overflowed resulting in a release of contaminated rinsing wastewater under the gate of the neutralizing station and via sewer inlets into a branch of the compound storm sewer, emptying into the Třebovka river. Immediately after detecting the leak, the operator carried out all the remedial measures and the CEI awarded it a conclusive fine of CZK 80,000 with respect to that.

Suggestions and petitions

See the summary of this Annual Report (3.1 Cooperation with the public); Integrated Agendas coordinators are actively involved in handling of suggestions and petitions, particularly in cases concerning work of multiple departments. Their principal task was to ensure a coordinated approach to the cases.

Olomouc TI – The interesting cases included a series of suggestions on an IP facility, Litovelská cukrovarna, a.s., on which we received four suggestions in April and May concerning the same issue, notably sugar refinery odour almost throughout the city of Litovel. One of the suggestions was made by the City of Litovel itself.

The odour situation recurs in the city annually, particularly in spring, when organic material in sludge beds, used for settling sugar beet washing water, starts to decompose, releasing odorous gas. The inspection found that the operator adheres to approved process rules and tries to eliminate the quantity of odorous substances around the ponds. The company applies a special product by means of a tractor-drawn sprayer to the edge of the sludge beds, and has installed a device consisting of gel plates admitting air through, which is then emitted to the surrounding area via perforated hoses. The inspection did not find any violation of the operator's obligations and interpreted the suggestions as unjustified.

4.7.3 Non-supervisory CEI work on integrated agendas

This work includes primarily development of expert statements:

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

Besides, coordinators of integrated agendas were actively involved in 2018 in work of technical working groups, primarily for the MoE, such as "Regions and Integrated Prevention" and the MIT "Forum for Exchange of Information on BAT".

An important part of work of some IAD inspectors of Ostrava and Brno TIs in 2018 was transboundary collaboration with the Slovak EI and under the IMPEL, such as the project on application of procedures in integrated prevention under Directive 2010/75/EU on Industrial emissions. Doing the Right Things for Permitting, based on the fact that the Industrial Emissions Directive sets a framework for permitting various industrial activities but there is no general methodology (guideline for the various steps). The CEI was invited to join the working group based on experience of the permitting process and inspection of set requirements.

EIA/SEA

In 2018, the CEI developed 610 statements on plans, documentations, reviews, notifications of strategies and proposals for strategies as part of the EIA/SEA process. Compared to last year, this is a more than 38% decrease in the statements issued (995). It can be concluded that Section 15 of Act no. 100/2001 Coll. on preliminary consultation is popular with reporters and submitters is used frequently.

Major EIA cases

Olomouc TI – the project "Expansion and modernisation of Hlubočky Ski Resort" was handled for the second time. It was first reported in 2017. It concerned assessment of existing structures in the ski resort. The project was retracted and assessed again in 2018. The CEI again concluded that a major part of the landscaping work had been executed and that retroactive EIA assessment was unacceptable. Due to this fundamental fact and other shortcomings in the plan, the CEI demanded further assessment of the project pursuant to Act no. 100/2001 Coll. It is obvious from the screening conclusion that the project is going to be assessed pursuant to said Act.

Brno TI – In October 2018, the CEI received a notification on the commencement of a screening for ZEVO Vsetín Waste Energy Recovery Facility for comments. The objective of the project of Zásobování teplem Vsetín a.s. was to implement a facility for energy recovery from waste (ZEVO) in the applicant's heating plant. The ZEVO capacity was determined to be 12,000 t/year of mostly mixed municipal waste and other waste types at an annual rate of 333 working days and 8,000 hours.

Having assessed the known facts and studied the submitted documents, the CEI made its comments on the project. Based on the comment, the Zlín Regional Authority assessed the project and stated in its screening conclusion that the project is subject to environmental impact assessment under the EIA Act.

Ostrava TI – Distillation facility for solvent recycling – this was a case of installation of a rectification column for processing a mixture of solvents (waste) into separate fractions, which are then reused as raw materials in further production in an existing facility, used for collection, repurchase, storage and reuse of waste oils at Sedlnice. The CEI did not have any substantial comments. The assessment was halted at the applicant's request.

Applications for integrated permits

The CEI actively cooperates with regional authorities in the area of integrated prevention, including statements on IP and major changes to IP (much more frequent) as well as IP reviews.

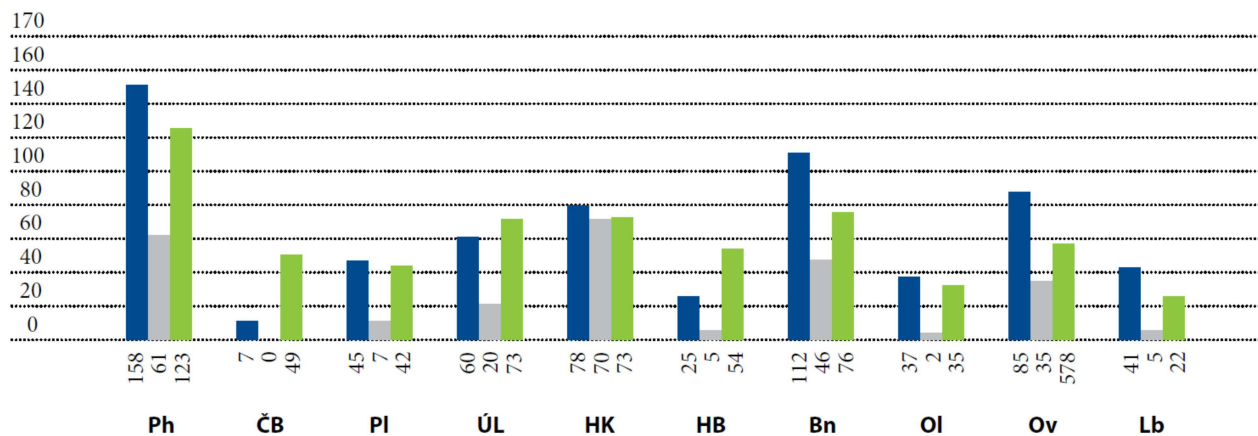
In 2018, the CEI developed 648 statements on applications for integrated permits or changes thereto. This is a slight decrease compared to last year (695). In 23 cases, CEI representatives attended face-to-face meetings on applications for integrated permits or changes thereto.

In its statements on changes to IP relating to expansion in landfill capacity, the CEI has had a uniform opinion, pointing out the expected waste management legislative changes and the ban on landfilling mixed municipal waste from 2024 onwards, resulting in a significant reduction in the stored waste. For these reasons, we made thorough reviews of the operators' reasons for expanding landfills, because work of these facilities should be phased out in future for the benefit of environmental protection.

Other expert statements

In addition, coordinators of integrated agendas of the TI made or cooperated on another 255 statements on EMAS, under the Safe Business programme, and environmental audits, etc., as mentioned above.

Statements issued by CEI TI + HQ in 2018



- Statements on applications for IP changes (CEI as a whole) - 648
- Other statements and consultations - 255 (251 by CIA + 4 by HQ)
- EIA/SEA (total for CEI) - 610 (604 by TI + 6 by HQ)

Reports on inspection

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

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

Since 15 Aug 2016, the IS has registered the posting (mostly by the CIA) of 2,033 reports on inspection.

4.7.4 Major cases from inspection work Three

highest fines:

Prague TI – A major case of 2018, handled by the IAD in previous years but concluded with a confirmation of the awarded fine of CZK 500,000 by the appeal authority, was an administrative proceeding against KLIO, s.r.o., for operation without an IP. Prague TI had reprimanded the operator for operating, on the inspection day, 6 Nov 2015, operated the wastewater treatment plant at Dolňanská 400, Praha 5, Zličín, without a valid IP. Specifically, the facility was used for operation 5. 1.b) Disposal or reuse of hazardous waste at a capacity over 10 t a day involving at least one of the following: physical and chemical modification pursuant to Annex 1 to the IP Act.



KLIO, s.r.o. – Filter press operation.



Pool full of admitted waste.

Olomouc TI – By a decision dated 25 July 2018, the CEI awarded a fine to MEGAWASTE-EKOTERM, s.r.o., Prostějov, for operation in contravention of binding IP requirements, the Air Protection Act and the Waters Act. The conclusive fine amounted to CZK 350,000. The decision entered into force on 30 Oct 2018.

Hradec Králové TI – Awarded a fine of CZK 200,000 to APA Hradec Králové s.r.o. for repeated serious violation of binding IP operating requirements at its car wreck collection and processing facility. The decision entered into force on 11 Jun 2018.

The CEI had found the same violation, consisting in storage of car wrecks containing hazardous components outside the dismantling hall, already in a 2011 inspection; newly, we found a larger quantity of car wrecks in various stages of dismantling outside the fenced facility compound, in two areas not intended for waste handling.

An example of positive inspection effect on an operation:

Brno TI – Based on repeated inspections at Galvanovna Vyškov, a facility operated by CZ SVAZIKO VÝŠKOV, s.r.o., we found operation in contravention of the IP. According to our findings, the operator had exceeded set emission limits for wastewater discharged from its neutralizing station (NS) on water pH and DIS. This was a repeated violation of the IP requirements on quality of wastewater discharged from the NS.

For said violation, we awarded a fine of CZK 40,000 to the operator in April 2018 for operation in contravention of the IP, which decision entered into force in April 2018.

When determining the fine amount, the CEI considered the significant mitigating circumstance that the operator was upgrading its NS. The NS renovation was to be completed in 2018. A repeated inspection on 2 Aug 2018 found compliance with IP requirements on water protection. The NS renovation work was still in progress. The renovation was completed in November 2018, and the analysis of water leaving the NS submitted by the operator on 27 Nov 2018 complied with the set emission limits. The NS renovation is therefore permanently capable of meeting requirements for wastewater discharge quality.



