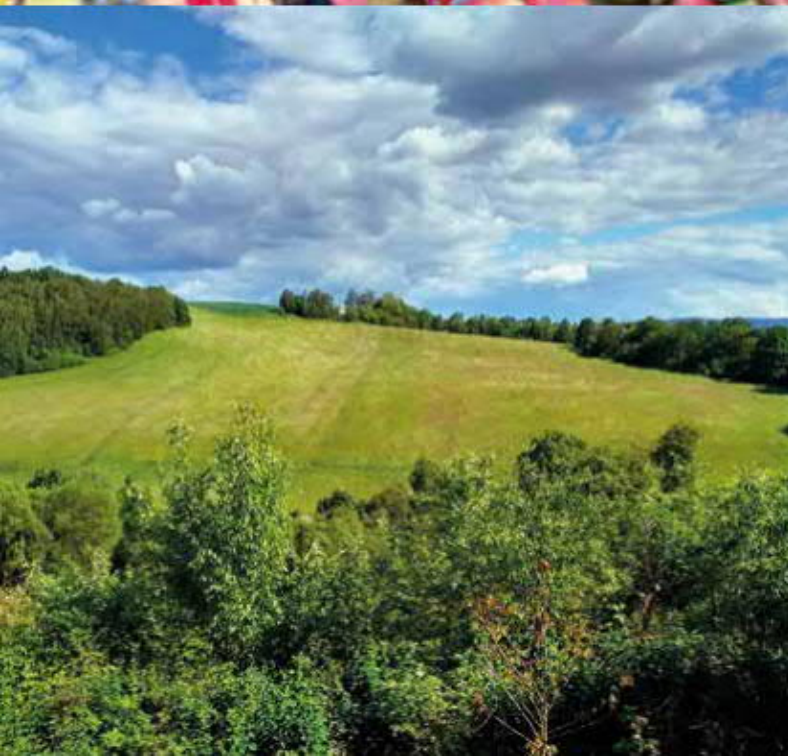




CZECH
ENVIRONMENTAL
INSPECTORATE





Annual Report 2020



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FOREWORD



As with practically every other sphere of human activity on both national and global scales, our year 2020 was fundamentally affected by the global pandemic of COVID-19 and the subsequent measures at both the governmental and professional levels.

On 12 March the state of emergency was declared and restrictions associated with it entered into effect; the state of emergency lasted till 17 March, i.e., two months and five days.

After a summer relaxation, a state of emergency was declared again on 5 October and lasted till the end of the calendar year 2020 (i.e., two months and 26 days).

In total, it lasted for 155 days, which is 42.35% of the year!

Work of governmental agencies was strictly regulated during the state of emergency, and the work of the Czech Environmental Inspectorate was affected by Governmental Regulations adopted on a continuous basis; specific measures differed from week to week. Probably the most serious restriction is the mandatory work from home for most of the employees during the state of emergency, resulting in a reduction in inspection work. With some simplification, we can say that during the state of emergency and the governmental regulation, the Inspectorate was only allowed to handle issues related to elimination of consequences of the pandemic (typically handling of medical waste) and respond to suggestions related to environmental threats or major environmental damage. Specifically, this involved requested CEI participation in handling accidents pursuant to the Waters Act and restricting unlawful conduct such as unpermitted cutting of trees, etc.

In spite of these restrictions, the total annual CEI performance (measured by total number of inspections and number of inspections per inspector) is 70% of the previous "non-covid" year.

As for decisions on fines, the year-on-year decrease is only 20%.

The Bečva case cannot be ignored when recapitulating the last year. This ecological disaster was the most closely followed case of the year involving CEI investigation. The Inspectorate is not responsible for the political dimension of the case, and it does not and must not, in any way or direction, affect its work. The media and public interest is understandable in human terms given the circumstances of the Bečva case, but I feel sorry that our inspectors' work in the investigation has been criticized. I must thank all the managers and inspectors involved on the CEI's behalf for their work done at a highly professional level (often beyond their obligations and under considerable media pressure and other circumstances they could not control). I have been and still am convinced about the quality and independence of CEI employees' work, and I will continue to defend it.

On the very first of the disaster, when the Bečva intervention was managed by applicable water management authorities (absolutely routinely and in accordance with law), as well as on the next days, we produced extensive documentation based on our own work and in cooperation with other involved entities, containing specific facts, evidence and other important information. We handed it all to Czech Police investigators on 25 September 2020, the fifth day after the accident.

The case is clearly a legal violation, an unlawful act, which has to be investigated properly, not a political case. In penal proceedings, the identification and conviction of the perpetrator is exclusively up to the Police, no other authorities, the CEI, politicians or the public. By the time this Annual Report is published, the Police may have pronounced the charge against whoever caused this accident of the decade. And I hope to be proud of our Inspectorate

having significantly contributed to the culprit's identification.

Before I get to the evaluation itself, let me present a basic diagram of the Inspectorate's position in the context of Czech public administration.

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

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

The performance of the Inspection Work Plan is monitored and inspected. Another significant part of the inspection work (over 40%) is inspection work based on public suggestions, the number of which continued to increase in the "corona" year 2020 as well. Each such suggestion has to be checked by law (typically by way of unannounced on-site inspection), and an administrative proceeding is or is not initiated depending on the findings.

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

- Within the CEI's legally defined areas of activity, focus all work on serving the public (communication, prevention, awareness raising, direct handling of suggestions) and an important factor is provision of a fair and non-discriminatory economic, social and environmental system.
- Base all external and internal activity from ethical rules and full moral and ethical integrity, including all tendering.
- Tasks and obligations pursuant to the Civil Service Act are undoubtedly a burden for the Inspectorate beyond its normal work and have impact not only on inspection work but also things such as the ability of smooth replacement of staff as part of standard fluctuation.

The CEI's "showcase" is its highly educated, expert and professional inspectors and other staff. Retention of these professional employees, their education and training and their work safety are a long-term priority.

- With that in mind, the situation in the area of salaries to the Inspectorate employees (e.g., long-term lowest average income of all the inspectorates in the CR) thus remains one of the significant threats and limits to quality performance of inspection work.

- Continue to act as an open authority in the sense of "absolute transparency" of all work done, of course in light of existing legal restrictions (e.g., the non-public nature of administrative proceedings as a strict requirement of the Rules of Administrative Procedure in force).

We managed to meet the monitored targets and parameters as specified above in 2020:

- Obligations and activities arising from the COVID-19 pandemic and all governmental measures (e.g., activities in inspection of medical waste).
- Handling of all suggestions received.
- Reduction to the number of temporarily vacant systemized job positions due to faster tendering.
- Meeting of requirements of the Civil Service Act and, most importantly its continuously generated lower-level standards (decrees, measures and Mol methodological instructions).
- Qualified staff continuously added, particularly team of senior civil servants stabilized.

The following are the major restrictions on the CEI work:

- Ambiguity of legal regulations enforced, resulting generally from the legislative negotiation process (various changes, amendments, interventions during parliamentary consultation, results of lobbying, etc.). Along with growing legislative obligations of entities (meaning growing objective inspection obligations for the CEI), this increases the pressure on speed of inspection work, which may lead, in some cases, to inspectors' inadvertent errors.
- Lower social pressure on legal compliance in general, including environmental legislation.
- Gaps in methodological communication and unification of procedures with authorities of appeal, including differing views of regional appeal authorities, e.g., regarding correct and just amounts and type of penalties for the same environmental delicts.
- Permanently undervalued remuneration to CEI employees,

particularly executive inspectors. According to continuously published comparisons of salaries in organisations in the governmental sector, the CEI continues to sit at the bottom of the ranking. It is the worst-paid inspectorate (compared to trade, veterinary, phytosanitary and other similar inspection authorities), the second-worst-paid organisation in the environmental department. Higher average wages are reported by institutions such as district archives and similar. This unambiguously leads to relatively high staff fluctuation, so the total annual numbers of admissions and departures are almost equal in spite of very successful filling of vacant jobs after those leaving.

- The nature of the inspection work as such, which is demanding particularly on inspectors' psychic qualities and overall resilience while demanding great levels of specialized expertise. The lack of experts in short supply concerns primarily lawyers, who can scarcely be accommodated under the described conditions.

In conclusion, it must be admitted that, in spite of the aforesaid problems and objective restrictions in the "pandemic year" 2020, the CEI succeeded and entered optimistically (optimism is a must for most of the employees) the thirtieth year of its independence existence.

We carried out 11,784 inspections, which was 5,112 fewer than the year before. The average number of inspections per inspector was 29, which is 30% lower than in previous years (the chief reason has been mentioned – practically half a year under emergency conditions). We issued 2,041 decisions on fines and 5,045 independent position statements and statements, including 667 on environmental impact assessment (EIA) processes.

These CEI's achievements, and the braveness and integrity at the time of an unprecedented pandemic crisis, deserve my sincere thanks to all the CEI employees from the highly professional inspectors to my colleagues in the CEI management.

Erik Geuss, CEI Director

SUMMARY INFORMATION ABOUT ACTIVITY IN 2016-2020

Summary information about activity in 2016-2020

	2016	2017	2018	2019	2020
No. of inspectors (as of 31 Dec)*	395	396	408	409	408
No. of inspections	15,883	15,864	16,572	16,896	11,784
All decisions (fines and other decisions, including on charges) in force:	10,260	10,249	8,541	8,607	2,444
- All fines that entered into force	2,755	2,655	2,543	2,532	2,041
- Other decisions in force (other decisions, incl. on charges)	7,505	7,594	5,998	6,705	403
Total amount of fines in force, CZK	130,717,343	113,051,685	100,274,621	112,329,717	87,604,415
Other decisions in force:	494	417	424	412	3
- Instances of halting or restriction to operations, a facility of part of it, in force	23	22	38	71	7
- No. of confiscations in force	123	143	157	119	1
- No. of remedial measures in force	348	252	229	222	1
EIA statements (Act no. 100/2001 Coll.)	1,013	1,019	610*	657	667
Other expert statements issued	6,986	5,356	5,333	5,538	4,378
No. of suggestions and petitions received	2,759	2,781	3,044	3,493	2,972
No. of suggestions submitted to public authorities from own inspection work	322	233	322	309	293
No. of crime reports	16	8	14	18	11
No. of accidents and emergencies	265	431**	413	369	315
No. of requests for information received (Act no. 106/1999 Coll. and	309	295	325	362	382
No. of complaints about CEI work or inspectors received (Section 175 of the RAP)	54	54	43	57	54
No. of relevant notifications on unlawful work of CEI employees	0	0	0	0	0

Total number of employees as of 31 Dec	539	536	550	557	546
Education structure (% of tertiary graduates among all employees)	77.9	77.8	77.8	81.5	82
Occupational safety/injuries (frequency of injuries per 100 employees)	0.37	0.19	0	0	0.18
Rate of unscheduled employee absence (sickness, injury) (% of scheduled time)	3.30	3.39	3.07	3.84	3.45
% of voluntary fluctuation (excludes forced departures, including due to organisational changes and retirements)	4.1	7.2	4.8	6	5.7
Total CEI budget funds in CZK	387,715,855.30	418,991,688.36	430,837,260.55	509,237,482.82	418,476,260

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

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



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1 DESCRIPTION OF ACTIVITIES

1.1 Role of the CEI

CEI organization

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

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

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

Legal framework of CEI activity

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

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

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

CEI prevention and penalty work

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

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

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

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

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

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

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

In case someone feels deprived of his rights by the decision of the authority (OVSS), he can demand an administrative court to repeal the decision or to declare it nugatory.

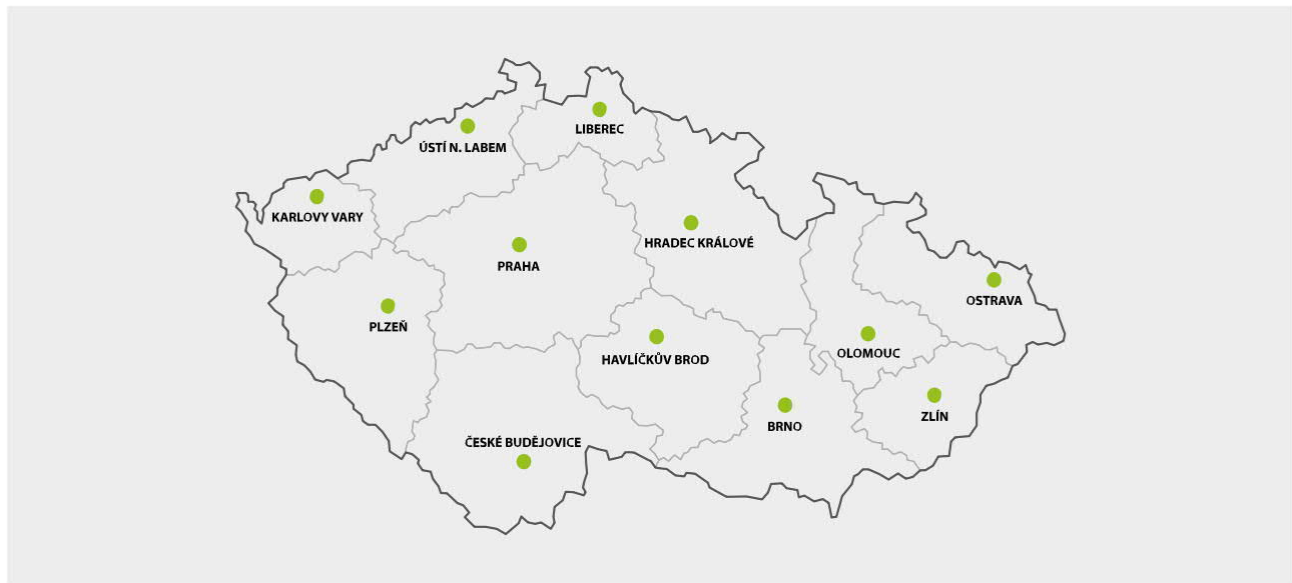
1.2 Organisational structure

The CEI is divided into 10 territorial inspectorates, two branch offices and headquarters. As of 31 Dec 2020, it employed 546 persons, including 421 expert employees.

Territorial inspectorates:

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

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



Overview of powers by environmental component

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

1.3 Intensity of inspection work

In 2020, the CEI made 11,784 checks and issued 2,444 decisions in force, including 2,041 decisions on fines. Compared to 2019, the total number of inspections decreased (-5,112) as did the number of decisions on fines issued and in force (-491). The decrease was caused by measures adopted in connection with the COVID-19 epidemic.

The total number of CEI inspectors in 2020 was 408. One inspector thus made approximately 29 inspections on average. In 2020, the CEI issued 5,045 position statements and statements, including 667 on EIA processes.

Numbers of inspections by territorial inspectorates, 5-year overview

	2016	2017	2018	2019	2020
Prague TI	2,169	2,200	2,221	1,970	1,353
České Budějovice TI	1,191	1,146	1,293	1,331	907
Plzeň TI	1,425	1,667	1,635	1,675	1,137
Ústí nad Labem TI	1,371	1,393	1,564	1,517	1,055
Hradec Králové TI	1,602	1,682	1,782	2,099	1,610
Havlíčkův Brod TI	1,468	1,408	1,405	1,474	1,012
Brno TI	2,237	1,962	2,064	2,224	1,454
Olomouc TI	1,324	1,244	1,227	1,327	977
Ostrava TI	1,630	1,705	1,705	1,698	1,226
Liberec TI	827	788	900	867	590
Headquarters	639	669	776	714	463

Year-on-year comparison of fines imposed, 5-year overview

	No. of fines imposed	No. of fines in force	Total amount of fines in force (CZK)
2020	2,109	2,041	87,604,415
2019	2,630	2,532	112,329,717
2018	2,641	2,543	100,274,621
2017	2,712	2,655	113,051,685
2016	2,887	2,755	130,717,343

2 OVERVIEW OF WORK OF TERRITORIAL INSPECTORATES

Territorial Inspectorate	No. of inspectors	No. of inspections	Statements		Fines			Other decisions			No. of emergencies (under air acts) and accidents (under Waters Act)	No. of suggestions handled	No. of suggestions submitted to public authorities from own inspection work	No. of crime reports
			EIA statements (Act no. 100/2001 Coll.)	Other statements	All fines imposed in report period	All fines that entered into force in report period	Total amount of fines in legal force (CZK)	Instances of halting or restriction to operations, a facility of part of it, in force	No. of confiscations in force	No. of remedial measures in force				
Prague	55	1,353	128	1,098	173	177	12,615,900	9	3	18	48	714	64	1
České Budějovice	30	907	36	327	133	150	6,518,870	42	1	25	29	204	15	1
Plzeň	35	1137	36	279	211	187	11,624,170	3	1	9	9	281	19	2
Ústí nad Labem	44	1055	75	441	218	203	6,920,420	0	0	8	18	334	16	2
Hradec Králové	36	1610	104	231	322	289	13,871,162	1	8	10	39	415	63	1
Havlíčkův Brod	30	1012	65	264	266	268	7,421,140	2	1	5	5	295	34	0
Brno	46	1454	104	852	233	243	12,236,886	2	1	25	39	460	22	0
Olomouc	27	977	16	193	175	147	4,151,420	13	1	9	42	168	14	1
Ostrava	41	1226	56	421	235	222	8,280,277	2	2	7	76	281	18	1
Liberec	25	590	32	209	79	85	3,311,470	1	1	14	10	210	27	0
CEI TI total	369	11,321	652	4,315	2,045	1,971	86,951,715	75	19	130	315	3,362	292	9

3 DEALINGS WITH STAKEHOLDERS

3.1 Cooperation with the public

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

3.1.1 Suggestions

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

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

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

CEI and the citizen public

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

are transferred for investigation to other applicable public authorities if the CEI is not applicable.

Numbers of suggestions received

In 2020, the CEI received 2,972 suggestions. The numbers of suggestions received by CEI TIs and Headquarters in 2020 are shown in the table below. As in previous years, Prague CEI Territorial Inspectorate handled the most suggestions in 2020. Sometimes the CEI receives a suggestion for the investigation of which it does not have legal powers. Such suggestions are transferred for investigation to a public authority of factual and territorial jurisdiction. This was the case with 375 suggestions in 2020. A single suggestion may draw attention to endangerment or damage to multiple environmental components. It is thus often the case that several departments act on the same suggestion. Information about how the different departments contributed to handling of suggestions in 2020 is shown in the table below.

Numbers of suggestions received by TIs and HQ in 2020

Territorial Inspectorate	Suggestions received	Suggestions handed over as irrelevant
Prague	656	64
České Budějovice	204	15
Plzeň	260	36
Ústí nad Labem	276	40
Hradec Králové	336	53
Havlíčkův Brod	224	18
Brno	374	46
Olomouc	144	19
Ostrava	281	22
Liberec	163	25
Headquarters	54	37
Total	2,972	375

The TI and HQ departments contributed to handling of suggestions received in 2020 as follows.

Territorial Inspectorate	Department					Integrated Agendas
	Air Protection	Forest Protection	Waste Management	Nature Protection	Forest Protection	
Prague	108	114	157	288	44	3
České Budějovice	17	34	41	98	14	0
Plzeň	46	49	68	108	9	1
Ústí nad Labem	44	51	86	138	14	1
Hradec Králové	65	105	86	116	37	6
Havlíčkův Brod	42	73	57	110	13	0
Brno	89	85	99	163	24	0
Olomouc	33	26	38	63	7	1
Ostrava	29	44	75	114	18	1
Liberec	32	43	45	69	14	7
Headquarters	8	15	15	13	1	2
Total	513	639	767	1,280	195	22

The CEI Air Protection Department most frequently handled suggestions concerning annoying smoke and emissions of odorous substances in the air and dust from industrial compounds. Besides, it dealt with suggestions relating to waste combustion and paint shop emissions.

The Water Protection Department most commonly investigated suggestions relating to unpermitted wastewater discharge into surface water and groundwater, watercourse pollution, groundwater and surface water consumption without permission or in contravention of a permit, as well as suggestions to inspect wastewater treatment plants and observance of minimum residual flow rates by small hydropower plants.

The Waste Management Department handled citizens' suggestions concerning waste handling, packaging, chemical substances and mixtures (including biocidal products). They included primarily illegal waste dumps, unpermitted landscaping using waste, handling of car wrecks without permission and violation of obligations in the area of recollection of electrical appliances and tyres.

The Nature Protection Department handled mostly suggestions to investigate cutting of non-forest trees and damage to trees

(whether deliberate or inadvertent – trimming, root system interference). We also handled interference with natural evolution of specially protected animal and plant species. Given the lasting drought in 2020, there were also suggestions relating to wetlands.

The Forest Protection Department dealt mostly with suggestions to investigate forest logging interventions, often in connection with damage to forest soil, as well as waste dumps and landscaping on forest land, forest owners' inactivity vis-à-vis bark beetle infestations and lacking or insufficient removal of bark beetle-infested timber and, last but not least, unauthorised use of land intended for forest functions for other purposes.

Toll free number

Effective as of 1 Sep 2008, the CEI has implemented a toll-free telephone number (800 011 011). It is a direct and free telephone contact between the CEI and citizens. The number is primarily used for receiving citizens' suggestions, handling citizens' queries regarding environmental issues, and citizens are also informed about the CEI's legal powers in this way. The number is in operation on weekdays between 8 am and 4 pm. We handle 1 phone call a day on average.

Numbers of received suggestions in 2016-2020 by TI and HQ

Territorial Inspectorate	2016	2017	2018	2019	20
Prague	580	59	70	94	6
České Budějovice	282	22	20	21	2
Plzeň	176	23	23	23	2
Ústí nad Labem	300	26	36	33	2
Hradec Králové	282	26	29	32	3
Havlíčkův Brod	236	23	23	27	2
Brno	336	32	33	38	3
Olomouc	133	13	15	16	1
Ostrava	283	30	27	32	2
Liberec	147	15	15	16	1
Headquarters	4	4	8	12	54
Total	2,759	2,781	3,044	3,493	2,9

3.1.2 Provision of information

In 2020, the Czech Environmental Inspectorate handled 382 requests for information, including 15 pursuant to Act no. 106/1999 Coll. on Free Access to Information, as amended, and 367 pursuant to Act no. 123/1998 Coll. on Right to Environmental Information, as amended. Besides information provided by the CEI pursuant to the Information Acts above, we communicate with the public by means of press releases,

annual reports, brochures, leaflets, etc.

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

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

web site to publish the Annual Report 2020 on its activity in provision of information, including mandatory information shown in the table below.