SVAZIKO VYŠKOV, s.r.o. – renovation of neutralizing station.

An example of a reprimand:

On 20 Mar 2018, a reprimand entered into force pursuant to Section 35, item

a) of Act no. 250/2016 Coll. on Liability for Misdemeanours and Proceedings on Them, awarded to Poděbradka, a.s., for its Dobrá Voda facility (2017 inspection) for missing the deadline for the report on compliance with IP requirements by just 4 days; the report was very well made and no shortcomings were found at the facility.

4.7.5 Conclusions

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

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

The CEI does not focus its work strictly only on awarding fines; it also pays attention to prevention and soft methods.

The CEI also actively cooperates with other public authorities, particularly regional authorities, which permit operation of facilities under the Integrated Prevention Act. The purpose of this cooperation is an endeavour to improve IP quality, IP agreement with current facility status, formulation of uniform binding operating requirements in terms of their enforceability, thus assuring high-quality environmental protection. The communication with regional authorities is not bad, but sometimes not reliable, which increases the time required for inspection preparation.

The uneven quality and completeness of publication of changes to IP in the IPPC IS. There are facilities for which a number of change decisions are missing in the information system. If a regional authority forgets to send a change to an integrated permit to the CEI, we are left completely uninformed.

The progressive increase in IP changes results in increased complexity of inspections. Inspections in the area of integrated prevention thus demand particularly precise preparation and sufficient time.

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

5.1 Ethics and integrity

Ethical rules

Ethical rules for public servants and employed staff doing work under Section 5 of Act no. 234/2014 Coll. on Civil Service, as amended (hereinafter, the "CSA"), are specified by the CSA, particularly Section 77, Para. 1 and 2 and Section 81, and the Deputy Minister of the Interior for Public Service Regulation no. 13/2015 of 14 December 2015. Article 9 of the Service Regulation deals with prevention of corruption and fraud risks and undesirable external influences that might endanger proper service performance. Ethical rules for employed staff are specified by Act no. 262/2006 Coll., as amended (hereinafter, the "Labour Code"), particularly Sections 303 and 304.

Documents governing CEI public servants and employees in the area of ethical conduct is the MoE Employee Code of Conduct, published on the CEI web site, section "Anti-corruption scheme" (www.cizp.cz/Protikorupcni-program).

The purpose of the ethical rules in force in the CEI is that all the employees and public servants knowingly and actively adhere to ethical principles in performing their tasks. The employees are periodically trained in ethical rules and demonstrably introduced to new documents. The supervisor/manager of each of the CEI organisational units is in charge of adherence to the ethical rules.

Reports of suspicion of commitment of illicit or corruption activity

Based on Government Regulation no. 145/2015 Coll. on Measures related to reporting suspicion of illicit activity in a service authority (hereinafter, "Government Regulation no. 145/2015 Coll."), the CEI has adopted a CEI Director's Service Regulation setting the procedural rules for reporting suspicion of commitment of illicit activity, including corruption activity, and defines protection of those reporting. Simultaneously, this Service Regulation specifies two public servants who accept the reports and investigate the contained suspicions (hereinafter, the "investigators").

A report on the suspicion of corruption or illicit activity can be made by any employee or public servant of the CEI or another public servant. Reports made are handled as confidential and they can be submitted at any time (in writing, e-mail). The process used to review the concerns reported is defined by Government Regulation no. 145/2015 Coll., the Deputy Minister of the Interior for Public Service Methodological Instruction no. 8/2015 and CEI Director's Service Regulation no. 7/2015. Among other things, these documents define a non-repressive policy towards the reporting person.

The CEI has and makes available the following options of reporting suspicion of illicit or corruption activity:

- Written reports thrown in the marked box located in a non-monitored area to the right of the main entrance to the CEI Headquarters (Na Břehu 267, 190 00 Praha 9) make it possible to submit suggestions anonymously.
- Reports sent via electronic mail to the address: prosetrovatel@cizp.cz.

Information on the CEI investigators and options for reporting suspicion of illicit or corruption activity is published on the CEI web site, section Practical Guide (www.cizp.cz/Podavani-oznameni-o-podezreni-ze-spachani-protipravniho-jednani-vcetne-korupcniho).

In addition to the above, each citizen or organisation has another option, independent of the CEI, for reporting suspicion of corruption activity of CEI employees, namely the Contact Centre Against Corruption of the Ministry of the Environment (www.mzp.cz/cz/kontaktnei_centrum_proti_korupci). Of course, reports of illicit activity can be made using the standard lawsuit method.

¹ This Service Regulation, as well as other Deputy Minister of the Interior for Public Service Regulations, is available on the web site of the Ministry of the Interior of the Czech Republic www.mvcr.cz and on the CEI web site www.cizp.cz/Protikorupcni-program.

5.2 Anti-corruption scheme

The Czech Environmental Inspectorate internal anti-corruption scheme (CEI ACS) is based on requirements of the Government of the CR, repeatedly formulated in its resolutions and regulations: Government Resolution no. 752 of 2 October 2013, as amended by GR no. 851 of 13 November 2013, approving the Framework Departmental Anti-corruption Scheme, updated by GR no. 1077 of 21 December 2015 and GR no. 853 of 29 November 2017; GR no. 39 of 16 January 2013, approving the document "From corruption to integrity – Government strategy for combating corruption in 2013 and 2014", establishing task no. 6.2.1. "Departmental internal anti-corruption schemes".

The CEI ACS is a set of procedures and measures for corruption risk management mandatory for employees and public servants in decision-making processes. Its purpose is to reduce precondition for corruption activity in the CEI and protect state property.

The CEI IACS is composed of five basic elements: Fostering and strengthening of anti-corruption climate; Transparency; Corruption risk control and inspection monitoring; Procedures for corruption suspicion; Evaluation of internal anti-corruption scheme.

The CEI IACS is performed in accordance with legal regulations. The CEI has defined corruption risks and set rules for resolving them, set procedures for reporting corruption activity and generally reduced preconditions for corruption activity.

The current CEI IACS is published on the CEI web site section Anti-corruption Scheme (www.cizp.cz/Protikorupcni-program).

As part of its endeavour for maximum transparency, the CEI publishes all its contracts and invoices in both the Register of Contracts and MoE Open Data (www.mzp.cz/cz/otevrena_data). Twice a year, the CEI publishes its list of advisors and advisory bodies on its web site, section Anti-corruption scheme.

The CEI has in place a Map of Corruption Risks, which is updated continuously. The number and percentage of CEI organisational units assessed for risks related to corruption and with major risks identified is 100%. Each supervisor/manager and employee has been informed about the anti-corruption policy and organisational procedures. All employees are continuously trained and educated.

No case of corruption was reported in the past 4 years (2015-2018). No contracts with partners or suppliers have been terminated or restored due to violation of corruption-related regulations.

5.3 Complaint handling

Complaints filed as reports on concerns about unethical or illicit activity

No relevant suspicions of corruption activity under Government Regulation no. 145/2015 were reported to the CEI in 2018. The email address prosetrovatel@cizp.cz received 11 submissions. Out of these submissions, none were relevant reports on concerns of corruption activity in a public service authority. All the submissions delivered were handled pursuant to Section 42 or 175 of the RAP. No written reports were thrown in the marked box.

Complaints about inappropriate conduct of inspectors or proceedings of TIs

As part of its work, the CEI also investigates complaints filed pursuant to Section 175, Para. 4 of Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended (the "RAP"), including complaints about both the authority's steps and inappropriate conduct of its officials, but the latter are minimal (www.cizp.cz/Podavani-podnetu-stiznosti). Complaints about inappropriate conduct of CEI inspectors or proceedings of territorial inspectorates constitute an important feedback that helps the organisation improve its work. The CEI investigates facts given in the complaint and finds the complaint to be justified, partly justified or unjustified based on the investigation. In 2018, the CEI received 43 complaints, out of which 40 were not found to be justified. Three complaints were found to be partly justified. The table below shows an overall overview of the complaints broken down by territorial inspectorates.

Numbers of complaints about inappropriate conduct of inspectors or proceedings of CEI TIs in 2018 handled by TIs and CEI Headquarters.

Numbers of complaints about inappropriate conduct of inspectors or proceedings of TIs in 2018

Territorial Inspectorate	no. of complaints	out of that, found to be		
		justified	partly justified	unjustified
Prague	10	0	0	10
České Budějovice	0	0	0	0
Plzeň	4	0	0	4
Ústí nad Labem	1	0	0	1
Hradec Králové	4	0	0	4
Havlíčkův Brod	2	0	0	2
Brno	3	0	1	2
Olomouc	2	0	0	2
Ostrava	0	0	0	0
Liberec	0	0	0	0
Headquarters	17	0	2	15
Total	43	0	3	40

Employee complaints in the employment area

Complaints by CEI staff working as employees are governed by the Labour Code, Sections 276 and 285. Complaints by CEI staff working as public servants are governed by the Civil Service Act (CSA), Section 157. If an employee has doubts or disagrees with human resources decisions, the state secretary of the Ministry of the Environment is the authority of appeal pursuant to Section 162, Para. 4, item c) of the CSA. Besides, employees can proceed in accordance with legislation in force.

In 2018, the CEI received no complaints about employment procedures. The CEI received no fines or other penalties due to non-compliance with legislation and regulations in the social (employment) area.

5.4 Data protection and legislative compliance

25. May 2018 saw the entry into force of General Regulation of the European Parliament and of the Council (EU) No 2016/679 on Personal data protection. Based on the Regulation, the CEI produced its own Personal Data Protection Guideline, including 12 annexes (Service Regulation no. 17/2018).