Pursuant to Section 18 of the Act, the CEI uses its

Requested information pursuant to Act no. 106/1999 Coll. in 2020

	Number
No. of requests for information	15
No. of issued decisions on refusal	0
No. of appeals against the decision	0
Court review of a CEI decision to refuse to provide information – copy of substantial parts of a judgment. Overview of expenditures made in connection with legal proceedings.	/
List of exclusive licences granted, including justification of necessity of granting of exclusive licence	/
Number of complaints submitted under Section 16a, reasons for filing and brief description of their handling	1 <u>Reason:</u> The specified complaint pursuant to Section 16a of the Act aimed against the partial discarding of the request. <u>Method of handling:</u> Pursuant to Section 16a, Para. 5 of the Act, the complaint was ceded to a superior authority to handle. The superior authority confirmed the CEI's actions.
Other information relating to enforcement of this Act	3 requests for information were discarded, including 1 partially, pursuant to Section 14, Para. 5, item c) of the Act, since the requested information did not relate to the CEI's sphere of activity.

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

Liberec TI. Of the total number of requests received, we issued 41 decisions to refuse the information or part of it, most commonly because the requested information concerned proceedings in progress and decisions on delicts and other administrative violations not yet in force.

Pursuant to this Act, 367 requests were received in 2020. The most requests were handled by the CEI HQ, the least by the

Overview of requests for information received by TI and HQ in 2020

TI	Total number of requests received	No. of requests under Act no. 106/1999 Coll.	No. of requests under Act no. 123/1998 Coll.
Prague	39	0	39
České Budějovice	24	0	24
Plzeň	22	0	22
Ústí nad Labem	33	0	33
Hradec Králové	50	0	50
Havlíčkův Brod	27	0	27
Brno	40	0	40
Olomouc	31	0	31
Ostrava	15	0	15
Liberec	13	0	13
Headquarters	88	15	73
Total	382	15	367

Numbers of requests for information in 2016-2020

The total number of requests for information increased slightly in 2020. The CEI received 20 more requests pursuant to Act no. 123/1998 Coll. and 2 more requests pursuant to Act no. 106/1999 Coll. compared to 2019. While the numbers of requests under Act no. 123/1998 Coll., i.e.,

environmental information, have been growing for years, the numbers of requests pursuant to Act no. 106/1999 Coll. have been more or less stable. The public interest in provision of information is constantly relatively high. Public queries posted on the CEI discussion forum are not included in the records pursuant to the above Acts.

Numbers of requests for information received in 2016-2020

Year	Total number of requests received	No. of requests under Act no. 106/1999 Coll.	No. of requests under Act no. 123/1998 Coll.
2020	382	15	367
2019	362	13	349
2018	325	15	310
2017	295	18	277
2016	309	30	279

Discussion forum

The Czech Environmental Inspectorate runs a discussion forum on its website, where citizens can ask all types of questions about the environment. These questions are not included in the records pursuant to the above Acts. In 2020, the Czech Environmental Inspectorate received 59 queries and comments, which was two more compared to the year before. Like in 2019, the questions aimed mostly at waste management, water protection air protection. The most common discussion topics were waste management, wastewater management and annoyance with odorous air-polluting emissions. A part of the questions also concerned issued outside of the CEI's powers.

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

3.2 Cooperation with state institutions, professional and interest organisations

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

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

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

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

3.3 International collaboration

Due to the global COVID-19 epidemic and the associated measures, the CEI made only four trips abroad in 2020, involving a total of six employees of the CEI. In spite of that, international collaboration continued in the form of online communication.

The IMPEL held a General Meeting, which was in the form of a video conference in light of the current epidemiological situation. The CEI inspectors are involved in the work of IMPEL expert groups on air and industry, water and soil, transboundary waste transport and waste, nature protection and cross-section instruments and approaches. In 2020, our inspectors participated in the projects "Meeting of IMPEL expert group on nature", "Meeting of leading members of the expert group on waste and transboundary waste transport", "SWEAP" and "Meeting of contact points for NCP best practices meetings"; the head of the CEI Waste Management Department has been appointed the leader of the latter project. The project on implementation of the Industrial Emissions Directive and the meetings of the Industry and Air expert team continued another year. Moreover, our inspector was involved in a specialist group under the project ISCO (In Situ Chemical Oxidation) as part of the Water and Soil expert group.

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. Towards the end of 2020, an inspector from the International Biodiversity Protection and CITES Department and one from the Nature Protection Department attended a video conference on the international operation Lake, fighting illegal trade in eels. The video conference focused on setting international collaboration in coordinating inspections for 2021.

In the area of waste management, our inspectors were involved in the Euroregion Nisa project on waste management in the Bohemia-Saxony borderland and associated landfilling issues. An inspector from the CEI Waste Management Department also acted as a chairman of a meeting of the European Chemicals Agency (ECHA) working group on the pilot project "Fabrics from Waste". A CEI inspector attended periodic on-line sessions of the ECHA information exchange forum, used for exchanging information about enforcement of chemicals regulations. Our inspector also participated in the meetings on EMPACT Environmental Crime – Illegal Handling of Used Batteries, which involves specific focus actions dealing with the different areas of unlawful conduct associated with violation of environmental protection regulations.

A CEI representative attended two on-line meetings as part of CASP 2020 project, based on European Commission activity and focused on product testing facilities in accredited laboratories in the EU. In 2020, the CEI was involved in the part of the project focused on lead, cadmium and nickel contents in costume jewellery products marketed via on-line sales and subsequently tested in an accredited laboratory in France. The virtual meeting with the laboratory included an introduction to the test methods (both screening and accredited) and analysis results, including examples of products that failed to meet the requirements of the REACH regulation.

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 Elbe, Oder and Danube, Austrian Boundary Waters). Due to the epidemic measures, some of the meetings were held on-line or via correspondence. Moreover, a CEI inspector attended a webinar in this area on "Introduction to procedures in developing a joint manual for sludge lagoon safety assessment".

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 16,075.78 on trips abroad in 2020.

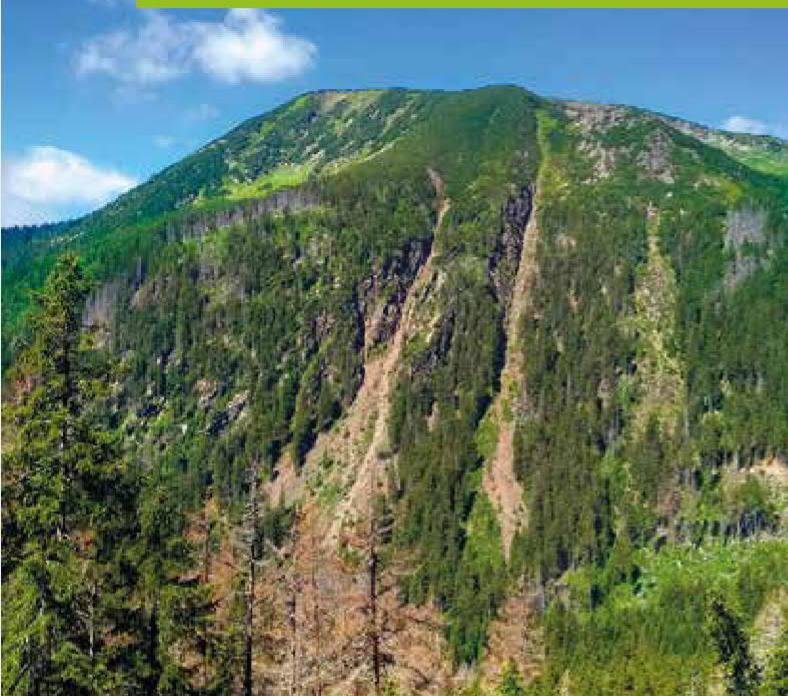
3.4 Communication with public and media

The CEI communicates with the public and the media on a systemic basis. The situation in 2020 was considerably affected by the COVID-19 pandemic; the CEI was moderate in publishing press releases in connection with the declared state of emergency.

In 2020, we published 77 press releases and answered 280 media questions. The CEI organized no press conferences due to the pandemic.

According to Newton Media agency, the CEI was mentioned in 2,681 media items. Within that, 79 were aired on the radio and 156 on the television; 662 articles were published in print dailies and regional papers, and 1,964 in on-line magazines. However, Newton Media does not monitor all output, particularly in electronic media.

In 2020, the media were most interested in the Bečva river accident, staff changes in the CITES Department, municipal waste landfills, illegal waste imports, hazardous waste, wetlands, artificial snow, fish kills, swans shot near Klatovy, nest destruction, moldavites and illegal tree cutting.



4 CEI WORK IN 2020 BY DEPARTMENT

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

Overview of CEI work in 2020 by department

Overview of work in 2020 by department								
	Air Protection	Forest Protection	Waste Management	Nature Protection and CITES	Forest Protection	Integrated Agendas	TOTAL 2020	
No. of inspectors (heads of departments + inspectors; final as of 31 Dec)*	80	85	97	82	47	17	408	
No. of inspections	3,063	2,327	2,749	2,124	1,058	463	11,784	
EIA statements (Act no. 100/2001 Coll.)	reported by IAD	reported by IAD	reported by IAD	reported by IAD	reported by IAD	667	667	
Other statements	2,502	717	136	78	85	860	4,378	
Fines	All fines imposed	322	401	756	504	99	27	2,109
	All fines that entered into force	302	404	719	494	92	30	2,041
	Total amount of fines in legal force (CZK)	12,973,000	16,206,865	40,602,000	9,717,050	4,224,500	3,881,000	87,604,415
Other decisions	Instances of halting or restriction to operations, a facility of part of it, in force	0	0	-	35	40	0	75
	No. of confiscations in force	0	-	-	104	-	-	104
	No. of remedial measures in force	6	34	3	17	69	1	130
No. of emergencies (under air acts) and accidents (under Waters Act)	121	194	-	-	-	-	315	

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

- The department has no powers for this activity.

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

4.1.1 Overview of inspection work in 2020

Inspection work in 2020 was carried out by the Air Protection inspectors in the areas of air protection proper, ozone layer protection and Earth's climate system protection to the full extent of powers defined in legal regulations in force and effect embracing the related environmental protection aspects. We inspected performance of obligations imposed by generally binding national legal regulations and EU regulations as well as performance of obligation specified in permits for operation of stationary sources of air pollution. In total we made 3,063 inspections, including 42.6 % scheduled and 57.4 % unscheduled. The inspection work decreased compared to 2019 due to the measures adopted in connection with COVID-19 (a 34% decrease compared to 2019).

The numbers and distribution of inspections carried out in 2020 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 (2,506 checks) and the related activities of persons authorised for emission measurement and development of expert assessments (318 checks), and fewer inspections concerned compliance with requirements for protection of Earth's climate system (188 checks, within that 32 at facilities included in the greenhouse gas emissions permit trading system and 156 at entities handling fluorinated greenhouse gases) and ozone layer protection

/ stratospheric ozone (19 checks). In connection with inspections of adherence to requirements when handling controlled substances and fluorinated greenhouse gases, we inspected 3 entities doing activities requiring certification by the Ministry of the Environment. In addition, we made 29 checks at entities operating air pollution sources that cannot be classified in any of the above inspection categories.

The checks made in 2020 and those made in the previous period with proceedings extending into 2020 resulted in 302 decision in force on fines for violation of obligations in the area of air protection, ozone layer and Earth's climate system protection. The inspection work decreased compared to 2019 due to the measures adopted in connection with COVID-19 (a 22% decrease compared to 2019; 386 decisions in force in 2019). Specifically, there were 263 fine proceedings initiated in 2020 (totalling CZK 8,363,000), 38 initiated in the previous year (totalling CZK 4,560,000) and one initiated in 2015 (legal proceedings, returned by court, new MoE decision, totalling CZK 50,000), all totalling CZK 12,973,000 (compared to CZK 13,124,400 in 2019). The decisions in force on fines involved a total of 437 delicts (compared to 514 in 2019). Another six

delicts were handled by reprimand (compared to 18 in 2019). Besides separate inspections on adherence to obligations of operators of stationary sources of air pollution, the department inspectors were again involved in 256 inspections of facilities with integrated permits (integrated checks), inspecting adherence to all environmental protection requirements (compared to 345 integrated checks in 2019).

The total amount of fines imposed by Air Protection inspectors for violation of air protection requirements in proceedings run separately by the APD inspectors was CZK 12,278,000; it was CZK 510,000 for violation of requirements for handling of fluorinated greenhouse gases, CZK 145,000 for violation of requirements for handling of controlled substances, and CZK 40,000 for operators of facilities included in the greenhouse gas (carbon dioxide) emission permit trading scheme. No fines were imposed in authorized and certified entities in 2020.

4.1.2 Overview of performance of departmental tasks

4.1.2.1 Air protection

In the area of air protection, departmental tasks were performed in 2020 as a part of the 5 categories of departmental tasks, namely (i) inspection of operation of facilities based on permits of air protection authorities and in accordance with the permits, (ii) compliance with set pollution levels (emission limits and emission ceilings) and technical requirements replacing or extending emission ceilings, (iii) detection of air pollution levels, (iv) record-keeping and reporting duty, and (v) other duties of entities operating stationary sources of air pollution and bans on selected activities.

I.

In 110 cases, the inspections found out that operators or stationary sources of air pollution listed in Annex 2 to the Air Protection Act, the operation of which requires a permit of an air protection authority, operated the facilities without a permit. Fines totalling CZK 6,319,000 were imposed for the proven delicts.

In 61 cases, the inspections found out that operators or stationary sources of air pollution listed in Annex 2 to the Air Protection Act, the operation of which requires a permit of an air protection authority, operated the facilities in contravention of permits. Fines totalling CZK 2,769,000 were imposed for the proven delicts.

In 18 cases, the inspections found that operators of stationary sources of air pollution with integrated permits operated their facilities in contravention of air protection requirements included in their integrated permits. Fines totalling CZK 879,000 were imposed for the proven delicts.

Since 2012, the operating permits have also included requirements for operation when exceeding air pollutant threshold values (the smog warning and regulation system), approved by the CEI before 2012 as regulation rules.

No smog situation and associated regulation was declared in the Czech Republic in 2020 (airborne dust expressed as PM₁₀ being the primary pollutant); therefore, Air Protection Department inspectors performed zero checks at facilities with operating requirements for the event of exceedance of air pollutant thresholds.

The CEI did not suspend operation of any stationary sources of air pollution in 2020.

II.

Exceedance of emission limits for pollutants and technical requirements that replace or extend emission limits was identified in 24 cases; fines totalling CZK 670,000 were imposed for the delicts in 12 cases in proceedings run separately by Air Protection inspectors. Another 6 cases were handled in joint proceedings with other delicts (totalling CZK 420,000 if most severely punishable); there were yet another 6 cases of operation in contravention of integrated permits. Out of this number, we found 20 cases of exceedance of specific emission limits for pollutants, for which we imposed fines totalling CZK 620 in 11 separate proceedings. Three cases were handled in joint proceedings (totalling CZK 420,000, cases of most severely punishable delicts); there were yet another 6 cases of operation in contravention of integrated permits. The most numerous case types were exceedance of emission limits on particulate matter (12 cases, solid fuel combustion in boilers, chip dryer), carbon monoxide (5 cases, combustion processes), volatile organic compounds (1 case, paint surface treatment), nitrogen oxides (2 cases, combustion processes), PCDD/PCDF dioxins (1 case, waste incinerator), fluorine (2 cases, firing kiln and board melting plant), and chlorine (1 case, board melting plant).

Inspection of adherence to prescribed pollution levels (specific emission limits) and air impacts of sources was also done by means of measurements carried out by Air Protection Department employees of the CEI Headquarters. Direct measurements were made to check adherence to emission limits at one operator, the concentration of one pollutant was determined, and no exceedance of the emission limit for that substance (solid pollutant) was found. The measurement results were used as a support argument in the CEI's objectivization statement on pollution levels when handling of citizen suggestions regarding the operator.

Moreover, there were four cases of identified violation of technical requirements for operation of stationary sources of air pollution,

which replace or complement emission limits. For this delict, an Air Protection inspector ran an independent proceeding and imposed a fine of CZK 50,000; three delicts were handled in joint proceedings with other delicts (none were of the most severely punishable type).

III.

In 2020, the CEI inspected adherence to the duty of identification and evaluation of air pollution levels by direct measurements taken by authorised persons as single measurements or continuous measurement arranged by the operator. It was an obligation of facility operators to submit reports with measurement results to the Inspectorate within the set period. In 37 cases, we identified violation of the obligation to carry out single emission measurement. Fines totalling CZK 238,000 were imposed for these delicts in 10 separate proceedings. Another 27 delicts were handled in joint proceedings with other delicts (totalling CZK 170,000 if most severely punishable). In 47 cases, operators of facilities did not adhere to the obligation to submit the report with measurement results to the Inspectorate, for which we imposed fines totalling CZK 186,500 in 31 separate proceedings. Another 12 delicts were handled in joint proceedings with other delicts (totalling CZK 25,000 if most severely punishable), and four delicts were resolved with reprimands.

In 2020, CEI inspectors checked 318 cases of adherence to duties of persons authorised by the Ministry of the Environment for development of expert reviews and performance of single emission measurements. The checks found no violation of authorized entities' obligations. The inspected expert reviews had been developed by their authors in accordance with the MoE Air Protection Department methodological instruction for development of expert reviews, and showed no formal shortcomings.

IV.

Failure to adhere to the obligation to keep operating records or submit summary operating records was proven to operators of stationary sources of air pollution in 113 cases. Fines totalling CZK 391,500 were awarded for these delicts in 37 separate proceedings. Another 75 delicts were handled in joint proceedings with other delicts (totalling CZK 50,000 if most severely punishable), and one delict was resolved with a reprimand.

V.

Our inspection work also identified violation of other obligations and bans in air protection. These obligation include, above all, the obligation to burn waste only in facilities intended for that purpose, eliminate dangerous conditions of stationary sources of air pollution and perform the associated reporting

duties. Combustion of materials other than dry plant material not contaminated with chemicals in open fires is prohibited.

We found three cases of combustion of unpermitted materials in open fires. Fines of CZK 35,000 were imposed for the violations in separate proceedings. Combustion of waste in stationary facilities was proven in two cases; fines of CZK 25,000 were imposed on the operators for the violation.

Failure to eliminate dangerous conditions as a consequence of malfunction of a facility was proven in one case, leading to the imposition of a fine of CZK 100,000. There were three cases of non-submission of a report to the CEI. The fines for those violations were absorbed in another delict that was more severely punishable.

An inspection found in one case that the technical condition of a combustion source with a capacity below 300 kW had not been checked by a professionally qualified person. The delict consultation resulted in the imposition of a combined fine on the operator for multiple delicts, amounting to CZK 15,000.

4.1.2.2. Earth's climate system protection

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

The 156 checks of operators of facilities with fluorinated greenhouse gas contents and other entities handling fluorinated greenhouse gases resulted in 19 proven delicts, leading to the imposition of 14 fines totalling CZK 510,000. They were cases of violation of the obligation to arrange equipment tightness inspection.

Other violations were handled in joint proceedings with other delicts. They included one case of exceedance of a European Commission quota for F-gases placed on the market, as well as two cases of failure to submit records on facilities containing at least five tonnes of equivalent of CO₂ F-gases upon the CEI's request.

In 2020, we made 32 inspections of stationary facilities included in the greenhouse gas (carbon dioxide) emission permit trading system. We imposed two fines for four delicts – violations of MoE permit requirements. One delict was handled separately; it involved failure to submit an emission report to the Ministry of the Environment. The other case was three violations handled together. They involved

operation in contravention of MoE decision, failure to report an intended change in the facility use, and failure to report end of operation of one boiler and start of operation of another boiler.

4.1.2.3 Ozone layer protection

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

The result of 19 checks of compliance with requirements on handling of controlled substances was four cases of violations, for which we imposed two fines totalling CZK 145,000 in joint proceedings. In one case, an entity handling controlled substances committed a violation by not arranging equipment tightness inspection from an entity certified by the Ministry of the Environment; in the other case, controlled substances had not been handed over to a certified entity for disposal within the set period.

Being the administrator of the fee for imports and production of controlled substances, the CEI inspected compliance with the fee duty of entities marketing the controlled substances. In two cases, we assessed the fee payment obligation totalling CZK 5,720 for imported halons for critical uses.

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

4.1.3 Overview of performance of specific tasks

Due to the extent of the departmental tasks, covering all of the air protection inspector's inspection work in the areas of air protection, climate and ozone layer protection, no specific tasks were assigned for 2020.

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

Prague TI

The CEI imposed a fine of CZK 100,000 on Zemědělská akciová společnost HLUBOŠ for operating a biogas station including

a cogeneration plant in contravention of a binding requirement of the integrated permit – exceedance of a set emission limit.

České Budějovice TI

The CEI imposed a fine of CZK 200,000 on Energetické centrum s.r.o. for operating a combustion source in Otín without a permit from an air protection authority and exceeding the emission limit on carbon monoxide and particulate matter.

Plzeň TI

The CEI imposed a fine of CZK 250,000 on IC-PARK ENERGO, a.s. for operating a biogas station in Svojší in contravention of the integrated permit – long-term storage of biodegradable waste and failure to make microbiological analysis of the digestate according to set requirements.

Ústí nad Labem TI

The CEI imposed a fine of CZK 300,000 on the tyre manufacturer Nexen Tire Europe s.r.o. in Bitozeves for operating the process equipment “mixing of rubber blends” without a permit from the air protection authority and operation in contravention of a binding requirement – without a functional emission reduction device and failure to inform about a malfunction.



During the check, the inspectors found out that Nexen Tire Europe s.r.o. was operating the rubber mixing plant without a functional emission reduction device: the waste air was emitted into the air freely without any treatment via a disconnected pipeline.

Liberec TI

The CEI imposed a fine of CZK 70,000 on LIBERECKÉ KOTLÁRNÝ – Hölter, s.r.o. for operating stationary combustion sources in Rychnov u Jablonce nad Nisou without a permit and for not detecting air pollution levels from the sources.

The CEI imposed a fine of CZK 70,000 on Teplárenská novoměstská s.r.o. for operating a stationary combustion source in Nové Město pod Smrkem without a permit from the air protection authority.

Hradec Králové TI

The CEI imposed a fine of CZK 200,000 on Nemocnice Pardubického kraje, a.s. for exceedance of a specific emission limit on dioxins in a hazardous waste incinerator.

Havlíčkův Brod TI

The CEI imposed a fine of CZK 350,000 on ENVIROPOL s.r.o. for operating an electrical waste processing plant in Jihlava in contravention of the permit. Moreover, the company violated its obligation to emit pollutants from the since into the air via a chimney or exhaust, and failed to operate the source in accordance with manufacturer requirements.

Brno TI

The CEI imposed a fine of CZK 2,000,000 on ZUCCA a.s. for operating stationary sources – cogeneration plant and biogas station – at Velký Karlov near Hrádek u Znojma, without a permit.

Olomouc TI

The CEI imposed a fine of CZK 330,000 on CARMAN, a.s., operating stationary sources (fuel combustion and wood processing in Uničov) for exceeding a specific emission limit on particulate matter, failure to measure emissions and failure to report data from summary operating records.

Ostrava TI

The CEI imposed a fine of CZK 200,000 on BIKE FUN International s.r.o. in Kopřivnice for operating stationary sources without an operating permit or in contravention of it, failure to submit a report on single emission measurement, failure to detect pollution levels, failure to keep and archive operating records and failure report data from summary operating records.