The Guideline is fully in line with the Regulation requirements, setting:

- 1) the subject matter and scope,
- 2) definitions of terms,
- 3) administrator's powers and responsibilities in personal data processing,
- 4) administrator's obligations in personal data processing,
- 5) personal data subjects and records on their personal data,
- 6) conditions, methods, scope and means of personal data processing,
- 7) subject consent to personal data processing,
- 8) informing personal data subjects,
- 9) personal data protection,
- 10) data subjects' right protection,
- 11) confidentiality obligation,
- 12) terms and methods of personal data destruction,
- 13) reporting duty on security breach,
- 14) appointment of personal data proxy,
- 15) crisis plan.

The CEI can conclude that it received no complaints in 2018, or its conduct or procedures were the subject of complaints about infringement on privacy, trade secrets, loss of data or unauthorised publication of data. The CEI also complied with all legislation and regulations in the social (employment) area and in the area of product and service use.

The CEI paid CZK 28,758 in total in penalties, interest and fines in 2018. Out of that amount, the CEI paid CZK 27,758 under Section 254, Para. 1 of Act no. 280/2009 Coll., Taxation Rules, as amended (interest payment to Štůsek D.V.B. s.r.o.). A fine of CZK 1,000 was imposed for exceeding the speed limit on open road. The CEI paid the fine, and then the employee violating the speed limit paid the amount to the CEI account.

6. Tendering and supply chain in 2018

Among other things, the Czech Environmental Inspectorate is a departmental organisation of the Ministry of the Environment, thus adhering to rules for centralised governmental procurement (centralised public tendering system) and being a public contracting authority, which adheres to a number of legal and its own regulations in public tendering (for details, see www.cizp.cz/Vyberova-rizeni).

Supply chain

The organisation's supply chain comprises primarily permanent outsourcing:

- car servicing and repairs,
- cleaning services,
- reception desk services,
- building management and maintenance,
- legal service provision,
- printer servicing,
- IT jobs, service and system support.

In addition, currently required services, professional training and procurement of instrumentation for the CEI departments.

Contracts above CZK 50,000, excl. VAT, were used for 37 public tenders in 2018.

Review of contractors' environmental impacts, employment procedures and impacts on society

When awarding public contracts, the CEI tries to apply environmental requirements, split public contracts into parts to enable participation of smaller contractors, and reserve maximum of its public contract for contractors employing persons with disablements.

Based on Government Resolution of 14 June 2010 no. 465 on Rules of application of environmental requirements in public tendering, we reviewed three suppliers in three tender titled "Furniture procurement, including minor structural modifications to the Secretariat and Director Office, CEI Headquarters, Prague", "Provision of toilet paper, paper towels and liquid soap for the CEI", and "Provision of toners and cartridges for CEI printers", i.e., 8.1%.

The screening of public contractors in the social area always included a check of adherence to legal requirements and the contracting authority's requirements, as well as the bidding price.

In an over-the-limit public contract split into parts titled: "Provision of reception desk services at CEI Territorial Inspectorate in Prague", "Provision of reception desk services at CEI Territorial Inspectorate in Plzeň", "Provision of reception desk services at CEI Territorial Inspectorate in Havlíčkův Brod", and the tender titled "Provision of original toners and cartridges for CEI printers", we applied the contracting authority's right to reserve the contract for supplier who employ persons with disabilities – reserved contracts (the applicant has to submit a confirmation of the criteria by the employment office). We reviewed three contractors in the above tenders, i.e., 8.1%.

7. Employee environment and human resources

The CEI regards employee care as a fundamental value and core of its professionalism. The principal approach is immediate contact between the management and employees of all territorial inspectorates, and an emphasis on continuous training of expert employees and occupational safety. The human resources strategy focused primarily on controlling and reporting of human resource management and employee professional growth. The current emphasis is on knowledge (knowledge management).

As of 31 Dec 2018, the CEI had 550 employees, within that 305 were women and 245 men. CEI employees work at inspectorates in 10 regions. Most of the employees work in expert professions (80%) and have university education (78%). Employees with more than 10 years of experience in the CEI make up 58% of the staff.

The CEI employs public servants, whose employment circumstances are governed by the Civil Service Act (CSA), and contract employees, whose rights and obligations are defined by the Labour Code (LC). This results in the necessity of two collective agreements: for the civil service and for the contract employment.

No. of employees (actual) by region (inspectorate)

Year	2015	2016	2017	2018	%
No. of employees, absolute, as of 31 Dec	538	539	536	550	100.0
Prague and Central Bohemia	62	65	57	62	11.3
České Budějovice	37	39	38	36	6.5
Plzeň	41	44	43	44	8.0
Ústí nad Labem	48	47	48	49	8.9
Hradec Králové	41	42	42	44	8.0
Havlíčkův Brod	34	35	37	37	6.7
Brno	53	50	51	54	9.8
Olomouc	32	34	34	34	6.2
Ostrava	46	44	47	47	8.5
Liberec	31	31	32	32	5.8
Headquarters (Prague)	113	108	107	111	20.2

Classification of employees by education and sex, as of 31 Dec 2018

Education attained	Males	Femal	Total	%
Primary	0	0	0	0.0
Secondary professional	0	6	6	1.1
Complete secondary	2	10	12	2.2
Complete secondary	12	71	83	15.1
Higher professional	6	15	21	3.8
University	225	203	428	77.8
Total	245	305	550	100

Duration of employment, as of 31 Dec 2018

Duration	Number	%
up to 5 years	160	29.1
up to 10 years	69	12.5
up to 15 years	104	18.9
up to 20 years	108	19.6
over 20 years	109	19.8
Total	550	100

Numbers of employees broken down by employment and employment contract type

Year	2015	2016	2017	2018	%
No. of employees as of 31 Dec, total	538	539	536	550	100.0
Percentage of employees covered by collective agreement	100	100	100	100	100.0
Top management employees: directorate + department directors (public servants)	16	14	14	15	2.7
out of that, women	3	2	2	2	
out of that, men	13	12	12	13	
Expert employees (public servants)	425	431	429	437	79.5
out of that, women	195	205	205	217	
out of that, men	230	226	224	220	
Support profession employees (contract employees)	97	94	93	98	17.8
out of that, women	85	81	81	86	
out of that, men	12	13	12	12	
Employment for indefinite period	488	497	493	492	89.5
out of that, full-time	473	489	486	484	
out of that, part-time	15	8	7	8	
Employment for definite period*	50	42	43	58	10.5
out of that, full-time	47	40	42	53	
out of that, part-time	3	2	1	5	
No. of WOMEN as of 31 Dec	283	288	288	305	55.5
Employment for indefinite period (women)	256	260	259	269	88.2
out of that, full-time	245	254	253	262	
out of that, part-time	11	6	6	7	
Employment for definite period (women)	27	28	29	36	11.8
out of that, full-time	26	26	28	33	
out of that, part-time	1	2	1	3	
No. of MEN as of 31 Dec	255	251	248	245	44.5
Employment for indefinite period (men)	232	237	234	223	91.0
out of that, full-time	228	235	231	222	
out of that, part-time	4	2	1	1	
Employment for definite period (men)	23	14	14	22	9.0
out of that, full-time	21	14	14	20	
out of that, part-time	2	0	0	2	

* Definite period: pursuant to Section 21 of the CSA, employees are admitted for a definite period if they have not successfully passed the officer examination.

As soon as an employee passes the officer examination, the employment is extended for an indefinite period of time.

7.1 HR management

The CEI's approach to its employees is governed by the Labour Code and the Public Service Act, as well as internal regulations. The key internal guidelines include:

- Wage rules – 28 May 2012
- Work rules – 11 Apr 2012
- CEI Guideline no. 11/2018 – Guideline on employee medical services at the Czech Environmental Inspectorate
- Service Regulation 10/2015, defining application of the Public Service Act in the Czech Environmental Inspectorate – in effect as of 4 Dec 2015
- Service Regulation 24/2017, defining the procedure for service assessment of public servants employed in the Czech Environmental Inspectorate – in effect as of 1 Jan 2018

In 2018, the HR department work focused on implementation of the OK Base HR system, particularly the attendance module, used by all the CEI employees. More than 132 tenders were held in order to increase the CEI's job occupancy. In addition, the HR department work in 2018 focused on good and timely implementation of legislative changes in employment law, wages and training in the CEI. As every year, the dominant task of the HR department was economic and sensible use of wage resources allocated.

Employment

Due to its character, the CEI offers primarily qualified jobs. Maintaining employees is the key, and is measured by the voluntary fluctuation indicator.

At the end of the year, the CEI had 39 job vacancies. The current task for the CEI management is still to stabilise and develop the key professions. The average percentage of voluntary fluctuation at the CEI is low: 4.8%.

Changes in the employee rates are monitored by periodic internal reporting and assessed by the management. Jobs are always awarded in a public tender. Employee stabilisation is assisted by benefits, to which public servants and contract employees are entitled in the same way. Flexible working hours are one of the important factors.

Pursuant to the Civil Service Act (CSA), employee career promotion cannot be planned: tenders have to be organised for each systemic job. Assessment of public servants in terms of set personal goals and self-training takes place every year.

Total number and percentage of new employees and employee fluctuation rate

Numbers of newly admitted employees and employees leaving employment, rate of fluctuation, 2015-2018

	2015	2016	2017	2018
No. of employees admitted in the year	32	51	49	59
out of that, women	17	32	37	33
up to 30 years	3	8	10	16
Aged 30-50	13	22	23	13
Aged over 50	1	2	4	4
out of that, men	15	19	12	26
up to 30 years	6	7	2	7
Aged 30-50	5	7	4	10
Aged over 50	4	5	6	9
No. of employees, absolute, as of 31 Dec	538	539	536	550
Total no. of employees leaving in the year	48	43	55	51
out of that, men	22	19	23	25
up to 30 years	2	1	3	1
Aged 30-50	10	10	7	15
Aged over 50	10	8	13	9
out of that, women	26	24	32	26
up to 30 years	3	3	4	4
Aged 30-50	16	16	18	13
Aged over 50	7	5	10	9
% of voluntary fluctuation*	3.49	4.1	7.2	4.8
(excluding forced departures, incl. due to organisational changes, retirements, departures due to injury or death)				
% of total employee fluctuation	8.81	8	10.2	9.5
Total number of terminated employments in the year x 100 / average number of employees in the year.				