Headquarters Air Protection Department

The CEI imposed a fine of CZK 120,000 on EAF protect s.r.o. for failure to hand over controlled substances banned from use to a certified entity for disposal and exceedance of the allocated quota on fluorinated greenhouse gases placed on the market.

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. The CEI work was affected by the COVID-19 epidemic in that the measures in force restricted its inspection work, leading to a decrease in the delict proceedings.

In 2020, the number of inspections made decreased compared to 2019 (from 4,628 to 3,063). The number of delicts handled also grew from 532 in 2019 to 443 in 2020.

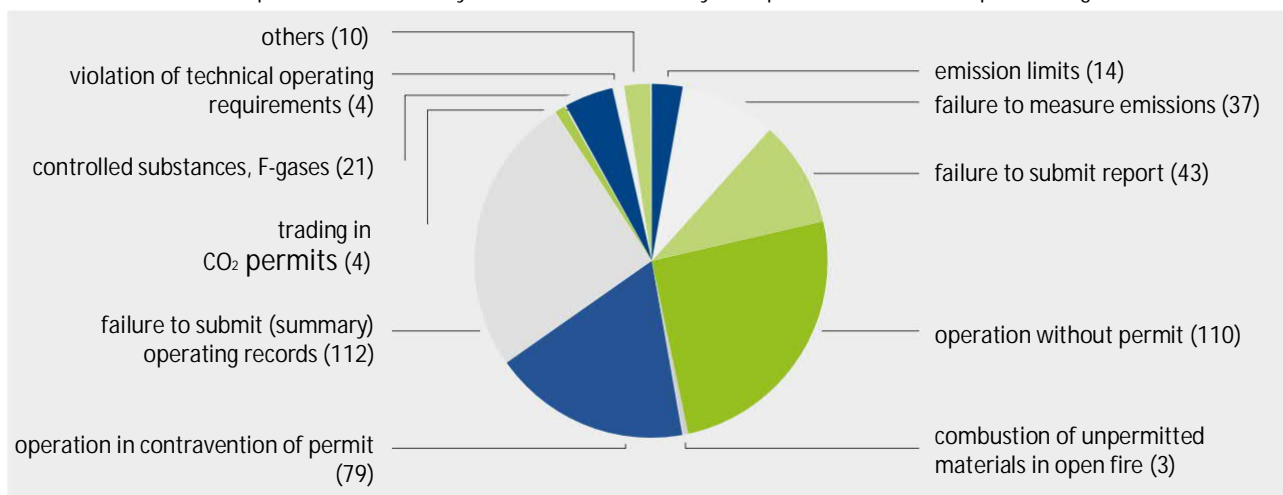
In spite of that, the numbers of cases of operation of air pollution sources without a permit are still high, even though

the trend has been decreasing slightly in the recent years. In 2020, we handled 110 delicts of operating sources without a permit; it was 120 delicts in 2019.

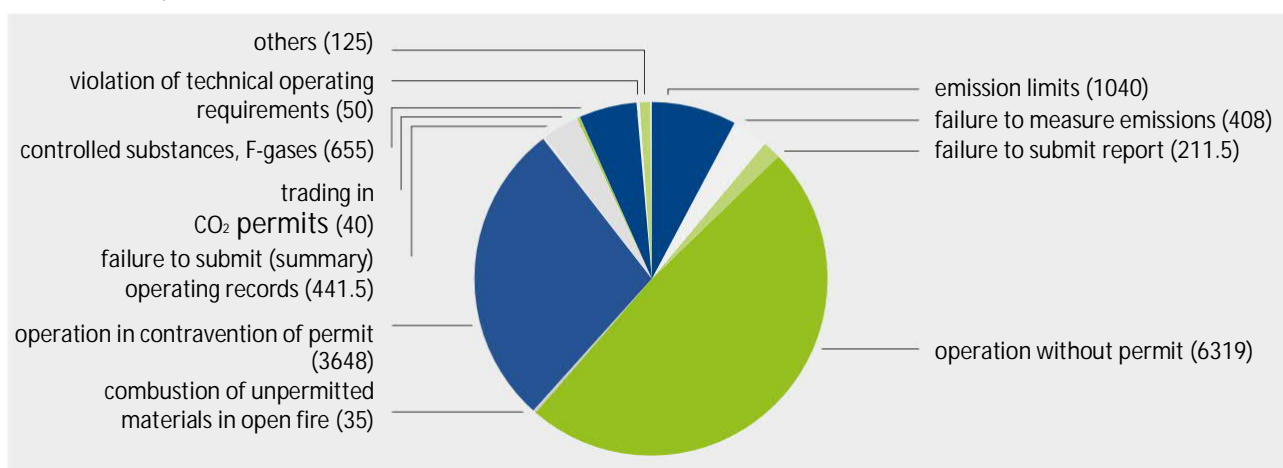
The CEI paid attention to Earth's climate system protection, both prevention of leakage of fluorinated greenhouse gases and compliance with requirements on operators of facilities included in the greenhouse gas emission permit trading system.

Even though the use of ozone layer depleting controlled substances is in a phase-out, we handled two delicts in 2020 of violation of requirements for handling them and marketing them. In 2020, we found two cases of non-performance of the fee duty of importers for marketing of controlled substances (halons for critical uses) and prescribed payment of the fees and their appurtenances, being the fee administrator.

Numbers of delicts in air protection, ozone layer and Earth's climate system protection in 2020 in proceedings on fines



Fines awarded for violations of air protection, ozone layer and climate protection requirements in 2020, by type of violation [thousands CZK]





4.2 Water protection and prevention of major industrial accidents

4.2.1 Overview of inspection work in 2020

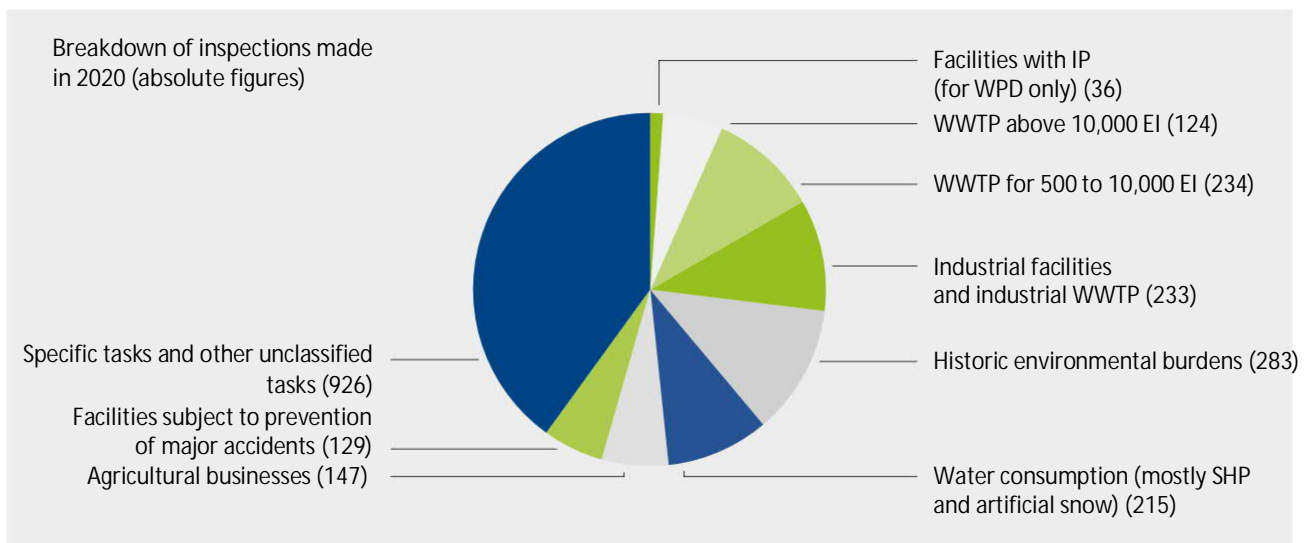
Inspection work in 2020 was done by the Water Protection Department (WPD) inspectors to the full extent of powers defined by the Waters Act, Major Accident Prevention Act and Integrated Prevention Act in force and effect.

In 2020, Water Protection Department inspectors carried out 2,327 separate checks. Within that, 45% of the checks were scheduled (1,051) and 55% were unscheduled (1,276), the latter including checks made based on suggestions. Moreover,

the WPD inspectors made 278 checks under the Integrated Prevention Act in cooperation with the other Departments.

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

The WPD work in 2020 was adversely affected by the declared states of emergency and the associated anti-epidemic measures under Government Resolutions.



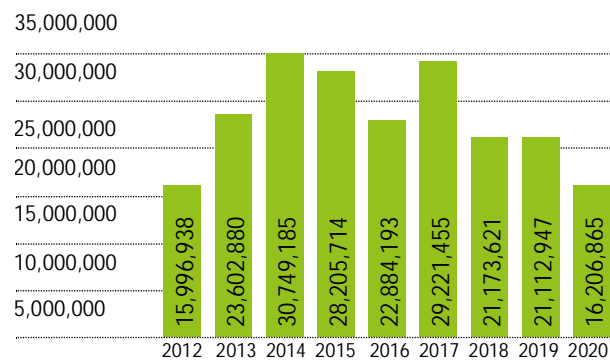
Based on the inspection work, we initiated 418 delict proceedings and issued 404 conclusive decisions on fines totalling CZK 16,206,865. Moreover, WPD inspectors cooperated on the issuance of nine decisions as part of inspections in businesses with integrated permits (IP) that are registered in Chapter 4.7. The greater part of the fines were imposed based on results of unscheduled checks. To eliminate identified shortcomings and defects, we issued 30 decisions imposing remedial measures with deadlines.

Act no. 113/2018 Coll. cancelled, as of 1 January 2019, collection of advance charges. At the same time, the Waters Act amendment transferred the complete charge agendas to the State Environmental Fund. In spite of that, the CEI still issued decisions in the charge agenda in 2020, because, pursuant to the transitional provisions, charge obligations arising prior to the effective date of the amended Act no. 113/2018 Coll. are governed by Act no. 254/2001 Coll., as effective before the amendment. We issued seven decisions in the charge agenda, including one decision on charges for discharge of wastewater

into surface water amounting to CZK 2,088,205, and six decisions on groundwater collection totalling CZK 607,512.

WPD inspectors developed 1,825 statements, bot separately for the WPD (717) and as part of aggregate statements (1,108).

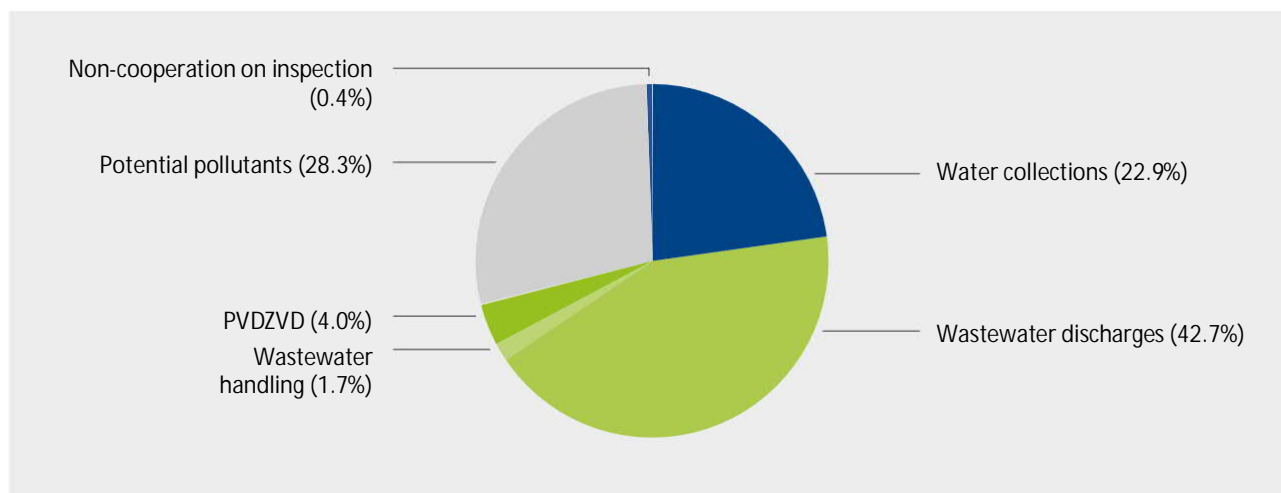
Amounts of fines in force (CZK)



In terms of delicts committed, the decisions on fines can be divided into six "categories", including penalties for water collection (surface and/or groundwater collection in contravention of and/or without a permit), for wastewater discharge (from WWTP, septic tanks and/or fine sewer outlets in contravention of and/or without a permit), for wastewater handling (disposal of wastewater from dead-end cesspools without documenting the disposal method, disposal of wastewater in contravention of the Waters Act, such as on farmland), for operation of hydraulic

structures and interventions in watercourses (PVDZVD, watercourse modifications without a permit, operating a hydraulic structure in contravention of a permit, operating or handling rules), for potential pollutants (handling of potential pollutants in the form of failure to make tightness tests of storage equipment, to make accident plans, to take adequate precautions to prevent potential pollutants getting into surface water or groundwater) and for non-cooperation on inspection (Section 10, Para. 2 of Act no. 255/2012 Coll.). Following is a percentage chart of fines that entered into force in 2020 by the delict "category".

Breakdown of fines in force into six basic categories of delicts committed



4.2.2 Overview of performance of main and departmental tasks

Inspections at environmental component pollution sources with valid integrated permits

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

We made 323 checks as part of the task. WPD inspectors in cooperation with other departments made 287 integrated inspections, and made 36 inspections on their own. A total of 27 penalty decisions imposed by the WPD entered into force, for fines totalling CZK 1,696,300. The most commonly identified delict was exceedance of emission limits in

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

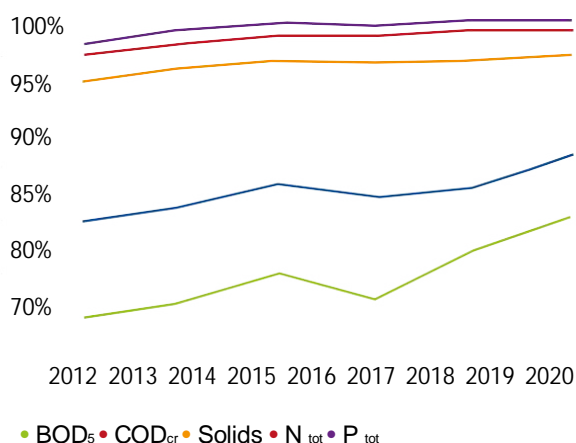
Inspections at most important municipal wastewater treatment plants sized above 10,000 EI

The purpose of inspections at most important municipal wastewater treatment plants (WWTP) was to check functionality and technical condition of the WWTP, compliance with Council Directive 91/271/EEC on municipal wastewater treatment and GR no. 401/2015 Coll., with an emphasis on identification of the actual produced and discharged pollution from different sources and all other facts that may affect WWTP functionality, thus quantity of pollution discharged. The inspections in 2020 included registration of relief chambers not protected by combined sewers from hydraulic overloading, and inspection of wastewater discharges from combined sewer outlets into surface waters. Act no. 113/2018 Coll. imposes on operators of WWTP relief chambers an obligation to have a valid permit from a water management authority for wastewater discharge from relief chambers to surface waters pursuant to Section 8, Para. 1, item c) of the Waters Act.

In 2020, we inspected 124 municipal WWTP for more than 10,000 EI (22 scheduled checks were not made due to the pandemic). Sources in this category do not commit frequent or significant violations of the Waters Act. Based on results of checks made in 2020 and in previous periods, were imposed seven fines that entered into force in 2020, totalling CZK 150,000. The fines were imposed for exceedance of permitted pollution emission limits sets in water management authority permits and for failure to adherence to conditions under which the WWTP was permitted and commissioned.

WWTP sized above 10,000 EI are checked periodically; the results indicate clearly that renovations of WWTP structural and process components and use of best available techniques leads to gradually improving quality of wastewater discharged from the WWTP, thus significant reduction of pollution discharged into surface waters. This statement is based on the observable trend of increasing efficiency of wastewater treatment, particularly as concerns the frequently debated indicator N_{tot} (more than 10% in 2010-2019; see schematic chart of average efficiency of pollutant removal).

Average efficiency of pollutant removal



For all municipal WWTP in this category, we inspected the balance data for 2019, showing that 3.41 million cubic metres of wastewater had been treated and that the treatment efficiency of municipal wastewater at these WWTP was 98.6% for BOD₅, 95.4% for COD_{cr}, 98.03% for solids, 81.9% for N_{tot} and 89.2% for P_{tot}.

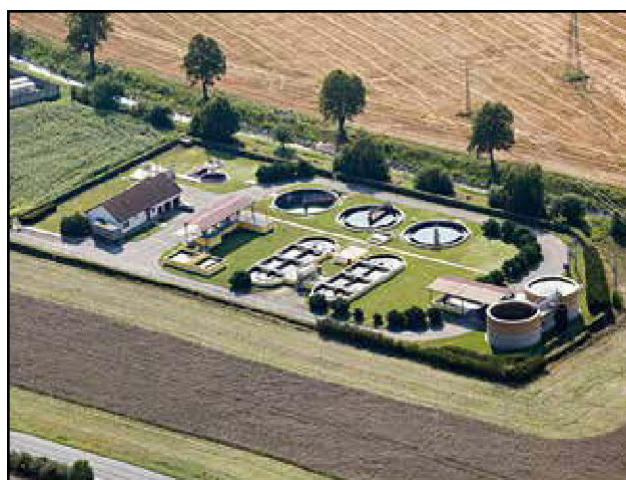
Inspection of municipal wastewater treatment plants for 500 – 10,000 EI

The inspection of WWTP in the category from 500 to 10,000 EI was focused on compliance with requirements in water management authority permits.

for establishment of these hydraulic structures, compliance with wastewater discharge permit requirements in light of their method of operation. The checks included inspection of permits for discharge of wastewater from relief chambers into surface water in response to the new legislation.

In 2020, we made 234 checks under this task, including 52 unscheduled. The pandemic situation prevented us from making 63 scheduled inspections. As a consequence, 28 decisions on fines entered into force, totalling CZK 1,873,000; 13 administrative proceedings on fines have not been concluded yet. The most frequent delicts are recurring exceedance of permitted pollution emission limits and quantity of wastewater discharged, as well as non-performance of inspection sample collection at set frequencies, wastewater discharge without permit from a water management authority, and missing permit from a water management authority for wastewater discharge from relief chambers not protected by combined sewers from hydraulic overloading into surface waters.

The list of fines shows that the worst shortcomings in operation of this category of WWTP occur constantly and regularly at WWTP operated by small municipalities and voluntary associations of municipalities. Based on long-term experience, staff expertise, extent and availability of technical devices, water utilities mostly operate WWTP without major shortcomings and process deviations affecting quality of wastewater discharged. It is obvious that wastewater handling in smaller municipalities may pose a future environmental risk and requires thorough inspection supervision. The numbers of unscheduled CEI inspections based on citizens' suggestion have increased significantly in recent years due to increasing public interest in water issues (including WWTP expansion and construction).



View of Bučovice WWTP

Inspection of industrial entities handling potential pollutants

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

Under this departmental task, we made 233 inspections. The most frequent shortcoming was exceedance of emission limits at industrial WWTP and failure to meet obligations for handling potential pollutants (hydraulic securing of reservoirs against leakage of stored substances, reservoir tightness tests, etc.). A total of 76 decisions entered into force in 2020, imposing fines totalling CZK 2,825,968.



Potential pollutants stored in a hydraulically unsecured area

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

The departmental task is regularly included in the WPD scheduled activity in order to supervise the state of long-term accidents and particularly the progress of remediation of historic environmental burdens (HEB), where remediation works under so-called environmental contracts are implemented. For 2020, we had 176 inspections scheduled under this task. Due to the pandemic situation, we made only 139 of the scheduled inspections. The inspection work at HEB sites took place outside inspection days as well. We made 144 unscheduled checks, including at other long-term accident sites where no environmental contracts exist but where pollution removal can be done by drawing on funds from subsidy schemes (National Programme Environment, Operational Programme Environment, etc.). In total, we thus made 283 inspections.

The remediation progress dynamics equalled that of the previous year thanks to the pressure on the acquirers in the form of enforcement of remedial measures in the event of their failure to perform by set

dates. Besides monitoring the remediation progress, the CEI's priority is continuous performance of remedial measures so that their delay or halting does not lead to recontamination of areas already rehabilitated, thus devaluing the investment spent so far. Every year, the Ministry of Finance in cooperation with the Ministry of the Environment declares priorities for public contracts to eliminate historic environmental burdens on sites owned by acquirers of privatized properties for the following year in order to comply with deadlines for remedial measures and avoid delays in the remediation actions. In spite of this strict regime, there are still sites where remediation does not progress for technical reasons or due to newly discovered facts, and their completion needs to be postponed sometimes beyond 2030. Some sites are suffering very problematic situations due to exhaustion of funds from a guarantee or a realistic risk of their exhaustion.

In 2020, a total of 13 decisions on remedial measures for HEB entered into force. For violations consisting in water pumping without a water handling permit, performance of remediation works without an approved project design or violation of CEI decisions, we imposed three fines totalling CZK 253,590, which entered into force in 2020. Remediation projects were formally completed and environmental contracts ended with five acquirers.



Agglomeration – Dolní oblast VÍTKOVICE, a.s., – remediation works during intervention and after its completion

Inspection of (mostly surface) water collection

This task focused on water collection with an emphasis on compliance with requirements of water management authority permits (observance of minimum residual flow rates) and observance of permitted quantity of water collected, both surface and groundwater. In the summer, the inspections focused primarily on water collection for operation of small hydropower plants. In the winter, we inspected water collection by skiing resorts, which use water for artificial snowing of ski slopes. Under this departmental task, we made 215 inspections. 48 decisions on fines totalling CZK 2,568,344 entered into force. The most frequent finding was exceedance of the quantity of water collected for drinking and utility water supply. Small hydropower plants violated the minimum residual flow rates in watercourses as a consequence of non-compliance with operating requirements.



Non-observance of minimum residual flow rate

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

Agricultural businesses handle potential pollutants such as dung, manure slurry, manure liquid, digestate, fugate, fermentation sludge, silage juices, agrochemical and petroleum products, which is why they are covered by a separate CEI WPD inspection task. The purpose of this task was to check agricultural businesses in terms of compliance with the Waters Act as well as, inter alia, Decree no. 450/2005 Coll., as amended, on requisites of handling of potential pollutants and requisites of accident plans, method and extent of accident reporting, accident handling and elimination of harmful consequences of accidents. As a support reference, the WPD inspectors apply Act no. 156/1998 Coll. on Fertilizers, as amended. The checks also included audits of complete water management agenda.