*Service and contract employment terminated by employees. The figure excludes voluntary retirement, service and contract employment terminated by the employer (termination in trial period, removal for manager position), service termination by law, service and contract employment terminated by expiry of a definite period of time.

Overview of economic, medical and social employee benefits (except pension scheme) relating to full-time employees for an indefinite period of time, 2018

	Top management employees (public servants)	Employees – expert employees (public servants)	Support profession employees (employed employees)
Average monthly no. of employees in the year	15	428	96
Healthcare allowance	YES	YES	YES
Unpaid leave for family purposes (unpaid, by KS)	by LC	by LC	by LC
Indisposition leave (5 days/year)	YES	YES	YES
Meal allowance	YES	YES	YES
Children's recreation allowance	YES	YES	YES
Family recreation allowance	YES	YES	YES
Jubilee rewards	YES	YES	YES
Culture and sports allowance	YES	YES	YES
Rewards and gifts, pecuniary	YES	YES	YES
Social subsidies	YES	YES	YES

Diversity and equity of opportunities

The Czech Environmental Inspectorate is an organisation that respects equal opportunities for men and women. Employee selection considers expertise of applicants above all. The wage transparency is assured by wage scales. The wage equality is based on each employee's work evaluation.

The departments within the organisation are highly diverse in terms of gender, age and practical experience. The organisation cultural does not permit any form of direct or indirect discrimination supporting gender stereotypes. The Work Rules include a requirement for work discipline and adherence to rules of politeness and thoughtfulness. The CEI promotes equal opportunities in the organisation by means of flexible working hours and part-time employment, thus allowing all employees equally to harmonise their private and work life.

A separate presentation on equal opportunities is included in the admission training. Taking the e-learning course on equal opportunities was mandatory for all new and existing employees in 2018.

Relationships between CEI employees and management

Both public servants and contract employees have to have separate collective agreements; the collective agreement covers all the CEI employees. Each of the collective agreements defines the following in particular: employee privacy protection, provision of leave, occupational health and safety, wage policy, company lunches, employee training at work, information sharing between management and trade unions, negotiation procedures, and Cultural and Social Needs Fund creation and drawing. Minimum notice periods for organisational changes are governed by the Labour Code.

Equal remuneration for men and women is assured by the wage class being systemised for a service of employment job.

By default, the CEI management communicates with employees by means of meetings. They are complemented with other communication platforms that facilitate information availability, such as e-mail and intranet, where employees can find all the company's internal standards and information on organisational and HR changes, among other things.

Composition of managerial bodies and employee categories, 2018

	Total	Males	Females	Males (%)	Females (%)
No. of employees as of 31 Dec 2018	550	245	305	44.5	55.5
Top management (management + heads of departments, civil servants)	15	13	2	86.7	13.3
Employees, expert employees (public servants)	437	220	217	50.3	49.7
Support profession employees (contract employees)	98	12	86	12.2	87.8

7.2 Training

In 2018, training courses and conferences trained 3,452 participants; this is more than 6 event per CEI employee. The above amount excludes courses mandatory by law, such as OHS, fire prevention, drivers.

In terms of type of event, we divide training events into:

- internal courses (25 events, 1,181 participants, 7,924 hours),
- external courses (119 events, 255 participants, 1,976 hours),
- conferences (28 events, 130 participants, 2,063 hours),
- e-learning courses (19 events, 1,886 participants, 23,362 hours).

In internal training, the CEI focuses primarily on deepening of knowledge of legal regulations, including periodic revisions of the fundamental legal regulations: Rules of Administrative Procedure, Inspection Rules, Act no. 250/206 Coll., EIA and Financial Controlling Act. At the same time, the CEI responds to legislation changes and organises training on new regulations relating to the Inspectorate activity, such as GDPR. The following expert topics were presented inspectorate-wide: water sampling, Waters Act charge amendment, and Building Act amendment.

Soft skills are another training area. In the area of soft skills, we continued training in communication skills for managers and deputy managers. The training was a one-day follow-up course on leadership and motivation. By now, all the managers and deputy managers of all our territorial inspectorates have been trained. The training elicited very positive participant feedback. According to the majority of the participants, it had exceeded their expectations.

The CEI intention is to continue the set trend of soft skills training. In 2018, the CEI provided further training in the area of communication skills for 62 inspectors, mostly in preventing conflict situations. The training was implemented based on work evaluation targets.

Computer literacy is another important component of the training. Based on excellent feedback on the training in MS Office Excel for intermediate users, we also provided training in MS Office Outlook and Word. Eleven courses took place, each attended by 10-15 people. The capacity was limited to a maximum of 15 persons per course due to computer availability.

Besides attendance training, the CEI also provides on-line training opportunities. Almost all our employees took the following training in 2018: Cyber-security, Equal Opportunities for Men and Women, and Combating Corruption in Public Administration. Some of our employees also took other courses offered on their own initiative. The GDPR course is an example.

7.3 Occupational health and safety

Principles assuring occupational safety

The expert CEI employees (inspectors; 408 out of 550 employees as of 31 Dec 2018) in particular work in very diverse and demanding environments of various companies and sites, where they inspect operations that cause pollution or investigate environmental damage or hazards. Therefore, occupational safety and health protection are among the fundamental priorities in the CEI.

The OHS area is governed by legislation in force and regulated by a number of internal guidelines, the most important being the Czech Environmental Inspectorate Safety Policy, as well as OHS Organisation and Management, Procedures for Work at Heights and Over Depths, Car Traffic Rules, and Organisation and Implementation of Fire Prevention. The OHS condition is examined annually by a comprehensive review, provided by an external company.

The CEI carries out periodic safety training for employees, and all the employees are introduced to general and internal occupational safety and health protection regulations in force.

Occupational safety issues are a part of the collective agreements. Part IV of the collective agreement deals with issues of work environment management, occupational health and safety and inspection of work environment, fire prevention and occupational health protection. Occupational safety, as stipulated in the collective agreements, is supervised by the CEI Trade Union Committee, representing all CEI employees and consulting OHS issues with CEI management. It is involved periodically in the annual comprehensive OHS check, inspects records and reports on work-related injuries, etc.

Training, study, schooling and courses, 2018

	Unit	Males	Females	CEI total
Average hours of all types of training per year per employee out of average monthly number of employees	Absolute no.	66.4	64.8	65.5
Average hours of all types of training per year per employee as of 31 Dec	Absolute no.	66.4	62.5	64.2
Top management employees (directorates + department directors; public servants)	Absolute no.	71.2	83.0	72.7
Employees, expert employees (public servants)	Absolute no.	67.6	67.5	67.5
Support profession employees (employed employees)	Absolute no.	40.4	49.2	48.2

Injury rate, missed days and absences

The high efficiency of OHS management and employee discipline is illustrated by low injury frequency, which did not exceed 0.4 (injuries per 100 employees) in 2014-2018. The primary causes of the work-related injuries are unpredictable work risks and human error.

In 2014-2018, the number of registered injuries did not exceed 2 annually, and there were no lethal injuries or professional diseases. All injuries are consistently recorded in each workplace, including an investigation of their causes. All work-related injuries have led to implementation of technical or training measures to prevent recurrence of injuries with the same cause.

Injury, illness, missed days and absence rates of CEI employees

Unit		2015			2016			2017			2018		
		Males	Females	Total	Males	Females	Total	Males	Females	Total	Males	Females	Total
Average monthly no. of employees in the year	absolute no.	255	283	545	251	288	539	251	289	540	245	294	539
No. of work-related injuries	absolute no.	2	0	2	0	3	3	0	1	1	0	0	0
Registered work-related injuries leading to incapacity for work of at least 3 days (GRI Injury)	absolute no.	1	0	1	0	2	2	0	1	1	0	0	0
Total number of serious work-related injuries leading to hospitalisation over 5 days	absolute no.	1	0	1	0	1	1	0	0	0	0	0	0
Total absence days due to injury and occupational disease (GRI lost day)	days/shifts	241	0	24	0	59	59	0	12	12	0	0	0

Injury, illness, missed days and absence rates of CEI employees

	Unit	2015	2016	2017	2018
Injury rate (no. of registered work-related injuries per 100 employees) (CZ standard)	Relative no.	0.18	0.37	0.19	0.00
Average missed calendar days per registered work-related injury (Average number of lost days per registered injury)	Absolute no.	24.00	29.50	12.00	0.00
Absence due to illness, work-related and other injuries (% of total time worked) (CZ standard)	%	4.58	4.05	4.04	3.65
Unscheduled absence rate Absence due to unscheduled absence: illness, work-related and other injuries (% of planned work time) (GRI Absentee rate)	%	3.69	3.30	3.39	3.07
Percentage of incapacity to work Missed calendar days of incapacity to work times 100 to calendar days times number of employees (GRI Lost day rate)	%	0.01	0.03	0.01	0.00
LTIFR (Lost Time Injury Frequency Rate) Represents no. of injuries after at least 3 days of incapacity for work divided by total hours worked expressed as millions of hours.	Absolute no.	1.09	2.19	1.07	0.00

8. Energy and material intensity of CEI work

The CEI purchases all its energy from contractors selected as part of the centralised public procurement system. Electricity was supplied by Centropol Energy a.s., and natural gas by Pražská plynárenská a.s.

The CEI aims at reducing the consumption of its energies, which is affected by climate conditions, and petrol and diesel consumption is affected by the numbers of inspections and distances to inspected entities. The CEI does not use any significant quantities of raw or other materials.