A total of 147 checks were carried out. Based on these inspections and ones made in previous years, we imposed 57 fines in force totalling CZK 2,362,940 and six conclusive decisions on remedial measures. Inspections identified shortcomings not only in handling of potential pollutants but also in water management. This inspection work, too, was affected by the restrictions as a consequence of the COVID-19 situation.



Unsecured dung heap

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

The objective of the inspection was to check entities classified in category B and selected entities in category A. In total, we were supposed to carry out 145 inspections based on the annual plan approved by the MoE. Inspection performance in 2020 was affected by declared states of emergency and current situation in each region and at each entity inspected. Eighteen scheduled checks were not carried out due to the COVID-19 epidemic, another 3 were not carried out because the object was removed from the jurisdiction of the Major Accident Prevention Act after the MoE plan was approved, or because safety documentation approval was still in progress. In reality, we made 124 scheduled checks in 2020, and another 5 checks beyond the scope of the annual plan.

The checks took place in cooperation with integrated inspection authorities (State Labour Inspection Office, authorities in fire prevention, population protection, integrated

rescue system, Czech Mining Authority, regional public health authority) and regional authorities pursuant to Act no. 224/2015 Coll., which integrates latest European regulations, notably Directive 2012/18/EU of the European Parliament and of the Council on the control of major-accident hazards involving dangerous substances. In most cases, the mandatory reduction of personal contact, the checks were made individually on pre-arranged dates and with minimum presence of both inspecting and inspected persons. In some cases, checks could not be attended by all the inspection bodies due to internal restrictions or performance of other tasks related to contagion control. The subject matter of the inspections was assessment whether information in safety documentation matches actual site conditions, whether measures adopted to prevent major accidents are sufficient, whether resources mitigating potential consequences of major accidents are appropriate, and whether preventive precautions specified in the safety programme or safety report and internal accident plan are observed.

The checks focused on local examinations of the facilities, technical condition of equipment inspected and its level of security. They also focused on basic elements of the safety management system, evaluation of major accident prevention (MAP) system status, contents of reports on inspection or audit results, and registration of emergencies and methods of their evaluation.

Six major accidents occurred in the course of 2020. They involved releases of dangerous substances, fires and explosions. Some of the shortcomings identified were eliminated during inspection. Implementation of remedial measures imposed as part of the protocol has been checked or will be checked by inspections in coming years. The CEI imposed a fine of CZK 450,000 in force on one of the inspected operators for a delict

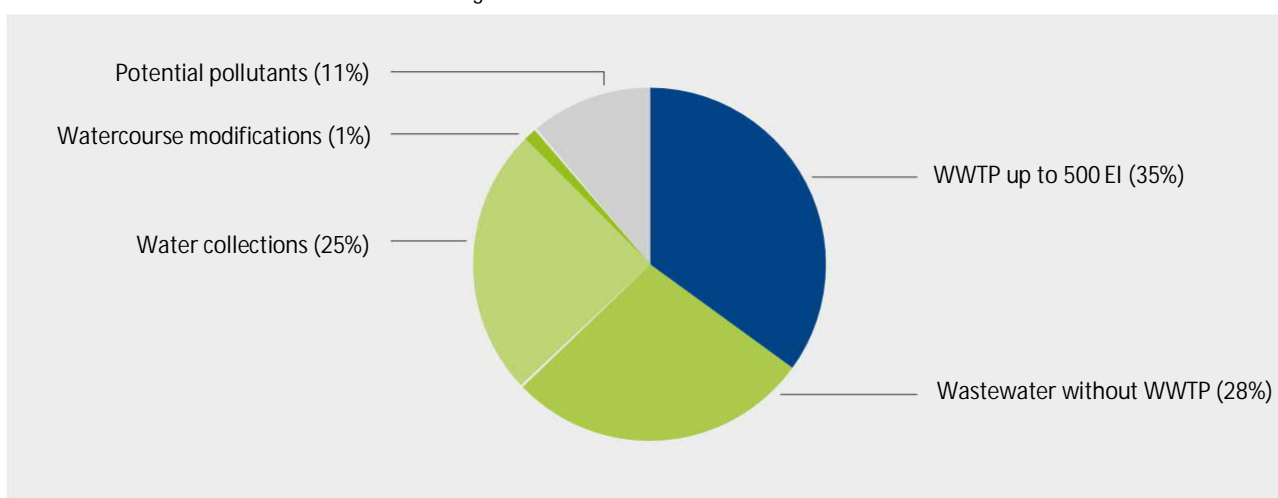
against the Major Accident Prevention Act. The results of this inspection work can be evaluated as significant in terms of their positive environmental impact by preventing accidental situations.

4.2.3 Overview of performance of specific tasks – summary

Under this task, the inspections focused on issues characteristic of the territory of each respective territorial inspectorate (TI). They typically follow from inspections made in previous periods and aim at smaller entities, which CEI experience shows continue to have low awareness of provisions of the Waters Act. Governmental measures in connection with the state of emergency declared due to the COVID-19 pandemic were also reflected negatively in this scheduled work. Out of the 189 scheduled checks, 112 were cancelled. On the other hand, another 737 unscheduled checks were carried out. In total, we made 926 specific task checks and imposed 134 fines in force totalling CZK 4,026,723.

From the point of view of delicts committed under our specific tasks, the amount of fines in force can be divided by percentage into five basic categories: wastewater discharge from WWTP in contravention of or without a permit; wastewater discharge from septic tanks or free sewer outlets in contravention of or without a permit or wastewater disposal from dead-end cesspools without documenting their disposal method; surface water and groundwater consumption in contravention of or without a permit; watercourse modifications without a permit and handling of potential pollutants in the form of non-performance of storage equipment tightness checks, failure to make accident plans or non-performance of adequate measures to prevent potential pollutants entering into surface waters or groundwater.

Breakdown of fines in force into five basic categories of delicts committed



Results of most important specific tasks are summarized below.

Inspection of holiday and accommodation facilities

The inspections mostly followed from the previous year's specific task, involving inspection of holiday facilities in the NP České Švýcarsko, PLA Labské pískovce and PLA Lužické hory with a focus on groundwater collection and wastewater disposal. The inspections took place in the territories of Ústí nad Labem TI, Olomouc TI (Hrubý and Nízký Jeseník), České Budějovice TI (NP Šumava), Hradec Králové TI (Krkonoše and Orlické hory), Havlíčkův Brod, Ostrava and Liberec TI.

A total of 48 checks were carried out, and legal violations were identified in 22 cases. Penalties in force totalling CZK 460,097 were imposed for the violations, and other penalty proceedings have not been completed yet.



Holiday area WWTP – non-functioning biodisc WWTP

Inspection of municipal wastewater treatment plants for up to 500 EI

These checks are made in order to supervise adherence to obligations under the Waters Act for municipal WWTP for up to 500 EI. We made 17 checks in the Ústí nad Labem Region and identified six delicts of legal non-compliance in wastewater discharge. We made seven investigations in the Brno Region, and malpractice was found in all the cases but one. The other TIs identified 20 more violations in water management in their checks at WWTP for up to 500 EI. For the 32 violations, the CEI imposed penalties in force totalling CZK 984,000. These results indicate the necessity to continue supervising the WWTPs for up to 500 EI in the coming years.

Check of wastewater discharge from free sewer outlets

The check focused on inspecting wastewater disposal in municipalities in the jurisdiction of Plzeň TI and Ostrava TI. In total, we inspected 22 municipalities, concluding that small municipalities still have problems of exceedance of limits set in water management permits when discharging wastewater, arising from insufficient information about their obligations in the area of water management. The most frequent delicts were non-measurement of pollution concentration and amount of wastewater discharged and wastewater discharge without permit from a water management authority. Based on the inspection results, we ran 18 delict proceedings, leading to the imposition of fines in force totalling CZK 547,000.



Free sewer outlet

Inspection of handling of potential pollutants

Plzeň TI inspectors made checks of petroleum product stores and non-public fuel stations in order to ensure elimination of shortcomings identified and bring petroleum product stores in compliance with requirements of water management legislation. An inseparable part of the checks was inspection of building drinking water supply, wastewater disposal method and current state of water management and operating documentation. Plzeň TI inspectors checked 12 entities and found six to be in legal violation in storing potential pollutants. It consisted mostly of operation of storage reservoirs without an approved accident plan and failure to prove performance of tightness tests. The total amount of conclusive fines was CZK 55,000. The other TIs inspecting handling of potential pollutants identified another 19 cases of malpractice and imposed conclusive fines totalling CZK 385,000. Thus, the total penalties imposed under this specific task were CZK 440,000.

4.2.4 Major cases

Highest conclusive fines in the Water Protection Department by TI

Territorial Inspectorate name	Entity	Imposed fine in force	Entry into force
Ústí nad Labem TI	Sokolovská uhelná, právní nástupce, a.s	CZK 500,000	27. Jul 2020
Prague TI	Brenntag CR s.r.o.	CZK 450,000	18. Feb 2020
České Budějovice TI	SITTER s.r.o.	CZK 380,000	18. Dec 2020
Ostrava TI	RenoFarma Lučina, s.r.o.	CZK 341,220	23 Sep 2020
Liberec TI	Česká PIC s.r.o.	CZK 325,300	7 Nov 2020
Brno TI	TRANSBETON s.r.o.	CZK 309,828	3 Jan 2020
Plzeň TI	Pivovar Kout na Šumavě a.s.	CZK 226,870	25 Jan 2020
Hradec Králové TI	PRECYS s.r.o.	CZK 202,400	11 Dec 2020
Havlíčkův Brod TI	CTP Invest, spol. s r.o.	CZK 180,000	11 Jul 2020
Olomouc TI	ADPS s.r.o.	CZK 74,695	21 Mar 2020

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

Ústí nad Labem TI: Sokolovská uhelná, právní nástupce, a.s (highest conclusive fine imposed by WPD in force in 2020)

As part of investigation of an accident consisting in a leak of wastewater containing phenol and tar into a final treatment reservoir as a consequence of a malfunction in the Generator Plant section of the operator Sokolovská uhelná, právní nástupce, a.s., the CEI found out that the operator was in contravention of requirements of its integrated permit by failing to maintain equipment (industrial and storm sewerage) in such a condition that would prevent leakage of potential pollutants outside the facility and posing a threat to surface water or groundwater. The accident occurred after a retention reservoir was filled with wastewater containing the potential pollutant and spilled out, the damaged industrial sewerage and storm sewerage leaked the wastewater into the final treatment reservoir and then into the Chodovský brook. Based on an assessment of the case, the CEI concluded that it was a water accident under Section 40 of the Waters Act. For the proven delicts, consisting in non-performance of measures to prevent accidents and reduce their potential consequences and in exceedance of emission limits in discharged wastewater, the CEI

applied Section 37, Para. 4 of Act no. 76/2002 Coll., to impose a fine on the facility operator amounting to CZK 500,000. The facility operator appealed against the CEI's decision, but the authority of appeal confirmed the fine amount. The CEI's decision entered into force on the decision of the authority of appeal on 27 Jul 2020.



Accident at Sokolovská uhelná, právní nástupce, a.s

Prague TI: Brenntag CR s.r.o.

The scheduled inspection at Brenntag CR s.r.o. focused on performance of obligations pursuant to Act no. 224/2015 Coll. (Major Accident Prevention), but as we identified a violation of Act no. 254/2001 Coll. (Waters Act), we extended the scheduled inspection by an on-site notification to include performance of obligations under the Waters Act, namely handling of potential pollutants in the company's compound. The CEI found the company guilty of storage of corrosive potential pollutants in outdoor areas without any hydraulic safety measures in contravention of the Waters Act, storage of various transport packages of toxic liquids in a roofless outdoor area without any hydraulic safety measures next to an acid and lye storehouse, and storage of used potential pollutant packaging outside another storehouse

in an unpaved outdoor area. Moreover, the CEI found a violation of the Major Accident Prevention Act in the company not following its safety programme in its storage of potential pollutants. The CEI imposed a fine of CZK 500,000 on Brenntag CR s.r.o. pursuant to a provision on the most serious delicts, i.e., the company had not proceeded in accordance with an approved safety programme with a view to the fact that the company had stored potential pollutants in a way that did not prevent undesirable leakage of said potential pollutants into soil or their undesirable mixing with rainwater. The company appealed against the decision, and the authority of appeal reduced the fine to CZK 450,000. The MoE decision entered into force on 18 Feb 2020.

České Budějovice TI: SITTER s.r.o.

The CEI found SITTER s.r.o. guilty of committing delicts consisting in groundwater collection for watering livestock at Valtrov farm without a valid water handling permit from a water management authority, for discharging wastewater from a wastewater treatment plant without a valid water handling permit from a water management authority, and for not presenting an updated accident plan for handling of potential pollutants. The CEI imposed a fine of CZK 380,000 on the company pursuant to a provision on the most severely punishable delicts, i.e., discharge of wastewater into surface waters without a water handling permit. The company did not appeal against the CEI decision, and the CEI decision entered into force on 18 Dec 2020.

Ostrava TI: RenoFarma Lučina, s.r.o.

In running an agricultural business centre in Veřovice, RenoFarma Lučina, s.r.o. had collected in 2017 and 2018 an excess of 3,446 cubic metres of groundwater beyond its permitted annual limit. Moreover, it handled a potential pollutant (manure liquid) without preventing its leakage from a pit onto the paved area in front of the dung store and then onto municipal land of Veřovice. By doing so, the company had put at risk groundwater quality on Veřovice municipal land due to the leaked manure liquid penetrating soil layers, as well as surface water quality in the ditch along the Veřovice – Ženklaava road. For said delicts, the CEI imposed a fine of CZK 341,220 on the company pursuant to the provision on the most severely punishable delicts, i.e., leakage of potential pollutants. The company appealed against the decision, and the authority of appeal confirmed the CEI's decision. The MoE decision entered into force on 23 Sep 2020.

Liberec TI: Česká PIC s.r.o.

When inspecting Česká PIC s.r.o. Náhlov farm compound, the CEI identified malpractice consisting in the collection of 13,012 cubic metres of groundwater without a valid water handling permit, dating from 1 Oct 2018 to the inspection date, i.e., 30 Jun 2020. For the collection of the unpermitted amount of groundwater,

a fine of CZK 325,300 was calculated for the company. The company did not appeal against the CEI's decision, which then entered into force on 7 Nov 2020.

Brno TI: TRANSBETON s.r.o.

In an inspection of the groundwater collection, the CEI found that TRANSBETON s.r.o. had collected 7,924 cubic metres of groundwater for concrete production without a permit. For this violation, we imposed a fine of CZK 309,828 on the company. The decision was not appealed and the fine entered into force on 3 Jan 2020.

Plzeň TI: Pivovar Kout na Šumavě a.s.

The brewery company Pivovar Kout na Šumavě a.s. violated the Waters Act by collecting 3,241 cubic metres of groundwater beyond its permitted limit in 2017. For this violation, we imposed a fine of CZK 226,870 on the company. In determining the fine amount, the CEI applied the upper legal bound of CZK 70 per cubic metre. The chief reason was the repeated exceedance of the limit for more than half a year. The fine entered into force on 25 Jan 2020.

Hradec Králové TI: PRECYS s.r.o.

The company PRECYS s.r.o. exceeded the maximum permitted surface water collection quantity in 2018. It collected 5,060 cubic metres from the Elbe river beyond the scope of its integrated permit. Moreover, the company did not report a violation of a binding operating requirement set in its integrated permit. By doing so, the company violated the Integrated Prevention Act. The CEI found PRECYS s.r.o. guilty of both the delicts and imposed a fine of CZK 202,400 on it for the most severely punishable delict, i.e., under Section 37, Para. 4 of Act no. 76/2002 Coll. The company did not protest against the order, and the order entered into force on 11 Dec 2020.

Havlíčkův Brod TI: CTP Invest, spol. s r.o.

On 25 Sep 2019 and 18 Oct 2019, the company CTP Invest, spol. s r.o., discharged, from its Central Trade Park by the D1 motorway at Humpolec, wastewater into the surface water of a rainwater retention pool via its storm sewer without a water handling permit. The CEI imposed a fine of CZK 180,000 for the delict. The company did not appeal against the CEI's decision, so it entered into force on 11 Jul 2020.

Olomouc TI: ADPS s.r.o.

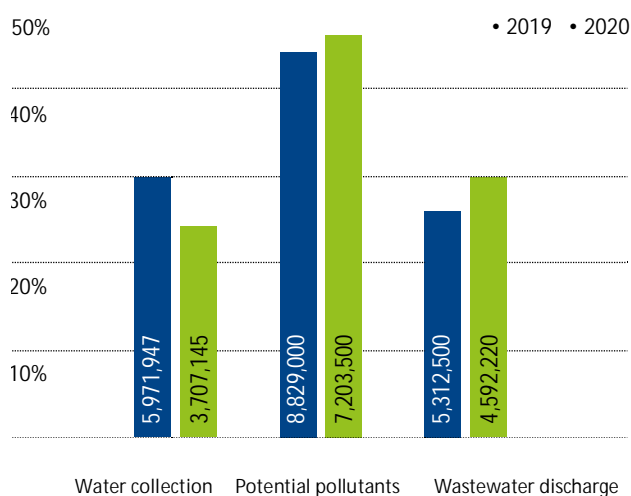
The company ADPS s.r.o., being the operator of the Třemešek holiday area, had collected 1,277 cubic metres of groundwater for the facility from a borehole without a water handling permit. Moreover, in 2017, 2018 and in June 2019, the company had discharged pre-treated wastewater from a wastewater treatment plant into surface water without a permit from a water management authority. For both violations, the CEI imposed a fine of CZK 74,695 on the company. The company did not appeal against the decision, and on 21 Mar 2020, it entered into force.

4.2.5 Conclusions from inspection work

The CEI work in the area of water protection in 2020 did not differ from previous years. The inspection plan development followed legal obligations, as the Major Accident Prevention Act and the Integrated Prevention Act set exact inspection intervals. In 2020, the governmental measures issued in the Czech Republic in connection with the state of emergency caused by the COVID-19 pandemic were reflected negatively in the implementation of all scheduled work tasks. In conjunction with the declared extraordinary measures, consisting mostly in reduction to personal contact, the inspection work in 2020 was attenuated, reflecting in the total number of inspections (approx. 75% of checks were made compared to 2019). We only carried out inspections with a focus on handling of suggestions and accidents and operations preceding checks focused on new findings from field reconnaissance and checks of compliance with decision requirements based on documents received in electronic or paper form. Anti-epidemic measures were observed in cases where it was necessary to perform a check in the presence of the inspected persons.

The overall results of our inspection work in 2020 prove that the most frequent shortcomings identified in the area of water management include wastewater discharges into surface waters in contravention of water management authority permits and water collection without a permit or in excess of permitted quantities. On the whole, it can be summed up that water, mostly groundwater collection without permit from a water management authority, occurs primarily in small businesses in catering and accommodation services. In the area of handling of potential pollutants, they include non-performance of tightness tests or their performance by professionally unqualified persons, absence of accident plans and failure to take adequate measures when handling and storing potential pollutants.

Breakdown of fine amounts by delict in comparison between 2019 and 2020



As in previous years, it was again proven that larger entities do not have permanent serious problems complying with environmental legislation. Quite to the contrary, small operations, including accommodation and catering facilities, car repair shops, warehouses, hauliers, filling station operators, municipalities operating WWTP for up to 500 EI or open sewer outlets, showed legal violations in nearly one fifth of the inspected entities. In the area of supervision and identification of legislative violations followed by imposition of fines, we have confirmed a trend of more violations found in unscheduled checks than findings from scheduled ones, meaning more time and administrative demand for producing evidence, documentation and concluding investigation.

Throughout 2020, the CEI monitored and assessed the current situation regarding handling of historic environmental burdens (HEB). Problems with implementation or completion of remediation are expected in future on sites where funds guaranteed by contracts with the Ministry of Finance have been spent and where CEI decisions have not yet been complied with.

The inspection supervision done under the Major Accident Prevention Act continues to have a positive impact on prevention of accidents and emergencies, even though one entity was found guilty of storage of potential pollutants in contravention of the approved safety programme in 2020.

The inspections are still a major preventive tool in the area of water protection; therefore, the CEI will continue its consistent supervision over larger and more important pollution sources as well as systemic searching for new sources in field investigations and in cooperation with water management authorities, watercourse and catchment area administrators to prevent as much as possible contamination of groundwater and surface waters (watercourses, fishponds and water reservoirs) by any legal entity. We will focus primarily on inspecting facilities in which we have found violations of water protection regulations in the past and on entities which have not been checked or were many years ago.

4.3 Water management, chemicals and biocidal preparations

4.3.1 Overview of inspection work in 2020

The CEI Waste Management Department (WMD) inspectors made 2,749 checks in 2020. Their inspection work focused on waste management, packaging and chemicals in relation to national and European legislation in force. Scheduled inspections took place in 1,149 cases. We made 1,600 unscheduled checks, including based on suggestions received. The Waste Management Department was involved in handling 767 suggestions. Besides, the WMD inspectors were involved in 215 integrated inspections pursuant to Act no. 76/2002 Coll. on Integrated Prevention (IPPC).

In 2020, we initiated 789 proceedings and issued 756 decisions on fines. A total of 719 decisions on fines entered into force in 2020, and remedial measures were ordered conclusively in three cases. Fines totalling CZK 40,602,000 entered into force in the report period. Moreover, we made two crime reports and 177 suggestions to other authorities in 2020.

4.3.2 Overview of performance of

departmental tasks Waste disposal and

treatment facilities

We inspected facilities intended for waste disposal, primarily landfills, facilities for waste treatment before disposal, waste incinerators and facilities for co-incineration of waste. Another type of inspected facilities were decontamination sites and deemulsification stations, whose work procedures enable elimination of hazardous waste properties using physical and chemical processes.

The checks were made pursuant to both the Integrated Prevention Act and the Waste Act. In total, we made 101 inspections of waste disposal facilities. The checks resulted in 41 delict proceedings on fines, and 33 of the decisions or orders entered into force, totalling CZK 10,360,000.

Waste incinerators, waste modification and storage facilities

We inspected eight hazardous waste incinerators without any findings that would lead to the imposition of a fine. The hazardous waste incinerator checks were restricted, mostly with a focus on infectious waste. Due to the strain on the healthcare system during the COVID-19 epidemic, several scheduled inspections of hazardous waste incinerators did not take place, and not all of the municipal waste incinerators took place. We also inspected neutralizing stations, facilities for waste modification before disposal and waste storage facilities. The penalties imposed totalled CZK 4,090,000.

We also inspected neutralizing stations and facilities for waste modification before disposal, where the most serious finding was that the modified waste failed to conform to the pollutant limits set by the operating rules or an executive regulation. We also found exceedance of capacity for admission of hazardous waste, failure to store hazardous waste adequately, failure to keep continuous records of admitted waste to the required extent, and exceedance of the set maximum annual capacity of facilities. During a check in a hazardous waste storage facility, we found a major violation in the form of hazardous storage (see 4.3.4 Major cases below).

Landfills

We made 85 inspections of landfills and ran 35 delict proceedings with landfill operators, with 28 fines having entered into force, totalling CZK 6,520,000 as of the end of the year. The inspection work focused on checking landfills against integrated permits. At the landfills, the CEI focused, as usual, on the waste reporting methods and generation of financial reserves, i.e., submission of money to a land reclamation fund. Erroneous reporting and purposive application of structural elements were found in some cases. Where a land reclamation reserve was not generated adequate to the quantity and type of waste deposited, we determined remedial measures to pay the missing amount not transferred to the special account for incorrectly reported waste quantity. Shortcomings in record-keeping by landfill operators result in not paying the money for the financial reserve for land reclamation as well as not collecting fees for waste deposited. There is an ever-continuing effort of operators to exempt admitted waste from the payment obligation (materials for technical structures, compensation layers, structural elements, products from waste).

Specific findings from landfills were as follows: unsorted plastic waste from a recycling centre was transported to a landfill without any treatment; electrical waste (class 4 electrical appliances – large appliances) was admitted to a landfill in contravention of the integrated permit and operating rules; seeping water was retained in the landfill body in contravention of operating rules and the seep water reservoir was not operated properly; the active landfill size was exceeded with a large part of the landfill uncovered, in terms of both the areal extent and the layer thickness of the exposed waste; the active zone was not divided by dams as required; there was extreme dustiness; large amounts of waste blow away by wind were identified. In one case, the landfill capacity was exceeded hugely above the set maximum landfill elevation, for which the CEI imposed a fine of CZK 1 million. In addition, we imposed a fine of CZK 3.5 million

for the use of certified products for technical structural elements in the first stage of landfill operation in contravention of the integrated permit. In a case of investigation into a landfill fire, we took pictures using a pilotless system (drone) following repeated blazes, and we cooperate with the Fire Rescue Service.



Landfill capacity exceedance – set maximum elevation exceeded

Old landfills

Beside landfills in active operation, our inspectors focused on landfills out of operation for decades – old landfills. We checked the condition of landfills shut down and reclaimed in the 1990s. We made the following findings from the disused landfills: They were largely original small municipal landfills that have been reclaimed, but it turns out years later that the land reclamation was not always done well enough. In some places, waste was exposed at the surface, but mostly the sites are overgrown with tall vegetation.

Not registering such old landfills in the property cadastre seems to be a system shortcoming. The land is registered as “others” or “arable land”. In many cases, it is difficult to identify whether a piece of land is laden with waste without knowledge of local and historical context. This applies to hundreds of plots in the CR. Unfortunately, some landfills have not been reclaimed properly or have been reclaimed quite insufficiently. Many disused landfills still continue to receive illegally dumped waste without any permission (illegal dumps); the municipality is sometimes aware of this. Current legal regulations on waste management cannot be applied retroactively, so that remedy of identified shortcomings cannot be achieved, and the entity in charge (most commonly a municipality) cannot be ordered

to mend a bad land reclamation, etc. Numerous complaints from owners of land laden with old municipal dumps are then difficult to resolve, often impossible.

Waste reuse facilities

The CEI checked compliance with the Waste Act at various types of waste reuse or pre-treatment facilities, most importantly for biodegradable waste (composting plants, biogas stations, sludge application to soil, biodegrading areas), as well as reuse of construction waste and waste excavated soil in landscaping and land reclamation, facilities for treatment and recycling of construction waste (recycling plants), plastic recycling, waste sorting and alternative fuel production. We also checked facilities for mechanical-biological and mechanical-physical waste treatment. We made 474 inspections, including 196 based on suggestions received. The suggestions received mostly aimed at unpermitted landscaping and dumping of waste on land, and a number of suggestions pointed out activities such as waste crushing in terms of dust, noise and violations of operating rules. Some of the suggestions were transferred to municipalities since they were outside the CEI's jurisdiction. We ran 228 delict proceedings, resulting in conclusive fines totalling CZK 15,623,000.



Waste not secured during collection; facility storage capacity exceeded

Waste reuse on ground surface

These inspections involved primarily facilities reusing waste soil and construction waste for land reclamation and landscaping, where waste is layered and used for levelling ground depressions. We found problems

in temporary collection and storage of soil (during construction at a different place, and unpermitted deposits of construction and demolition waste), bituminous mixtures and landscaping using construction and demolition waste not properly granulated to form high-quality recycled material. We investigated situations where landscaping affects land included in the agricultural land fund (ALF) or forest land, as well as unpermitted handling of sediment extracted from a fishpond. The total quantities of waste in temporary stores and landscaping tend to be considerable (up to dozens of tonnes). In addition, we found that areas are not secured against entry of unauthorised persons, admitted waste is not inspected, facilities are not monitored adequately, records and operating logs are not kept, waste quality is not identified before admission pursuant to the executive decree. We also detected dumping, spreading and compacting of excavated earth outside construction sites. Firms will often accept waste from construction companies even if they are not authorized to accept such waste.

Waste recycling facilities

The inspections at 75 waste recycling facilities resulted in 48 delict proceedings, producing conclusive fines totalling CZK 2,682,000. Permitted facilities were found to violate requirements of regional authority decisions on facility operation and of operating rules for reuse or treatment of waste, i.e., violation of operating rules. Fines were imposed, for example, for failure to keep records on admitted waste, failure to prove correctness of data in annual waste production and management reports, where material flows for large quantities of "other" and "hazardous" waste could not be traced, yet had been demonstrably admitted by the facilities. Moreover, we found, for example, that waste was not secured against destruction, theft or release and against weather effects, and quantities of waste exceeded the permitted one-time capacity set in the approved operating rules for the facilities. We also found out that mobile waste crushers were operated on land without necessary consent of the applicable regional authority and that outputs from recycling plants in the form of crushed construction debris and asphalt were handed over to unauthorised entities; some of the inspected entities failed to report on waste types and quantities and methods of handling them on behalf of the mobile waste reuse facilities (unpermitted location, operation without consent, violation of business hours set by operating rules). We investigated the use of crushed automotive tyres and applications of harmful recycled material containing asbestos, which may be hazardous to the environment or human health. Inspections at facilities treating waste (construction waste in particular) producing treated waste or products (as per certificate or declaration of conformity), we found recurring unclarity associated with definition of by-product or situations under which waste ceases to be waste.

Biodegradable waste treatment facilities

In the area of biodegradable waste (BDW) treatment facilities, the CEI made 52 checks in 2020 and received nine suggestions, which is comparable to 2019, when we dealt with 10 suggestions. A detailed breakdown by BDW treatment facility type is shown in the table below.

Biodegradable waste reuse facilities

	No. of inspections	No. of suggestions
Composting plants	41	5
Biogas stations	8	1
Use of sludge on ALF	3	3
Total	52	9

In the course of 2020, we initiated 28 delict proceedings and 26 decisions entered into force, imposing fines totalling CZK 575,000. In one case, the CEI imposed a fine of CZK 60,000 on a composting plant operator for violating the Inspection Rules by not providing the CEI with requested documents necessary for proper inspection evaluation. The CEI imposed the greatest fine of CZK 100,000 to a composting plant operator for violating the approved operating rules primarily by accepting sludge from municipal wastewater treatment to the composting plant even though it was not used in the composting plant, only then handed over without any treatment for use on agricultural land, which it was not permitted to do. The composting plant operator also violated other points of the operating rules and made record-keeping errors. The CEI decision was confirmed in full by the authority of appeal.

The most inspections were carried out at composting plants, as in previous years. Specifically, we checked 41 composting plants in 2020. With that number, there were 34 composting plants operated based on approval of applicable regional authorities or integrated permits, as well as three so-called small facilities and four instances of community composting. Composting plants were also the subject of most of the delict proceedings (23) and of the conclusive decisions (23).

When inspecting composting plants operated based on approval of applicable regional authorities, the CEI most commonly found violations of facility operating rules, exceedance of facility capacity, violations of prescribed composting procedures, insufficient temperature measurement in batches, insufficient frequency of compost inspection analyses and not monitoring all indicators for assessment of composting plant output and handling of BDW outside secured plant areas. Moreover, CEI inspectors frequently find violations of record-keeping duty (errors in continuous records, failure to submit annual

waste production and management reports, not keeping operating logs and batch cards, etc.). For example, we imposed a fine of CZK 40,000 on a composting plant operator for operating the plant after expiry of the respective approval. Besides, we found that the required temperatures were not achieved in batches during the composting process and that operators submitted reports stating incorrect data. Inspections of small facilities showed continuing problems with exceeding the maximum quantity of waste per batch and non-performance of output (compost) analyses.

CEI inspectors also check biogas stations that receive waste and use of sludge on agricultural land. All the inspections focused on use of sludge on agricultural land in 2020 were made based on received suggestions, which pointed out mainly allegedly unauthorised dumping of WWTP sludge on agricultural land. In connection with use of sludge on agricultural land, the CEI imposed two conclusive fines in 2020. In one case, the CEI imposed a penalty on a biogas station operator for violating the operating rules by insufficiently checking the digestate quality.

Illegal waste handling

Illegal waste disposal and, most importantly, depositing as part of unpermitted landscaping was investigated in 347 checks or inspection operations, most of which were based on suggestions received. Besides burning of waste (15 investigations identified 8 delicts worth CZK 216,000), they involved illegal landscaping using construction waste (152 delict proceedings in force worth CZK 12,150,000) and illegal dumps (we only dealt with those where the originator is known; resolving illegal dumps falls within the powers of ORP as of 2021 due to the new Waste Act). The amounts of penalties from delict proceedings, 167 have come into force so far, totals CZK 12,366,000. The greatest fines for illegal waste handling amounted to CZK 3,500,000 for disposing of 26,123 tonnes of earth and stone waste in places not designated for the purpose and for unauthorised handover of 16,042 tonnes of construction waste, waste concrete and asphalt; and a fine of CZK 1,500,000 for handling 9,334 tonnes of construction waste and waste earth in landscaping.

Waste collection and repurchase facilities

In 2020, we made 183 checks at waste collection and repurchase facilities and storage facilities for other and hazardous waste. We initiated 85 proceedings on fines, and 78 decisions entered into force, imposing fines totalling CZK 3,658,000.

The CEI work focused on potentially problematic facilities. In most cases, our inspection work

did not find major legal violations. One of the most frequent violations identified in 2020 was violations of facility operating rules, e.g., exceedance of one-time and maximum facility capacity. Our checks constantly discover insufficient identification of collected waste, notably hazardous waste, including graphic hazard symbols, and non-provision of hazardous waste identification sheets for collection points. Other recurring finding is insufficient information on the notice boards of waste collection and repurchase facilities, such as incomplete lists of wastes repurchased. On the contrary, waste repurchase from natural persons showed fewer and fewer errors in identification of persons bringing the waste, and we also found fewer cases of cash payments compared to previous years (only one violation found in 2020).

Mobile waste collection and repurchase facilities continue to appear problematic: they are a weak link particularly in the area of hazardous waste handling; the system permits, to a great extent, various methods of illegal hazardous waste handling. Even though the hazardous waste transport registration system (SEPNO) tries to trace hazardous waste from the originator to the final use or disposal, the effort is frequently thwarted by handing waste over between mobile facilities or mobile facility operators not reporting waste transport from stationary facilities, which complicates the tracing considerably. This practice should be curbed to some extent by a legislative amendment. In addition, the problems with the annual waste management reports, which are either incorrect or not submitted at all, do not make the waste tracing any easier. As concerns waste collection and repurchase facilities and storage facilities for other and hazardous waste, systematic inspection work is still crucial as it promotes compliance with regulations in this area of waste management. Within this departmental task, the greatest conclusive fine of CZK 400,000 was imposed on a mobile facility operator. The penalty was assessed for fictitious handover of 794 tonnes of hazardous waste to the facility for disposal in 2016, although the mobile facility had never physically accepted or handled the waste, meaning that the annual waste management reports were fake and the final waste management data were thus distorted. The penalty was confirmed by the authority of appeal.

Car wreck collection, repurchase and processing facilities

In the area of car wreck management, we inspected 72 entities in 2020, including 28 checks based on suggestions received. For comparison, the CEI inspected 90 entities and received 35 suggestions in 2019; there was thus a decrease in the number of inspections and a slight decrease in the suggestions received in this area. CEI inspectors initiated 40 delict proceedings and 33 decisions entered into force in 2020, imposing

finest totalling CZK 1,511,000. Four of the fines totalling CZK 100,000 were imposed for the inspected entities' non-cooperation in inspection, i.e., violation of the Inspection Rules. The CEI imposed fines on three natural persons; the remaining cases were legal entities and natural persons authorised to do business.

In 2020, CEI inspectors dealt with both suspicions of illegal car wreck handling and checks of car wreck collection and/or processing facilities approved by applicable regional authorities. When inspecting the approved facilities, the CEI identified, as in previous years, particularly violation of facility operating rules (e.g., capacity exceedance, storage and disassembly of car wrecks outside approved areas, malpractice in car wreck storage, not securing admitted car wrecks against oil leaks, etc.) and record-keeping malpractice. The greatest conclusive fine amounting to CZK 350,000 was imposed on a car wreck collection and processing facility operator. The CEI handled the case based on a suggestion of the Czech Police, which had fined a traffic offence committed by a car wreck that should have been disposed of at said authorized facility. The CEI's check identified more violations of the Waste Act by the operator, including more than tenfold exceedance of the permitted facility capacity, storage of admitted car wrecks in areas not permitted by the regional authority and record-keeping malpractice. The CEI decision on the imposition of a fine was confirmed by the authority of appeal. The CEI filed a motion to the regional authority to cancel its approval to the facility.

Our inspectors handled multiple cases in 2020 where a car wreck accepted by a permitted facility, which had issued a confirmation of environment-friendly disposal, was found in traffic by the Czech Police, e.g., during a routine road check, involved in a traffic accident, etc. The CEI considers such cases serious particularly with a view to the technical condition of the vehicles which their previous owners had wanted to get rid of, so they handed them over for disposal and thus removing them from the registry.

As in previous years, the CEI again handled cases of illegal car wreck disassembly. These are vehicles accepted by permitted facilities but in reality disassembled by other people in other places than permitted by the regional authority. In such cases, we impose fines on both illegal workshops and permitted car wreck collection facilities. The CEI also comes across cases where vehicles are purchased from abroad that had an accident or are in poor technical condition and are then disassembled for spare parts in places not designated for the purpose. In more serious cases, car wrecks are disassembled or stored in hydraulically unsecured areas, thus posing a risk to surface waters and groundwater.



Illegal car wreck facility inspection

Recollection of used products

Recollection of used products includes electrical appliances, batteries and storage batteries and tyres. The CEI made 139 checks in this area in 2020, including 62 based on suggestions received. Some of the suggestions aimed at multiple manufacturers/obliged entities not complying with legislative requirements or multiple non-functioning recollection points, meaning that multiple checks ensued from one suggestion. As in 2019, the CEI received the most suggestions concerning non-functioning tyre recollection points. However, the CEI also dealt with functionality and availability of electrical appliance recollection points.

The table below shows numbers of inspections by product type subject to recollection; some of the inspections focused on multiple products handled by the inspected entity.

Recollection of used products

	Number of inspections
Electrical appliances	67
Tyres	66
Batteries and storage batteries	8
Total	139

As in previous years, the CEI checked primarily entities that place products on the market, distributors, end vendors and processors of said products, as well as recollection points to see whether they are functional and accessible for end users and perform recollection free of charge. CEI inspectors initiated 50 proceedings on fines in 2020, and 49 decisions entered into force, imposing fines totalling CZK 953,000. Some of the conclusive fines were imposed for facts identified by inspection in 2019. The greatest conclusive fine of CZK 150,000 was imposed on an end vendor of electrical appliances that failed to provide recollection of appliances at the point of supply of new

appliances, i.e., “one for one” and for said end vendor having a system not permitting recollection of electrical appliances free of charge; it conditioned recollection by ordering and paying a special package, which included additional services (carrying the appliance upstairs and connecting it) not related to the mandatory free recollection obligation.

Tyres

In the area of tyre recollection, the CEI inspected 14 obliged entities, 27 end vendors and 29 recollection points. As said above, the CEI received the most suggestions concerning non-functioning tyre recollection points, notably recollection points set up by individually performing manufacturers, e.g., at car repair shops, tyre service shops and car vendors. The suggestions received mostly highlighted absolute refusal of tyre recollection or conditioning of recollection by purchasing new tyres.

In addition, the CEI checked tyre importers and transboundary hauliers who were suspected of not performing their obligations (free riders) and checked compliance of individually performing entities (primarily provision of minimum recollection levels, submission of annual reports, etc.). Among the end tyre vendors, we checked primarily compliance with the obligation to inform end users, recollection implementation and obligation to state separately on sale bills the costs of tyre recollection and processing and waste tyre reuse. In the area of tyre recollection, we imposed 17 conclusive fines totalling CZK 303,000. For example, a fine of CZK 100,000 was imposed on an obliged entity suspected by the CEI of non-functioning of recollection points set up by it, for non-cooperation in inspection. In addition, the CEI imposed a fine of CZK 60,000 on an obliged entity not performing any of its obligations (i.e., not submitting a motion for registration in the list of obliged entities, not doing recollection, not meeting the minimum recollection level and not making an annual report). In 10 cases, the CEI imposed fines on end vendors, particularly for not informing end users about the recollection method, charging a fee for recollection or not showing separately the costs of recollection on sale bills; the fines ranged from CZK 3,000 to CZK 25,000.

Electrical appliances, batteries and storage batteries

In the area of electrical appliance recollection, the CEI made 67 checks, most of them (25) at recollection points. The checks were related primarily to suggestions received, pointing out non-functioning recollection points within a joint recollection system. Besides, we checked 11 manufacturers, 18 end vendors, 2 distributors, 3 joint recollection systems and 10 electrical appliance processors. In the area of batteries and storage batteries, we checked 4 manufacturers (3 of them

were proven to be free riders), 3 end vendors and 1 recollection point. In estimating entities suspected of free riding, the CEI inspectors use primarily information about imports of electrical appliances, batteries and storage batteries provided by the Customs Administration.

In this area, CEI inspectors initiated 32 proceedings and 31 decisions entered into force, imposing fines totalling CZK 650,000. As in 2019, the most frequent legal violation in this area is free riding of importers of electrical appliances and batteries. Moreover, the CEI imposed fines on end vendors of electrical appliances for not permitting recollection “one for one” and not informing end users about the recollection method. In three cases, we imposed fines on electrical appliance processors for record-keeping malpractice and, in one case, for exceedance of annual facility capacity (i.e., violation of facility operating rules).

Industrial businesses and other waste producers In 2020, our inspectors made 612 checks of waste producers. We initiated 152 proceedings on fines, and 148 decisions entered into force in 2020, imposing fines totalling CZK 3,408,000.

Traditionally, a large portion of the waste producers inspected are large industrial facilities having integrated permits. However, the COVID-19 pandemic meant that a number of these inspections had to be shifted to 2021, as in other areas, resulting in a noticeable decrease in inspected entities. Besides scheduled checks, the CEI WMD inspectors investigated suggestions received with a priority. Thanks to continuous training on legislation by company environmental officers, big waste producers, usually having integrated permits, were again not problematic entities in terms of compliance with the Waste Act. We identified rather minor delicts, such as inadequate waste sorting due to poor staff discipline. Major waste producers include construction companies, where CEI WMD inspectors find delicts in handling waste earth and demolition material. This waste is often deposited in areas not designated for the purpose and, due to its seeming harmlessness, handed over entities not authorised to accept it. Another recurring, one might even say traditional, violation of the Waste Act among waste producers was non-performance of registration and reporting duties, errors in identification or labelling of hazardous waste, collection of waste not separated by type and insufficient securing of waste against destruction or release into the environment.

The greatest fine imposed by the CEI WMD on a waste producer was CZK 200,000; it entered into force in 2020 after confirmation by the authority of appeal. It concerned the construction

waste domain. A construction company was building a sewer system and a wastewater treatment plant, depositing excavated waste earth on several plots of land not designated for it. On some plots, the company used the earth for unpermitted landscaping, and it also dumped waste produced by road modifications necessary for the sewer system construction. The company also handed some of the waste earth to a natural person not doing business.

Municipalities

In 2020, the CEI WMD made 65 inspections of municipalities. We initiated 18 proceedings on fines, and 17 decisions entered into force, imposing fines totalling CZK 459,000. Inspections at municipalities focused primarily on provision of sites for separate collection of municipal waste components, i.e., hazardous waste, paper, plastics, glass, metals and biodegradable waste (BDW), and newly since 1 Jan 2020, cooking oil and fat. The new obligation to collect cooking oil and fat was adopted well by municipalities; most of them had been ready for the new collection item at the end of the year before. Most of the municipalities inspected have an adequately set system for municipal waste collection, transport, sorting, reuse and disposal due to many years of practice, as well as designated areas for collection of municipal waste components. Adaptation to new waste-related legislation is a new biggest challenge.

However, inspectors in 2020 came across problems with construction and demolition waste and biodegradable waste in municipalities. Owing to lack of knowledge, construction and demolition waste produced by construction work in municipalities are sometimes deposited without quality analysis on municipal land not designated for it or used for mending tracks or filling various depressions in municipal territory. The greatest fine of CZK 180,000 was thus imposed on a municipality for depositing a mixture of crushed gravel with asphalt coating from renovation of an asphalt road on land falling within the agricultural land fund, which is subject to special protection and is not intended for waste management.

In summer in particular, biodegradable waste was burnt in the open air in a few cases, contradicting the law. They included, for example, branches, grass and cemetery green waste. Our inspectors also came across a case where BDW was handed over, in good faith probably, to a farmer for reuse, but the farmer was not authorized to accept it pursuant to the Waste Act.

Transboundary waste transport

The CEI WMD powers include inspections focused on performance of obligations related to transboundary waste transport, particularly senders and recipients of waste pursuant to

EU Regulation no. 1013/2006 on waste transport (the "Regulation"). They include mandatorily scheduled inspections as required by the Regulation, made at waste producers or facilities that trade in waste (import and export). In addition, the CEI WMD makes checks based on information about intercepted unpermitted transport in the CR and abroad. In such cases, the CEI cooperates with the MoE (international collaboration) and customs authorities (CA). The purpose of the inspections in 2020, too, was to check compliance with the Regulation (notably prohibitions and restrictions, waste classification), including transport administration (documents). As the year 2020 was complicated by the COVID-19 pandemic, the collaboration with customs authorities was still restricted; they make roadside checks, particularly at former border crossings and other selected sites. We continue our cooperation between with customs authorities, authorities in criminal proceedings and the judiciary, since many cases of unpermitted transport potentially shows signs of the crime of unpermitted waste handling. We also continue the collaboration under the agreement between the CEI and the Polish Environmental Inspectorate GIOS. Due to the increased production of medical waste and its expected increased transports, the Europol responded on an international scale with its action Retrovirus and then an early warning report concerning possible illegal handling of medical waste during the second wave of the COVID-19 pandemic.