Energy audits and energy performance certificates have been commissioned for all the buildings owned by the CEI. They will give rise to measures that will reduce future energy consumption. With support from the State Environmental Fund and the Ministry of the Environment, the CEI would like to make energy-saving investment projects at its Brno, Hradec Králové, Ostrava and České Budějovice TIs. Independent of these measures, the CEI carries out measure to reduce its

energy intensity, such as by installing energy-saving light sources and procuring energy-saving appliances (refrigerators and kettles, for example).

The vehicle fleet will be renewed in 2019: six vehicles will be replaced with CNG ones to reduce CO₂ emissions and noise, while the waste gas from these drives does not contain sulphur dioxide. No carcinogenic additives are used in CNG vehicles. In years to come, we expect to replace about 35% of our cars burning petroleum products with alternative drive vehicles.

Our waste management is governed by a separate guideline. The CEI produces separated waste, municipal waste and bulky waste, such as discarded furniture. Batteries, electrical waste, fluorescent lamps, etc., are handed to authorised entities for recollection. Waste is handed to regional contractors for disposal. Wastewater is discharged into public sewers.

CEI waste weight (kg) and disposal method (documented by accepting party)

	2014		2015		2016		2017		2018	
	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste
Reuse (use in another process), paper, plastic, glass	28	23,300	17	22,550	25	29,100	29	15,431	27	15,919
Combustion		30,500		31,300		30,949		26,893		28,041

The quantity of other waste depends primarily on mixed waste (employees eat in their workplaces), packaging used on shipments ordered and delivered (printer paper, laptop computers, sanitary supplies, etc.). Moreover, the Headquarters contains a collection site for sorted waste: paper, plastics, glass, beverage cartons and metals, shared by two adjacent buildings in which the CEI is a partial tenant, besides flats.

CEI energy, fuel and water consumption

	Fuel type	Unit	2014	2015	2016	2017	2018
Purchased and consumed energy sources	Petrol	l	84,218	74,225	75,294	68,172	63,165
	Diesel	l	49,655	39,996	43,709	50,289	51,243
	Electricity*	kWh	559,858	497,774	475,838	511,156	462,40
	natural gas	m ³	95,628	86,263	98,912	93,601	93,397
	Heat	GJ	1,398	1,535	1,834	1,589	1,681
Drinking water consumption from municipal water supply or other water utility		m ³	7,951	7,916	8,145	10,822	6,769

*The origin of electricity supplied to the CEI, an end customer, by CENTROPOL ENERGY, a.s., in 2018 was as follows: fossil sources 59.53%, nuclear 30.36%, renewables 10.11%, others 0%.

9. Economics

In 2018, the CEI worked with non-investment funds amounting to CZK 409,924,178.74 (including CZK 33,302,732.70 of UEC) and budgetary investment funds amounting to CZK 20,913,081.81 (including CZK 4,539,968.75 of UEC). The total budgetary funds thus were CZK 430,837,260.55. The CEI also worked with non-budgetary funds of CZK 455,439.

Drawing of non-investment expenditures for 2018

Indicator	Adjusted budget	Drawing	Balance
Salaries of employed employees	41,782,404.00	25,753,029.00	16,029,375.00
Salaries of employed employees – UEC	8,024,672.00	8,024,672.00	0
Salaries of public servants – PS	188,645,625.00	188,645,625.00	0
Salaries of public servants – PS – UEC	2,265,797.00	2,265,797.00	0
WPD	2,535,955.00	1,454,587.00	1,081,368.00
WPD-UEC	725,839.00	263,645.00	462,194.00
Severance pay	500,000.00	252,837.00	247,163.00
Severance - UEC	603,242.00	195,000.00	408,242.00
Insurance – SS+HI	79,377,755.00	72,648,530.00	6,729,225.00
Insurance – SS+HI – UEC	4,293,733.00	4,293,733.00	0
Total wage expenditures	328,755,022.00	303,797,455.00	24,957,567.00

Indicator	Adjusted budget	Drawing	Balance
Other current expenditures	57,736,451.64	44,636,624.02	13,099,827.62
CSNF transfer	4,608,561.00	4,608,561.00	0
Non-budgetary resources	455,439.00	406,669.00	48,770.00
UEC 2017	17,568,705.10	12,921,094.97	4,647,610.13
Total current expenditures	80,369,156.74	62,572,948.99	17,796,207.75

Indicator	Adjusted budget	Drawing	Balance
Non-investment expenditures	800,000.00	0	800,000.00
Total non-investment expenditures - EDS/SMVS	800,000.00	0	800,000.00
Total non-investment expenditures	409,924,178.74	366,370,403.99	43,553,774.75

Drawing of investment expenditures for 2018

Indicator	Adjusted budget	Drawing	Balance
New web site	600,000.00	0	600,000.00
AM-access management, network security	400,000.00	0	400,000.00
Multifactor user authentication	1,900,000.00	0	1,900,000.00
Waterproofing of basement in Plzeň	157,239.50	99,201.00	58,038.50
Fireproof doors for HQ	200,000.00	0	200,000.00
Wooden door frames for HQ	265,000.00	0	265,000.00
CCTV system for HK	165,000.00	0	165,000.00
Entrance door upgrade in HB	79,921.00	79,921.00	0
ESS and EFS renovation in HK	1,250,000.00	43,000.00	1,207,000.00
Corridor printer renewal	1,800,000.00	0	1,800,000.00
Electro osmosis in Plzeň	36,294.00	36,294.00	0
GPS Trimble for Ostrava	450,000.00	0	450,000.00
ESS end device installation in HK	100,000.00	0	100,000.00
ESS end device installation in CB	100,000.00	0	100,000.00
ESS end device installation in Prague	100,000.00	0	100,000.00
GPS accessories for Ostrava	55,000.00	0	55,000.00
Air-conditioning for server room at UL	662,477.00	662,477.00	0
Continuous measurement system	982,072.30	982,072.30	0
Portable continuous analyser	737,616.00	737,616.00	0
Ultrasonic flow meter	399,264.00	399,264.00	0
Car procurement	5,187,939.40	0	5,187,939.40
CNG car procurement	2,992,695.00	0	2,992,695.00
Active component renewal	1,863,945.16	1,863,945.16	0
Aggregated project	428,618.45	0	428,618.45
Total investment expenditures	20,913,081.81	4,903,790.46	16,009,291.35
Total costs	430,837,260.55	371,274,194.45	59,563,066.10

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

The saving of CZK 17,796,207.75 in non-investment expenditures is related to the expansion of supervisory duties (new ALF Act) – the furniture procurement for approx. CZK 2,000,000 was not fully implemented. Another reason was a plan to use the funds for guarding of buildings by Securitas. The redecoration of HQ offices and carpeting replacement were not completed, and funds for ICT were not drawn in full, particularly due to a reduction to maintenance in relation to the new documentation service and cancellation of support for the geographic information system.

The saving of EDS/SMVS non-investment expenditures amounting to CZK 800,000 is due to the fact that the project AM-access control and network security will only be implemented in 2019.

The saving of CZK 16,009,291.35 in investment expenditures was caused by not drawing investment funds on projects approved in 2018. They were primary investments in ICT (CZK 4,700,000), operating investment (CZK 2,645,000) and car procurement (CZK 8,180,634.40), which is organised centrally by the MoE. All of the investment projects are shifted to 2019, when they will be implemented and paid for.

9.2 Use of reserve fund and other non-budgetary resources

The CEI did not use the reserve fund in 2018.

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

- 115V02300D034 - Entrance door upgrade in Havlíčkův Brod – allocated funds CZK 79,921, spent CZK 79,921
- 115V02300D0035 - ESS and EFS renovation in Hradec Králové – allocated funds CZK 1,250,000 – spent CZK 43,000
- 115V02400D015 - Air-conditioning for server room in Ústí nad Labem – allocated funds CZK 662,477, spent CZK 662,477
- Project 11V02400D016 – Continuous measurement kit – allocated funds CZK 982,072.30 – spent CZK 982,072.30
- 115V02400D017 - Portable continuous analyser – allocated funds CZK 737,616, spent CZK 737,616
- Project 115V02400D019 – Ultrasonic flow meter – allocated funds CZK 399,264 – spent CZK 399,264

Non-budgetary resources

- Insurance premium CZK 455,439.00

9.3 Total income assessment

The CEI's total income in 2018 was CZK 2,070,016.84. It was CZK 712,983.16 below the approved budget. The income gap is due to the fact that since August 2017, pursuant to the new Misdemeanour Act, inspectors no longer have to order payment of proceeding costs of CZK 1,000 if awarding a fine by order.

Budgetary income	Approved budget	Adjusted budget	Reality
2132	325,000.0	325,000.00	193,874.85
2133	3,600.00	3,600.00	1,208.00
2310	0.00	0.00	12,587.00
2322	0.00	0.00	663,094.00
2324	2,454,400.0	2,454,400.00	1,021,013.99
2329	0.00	0.00	14,187.00
3113	0.00	0.00	145,127.00
4132	0.00	0.00	18,925.00
Total	2,783,000.00	2,783,000.00	2,070,016.84

Income analysis

2132	Income from rental of other real estate and parts thereof	Includes income from rental of office spaces at Havlíčkův Brod and Liberec TIs.
2133	Income from rental of moveable assets	Includes income from rental of moveable assets at Havlíčkův Brod TI.
2310	Income from sales of short-term and low-value assets	Includes income from repurchase of personal protective equipment.
2322	Received insurance adjustments	Includes insurance premium paid for insured events.
2324	Proceeding costs	Includes proceeding costs and distraintment.
2329	Other non-tax income	Includes other non-tax income.
3113	Income from sales of other long-term assets	Includes income from sales of long-term tangible assets.
4132	Transfer from other own funds	Includes transfer of unspent wage funds from 12/2018.