In 2020, we inspected 56 waste senders and recipients, mostly entities transporting waste subject to the so-called green list. Thanks to the collaboration with the Customs Administration, we inspect waste transport companies. This is mostly in response to unpermitted shipments identified by the Customs Administration, where checks of waste hauliers and recipients have ensued. We initiated 21 delict proceedings under this departmental task. 19 decisions on fines totalling CZK 924,000 entered into force.

The most frequent and recurring findings relate to discrepancies in transport documentation, such as incorrect or false data in Annex VII to the Regulation or absence of a contract pursuant to Article 18. In some cases, this is caused by lack of knowledge; in others, the documents show business relationships rather than physical waste routes, and inspectors have come across cases indicating deliberate manipulation of documents in an effort to conceal the actual waste handling. If the data are false regarding the actual waste route, type and recipient, information is inconsistent, etc., the transport is assessed as unpermitted, followed most commonly by a delict proceeding for the waste sender or recipient, sometimes cooperation with authorities of criminal proceedings. Besides, the waste quality did not in some cases comply with the green list requirements; the CEI also came across cases of importing waste declared as products even though it was waste (e.g., crushed and destroyed waste tyres,

earth mixed with municipal waste). We also repeatedly come across cases where a recipient operating a facility for preliminary treatment of R12/R13 waste does not comply with the rules of Government Regulation no. 352/2014 on the Waste Management Plan of the CR. If waste intended for preliminary reuse are shipped to the CR, information on the subsequent use other than preliminary has to be provided in a document under Annex VII to the Regulation or an annex to the document. Newly, this obligation is anchored directly in Act no. 541/2020 Coll. on Waste, giving the CEI a new instrument for enforcing the obligation from entities involved in waste transport (waste hauliers and, most importantly, recipients). Waste transport for preliminary use only (typically R12/R13 – sorting, modification, storage) is therefore not regarded as transport for eco-friendly waste reuse. During roadside checks in particular, the inspection authorities can better use the options of the Act and the Regulation; if verifiable information about the end use of the waste is not presented, they will use their legislative option to take vehicles out of traffic and inform applicable authorities about unpermitted waste transport, so that hauliers are at a greater risk of waste repatriation and related delays and cost increases.

Another frequent violation in waste transport, even in cases wholly within the CR, is failure to mark vehicles transporting waste; our inspectors also collaborate with the CA on such cases. However, vehicle marking is not the waste hauliers' only duty; they are also responsible for giving the driver properly and correctly completed documents for the duration of the transport. As with senders and recipients, our inspectors come across errors in documents for transports pursuant to the green list, e.g., recipient not specified correctly, incorrect waste declaration, weight and reuse method, sender's signatures, etc. For such shortcomings, usually connected with failure to mark vehicles as well as absence of hazardous waste identification sheets in cases of hazardous waste transport, we imposed 11 conclusive fines on hauliers totalling CZK 88,000. The CEI also made one crime report in 2020 due to a reasonable suspicion about the commitment of a crime of unpermitted transport of waste to the CR. Since the cases and persons are still in investigation or proceedings have not been concluded, we cannot provide specific details on these cases yet.

In 2020, too, we identified serious cases of unpermitted transport of waste to the CR, because our country still seems to be a relatively cheap market for waste lacking processing capacities. In most cases, the waste is declared as "green list" waste but, in reality, it often shows signs of municipal waste more than anything else. At the end of 2020 and effective as of 1 Jan 2021, Annexes to EU Regulation no. 1013/2006 on waste transport were updated, further complicating

the already limited possibility to export plastic waste, which is why we cannot expect an improvement next year, because the processing (recycling) capacities in the EU and the OECD are still insufficient. Our inspectors come across cases showing a high level of organization and practicality. The waste market is still very profitable, which is why ever more companies are willing to violate the law for financial benefit.

The greatest conclusive fine of CZK 490,000 imposed by CEI inspectors for transboundary waste transport was confirmed by the authority of appeal in 2020. The violation consisted in importing more than 25 thousand tonnes of various catalogue types of waste to the CR in contravention of transport documents. Thus, the company had deliberately produced false documents in order to conceal the origin of the waste and enable handing over the waste under quite different catalogue numbers for further handling in the CR. Another finding made in 2019, relating to an illegal import of plastic waste of zero material reusability from Italy and its illegal dumping in a reclaimed area, resulted in a CEI imposing a fine of CZK 450,000. In this case, we fined a facility operator for operating the facility in contravention of its approved operating rules, namely accepting 567.4 tonnes of the waste at Lazy u Orlové and at Dolní Suchá and dumping approx. 28.92 tonnes of the waste by way of landscaping as part of revitalisation of the territory in question.



Illegally dumped waste from unpermitted waste shipment

Inspection of compliance with Packaging Act

CEI WMD inspectors also check obligations under the Packaging Act. In 2020, we made 77 checks in this area, which was about 25% fewer than the year before, when we had checked 104 entities. In the course of 2020, we initiated 50 proceedings on the imposition of administrative penalties, and 53 decisions entered into force. They imposed fines for violations of the Packaging Act and, in four cases, the Inspection Rules (particularly not presenting document necessary for proper inspection performance), totalling CZK 986,000.

In the area of packaging and packaging waste management, the CEI focused, as in previous years, particularly on entities suspected of not performing their obligations under the Packaging Act at all. They include notably importers of packaged goods and entities packaging their goods for customers, e.g., operators of e-shops and bistros and restaurants offering take-away food in non-returnable packaging (largely plastic and polystyrene boxes) without a contract with an authorized packaging company (AOS) and without registration in the so-called List of Entities. In addition, the CEI received two suggestions pointing out entities not performing their obligations.

In 2020, we also inspected entities registered in the List of Entities pursuant to Section 14, Para. 1 of the Packaging Act, who are primarily obliged to make sure that waste from packaging placed by them on the market or into circulation is reused to the mandatory extent, to keep continuous records on packaging and packaging waste and methods of handling them and report data from said records to the MoE annually. The checks most commonly find violations in the form of non-performance of the mandatory extent of recycling or incorrect completion of annual reports on packaging and packaging waste.

The greatest conclusive fine of CZK 150,000 was imposed on the operator of a fast-food network issuing packaged food to customers. They included, in particular, polystyrene food packaging and plastic cups. Although said operator had already been fined for non-performance of its obligations under the Packaging Act in 2018, the check in 2020 found that it was still not performing, and it remedied the situation only after our second check. Besides in 2020, CEI inspectors fined other restaurant operators offering takeaway food in non-returnable packaging, importers and vendors of wine, foodstuffs, drugstore goods, detergents and disinfectants, weapons, household supplies, watches, etc. Most of the entities found not performing their obligations under the Packaging Act remedied the situation after our check.

Effective as of 1 Jan 2021, obliged entities are allowed an exemption from the obligations under the Packaging Act pursuant to Section 15a of the Packaging Act providing they meet simultaneously two requirements on annual turnover and quantity of packaging they placed on the market or in circulation: annual turnover of CZK 25 million (4.5 million before 31 Dec 2020) and less than 300 kg of packaging. However, they have to prove compliance with said requirements during inspection. The exemption was applied and complied with by four entities in 2020; thus, more frequent application can be expected in the coming years.

Inspections of adherence to Chemicals Act and Biocides Act
The checks focused on regulations on chemicals,

including the Chemicals Act, the Biocides Act and associated directly applicable European regulations: REACH, CLP, the Detergent Regulation, Biocides Regulation and others. Under the above regulations, the CEI made 481 inspections. Most of the inspections concerned REACH (registration of substances, material safety data sheets, restricted and authorised substances, totalling 211 checks) and obligations under CLP (classification, labelling and packaging of substances, 188 checks in total). Biocidal products (including disinfectants) were checked in 65 cases. Another 170 inspections were made based on 142 notifications received from the EU Rapid Alert System for Non-Food Products (Safety Gate/RAPEX). The CEI also made inspections based on notifications from the Poison Centre; they were cases of accidents in connection with a dangerous chemical mixture that had not been reported to the Ministry of Health register (CHLAP chemical and preparation register).

In 2020, 114 fines and reprimands imposed by the CEI under the Chemicals Act, the Biocides Act and Inspection Rules (Act no. 255/2012 Coll.) entered into force, totalling CZK 2,453,000. We initiated 121 delict proceedings. Most of the violations concerned wrong identification of substances or mixtures, notification of chemical mixtures to the Ministry of Health register, quality of material safety data sheets, biocidal products, advertising on the internet and restricted substances.

We continued our collaboration with foreign inspection authorities. The CEI received information about five cases of violations by supervisory authorities in other EU states, and sent four cases abroad. The CEI was also involved in the work of the European Chemicals Agency (enforcement information exchange forum and biocides working group). CEI employees were actively involved in two forum working groups (project prioritization and pilot project preparation on reclaimed substances).

Thematic inspections

• REF-8

As part of the Europe-wide inspection project REF-8, we inspected throughout the year compliance of products (substances, mixtures, items, biocidal preparations) sold via the internet with requirements of the REACH, CLP and BPR regulations. As concerns the REACH regulation, we inspected material safety data sheets and regulated substances (e.g., heavy metals, substances contained in textile products). The CLP and BPR checks concerned advertising for hazardous chemical mixtures and biocidal products. We checked a wide range of on-line vendors and product types (disinfectants, costume jewellery, construction and swimming pool chemicals, cleaners, decalcifiers, solvents and paints, nicotine-containing mixtures, textiles, solders, etc.). Out of the 44 inspections, we found violations of chemical legislation in at least 36 cases, representing a high degree (82%) of

non-compliance with legislative requirements (31 violations of CLP, 9 of BPR and 7 of REACH). In 2020, we imposed 29 conclusive fines totalling CZK 522,500, representing about 21% of the total sum of conclusive fines in the chemical area in the report period.

The most frequent violations include not informing consumers about dangerous properties of products purchasable on-line. Most of our inspections of costume jewellery (using screening methods to identify excessive contents of lead, cadmium or nickel) found relatively significant quantities of non-compliant products.

• CASP 2020

In the first half of 2020, our inspectors checked costume jewellery marketed via internet shops. This inspection work was grounded in a European Commission activity (CASP 2020 project) and made use of product testing in an accredited laboratory in the EU. We inspected lead, cadmium and nickel contents in costume jewellery (bracelets, earrings, necklaces, components, rings, broches) using an X-ray spectrometer, and sent those in which we found potential unpermitted contents for an accredited composition analysis.

We made four inspections and then tested 19 products, in which we found potential excessive lead, cadmium or nickel, which pose a risk to human health if worn (particularly on long-term contact with the skin). The EU project found non-compliance in 35% of the inspected products (180 items analysed in total), most of which came from European e-shops. In the CR, non-compliance was found in 79% of the analysed product, the highest value of all the eight participating countries. This rate is not caused by a high share of non-compliant products on the market but the high efficiency of the screening, used in inspections for selecting potentially dangerous products.

CEI inspection work on disinfectants From the start of the coronavirus crisis, CEI inspectors checked the sales of disinfectants (PT1/2) via the internet. Our inspectors collected records on 125 products sold via the internet suspected of potential violation of regulations falling within the CEI's jurisdiction (notably labelling, packaging, material safety data sheets, internet sales). Another activity was monitoring of disinfectants used for cleaning public areas (by public transport companies in particular). We registered the use of 68 disinfectants.

Major case in chemicals agenda: GS Caltex Czech, s.r.o. In the period from between 1 Jan 2017 and 31 Dec 2018,

the company imported from Korea more than 1 t/year of substances not registered with the European Chemicals Agency. They included, e.g., calcium stearate and 1-octene. The company failed to report classification and labelling of other imported substances to the ECHA. For this violation, we imposed a fine of CZK 200,000 on the company.

4.3.3 Overview of performance of specific tasks

In addition to nation-wide departmental tasks, the CEI TI set specific tasks. These tasks correspond to local needs based on knowledge of the respective region. Alternatively, they were inspections at a specific entity with follow-up checks monitoring individual waste streams. However, the inspections could not be carried out in full in 2020 with a view to the epidemiological situation, and are expected to continue in the next period (e.g., medical waste handling). Under specific tasks, we inspected, e.g., record-keeping discrepancies based on CENIA data analysis, historic environmental burdens, joint inspections with the FRS in waste reuse or disposal facilities, waste flow checks in selected mobile facilities and sites with abandoned waste.

HEB inspections at Ostramo lagoons

An important remediation project was the continued elimination of sludge from Ostramo lagoons; the excess sludge was removed completely from the lagoon site by the end of the year, totalling 77,500 tonnes. In the course of 2020, we also continued our regular supervision of the transport of the excess sludge from the Ostramo lagoons to the hazardous waste dump in Čáslav. In 2020, we carried out inspections at a waste co-incineration facility (Sokolovská uhelná, právní nástupce, a.s.), which gasified the sludge together with brown coal until August 2020. A part of the sludge is temporarily stored at two sites, from where they will be handed over for thermic disposal to Germany (MUEG facility with final use at LEAG power plant). The remediation checks will continue in 2021.

4.3.4 Major cases

Highest conclusive fines in the department by TI Prague TI Purum s.r.o.

In 2018, we inspected the facility "Waste handling centre" at ÚVR Mníšek pod Brdy in Mníšek pod Brdy ("Mníšek facility"). The CEI check found out that Purum s.r.o. had violated binding requirements of the integrated permit decision for the Mníšek facility. The violation by Purum s.r.o. consisted primarily in the fact that it had exceeded the capacity for admission of hazardous waste enormously, many times, at three facilities integrated in the Mníšek facility, stored the hazardous waste

in a risky manner, and even handled it outside the designated Mníšek facility (in HARD hall). For this identified violation, the CEI imposed a fine of CZK 4,000,000 on Purum s.r.o. Purum s.r.o. then appealed against the decision on the fine to the MoE; the authority of appeal confirmed the CEI's decision in full and the decision entered into force.

České Budějovice TI

HOKOV, spol. s r.o.

A conclusive fine of CZK 400,000, confirmed by the authority of appeal in 2020, was imposed for stating false data in the annual waste production and management report, which made it impossible to trace material flows or large quantities of other and hazardous waste, which had been admitted to a permitted facility of HOKOV, spol. s r.o. according to the documents.

Plzeň TI

Recyklace Sanace Bohemia s.r.o.

A conclusive fine of CZK 3.5 million was imposed for disposal of 26,123 tonnes of earth and stone waste (output from facilities) on land/sites not designated for the purpose and handover of 16,042 tonnes of concrete waste, crushed construction debris and asphalt to unauthorised entities. The violation occurred in 2017, the inspection started in 2018 and the proceeding was only completed successfully in 2020. The entity deliberately delayed the investigation, resulting in the imposition of two fines for non-cooperation pursuant to the Inspection Rules.



Waste disposal in places not designated for it

Ústí nad Labem TI FIKOV

Metal s.r.o.

The CEI made an inspection of compliance with the Waste Act at FIKOV Metal s.r.o. facility for collection, repurchase and reuse of waste (car wrecks) in Lovosice. The inspection found that in 2016

and 2017, the company exceeded the annual car wreck capacity. The car wrecks were handled (stored) outside areas defined in the facility operation approval, some still contained operating fluids without any trays or other devices placed under them to prevent leakage of operating fluids into the environment. Besides, the company exceeded the permitted numbers of unprocessed car wrecks stored in areas designated for the purpose. In contravention of legal regulations, a car wreck that had been submitted to the facility for eco-friendly disposal was found travelling on a road. Moreover, the company had not submitted a report on collection and processing of car wrecks and their parts, production and handling of car wrecks for 2016; it submitted the report completed wrongly in 2017. For the violation of the Waste Act, we imposed a conclusive fine of CZK 350,000 on the company. The authority of appeal confirmed the CEI's decision in full. Due to repeated legal violations, the CEI filed a motion to the regional authority to cancel its approval to the facility.

Hradec Králové TI

FCC HP, s.r.o., Lodín landfill

When inspecting the company FCC HP, s.r.o., namely its facility "Lodín landfill and solidification plant", we found that the company had used, at least since 1 Jan 2016 to the CEI inspection date, five types of certified products from waste as material for technical security structures for the landfill, which was not a permitted activity. By doing that, the company violated requirements of the integrated permit decision. Moreover, the quantity of products used for the technical security structures were not included in the threshold of 20 percent of total weight of waste stored in the landfill in the calendar year that can be exempted from the waste storage fee; if this amount is exceeded, the waste storage fee has to be levied and a financial reserve for land reclamation of the landfill has to be generated. The CEI imposed a fine of CZK 3.5 million on the company. The company appealed against the CEI decision. The authority of appeal dismissed the appeal and confirmed the CEI's decision.

Havlíčkův Brod TI

MV Speed s.r.o.

Based on a received suggestion, the CEI inspected compliance with the Waste Act in connection with a backfill on land at Kozichovice. The check of the land plots and the presented documentation found out that MV Speed s.r.o. had, between 13 Apr 2018 and 18 Apr 2019, handled at least 5,069 tonnes of waste earth on land not designated for waste handling. The company thus violated its obligation under Section 12, Para. 2 of the Waste Act. Moreover, we found out that MV Speed s.r.o. had, between 13 Apr

2018 and 31 Mar 2019, accepted at least 3753 tonnes of waste earth into its ownership without being authorized for accepting the waste. For these legal violations, the CEI imposed a fine of CZK 300,000 on MV Speed s.r.o., which entered into force in 2020.

Besides, in the same case, we imposed a conclusive fine of CZK 120,000 for violation of Act no. 334/1992 Coll. on Agricultural Land Fund Protection, as amended, and a conclusive fine of CZK 178,000 for violation of Act no. 114/1992 Coll. on Nature and Landscape Protection, as amended.

Brno TI

EUROFIN - IMC, s.r.o.

In 2018, the company carried out landscaping on plots at Němčický using 229,000 tonnes of waste. Specifically, it comprised nearly 219,000 tonnes of earth, 9,500 tonnes of mixed or separate concrete, bricks and roof tiles and over two tonnes of bricks. No landscaping on the site had been permitted at the time pursuant to Section 14, Para. 1 of the Waste Act or to the Building Act. Moreover, the company failed to report on waste types, quantities and handling methods and on waste producers for 2017 for the mobile waste collection and repurchase facility operated by it. The company appealed against the fine of CZK 1,000,000, and the authority of appeal reduced the fine to CZK 500,000.



Unpermitted landscaping

Olomouc TI

Natural person authorised to do business

A natural person authorised to do business, being the operator of the waste reuse facility "Obora Landscaping, Stage 2" on land in Dub nad Moravou, operated the facility on the day of CEI inspection, 18 Jun 2018, in contravention of operating rules. The operator had reused approx. 210 tonnes of construction and demolition waste and organic waste without authorization, thus acting in contravention of the operating rules. As it did not present requested documents on operation of the

facility, the CEI concluded it was a violation of Section 10, Para. 2 of the Inspection Rules and imposed a conclusive fine of CZK 95,000.

Ostrava TI

AMAZE AGENCY s.r.o.

The CEI inspected the company in 2019 based on a notification by the Railway Infrastructure Administration concerning the discovery of some barrels on a plot of land at Sedlnice and in connection with a case of a vehicle halted by a Customs Authority patrol near Mikulov border crossing. The inspection found that the company had committed of six instances of unpermitted waste transport totalling 126,720 kg with the transported waste disposed of immediately at a landfill; in addition, we found that the inspected entity had violated several other provisions of the Waste Act in connection with operating a waste collection facility. The CEI made a report on the suspicion of the commitment of a crime consisting in unauthorised waste handling under

Section 298, Para. 1 of Act no. 40/2009 Coll., the Penal Code, which resulted in the initiation of a penal proceeding against the company as a legal entity and two natural persons on an offence under Section 298, Para. 1 of the Penal Code. In the proceeding, the CEI provided Czech Police with professional assistance and cooperation. The violation of the Waste Act led to a proceeding that imposed a conclusive fine of CZK 1 million. The CEI also filed a motion with the applicable regional authority to revoke its approvals for the facility, which the regional authority then revoked.

Liberec TI

Velké Hamry Municipality Harrachov Municipality

The CEI imposed the greatest fine on Velké Hamry Municipality for illegal handling of fishpond sediments on municipal and private land without ruling out hazardous properties of the waste sediment. A fine of CZK 100,000 was imposed on the municipality pursuant to Section 12, Para. 2. An identical fine was imposed on Harrachov Municipality for burning waste from the former customs house on an unsecured municipal plot.

4.3.5 Conclusions from inspection work

The inspection work in 2020 was affected by the epidemiological situation in the form of restrictions and a 21% decrease in inspection work, along with the administrative work (number of decisions issued down by 14%). In many cases, the CEI made correspondence checks and eliminated physical contact with inspected persons; the COVID situation also resulted in cancellation or shifting of some checks that could reasonably be

postponed. Many inspections in 2020 took place in close cooperation with FRS prevention officers with the purpose of preventing fires by collecting waste and to identify compliance with fire prevention requirements in operation. We selected waste management facilities with greater potential fire risk, containing buildings with handling, treatment and processing of higher quantities of waste, e.g., plastics, paper, electrical waste, etc.

As for the departmental tasks, it can be concluded that similar shortcomings as in previous years are found in the areas of waste management and chemicals; no significant negative trends were observed in any of the areas. Handling of construction and demolition waste in contravention of legislation, including by municipalities, remains the most common problem. Fewer unpermitted waste shipments were intercepted than in 2019, which can be explained by the intensive activity of the CEI and the CA in 2019. In spite of that, we still found in 2020 that some entities try to transport waste illegally from abroad, which is why the CEI will continue these checks in cooperation with the Customs Administration and authorities of criminal proceedings. Representatives of the Customs Administration, the judiciary and police investigators have been trained in this respect. We also communicate more intensively with applicable foreign authorities on unpermitted transport. Besides monitoring and inspection, our inspectors also did prevention.

Due to the enormous increase in disinfectants on the market during the epidemic, the CEI has published instructions for their suppliers. During the state of emergency, inspectors gave expert consultations (by telephone, email) to disinfectant suppliers (52 cases) to help reduce the presence of non-compliant products on the market.

Another trend affecting WMD work in 2020 too was the great number of suggestions to make investigations in the area of waste management, with was undoubtedly a consequence of more people spending time outside under the lockdown. They were most importantly suggestions related to construction and demolition waste handling and illegal dumps. Another important category was suggestions on car wreck handling without a permit and evading obligations in tyre recollection. Many of the suggestions, seen as marginal or local by the CEI, could, and should have been handled by other public authorities. Unfortunately, some municipalities have given up on inspection work, so we are often asked for help by ORP officials. Fluctuation is frequent on these positions, associated with lack of experience. Smaller municipalities in particular do not make full use of legislative options for handling problems with their citizens, due to their wide range of obligations, lack of experience and objective complexity of legislation, Unfortunately, this burdens CEI

WMD inspectors, who then lack capacity for handling more complex cases.

In 2020, the CEI WMD began using a pilotless system to a higher degree, notably in dealing with large backfills of construction waste on land not intended for it, illegal car wreck facilities and to investigate a municipal waste landfill that caught fire repeatedly. The data acquired are important support for delict proceedings, and give an overall realistic view of the state of a site, e.g., a landfill following a great fire. As with the screening analytical measurements, applied successfully for several years, these methods contribute to increasing the CEI professionalism.

4.4 Nature protection and CITES

4.4.1 Overview of inspection work in 2020

The Nature Protection Department inspectors focused their work in 2020 on checking situations, activities and entities that might pose serious hazard to interests protected by departmental law, namely the Act on Nature and Landscape Protection, Act on Agricultural Land Fund Protection, Act on Wild Animal and Plant Protection and Regulation of Trade in Them, Act on Genetically Modified Organism Management, Act on Zoological Gardens and the Act on Use of Genetic Resources Under the Nagoya Protocol. The CEI's inspection activity can be divided into scheduled checks, following up on previous findings, reflecting current situation and comprising about 40% of the inspection capacity, and checks made based on public suggestions (another approx. 40%) and made operatively based on our own findings (about 20%). A great challenge in performing our inspection powers was adoption of measures related to the unfavourable epidemiological situation, which was reflected primarily in a search for least risky forms of supervision work.

Nature protection inspectors made 2124 checks and investigations in 2020 (57% compared to 2019), which is 26 investigations per inspector per year on average with 82 inspectors. A total of 684 decisions entered into force in 2020 (81% compared to the year before), including 494 decisions on the imposition of fines (244 for delicts committed by legal entities and natural persons doing business and 250 for those by natural persons), 25 reprimands, 35 decisions on restriction or halting of operation, 104 decisions on confiscation or seizure, 17 on remedial measures and 12 preliminary measures.

Inspectors made 1,763 investigations and checks in nature and landscape protection. The next greatest number of checks (244) was made in the CITES area, mostly related to the CEI's long-term collaboration with other public authorities; 79 checks were made under the ALF Act, 19 under the GMO act,

we made 13 checks at zoos and 5 checks related to requirements for use of genetic resources.

For a comparison, in 2019, for example, 119 decisions on confiscation or seizure and 25 decisions on remedial measures entered into force. Compared to 2019, it is thus obvious that the CEI managed to perform effectively its operative duties in the area of nature protection and CITES in spite of significant restrictions on authorities' work and long-term states of emergency. That was reflected in the total amount of conclusive fines imposed, which was CZK 9,717,050 in 2020, representing 105% of the 2019 figure (CZK 7,941,900 were fines to legal entities and natural persons doing business, and CZK 1,775,150 were fines to natural persons not doing business).

Besides, the CEI made eight notifications to authorities of criminal proceedings in the area of nature protection and CITES in 2020 and 52 suggestions to other public authorities at various levels.

Traditionally, the public sees the CEI as a public authority in nature protection that greatly surpasses the stereotypical idea of red-tape buck-passing with its professionalism and empathy and that is highly resistant to extralegal manipulative tendencies. That is why investigation of suggestions made by citizens and civic associations make up a significant part of the supervision work; they are a valuable source of information notably in terms of protection of non-forest trees and agricultural land fund. The number of suggestions made by the public is steadily growing regardless of the restriction on activity that Czech society had to cope with in 2020. In 2020, the inspectors handled 1,280 suggestions, which was about 1% more than the year before. On average, there are thus nearly 16 investigated suggestions per year per inspector. In this work segment, too, it is quite clearly demonstrated that the CEI managed to perform its public service mission regardless of the nation-wide social and economic restrictions.

The 608 statements issued by the CEI in 2020 (11% increase year-on-year) illustrate our inspectors' activity even in a situation paralysing significant segments of public life.

The most important aspect that affects the CEI's work in nature protection is the inspection and administrative work related to compliance with Act no. 114/1992 Coll. on Nature and Landscape Protection, mainly in connection with protection of non-forest trees. Enforcement of tree protection involved, as is traditional, the greatest part of our inspection work (1,763 out of 2,124 investigations and checks) and administrative work (fines worth CZK 8,335,250

out of the total of CZK 9,717,050, all preliminary measures, remedial measures and decisions on reducing or halting operations, most suggestions (36) to public authorities).

In the area of CITES, we made 244 checks in 2020, which is less than half the number in the year before. The CEI work was significantly affected by the major drop in transboundary movement of persons and freight in 2020 as a consequence of the virus pandemic. It was reflected primarily at Prague Airport. There, the CEI performed 604 inspection operations (about half the number in 2019), including checks and telephone or face-to-face consultations for the Customs Administration, inside and outside business hours as part of our permanent duty. Illegal trade involved primarily traditional Chinese medicine products, transported by members of Asian communities, and a few cases of individual, tourist imports (corals, trophies, parts of animal bodies). As for declared mail parcels, the CEI registered 166 cases in 2020, which is comparable to 2019.

The CEI found the most serious legal violations in the area of CITES when inspecting parcels importing or exporting living plants (notably cacti, as well as orchids, euphorbias and carnivores). We confiscated hundreds of individuals from 25 parcels. Other illegal shipments (dried meat, insects, clothing items, pelts) represented only a few cases. We identified one illegal shipment of ivory.

Based on the above and in light of facts identified in previous years, it can be concluded that the illegal activity in the trade in traditional Chinese medicine and living plants (notably cacti) may be of an organized nature and pose a risk of spreading denial of law in a specific community or subculture to which they are bound. Given the number of cases and unrelenting activity, we may infer connection with other types of illicit, or even criminal activity (e.g., tax evasion).

The most important case of 2020 was the confiscation of 21 parrots whose holder failed to prove their legitimate origin. In the area of CITES, the CEI ran 122 proceedings in 2020 (including 106 against natural persons), and fines totalling CZK 737,800 entered into force (including CZK 565,700 to natural persons). We continued our expertise activity in 2020, notably those related with criminal cases and the expert management of project VH20182021028 "Applied research into genetics of selected animal species protected under the international CITES treaty – development of a forensic method applicable as a tool for combating organized crime and serious environmental crime at national and international levels".

The CEI maintains long-term cooperation with authorities of criminal proceedings and judicial authorities, particularly in the area of unpermitted holding or trade in species protected by national regulations or international conventions. In this connection, our inspectors continued their expert work, consisting in assistance in house searches and development of 18 expert statements.

We see an ever-increasing number of suggestions received on issues under Act no. 334/1992 Coll. on Agricultural Land Fund Protection. In 2020, the CEI investigated 64 suggestions concerning ALF (agricultural land fund) issues. Out of that, 15 suggestions were referred to other public authorities since the CEI concluded they constituted violations of the ALF Act not covered by its powers. Regarding ALF, we made 79 checks in 2020 (52% increase year-on-year), including 15 in cooperation with other CEI Departments, such as the Waste Management Department, Water Protection Department, etc. As is traditional, most of the suggestions received concerned various backfills, waste and other materials placed on ALF land. In the report period, we issued 13 conclusive decisions on fines totalling CZK 444,000, which is 168% of the 2019 figure. The greatest fine of CZK 220,000 was imposed on Velké Hamry Municipality for dumping and spreading material (fishpond sediment) of qualitative properties unsatisfactory for depositing on ALF, i.e., introducing unpermitted substances to agricultural land. Besides, the CEI continued checks, initiated back in 2019, focused on farmland contamination with lead (exceedance of indicative and preventive lead concentrations pursuant to Decree no. 153/2016 Coll.) in connection with operation of sports shooting ranges.

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

Inspection work focused on requirements for use of genetic resources under the Nagoya Protocol remains a relatively novel part of the CEI's powers. In 2019, we developed an annual plan of inspections for 2020 in cooperation with the MoE, using a risk assessment approach. Thus, in close cooperation with the MoE in 2020, we made five inspections of potential users of genetic resources under the Nagoya Protocol, implemented in the national legislation by Act no. 93/2018 Coll. The checks consisted primarily in detecting whether the inspected entity is a user of genetic resources pursuant to legal regulations associated with the Act. In a positive case, the checks

involved obtaining information about compliance with the requirement of due care in using genetic resources. Due to the contagion situation, we chose a correspondence form of inspection, since obtaining the information did not necessarily require on-site inspection. According to the inspection findings, the majority of the inspected entities handle only genetic resources not subject to any restrictions in connection with the Nagoya Protocol. In one case only were we not able to rule out absolutely that the entity is a user of genetic resources pursuant to the applicable legal regulations. For this reason, the CEI recommended the inspected entity to contact the national contact person for the Nagoya Protocol and consult whether to adopt any measures in order to proceed with due care, and what measures they should be, if handling specific genetic resources covered by legislation associated with the Nagoya Protocol.

4.4.2 Overview of performance of departmental tasks

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

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

In response to the epidemic, the number of farming entities inspected in connection with allocation of agricultural subsidies was reduced to approximately one half. The primary objective was to reduce the administrative burden on farming entities and reduce the potential risk of coronavirus contagion. In concrete terms, the CEI carried out 164 eligibility checks at 161 applicants for agricultural subsidies. In 104 cases, we assessed compliance with statutory management requirements (PPH) arising from Council Directive no. 79/409/EEC on the protection of wild birds (PPH 2); and in 60 cases, compliance with the requirement arising from Council Directive no. 92/43/EEC on habitat protection was checked (PPH 3). Inspections focused on both European Directives were made at three applicants.

Inspections focused on performance of PPH arising from said European Directives and compliance with applicable provisions of Act no. 114/1992 Coll. focused mainly on areas with greater risks of conflict of farming and protected interests. In the case of PPH 2, these are plots posing a risk of unpermitted intervention in non-forest trees, prominent landscape features (watercourse and bottomland) or bird nesting sites, or located in areas of presence of selected specially

protected species bound to grassland (blue butterflies, corncrake). The requirement PPH 3 is checked in conjunction with the existence of a Site of Community Importance in a farmed area or its immediate vicinity.

The overwhelming majority of the eligibility checks are made based on a centralized inspection schedule, which covered at least 0.5% of the total number of applicants for agricultural subsidies in 2020. There were only two cases of extraordinary inspections in the report period, namely regarding additional inclusion of the latter of the Directives. In each inspection, map groundwork was used to select risk sites with a higher probability of conflict between farming and nature protection.

Only one case of violation of the inspection requirement CC and the respective provision of Act no. 114/1992 Coll. was found in 2020. The inspection found that the natural person doing business had committed unpermitted cutting of non-forest trees in connection with its farming; namely, it removed canopied tree stands in several large areas without a permit. The responsible entity was imposed a conclusive fine of CZK 30,000, and the payment agency was recommended to cut the agricultural subsidy by up to one percent.

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

2. Checks of handling of genetically modified organisms Checks of handling of genetically modified organisms follow a pre-developed schedule, which makes it possible, due to the limited number of entities handling genetically modified organisms, to inspect each GMO user periodically. Not all the inspections scheduled for 2020 were performed due to the governmental measures in connection with the COVID-19 pandemic, which resulted in restrictions on inspection work. In response to said restrictions, the CEI proceeded, with some long-standing entities, to make the inspection by way of correspondence, thus inspecting not the condition of spaces used for handling GMO but only documentation on handling genetically modified organisms.

In 2020, we made 19 inspections in this area. In 14 of the cases, we inspected closed handling of GMO in risk categories 1-2. In 2020, we completed inspections at two entities initiated in 2019.

In one case, we found a violation of the GMO Handling Act consisting in passing GM animals to an entity not authorized to handle GMO. For this violation, the CEI imposed fines both on the entity handing over the GM animals and the receiving entity, unauthorised to handle GMO.

We made two inspections focused on introduction of GMO to the environment in 2020. They both concerned field experiments. In recent years, the authorized entities have significantly reduced new field experiments; only the long-term experiment with GM plum trees and the experiment with GM barley (started in 2019) continued in 2020. Another type of GMO introduction into the environment is clinical assessments of medical preparations using GM cells. For medical/preventive and ethical reasons, we did not inspect entities authorized for this type of GMO introduction to the environment in 2020, as they were primarily medical facilities, fully occupied with the pandemic situation.

Due to a suspicion of importing GM aquarium fish, we inspected one entity importing aquarium animals from Asia in 2020. The inspection was completed in early 2021.

3. Zoological garden inspections

In the course of 2020, we made 13 inspections of zoological gardens operated based on MoE licences. A significant part of such inspections comprises not only verification of compliance with obligations under Act no. 162/2003 Coll. on Zoological Gardens but also inspection of handling of CITES individuals pursuant to Act no. 100/2004 Coll. and specially protected animal species and wild birds pursuant to Act no. 114/1992 Coll. Since they are mostly facilities keeping large quantities of individuals and the inspection requires assessment of large numbers of documents, including authentication of facts with other public authorities, all of the inspections have not been completed yet. The inspection at one entity initiated in 2020 has not been completed. On the contrary, in 2020, we completed inspections at three entities initiated in 2019. We found a violation of Act no. 100/2004 Coll. in one zoological garden operated based on a licence. It was a minor error of a rather administrative type.

One facility operated based on an MoE licence terminated its operation in the course of 2020; the Ministry cancelled its zoo operating licence by a decision. The CEI imposed a fine on the same entity for a delict consisting in repeated failure to produce an annual report on zoo activity and send it to the MoE and make it publicly available within mandatory deadlines.

Besides, the CEI continued its cooperation with the MoE, which it provides with information and documents necessary for its own inspection work, most importantly in the form of position statements on MoE periodic inspections and statements on applications for licences. In 2020, the CEI made over 10 position statements on MoE periodic inspections and several statements on applications for licences for operation of a zoological garden.

An integral part of the inspection work focused on compliance with Act no. 162/2003 Coll. was checks at breeding facilities whose activity may match the definition of a zoological garden. Although inspections of this type of facility were part of the work plan as a departmental task, most of them were made based on suggestions. In 2020, we inspected three such facilities. We also completed inspections at two entities initiated in 2019.

When checking those facilities, we found that one of them conformed to the device of a zoological garden pursuant to Section 2, Para. 1, item a) of Act no. 162/2003 Coll. The CEI is running an administrative proceeding on closing the zoological garden for the public because it is operated without an MoE licence. A conclusive fine was imposed on the same facility in 2020 for a delict under the Endangered Species Trade Act. The CEI found a violation of said Act in another facility that may conform to the definition of a zoological garden pursuant to the Zoological Gardens Act.

4. Inspections of implementation of measures ordered by the CEI under

Sections 66 and 86 of Act no. 114/1992 Coll.

Inspections of implementation of ordered measures were included in the work plan for 2020 based on results of an internal audit of CEI work. Their objective was to check that the required entities are implementing measures (or operating requirements) imposed on them by the CEI. The entities were selected for inspection based on a central analysis and in cooperation with territorial inspectorates familiar with local conditions. This inspection work included all the decisions issued under Sections 66 and 86 of Act no. 114/1992 Coll. that should have been performed in 2020 and whose inspection did not contravene the governmental regulations in connection with the COVID-19 pandemic.

The CEI made 57 checks, most of the remedial measures inspected concerning substitute planting of trees and remedial and rejuvenating pruning of previously damaged trees. Besides, they involved compliance with set requirements for work activity in relation to protection of biotopes of specially protected plant and animal species and protection of prominent landscape features and small-scale protected areas, particularly for activities done as part of landscape management and construction. Reduction or prohibition of activity

of entities aimed primarily at ensuring protection of specially protected plant and animal species.

The required entities mostly respected the measures and requirements. In four cases, the CEI identified non-compliance with requirements set in CEI decisions under Section 86 of Act no. 114/1992 Coll., namely regarding substitute planting of trees, fishpond repairs and pool construction. Not all the requirements had been performed in one case. Applicable proceedings on fines for delicts were initiated with the concerned entities. In one case in 2020, the decision requirements were only fully complied with after repeated inspections and a penalty.

5. Inspectorate-wide check

The cancellation of the inspectorate-wide check in 2020 was one of the consequences of the unfavourable epidemic situation in the CR. The check was supposed to focus, as is traditional, on compliance with legislative requirements in a selected PLA. The inspection will be carried out in one of the upcoming seasons depending on the further pandemic development.

4. 3 Overview of performance of specific tasks

The specific tasks reflect activities and entities representing current or potential serious threats to nature protection interests in territorial jurisdiction of our territorial inspectorates. Targeted inspection work is thus based on local knowledge of the region and focused on activities and entities that can be expected to pose potential serious threats to nature protection interests protected under acts of law within the CEI's jurisdiction. Although the scope of the specific tasks is much wider, we only report on tasks that we consider the most important and those that document the wide range of the Nature Protection Department's activity.

1) Checks of performance of substitute planting and care of non-forest trees, typically in conjunction with public administration checks

These checks were made with respect to the fact that ordering substitute planting as compensation for environmental harm caused by cutting of trees is an efficient nature protection tool. Alongside the order for substitute planting, the applicable authority may order subsequent care of the trees for the necessary time. These requirements have to be met even over a span of several years to compensate for environmental harm caused by cutting, which some entities fail to do. In 2020, the CEI made 19 checks and found two violations of orders, for which it imposed a fine.

Non-forest trees are generally protected from damage and destruction, most commonly in the form of cutting without a relevant permit or unprofessional interference with their

aboveground or underground parts during their treatment and maintenance or repairs of underground utility lines and similar structures. Non-forest trees are frequently damaged in this way in connection with construction, repair and maintenance of linear structures.

In 2020, the CEI made 56 such checks and identified 10 violations of legislative requirements and imposed four fines for delicts.

2) Checks of compliance with basic and detailed protection requirements for small-scale specially protected areas and SCI. The CEI has long considered checks of small-scale specially protected areas one of its priorities in natural and landscape protection. Specially protected areas contribute to habitat diversity of landscape and provide refuges for disappearing, rare and specially protected animal and plant species. In 2020, the CEI thus made 62 checks and investigations in small-scale and three checks in large-scale specially protected areas and three checks in Sites of Community importance. We focused primarily on boundary marking and compliance with basic and detailed protection requirements of both management and visitors. Identified shortcomings in area marking were consulted with applicable public authorities. Malpractice in relation to compliance with protection requirements was found in 12 cases. In six cases, the CEI imposed fines for delicts. In two cases, we also imposed remedial measures.

3) Checks of prominent landscape features of watercourses and bottomlands and registered prominent landscape features. A prominent landscape feature is an ecologically, geomorphologically or aesthetically valuable landscape component, forming its typical appearance or contributing to its stability. They include watercourses and bottomlands. An applicable nature protection authority may register other landscape components for said values; they are then protected as PLF.

In the long run, such landscape features are one of the most endangered landscape components, particularly due to human activity, which frequently affects riparian vegetation and beds of watercourses and may disrupt their ecological stabilisation function; such activity is only permissible with consent of a nature protection authority and following its requirements.

In 2020, we made 31 checks and found no unpermitted interventions in said PLF.

4) Checks of mandatory protection of selected memorial trees. Memorial trees are dominant features of

landscape, cultural and historical importance. They are very often invaluable ecologically due to their old age. It is therefore necessary to give them increased protection and identify them in landscape, which may help prevent damage by human activity. Protection of memorial trees is provided by a decision prohibiting interference with them and their protective zone. Any interventions are only possible with consent of an applicable nature protection authority and following its requirements. Identification of memorial trees in landscape is provided by a sign saying Memorial Tree and bearing the national coat of arms. These mandatory identifiers are provided by the applicable authority.

In 2020, we made 52 checks and found no violations of mandatory protection.

5) Checks of public administration by selected municipal authorities. These checks were made with a particular view to chronic shortcomings in administrative work, notably the process of permitting cutting of trees and ordering substitute planting by authorities of local and factual jurisdiction; the CEI mostly identifies these during inspection. The statement sections of inspected decisions consistently contain shortcomings, notably in specification of trees, resulting in impossibility to review the decisions. There is frequent absence of consideration for the public interest aspects of activities, which ought to outweigh the public interest in keeping the trees. Ordering of substitute planting to compensate for the environmental harm done by cutting the trees, which is an efficient nature protection tool, is frequently neglected.

In 2020, the CEI made 20 checks of public administration at municipal authorities, finding shortcomings in five cases and handling them subsequently.

6) Checks of compliance with requirements of granted exemptions from SPS and SPA bans.

Inspections of compliance with requirements of exemptions from bans for specially protected areas are considered by the CEI to be one of its long-term priorities in nature and landscape protection. Among other things, specially protected areas contribute to habitat diversity and provide refuges for disappearing, rare and specially protected animals, which is why compliance with requirements of nature protection authorities is necessary.

Interventions in populations and biotopes of specially protected plant and animal species endangered or rare in the CR and scientifically or culturally very important therefore require legal regulation. The purpose of set protection requirements is to evaluate the respective public interests (project implementation vs SPS protection when considering intervention in their natural evolution and development).

and to define requirements for project implementation to minimise the harm.

Entities considering an intervention that may affect SPA or SPS populations therefore have to comply with requirements set in permits issued for their intended activity.

In 2020, the CEI made 14 checks of compliance with set requirements, finding one violation of requirements of exemptions issued, for which we imposed a fine for a delict.

7) Checks of breeding and handling of CITES individuals, SPS individuals and wild birds

The CEI makes periodic inspections of compliance with legal regulations on holding, breeding and other handling of CITES individuals, specially protected animal individuals and wild birds. The selection of inspected entities is based on various criteria, such as discrepancies found in the CITES Registry, higher numbers of identified cases of illegal handling of specific species, etc.

In 2020, we made 32 checks focused mostly on compliance with legal regulations on holding and breeding CITES individuals. We inspected breeder of various classes of animals (parrots, turtles, primates). We found 13 cases of legal violation. The legal violations identified concerned mostly non-observance of deadlines for notification of change of holder to registration authorities and non-performance of unique identification of individuals in accordance with legislation. Based on these findings, the CEI imposed 11 fines for delicts in 2020.

The above specific tasks is closely related to the task "Checks of compliance with protective requirements for birds of prey and owls". Birds of prey and owls being among species at risk from humans in a number of aspects, including direct persecution, poisoning, illegal catching and egg picking, disturbance when nesting and destruction of biotopes. Most of the species are also protected under CITES. In 2020, we made 2 checks at breeders of these animals with a focus on compliance with Act no. 114/1992 Coll. and Act no. 100/2004 Coll. The checks found no violations of legislation in force.

8) Checks of caves, mines and other sites housing chiropterans
Spaces used by winter or summer colonies of chiropterans, which are among specially protected animal species, are absolutely crucial for survival of populations of these mammals. In 2020, we therefore made 6 checks at bat wintering sites, mostly caves and mines

in PLA České Středohoří. The investigations found no unpermitted entries into the areas, no disturbance or killing of wintering chiropterans.