10. Financial statement as of 31 Dec 2018

Balance sheet

			Period			
Item no.	Item name	Synthetic account	Gross	Current Correction	Net	Previous
			1	2	3	4
TOTAL ASSETS			783,606,511.26	325,093,065.27	458,513,445.99	468,714,194.84
A. Fixed assets			746,114,627.49	325,093,065.27	421,021,562.22	432,276,697.58
I.	Long-term intangible assets		38,048,453.76	34,778,308.18	3,270,145.58	4,329,832.80
1.	Intangible research and development results	012				
Feb	Software	013	19,591,887.88	17,567,311.30	2,024,576.58	3,082,031.80
3.	Valuable rights	014	183,000.00	171,631.00	11,369.00	13,601.00
4.	Emission permits and preference limits	015				
5.	Low-value long-term intangible assets	018	17,039,365.88		17,039,365.88	
6.	Other long-term intangible assets	019				
7.	Unfinished long-term intangible assets	041	1,234,200.00	1,234,200.00	1,234,200.00	
8.	Advances granted for long-term intangible assets	051				
9.	Long-term intangible assets scheduled for sale	035				
II	Long-term tangible assets		708,066,173.73	290,314,757.09	417,751,416.64	427,946,864.78
1.	Land	031	12,519,714.00	12,519,714.00		12,526,284.00
Feb	Cultural items	032	11,491.00	11,491.00	11,491.00	
3.	Buildings	021	495,768,600.36	127,895,669.00	367,872,931.36	375,807,667.36
4.	Separate tangible moveable assets					
	and sets of tangible moveable assets	022	103,366,891.59	66,062,611.31	37,304,280.28	39,137,222.42
5.	Cultivation wholes of permanent stands	025				
6.	Low-value long-term tangible assets	028	96,356,476.78	96,356,476.78		
7.	Other low-value tangible assets	029				
8.	Unfinished long-term tangible assets	042	43,000.00	43,000.00		
9.	Advances granted for long-term tangible assets	052				
10.	Long-term tangible assets scheduled for sale	036	464,200.00			
III Long-term financial assets						
1.	Property interest in entities with critical influence	061				
2.	Property interest in entities with substantial influence	062				
3.	Debt securities held until payable	063				
4.	Long-term loans	067				
5.	Long-term time deposits	068				
6.	Other long-term financial assets	069				
7.	Acquired long-term financial assets	043				
8.	Advances granted for long-term financial assets	053				

Balance sheet

			Period			
Item no.	Item name	Synthetic account	Gross	Current Correction	Net	Previous
			1	2	3	4
IV Long-term receivables						
1.	Returnable financial aid granted long-term	462				
2.	Long-term receivables from ceded credits	464				
3.	Long-term advances granted	465				
4.	Long-term receivables from guarantees	466				
5.	Other long-term receivables	469				
6.	Long-term advances granted for transfers	471				
7.	Long-term mediation of transfers	475				
B. Current assets			37,491,883.77		37,491,883.77	36,437,497.26
I. Inventory						
1.	Material acquisition	111				
2.	Material in store	112				
3.	Material on the way	119				
4.	Unfinished production	121				
5.	Self-made semifinished products	122				
6.	Products	123				
7.	Goods acquisition	131				
8.	Goods in store	132				
9.	Goods on the way	138				
10.	Other inventory	139				
II Short-term receivables			2,236,831.60		2,236,831.60	2,302,151.92
1.	Clients	311	18,381.00		18,381.00	18,381.00
2.	Bills for cashing	312				
3.	Receivables for discounted securities	313				
4.	Short-term advances granted	314	2,218,404.60		2,218,404.60	2,247,456.92
5.	Other receivables from main operation	315				
6.	Returnable financial aid granted short-term	316				
7.	Short-term receivables from ceded credits	317				
9.	Receivables for employees	335	46.00		46.00	54.00
10.	Social security	336				
11.	Health insurance	337				
12.	Pension plans	338				
13.	Income tax	341				
14.	Other taxes, charges and other similar pecuniary performance	342				
15.	Value added tax	343				
16.	Receivables from entities except selected governmental institutions	344				
17.	Receivables from selected central governmental institutions	346				

Balance sheet

Item no.	Item name	Synthetic account	Period			Previous
			Gross	Current Correction	Net	
			1	2	3	4
	18. Receivables from selected local governmental institutions	348				
	19. Receivables from tax administration	352				
	20. Clearance from tax redistribution	355				
	21. Receivables from distraintment and other handling of other people's assets	356				
	22. Other receivables from tax administration	358				
	23. Short-term receivables from guarantees	361				
	24. Fixed time operations and options	363				
	25. Payables from unfinished financial operations	369				
	26. Receivables from financial security	365				
	27. Receivables from bonds issued	367				
	28. Short-term advances granted for transfers	373				
	29. Long-term mediation of transfers	375				
	30. Costs of future periods	381				
	31. Incomes from future periods	385				
	32. Active estimate accounts	388				
	33. Other short-term receivables	377	36,260.00			
III	Short-term financial assets		35,255,052.17		35,255,052.17	34,135,345.34
	1. Asset securities for trading	251				
	2. Credit securities for trading	253				
	3. Other securities	256				
	4. Short-term time deposits	244				
5.	Other current accounts	245	33,781,133.02		33,781,133.02	31,215,208.02
	6. State financial asset accounts	247				
	7. Treasury and state debt liquidity control accounts		248			
	8. Accounts for tax sharing and split management	249				
	9. Current account	241				
10.	Current account CSNF	243	1,472,519.15		1,472,519.15	2,918,653.32
	14. Current accounts of state organisational component	225				
15.	Postage stamps	263	1,400.00		1,400.00	1,484.00
	16. Money on the way	262				
	17. Cash	261				

Balance sheet

Item no.	Item name	Synthetic account	Period	
			Current	Previous
			1	2
TOTAL LIABILITIES			458,513,445.99	468,714,194.84
C. Equity capital			424,676,702.97	437,269,183.27
I.	Accounting entity property and adjusting items		488,579,351.07	487,843,100.57
1.	Accounting entity property	401	726,993,064.25	726,993,064.25
2.	Privatisation fund	402		
4.	Exchange rate differences	405		
5.	Pricing differences on initial use of method 406		-238,435,713.18	-238,435,713.18
6.	Other pricing differences	407		-736,250.50
7.	Adjustments to previous accounting periods	408	22,000.00	22,000.00
II	Accounting entity funds		1,472,519.15	2,928,683.32
2.	Cultural and Social Needs Fund	412	1,472,519.15	2,928,683.32
4.	Reserve fund from other means	414		
III	Economic result		-3,082,033,541.17	-
1.	Economic result for current accounting period		-381,076,744.24	-363,739,327.91
2.	Economic result in approval proceeding	431	-2,330,468,250.41	-
3.	Economic result in previous accounting periods	432	-370,488,546.52	-370,488,546.52
IV	Income and expenditure account of budgetary activity		3,016,658,373.92	647,454,196.31
1.	Income account of state organisational components	222	-2,070,016.84	-3,904,543.21
2.	Special expenditures account	223	371,274,194.45	361,002,588.52
3.	State budget activity account	227		
4.	Aggregated incomes and expenditures of previous accounting periods	404	2,647,454,196.31	2,290,356,151.00
D. External resources			33,836,743.02	31,445,011.57
I.	Reserves			
1.	Reserves	441		
II	Long-term payables			
1.	Long-term credits	451		
2.	Long-term returnable financial aid received	452		
3.	Long-term payables from bonds issued	453		
4.	Long-term advances received	455		
5.	Long-term payables from guarantees	456		
6.	Long-term bills for payment	457		
7.	Other long-term payables	459		
8.	Long-term advances received for transfers	472		
9.	Long-term mediation of transfers	475		
III	Short-term payables		33,836,743.02	31,445,011.57
1.	Short-term credits	281		
2.	Discounted short-term bonds (bills)	282		
3.	Short-term payables from bonds issued	283		
4.	Other short-term loans	289		
5.	Suppliers	321		
6.	Bills for payment	322		
7.	Short-term advances received	324	111,184.00	213,964.55

Balance sheet

Item no.	Item name	Synthetic account	Period	
			Current	Previous
			1	2
8.	Payables from split management	325		
9.	Short-term returnable financial aid received	326		
10.	Employees	331		
11.	Other payables towards employees	333	14,222,086.00	13,409,312.00
12.	Social security	336	5,775,724.00	5,449,412.00
13.	Health insurance	337	2,439,973.00	2,335,400.00
14.	Pension plans	338		
15.	Income tax	341		
16.	Other taxes, charges and other similar pecuniary performance	342	2,221,390.00	2,068,611.00
17.	Value added tax	343		
18.	Payables to entities except selected governmental institutions	345		
19.	Payables to selected central governmental institutions	347		
20.	Payables to selected local governmental institutions	349		
21.	Tax advances received	351		
22.	Tax overpayments	353		
23.	Payables from indirect tax returns	354		
24.	Clearance from tax redistribution	355		
25.	Receivables from distraintment and other handling of foreign assets	357		
26.	Other payables from tax	359		
27.	Short-term payables from guarantees	362		
28.	Fixed time operations and options	363		
29.	Payables from unfinished financial operations	364		
30.	Payables from financial securing	366		
31.	Payables from subscribed unpaid securities and shares	368		
32.	Short-term advances received for transfers	374		
33.	Long-term mediation of transfers	375		
34.	Payables from treasury and state debt liquidity control	248		
35.	Expenditures of future periods	383		
36.	Revenues from future periods	384		
37.	Passive estimate accounts	389		
38.	Other short-term payables	378	9,066,386.02	7,968,312.02

Profit and loss statement

Number Item	Item name	Synthetic account	Current period		Previous period	
			Main activity	Economic activity	Main activity	Economic activity
				1		2
A. TOTAL COSTS			383,805,149.07		368,203,783.54	
I. Costs of operation			382,985,100.55		367,431,750.06	
1.	Consumed materials	501	7,633,716.73		7,784,672.48	
2.	Energy consumption	502	4,828,446.25		5,253,751.22	
3.	Consumption of other unstorable supplies	503				
4.	Goods sold	504				
5.	Capitalisation of long-term assets	506				
6.	Capitalisation of current assets	507				
7.	Change in own production inventory	508				
8.	Repair and maintenance	511	4,416,166.38		2,611,585.08	
9.	Travel costs	512	3,681,377.13		2,916,769.46	
10.	Representation costs	513	187,809.50		201,346.00	
11.	Capitalisation of internal services	516				
12.	Other services	518	26,051,972.44		30,809,093.45	
13.	Wages and salaries	521	227,657,701.00		214,022,085.00	
14.	Mandatory social insurance	524	76,936,818.00		72,548,387.00	
15.	Other social insurance	525				
16.	Mandatory social expenditures	527	5,274,938.00			
17.	Other social expenditures	528				
18.	Road tax	531				
19.	Property tax	532	1,970.00		1,970.00	
20.	Other taxes and charges	538	202,200.00		214,750.00	
21.	Indirect tax returns	539				
22.	Contractual penalties and interest on late payment	541			4,077.00	
23.	Other penalties	542	28,758.00		39,193.00	
24.	Donations and other gratuitous transfers	543				
25.	Materials sold	544				
26.	Deficits and damages	547				
27.	Fund generation	548	4,608,561.00		4,291,458.00	
28.	Depreciation of long-term assets	551	15,611,457.82		17,214,295.73	
29.	Long-term intangible assets sold	552				
30.	Long-term tangible assets sold	553	475,300.00		326,601.00	
31.	Land sold	554				
32.	Reserve generation and clearance	555				
33.	Corrective item generation and clearance	556				
34.	Costs of excluded receivables	557				
35.	Costs of low-value long-term assets	558	5,222,801.21		9,091,492.39	
36.	Other operating costs	549	165,107.09		100,223.25	
II	Financial costs		820,048.52		772,033.48	
1.	Securities and shares sold	561				
2.	Interest	562				
3.	Exchange rate loss	563	18,200.02		13,493.94	
4.	Costs of real-value repricing	564	801,848.50		758,539.54	
5.	Other financial costs	569				

Profit and loss statement

Number Item	Item name	Synthetic account	Current period		Previous period	
			Main ac	Economic activity	Main activity	Economic activity
				1		2
III	Costs of transfers					
1.	Costs of transfers of selected central governmental institutions	571				
3.	Costs of transfers of selected central governmental institutions	575				
IV	Costs of shared taxes and charges					
1.	Costs of shared natural person income tax	581				
2.	Costs of shared legal entity income tax	582				
3.	Costs of shared value added tax	584				
4.	Costs of shared excise duties	585				
5.	Costs of other shared taxes and charges	586				
V.	Income tax					
1.	Income tax	591				
2.	Additional income tax levies	595				
B.	TOTAL REVENUES		2,728,404.83		4,464,455.63	
I.	Operating revenues		2,715,305.43		4,448,979.63	
1.	Revenues from own product sales	601				
2.	Revenues from service sales	602	881,652.78		836,502.93	
3.	Revenues from rental	603	195,082.85		163,893.31	
4.	Revenues from goods sold	604				
5.	Revenues from administrative charges	605				
7.	Revenues from court charges	607				
8.	Other revenues from own activities	609				
9.	Contractual penalties and interest on late payment	641				
10.	Other penalties	642	788,893.80		2,174,918.84	
11.	Revenues from excluded receivables	643				
12.	Revenues from material sales	644				
13.	Revenues from sales of long-term intangible assets	645				
14.	Revenues from sales of long-term tangible assets except land	646	147,127.00		816,066.00	
15.	Revenues from sales of land	647				
16.	Fund drawing	648				
17.	Other operating revenues	649	702,549.00		457,598.55	
II	Financial revenues		13,099.40		15,476.00	
1.	Revenues from sales of securities and shares	661				
2.	Interest	662				
3.	Exchange rate revenues	663				
4.	Revenues from real-value repricing	664				
5.	Revenues from long-term financial assets	665				
6.	Other financial revenues	669	13,099.40		15,476.00	

Profit and loss statement

Number Item	Item name	Synthetic account	Current period		Previous period	
			Main activity	Economic activity	Main activity	Economic activity
				1		2
III	Revenues from taxes and fees					
1.	Revenues from natural person income tax	631				
2.	Revenues from legal entity income tax	632				
3.	Revenues from social insurance	633				
4.	Revenues from value added tax	634				
5.	Revenues from excise duties	635				
6.	Revenues from property taxes	636				
7.	Revenues from energy taxes	637				
8.	Revenues from road tax	638				
9.	Revenues from other taxes and fees	639				
IV	Revenues from transfers					
1.	Revenues from transfers of selected central governmental institutions	671				
3.	Revenues from pre-financing of transfers of selected central governmental institutions	675				
V.	Revenues from shared taxes and charges					
1.	Revenues from shared natural person income tax	681				
2.	Revenues from shared legal entity income tax	682				
3.	Revenues from shared value added tax	684				
4.	Revenues from shared excise duties	685				
5.	Revenues from shared property taxes	686				
6.	Revenues from other shared taxes and fees	688				
C.	ECONOMIC RESULT					
1.	Economic result before taxation	-	-381,076,744.24		-363,739,327.91	
2.	Economic result for current accounting period	-	-381,076,744.24		-363,739,327.91	

11. Overview of meeting of GRI standard indicators

Indicator name	Published indicator name	Chapter	Location in report text on page
	GENERAL DISCLOSURES		
	Organisation profile		
102-1	Organisation name.		Endpaper and Contact, abbreviations and
102-2	Primary brands, products and services		irrelevant
102-3	Organisation registered office		Endpaper and Contact, abbreviations and
102-4	Countries of organisation activity		Czech Republic
102-5	Nature of ownership and legal form	1.1 The CEI's role	State organisation, p. 8
102-6	Markets served		irrelevant
102-7	Organisation size	Overview information on activity in 2015-2018 1.3 Intensity of inspection work	4-5, 11
102-8	Numbers of employees	7. Employee environment and human	76-77
102-9	Organisation supply chain	6. Tendering and supply chain	75
102-10	Major changes	Foreword	3-5
102-11	Precautionary principle, Principle 15 of Rio Declaration	1.1 The CEI's role 4. CEI work in 2018 by department	All scheduled inspections and all CEI preventive activity. pp. 8-9, Chapter 4, pp. 19-71
102-12	Externally developed economic, environmental and social charters, sets of rules	5. Ethics and integrity	71-73
102-13	Membership in associations	3.3 International collaboration	16-17
	Strategy		
102-14	Declaration of highest-ranking person responsible	Foreword	1-3
102-15	Description of key impacts, risks and opportunities.	Foreword	(Future objectives defined under law, specifically on an annual basis see Work Plan at www.cizp.cz/Plany-cinnosti , pp. 1-3
	Ethics and integrity		
102-16	Organisation values, principles, standards and rules of conduct	1.1 The CEI's role: Legal framework for CEI work; 5. Ethics and integrity; 6. Tendering	8-19; 72-74, 75
102-17	Internal and external mechanisms for reporting concerns of unethical or illicit conduct	5. Ethics and integrity	72-74
	Organisation management		
102-18	Organisation management structure		8, 10, http://www.cizp.cz/Organizacni-struktura

Number name	Published indicator name	Chapter	Location in report text on page
	STAKEHOLDER ENGAGEMENT		
102-40	List of groups of stakeholders involved in organisation activity	3. Dealings with stakeholders	13-17
102-41	Collective agreement	7. Employee environment and human resources	76-77 and 80
102-42	Information for stakeholder identification and	3. Dealings with stakeholders	13-17
102-43	Organisation approach to stakeholder	3. Dealings with stakeholders	13-17
102-44	Key topics and problems raised by stakeholders	3. Dealings with stakeholders	13-14
	Identified serious aspects and boundaries		
102-45	All entities contained in consolidated financial statement of		CEI
102-46	Procedure for determining report contents and topic boundaries	1.1 The CEI's role, 4 CEI work 2018 by department	Report Contents defined by legally defined powers, internal structure and CEI obligations. Pp. 8-9, and Chapter 4, pp. 19-71
102-47	Major report topics	1.1 The CEI's role, 4 CEI work 2018 by department	Report Contents defined by legally defined powers, internal structure and CEI obligations. Pp. 8-9, and Chapter 4, pp. 19-71
102-48	Conversions of information shown in previous reports		No change
102-49	Major changes since last reporting period		No change
102-50	Reported period for information provided.		2018
102-51	Date of last previous report		Second CEI GRI report, first in May 2018
102-52	Specify cycle		Annual
102-53	Contact point for issues relating to report or its contents.		Tel.: 222 860 111, podatelna@cizp.cz
102-54	Statement of report agreement to GRI standards		7
102-55	GRI content index	11. Overview of fulfilment of indicators of	96-99
102-56	External report authentication		not authenticated
	Management Approach		
103-1	Explanation of major topics and their boundaries	1.1 The CEI's role, 4. CEI work in 2018 by department	Report Contents defined by legally defined powers, internal structure and CEI obligations. pp. 8-9, and Chapter 4, pp. 19-71
103-2	Managerial approach – complaint mechanism	5.3 Complaint handling	72-74

Indicator number	Published indicator name	Chapter	Location in report text on page
	SUBCATEGORY: SOCIETY/COMMUNITY		
	Anti-corruption activities		73-74
205-1	Total number and percentage of operations assessed for risks related to corruption and with major risks identified	5.2 Anti-corruption scheme	73-74
205-2	Communication and training on anti-corruption policies and procedures	5.2 Anti-corruption scheme	73-74
205-3	Confirmed cases of corruption and measures adopted	5.2 Anti-corruption scheme	73-74
	SPECIFIC DISCLOSURES		
	CATEGORY: Environment		
	Materials		83
301-1	Materials used by weight or volume	8. Energy and material intensity	83
	Energy		83
302-1	Total energy consumption in organisation	8. Energy and material intensity	83
	Water		83
303-1	Total water consumption by source	8. Energy and material intensity	83
	Wastewater and waste		83
306-2	Total weight of waste by type and disposal method	8. Energy and material intensity	83
	Review of contractors' environmental impacts		75
308-1	Percentage of new contractors subject to screening using environmental criteria	6. Tendering	75
	CATEGORY: Social area		
	SUBCATEGORY: EMPLOYMENT PROCEDURES AND DECENT WORK CONDITIONS		
	Employment		78-79
401-1	Total number and percentage of new employees and employee fluctuation rate	7.1 HR management	78-79
401-2	Employee benefits	7.1 HR management	78-79
	Relationships between employees and management		80
402-1	Minimum notice periods relating to operating changes, including specification in collective agreements.	7.1 HR management	80
	Occupational health and safety		81
403-1	Percentage of total workforce represented in formal committees for occupational safety and health associating employees and management	7.3 Occupational safety	81 (100 %)
403-2	Types of injuries and injury rates, occupational diseases, missed days and absence, total number of lethal work-related injuries.	7.3 Occupational safety	81-82
403-4	Health and safety topics contained in formal agreements with unions.	7.3 Occupational safety	81
	Training and education		80
404-1	Average training hours per year	7.2 Training	80-81

Indicator number	Published indicator name	Chapter	Location in report text on page
	Diversity and equity of opportunities		80
405-1	"Composition of managerial bodies and employee categories"	7.1 HR management	80
	Equal remuneration for men and women		80
405-2	Proportion of base pay and remuneration for women to men's by employee category and major operating site.	7.1 HR management	80
	SUBCATEGORY: HUMAN RIGHTS		
	Non-discrimination		73-74
406-1	Total number of discrimination cases and remedial action taken.	5.3 Complaint handling	73-74
	Contractor assessment in terms of impacts on society		75
414-1	Percentage of new contractors subject to screening using social impact criteria	6. Tendering	75
	Verification of contractor procedures in employment area		75
414-2	Major current and potential adverse impacts on employment procedures in the supply chain and measures adopted.	6. Tendering	75
	SUBCATEGORY: LIABILITY FOR PRODUCTS AND SERVICES		
	Customer data protection		74
418-1	Total number of justified complaints about violation of customer privacy and loss of customer data	5.4 Data protection and legislative compliance	74
	Legislative compliance		74
419-1	Pecuniary value of major fines and non-pecuniary sanctions due to legal and regulatory non-compliance in the social and economic area	5.4 Data protection and legislative compliance	74

* Not stated in the Annual Report for the time being.

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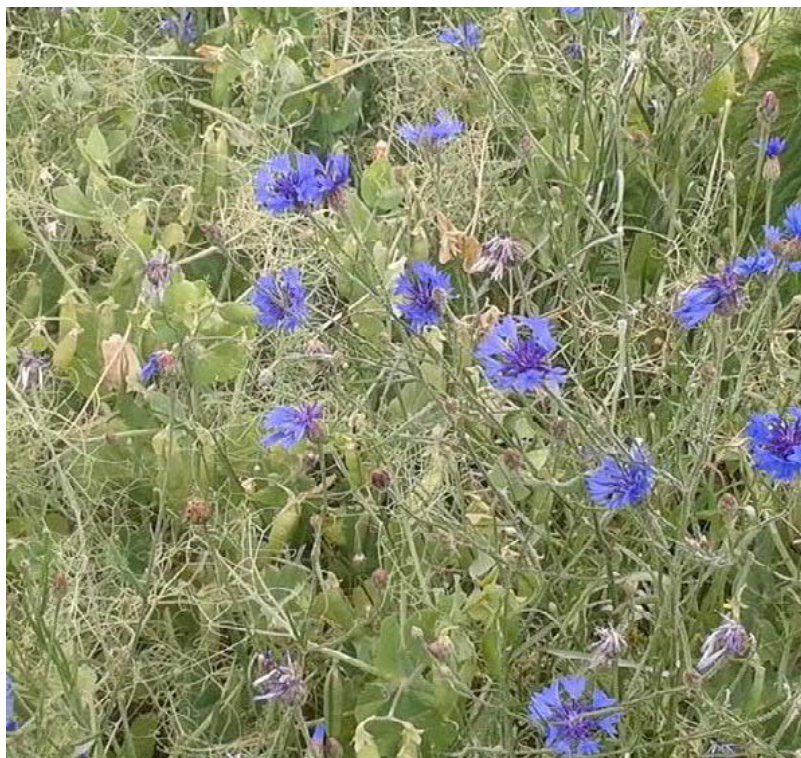


LIST OF ABBREVIATIONS

ALF	Agricultural land fund
APD	Air Protection Department
BAT	Best available techniques
BDW	Biodegradable waste
BWD	Basic waste description
BWWTP	Biological wastewater treatment plant
CC	Cross Compliance
CEI	Czech Environmental Inspectorate
CHMI	Czech Hydrometeorological Institute
CIA	Coordinator of integrated agendas
CIS	Central information system
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora, Washington Convention
CLP	Regulation of the European Parliament and the Council (EC) no. 1272/2008 of 16 December 2008 on classification, labelling and packaging of substances and mixtures
COD	Chemical oxygen demand
CS	Controlled substances
CSA	Civil Service Act
CSNF	Cultural and Social Needs Fund
ČRS	Czech Fishing Union
ČSO	Czech Society for Ornithology
DPB	Soil block section
EC	Emission ceiling
ECHA	European Chemicals Agency
EDS/SMVS	Records and subsidy system and management of state-owned assets
EEA	European Economic Area
EFTA	European Free Trade Association
EIA	Environmental Impact Assessment
EH	Environmental harm
EI	Equivalent inhabitants
EL	Emission limit
ENPE	Network of the European Prosecutors for the Environment
EMAS	Environmental Management and Audit System
EMS	Environmental Management System
EnviCrimeNet	Informal network of mostly police authorities dealing with environmental crime
E-PRTR	European Pollutant Release and Transfer Register
EU	European Union
EUFJE	EU Forum of Judges for the Environment
FA	Forest authority
FFS	Fuel filling station
F-gases	Fluorinated greenhouse gases
FMG	Forestry management guidelines
FMR	Forestry management records
FMP	Forestry management plan
FPD	Forest Protection Department
FRS	Fire Rescue Service
GMO	Genetically modified organisms
GMVP	Genetically modified vascular plants
GRI	Global Reporting Initiative

HEB	Historic environmental burdens
HQ	CEI Headquarters
IA	Integrated agendas
IAD	Integrated Agendas Department
IMPEL	Network of environmental inspection authorities of EU states
IP	Integrated permit
IPPC	Integrated Pollution Prevention and Control
IRI	Impel Review Initiative (voluntary evaluation of organisations integrated in the international network of inspectorates and agencies in environmental protection)
IPR	Integrated Pollution Register
IS IPPC	IPPC information system
ISPOP	Integrated system for reporting obligations
IRS	Integrated Rescue System
LČR	Lesy České republiky, s. p.
LF	Legal force
LIFFF	Land intended for the fulfilment of forest functions
MA ISOH	Car Wreck module of the Waste Management Information System (car wreck database)
MIT	Ministry of Industry and Trade
MoE	Ministry of the Environment
MoF	Ministry of Finance of the Czech Republic
MMW	Mixed municipal waste
NCA	Nature Conservation Agency
NLPA	Nature and Landscape Protection Act
NM	Nature Monument
NNM	National Nature Monument
NNR	National Nature Reserve
NP	National Park
NPD	Nature Protection Department
NPŠ	Šumava National Park
NR	Nature Reserve
OLH	Professional forestry manager
OR	Operating records
ORP	Municipality with extended powers
OVSS	Public Administration Execution Department
PAH	Polyaromatic hydrocarbon
PCB	Polychlorinated biphenyls
PČR	Czech Police
PHO	Public health protection zone
PLA	Protected Landscape Area
PLAA	Protected Landscape Area Administration
PLF	Prominent landscape feature
PM	Particulate matter
PPH	Statutory management requirements
RA	Regional authority
RAPEX	Rapid Alert System of Non-Food Products
REACH	Regulation of the European Parliament and the Council (EC) no. 1907/2006 of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and establishing a European Chemicals Agency
RIA	Railway Infrastructure Administration

RPHA	Regional Public Health Authority
RPLF	Registered prominent landscape feature
RMD	Road and Motorway Directorate
SCI	Site of Community Importance
SEA	Strategic Environmental Assessment
SEF	State Environmental Fund
SEI	Slovakian Environmental Inspectorate
SHPP	Small hydropower plant
SMW	Solid municipal waste
SNO	Hazardous waste landfill
SOO	Miscellaneous waste landfill
SOR	Summary operating records
SPA	Specially protected areas
SPS	Specially protected species
TIC	Toxicology Information Centre
TI	Territorial Inspectorate
TZS	Technical landfill securing
UEC	Unspent expenditures claim
ÚHUL	Institute for Forestry Management
ÚKZUZ	Central Institute for Supervising and Testing in Agriculture
WMD	Waste Management Department
WPD	Water Protection Department
WWTP	Wastewater treatment plant



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