9) Checks of compliance with protective requirements for specially protected species using man-made structures, swifts, bats and others

Use of man-made structures by specially protected animal species that thrive in urbanized environment is a chronic problem. They include, in particular, collisions between structures as biotopes for specially protected species and their external renovation, typically facade and roof. Specially protected animal species endangered or rare in the CR and scientifically or culturally very important therefore require legal regulation providing protection of their biotopes in the form of man-made structures, which they mostly use only seasonally. The primarily reason for using man-made structures is a lack of natural biotopes for these species in cultural landscape, such as hollow old trees.

In 2020, the CEI made 3 checks and found no violations of legal regulations in the area.

10) Checks of in situ protection of biotopes and populations of specially protected species

In situ protection of populations of specially protected species is the basic protection method, ensured by protecting and renewing suitable habitats and elimination of risk factors in the area of current or potential presence of said populations. In 2020, the CEI made 9 checks of protection of biotopes and populations of specially protected animal and plant species. In one case, we found a violation of Act no. 114/1992 Coll. and imposed six conclusive fines for delicts based on the finding.

4.4.4 Major cases

The CEI came across a wide range of unlawful conduct in 2020. As is traditional, the most common malpractice was unpermitted cutting of non-forest trees. The most serious forms of unlawful activity were registered in connection with interventions in specially protected areas and prominent landscape features as part of economic activity (frequently farming). They comprised, in particular, unpermitted landscaping, unpermitted water collection and water level manipulation. Such conduct often has destructive consequences for extensive communities, including specially protected species. We continued to find malpractice regarding agricultural land pollution and hazards. In recent years, non-compliance with requirements for activities set by decisions of nature protection authorities is a growing aspect of unlawful conduct.

Prague TI

A fine amounting to CZK 54,000 was imposed on Lysá nad Labem Municipality for cutting 13 fully grown non-forest trees in the town territory without permission of a nature protection authority.

České Budějovice TI

A fine of CZK 150,000 was imposed on Pohoří CD s.r.o. for an unpermitted intervention in the Prameniště Pohořského potoka nature monument. The CEI also supervised implementation of remedial measures. Given the obliged entity's willingness for their voluntary performance and the necessity of immediate performance, it was not necessary to order remedial measures with a decision.

Plzeň TI

The CEI investigated extensive cutting of 50 individual non-forest trees and 3540 m² of canopied tree stand in the first half of May 2020 without permission of a nature protection authority, namely at Šidlákov and Hora Svatého Václava on land used for farming. We imposed a fine of CZK 60,000 on the contracting authority Farma Šidlákov s.r.o. and a fine of CZK 10,000 on the contractor, a natural person.

Ústí nad Labem TI

The CEI imposed a fine of CZK 400,000 on AGC Flat Glass Czech, a.s., for damage to the prominent landscape feature Bouřlivec brook, an unpermitted intervention in natural evolution of the specially protected animal species marsh frog and killing of dozens of individuals of the specially protected species noble crayfish in connection with pumping water for process purposes in the summer of 2019. The entity appealed against the decision, and the MoE reduced the fine to CZK 350,000.

Hradec Králové TI

The most important case handled by Hradec Králové TI NPD was non-compliance with an exemption from protective requirements for specially protected animal species when building the Blato landfill. The fine, imposed on SKLÁDKA ELZET s.r.o., amounted to CZK 1,400,000. This was a long-standing case, with a Ministry of the Environment decision confirming a CEI decision on the matter from 2015 revoked by the Municipal Court in Prague and returned to the CEI to conclude. The CEI completed the decision as requested by the Ministry of the Environment and reissued it. The CEI decision was confirmed in the appeal proceeding. However, the MoE decision has recently been challenged with an action by the fined company.

Havlíčkův Brod TI

Sediment removed from Panský fishpond at Nadějov, without consultation with a nature protection authority, was dumped above the fishpond littoral in a registered prominent landscape feature which is home to specially protected plant and animal species. Following instructions of the Nature Conservation Agency of the Czech Republic, the fishpond owner made some interventions mitigating the impact of the mud dumping, which we considered when assessing the fine. We imposed a fine of CZK 90,000 on the perpetrator, Pila Dvořák, v.o.s.

Brno TI

For a release of wastewater from a farm compound carrying strong organic contamination into Site of Community Importance CZ0723426 Střížovice and Bašnov nature monument at Střížovice u Kvasic, representing a harmful intervention in the natural evolution of the specially protected species fire-bellied toad, the CEI imposed a fine of CZK 80,000 on Zemědělský podnik Kvasicko, a.s.



Dead crayfish in Bouřlivec brook

Olomouc TI

For damaging 85 fully grown non-forest trees by machine trimming as part of maintenance of agricultural land, the CEI imposed a fine of CZK 200,000 on ÚSOVSKO a.s.



Fully grown trees damaged during farmland maintenance

Ostrava TI

We imposed a fine of CZK 50,000 on SKANSKA a.s. for non-compliance with a decision on exemption under Section 56 of Act no. 114/1992 Coll. when building the Karviná bypass. SKANSKA violated the requirements quite deliberately by removing topsoil in the growing season, i.e., outside dates defined by the decision requirements.

Liberec TI

In 2020, Liberec TI NPD finished the proceeding concerning a delict committed at the turn of 2016, consisting in dumping and spreading 3000-4000 m³ of fishpond sediment in the bottomland along a watercourse prominent landscape feature on land protected as agricultural land fund at Bohdalovice. We imposed fines of CZK 220,000 and CZK 60,000 on Velké Hamry Municipality for said conduct.



Fishpond sediment dumped on land protected as agricultural land fund

4.4.5 Conclusions from inspection work

The CEI's nature protection and CITES agenda is highly diverse and encompasses six departmental laws: Acts no. 114/1992 Coll. on Nature and Landscape Protection, no. 100/2004 Coll. on Protection of Wild Animal and Plant Species by Regulating Trade in Them, no. 78/2004 Coll. on Handling of Genetically Modified Organisms and Genetic Products, no. 162/2003 Coll. on Requirements for Operation of Zoological Gardens, no. 334/1992 Coll. on Agricultural Land Fund Protection and no. 93/2018 Coll. on Requirements for Use of Genetic Resources Under the Nagoya Protocol.

The core of the CEI's work in the area of nature and landscape protection has traditionally comprised of inspection of compliance with Act no. 114/1992 Coll. In this area, the CEI came across a number of cases of unlawful conduct in 2020. Natural person, legal entities and natural persons doing business most frequently committed unpermitted cutting of non-forest trees.

Malpractice of agricultural businesses increased in both extent and importance. Nature and landscape

management was related to another sphere of delicts, fewer in numbers but constituting major or even destructive damage: unpermitted landscaping, dumping of earth and sediments removed from fishponds inside prominent landscape features and specially protected areas containing valuable and protected fauna and flora.

The CEI continues to regard the growing cases of ignoring requirements of decisions of nature protection authorities as highly dangerous to society. We also come across increasing numbers of cases of circumventing law by cutting big old trees. Entities wishing to avoid administrative proceedings that would decide about the cutting will cut down trees whose condition poses no acute or great danger under so-called "emergency", involving a simple notification.

In connection with agricultural activity in 2020, the CEI also came across conflicts between interests protected under the Nature and Landscape Protection Act and those protected under the Agricultural Land Fund Protection Act. Typical cases involved long-term neglect of PLF management, resulting in sites turning into water bodies or growing over. Renewal of proper farmland management then presented a conflict with interests protected under the Nature and Landscape Protection Act, because the sites developed valuable communities of specially protected plants and animals.

The CEI's inspection work in the area of agricultural land fund protection has again grown dynamically. The reasons are the same as the year before: ever increasing public awareness of the CEI's powers regarding the ALF and the size of agricultural land, covering almost half the country's area.

Inspection work aiming at prevention of legal violations is an important part of our work. Cross Compliance checks are particularly important in this respect, representing one of our most extensive agendas. Already in 2019, the CEI issued several decisions setting requirements for agricultural businesses in the area of rodenticide application. Impacts of our inspection work in the previous year were also evident in 2020, when we identified no significant conflicts with nature and landscape protection in this area.

The CEI work on practical implementation of the Nagoya Protocol, transposed to the national legislation by Act no. 93/2018 Coll., culminated in 2020 with the first inspections. It has to be emphasised that it is another supervisory power, the importance and scope of which are going to increase with growing scientific research.

In 2020, too, our inspection work included significant communication with the public and methodological, cooperative and

expertise work towards public authorities and authorities of criminal proceedings.

In the long run, our inspection work is strained with constantly increasing powers without adequate staff expansion. The cases handled by our inspectors in administrative and delict proceedings are increasingly complex. That is due to both developing legislation, increasingly emphasizing the formal aspects of investigation, obtaining evidence and processes, and conduct of delict perpetrators, who make use of appeals and court actions. The CEI is disproportionately burdened with non-supervisory administrative agendas related with records and reporting.

4.5 Forest protection

The Forest Protection Department had 46 inspectors in 2020. This number was identical to 2019. According to the size of forest land in the 2019 Green Book, each inspector supervises 58,484 ha of forest.

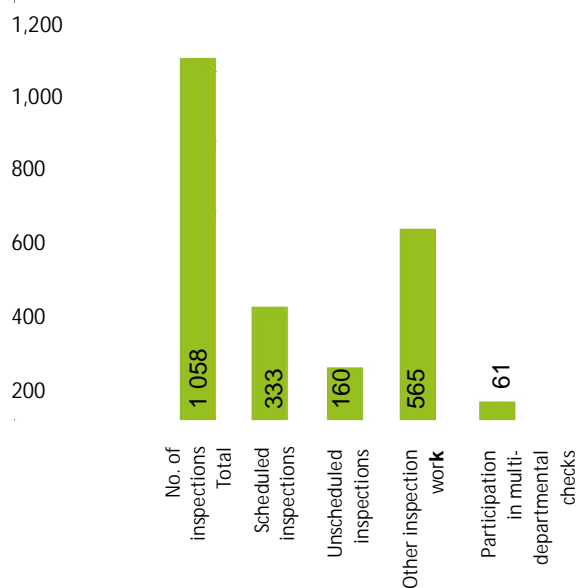
The forest inspection work proceeded based on a legal framework similar to previous years. It comprised primarily Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and its powers in forest protection, Act no. 289/1995 Coll. on Forests and on amendment of certain acts (Forest Act), Act no.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

The Forest Protection Department inspectors made 1,058 checks in the report period. We made 333 scheduled checks, 160 unscheduled and 565 others. Again, they comprised field activities in the form of pre-inspection work not followed by inspection, various investigations based on suggestions and information received, and cooperation with other public authorities, Police, etc. In addition, FPD inspectors were involved in 61 multi-departmental checks made by other CEI departments.

The number of unscheduled checks in particular was lower compared to the year before due to the declarations of the state of emergency in the spring and autumn of 2020 and the SARS-CoV-2 pandemic, with the CEI's inspection work limited to reduce contact with inspected entities and persons present at checks or investigations, unless necessary for case handling.

Annual Report 2020

Numbers of inspections in 2020



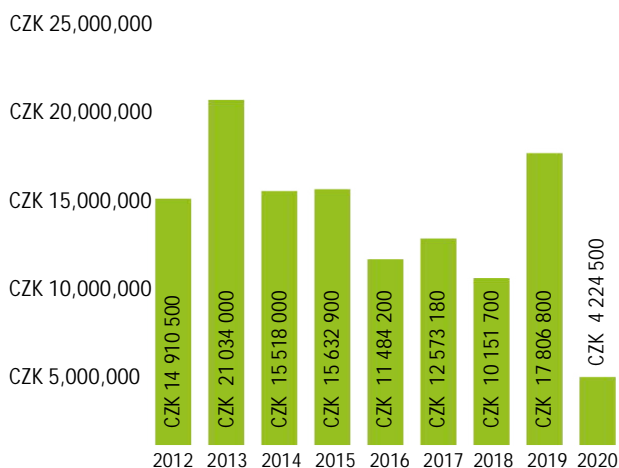
The total number of inspections was significantly lower than in 2019 due to the coronavirus crisis.

The checks encompassed all forms of forest property ownership, notably due to the excessive bark beetle presence. Prevention and education were the main objectives. Fines and orders of remedial measures were only applied in cases of repeated and gross legal violation.

In our other inspection work, we made 322 statements for EIA reports and 85 other position statements and statements for natural persons and legal entities as well as public authorities and Czech Police.

In 2020, we issued 99 decisions on fines under administrative and delict proceedings, and 92 of them entered into force in the report period. Eight decisions on fines issued in previous periods entered into force in 2020. The total amount of conclusive fines was CZK 4,224,500.

Conclusive fines



The Forest Protection Departments contributed to the fines imposed as follows: Prague CZK 1,240,000; České Budějovice CZK 423,000; Plzeň CZK 376,000; Ústí nad Labem CZK 105,000; Hradec Králové CZK 418,500; Havlíčkův Brod CZK 636,000; Brno CZK 563,000; Olomouc CZK 20,000; Ostrava CZK 53,000; Liberec CZK 390,000.

The sum of FPD fines was one quarter of the 2019 figure and the lowest since 2012. The causes lie in reduced inspections due to the pandemic and objectively realistic capacities of forest owners while tackling the bark beetle outbreak.

The violations for which the above fines were imposed are similar to previous years, comprising notably delicts of neglect of forest protection and measures preventing outbreak of biotic agents, violation of forest renewal regulations, damaging of land intended for performance of forest functions with forest traffic, unpermitted occupation of land intended for performance of forest functions, waste and litter in forests, non-performance of remedial measures to eliminate unlawful state of forests, etc.

The greatest conclusive fines among all Forest Protection Departments were imposed by Havlíčkův Brod FPD on SUPREME STORE s.r.o. for long-term failure to reforest clearings (at Hrdá Ves, Zlatkov and Věžná); it amounted to CZK 388,000. Prague TI FPD imposed a conclusive fine of CZK 380,000 on a natural person for unauthorised use of forest land at Vrané nad Vltavou for purposes other than forest functions (construction and landscaping). In addition, Prague TI FPD imposed a conclusive fine of CZK 295,000 on a natural person for doing unpermitted landscaping by dumping a layer 0.6–1 metre thick of excavated material on forest land.

These fines are described in more detail in 4.5.4 Major cases.

We also conducted administrative proceedings on remedial measures in the report period, where we issued 68 administrative decisions. 69 decisions on remedial measures entered into force, including four decisions on remedial measures issued in the previous years that entered into force in 2019.

We issued six reprimands, which entered into force in the report year. We ordered one preliminary measure. Halting or restriction to operations was implemented in 40 cases, all managed by the České Budějovice TI FPD.

We also applied the institute of invitations to make remedy in 2020, albeit to a lesser extent than in the previous period. The invitations were applied where it was clear that a legal violation would occur or a minor violation had already occurred. In terms of environmental impact in forests, it is more efficient to give the forest owner a change for remedy by a near date than conduct a lengthy administrative proceeding with an uncertain outcome. Thus, this instrument partly substitutes for administrative proceedings and remedial measures. It is employed particularly with small forest owners, who are thus informed about existing shortcomings and their obligations under a specific legal regulation. Only if the invitation is ignored or if the legal violation repeats, do we run a delict proceeding on a fine or remedial measures.

TI FPD made 10 suggestions to public authorities.

In the report year, the CEI FPD made one crime report concerning illegal logging of forest stands and landscaping on adjoining forest plots at Jáchymov, managed by Lesy Jáchymov, s.r.o.

4.5.1 Overview of inspection work in 2020

Prague TI

The inspection work plan for 2020 was largely met in terms of contents, numbers and dates. Out of the 60 scheduled items, we implemented 36. The remaining 24 were not carried out. The checks were made in municipal and private forests and focused on compliance with legal regulations on environmental protection in forests. In factual terms, they focused primarily on forest protection from harmful biotic agents, protection of land intended for performance of forest functions (unpermitted land occupation, dumps, landscaping), reforestation of clearings, logging, performance of remedial measures order in administrative proceedings, compliance with invitations, etc. Due to the large number of unscheduled checks, suggestions, complex cases and, most importantly, restricted inspection work due to the coronavirus pandemic, we were unable to carry out 40% of the scheduled checks. They were largely shifted to 2021.

In 2020, we made 84 unscheduled inspections, including 38 based on suggestions. Moreover, Prague TI FPD inspectors

cooperated on six multi-departmental checks based on suggestions. We made 66% of unscheduled checks in 2020. The unscheduled checks were made in state, municipal and private forests and dealt primarily with forest protection from bark beetles, logging, protection of LIPFF (unpermitted land occupation, dumps, landscaping), reforestation of clearings, etc.

České Budějovice TI

The assessment of performance of the approved inspection work plan showed that FPD inspectors made 72 scheduled checks, while 19 were shifted to 2021. Compared to the approved inspection work plan for 2020, 19 inspections were shifted to 2021 due to the epidemiological situation related to the COVID-19 disease, during which inspection work was restricted or halted. Dates of several inspections were shifted to different quarters of the year, and persons in charge were changed. The date and personnel changes were made due to illness of inspectors, FPD needs, information on current problems at specific entities and performance of inspection at different entities. Under some of the inspections, we registered a change of owners of the property to check. We either inspected the new owner or shifted the check to 2021 to enable the new owner to start managing the property. The scheduled inspections resulted in many proceedings on remedial measures and fines, which mostly concerned failure to perform remedial measures ordered (clearing reforestation), newly identified shortcomings in forest renewal, forest protection (bark beetle), use LIPFF and waste on forest land.

The TI FPD made 82 unscheduled checks. They mostly dealt with forest protection from bark beetles, forest renewal (failure to reforest clearings within set periods), damage to soil cover by digging for moldavites, use of LIPFF for purposes other than defined by the Forest Act, damaged cause by wild game and other specific FPD tasks.

Plzeň TI

Out of the 59 scheduled checks, we performed 38, resulting in Inspection Reports, Inspection Task Reports or Reports on Tasks Preceding Inspection. Some of the checks were moved to different quarters of the year. Due to the difficult coronavirus situation and restricted inspection work during states of emergency, some of the checks were not made (mostly comprehensive checks in municipal forests); they were shifted to 2021. The checks made concerned forest protection from bark beetles, protection of LIPFF (unpermitted land occupation, dumps, landscaping), performance of remedial measures ordered, etc.

By arrangement with the ÚHÚL, being the guarantor of inspections related to use of reproductive material, this type of scheduled checks (four in total) were also shifted to 2021.

We made 46 unscheduled inspections. They concerned primarily the development of biotic agents (bark beetles), forest land fund protection and comprehensive checks. To a lesser extent, they dealt with forest damage by logging, performance of remedial measures in forest renewal and damage caused by wild game.

Ústí nad Labem TI

Compared to the approved inspection work plan for 2020, which specified 84 checks, the TI FPD made 58 inspections, dealing mostly with comprehensive checks, performance of remedial measures from administrative decisions, forest land fund protection and biotic agents. Non-performance of 26 scheduled checks (shifted to 2021) was caused by the epidemic of SARS-CoV-2 and subsequent restriction of inspection work by the CEI Director's regulations and due to reduced staff numbers.

We made 63 unscheduled checks, focused on development of biotic agents, forest land fund protection, forest stand renewal, compliance with FMO/FMP and performance of remedial measures.

Hradec Králové TI

We made 30 scheduled checks. They concerned compliance with forest protection regulations in state, municipal and private forests. In factual terms, the scheduled checks were mostly comprehensive, focused on development of biotic agents and performance of measures ordered by the CEI. Besides, they focused on forest stand renewal, protection of LIPFF, recreational activities and handling of forest tree reproductive material. We did not carry out 17 of the inspections scheduled for 2020. The reasons were restrictions of public authority operation and spread of the COVID-19 disease. These inspections are scheduled for 2021.

We made 55 unscheduled checks in 2020. Most of them focused on development of biotic agents, forest damage by logging and forest land fund protection.

Havlíčkův Brod TI

The inspection work plan for 2020 specified 65 scheduled checks. However, the scope of the scheduled work changed dramatically. The reasons were the fast-changing bark beetle outbreak situation in the Vysočina Region and, of course, the restriction of inspection work due to the spreading of the SARS-CoV-2 virus and restricted

operation of public authorities, as well as the staff situation partly, as the Department was one inspector short in the first half of the year. The final count of scheduled inspections made in 2020 is thus 48. Thematically, the checks focused largely on development of biotic agents, forest stand renewal, forest land fund protection, forest damage by logging and performance of remedial measures ordered.

The trend of higher proportion of checks based on suggestions received continued in the report year. They totalled 30, which was a decrease compared to the year before as a consequence of the coronavirus pandemic. The checks dealt with forest stand renewal, development of biotic agents, forest damage by logging and forest land fund protection.

Brno TI

We made 58 scheduled supervisory checks in 2020. Compared to 2019, when we performed 128 scheduled checks, this was a major decrease in 2020, primarily due to the CEI's restricted inspection work in the spring and autumn based on the CEI Director's order in conjunction with the declaration of state of emergency and spread of the new SARS-CoV-2 virus. The missed checks were shifted to the following year. Among those carried out, the majority focused on comprehensive checks, forest stand renewal (reforestation, stand securing), performance of remedial measures ordered in administrative proceedings, forest protection and forest land fund protection (illegal occupation, etc.).

The FPD inspectors made 29 unscheduled checks focused on forest protection from bark beetles, illicit logging in forest stands, protection of land intended for performance of forest functions (unpermitted occupation, dumps, landscaping), reforestation of clearings, forest land fund endangerment by recreational activities, etc.

Olomouc TI

The inspection work in 2020 was disrupted by the declaration of states of emergency (spring and autumn), including the arising restriction in connection with the epidemic of the SARS-CoV-2 virus, which significantly affected the department's overall work. The restrictions posed by the state of emergency were reflected in the inspection performance. The plan for 2020 contained 69 checks, most of which were comprehensive checks followed by checks of application of forest tree reproductive material, inspections focused on performance of remedial measures and inspections at mining areas. In connection with the declaration of state of emergency, we did not make the large-scale scheduled inspection at LČR Jeseník forest administration in the first half of the year. In the latter half, we did not make 6 comprehensive checks, 2 checks under Act no. 149/2003 Coll., 1 check of remedial measures and 2 checks

of mining areas. The missed checks were moved to the inspection work plan for 2021.

We made 15 unscheduled checks in 2020. Their thematic focus is dominated by protection of LIPFF, illicit logging, forest protection concentrated primarily on issues associated with processing of timber infested with bark beetles. Compared to the results for 2019, the number of unscheduled checks decreased significantly.

Ostrava TI

This inspectorate made 31 scheduled checks. They mostly dealt with forest protection from bark beetles as well as LIPFF protection, forest renewal and performance of remedial measures. The non-performance was caused by restrictions imposed due to the governmental measures related to the spread of SARS-CoV-2 as well as the absence of one of our inspectors, who was sick the whole year, while the admission of the substitute inspector was administrated due to said restrictions in a way that he could only start work in the second half of the year.

We made 24 unscheduled inspections. A large majority of the inspections were focused on forest damage by logging and LIPFF protection. To a lesser extent, they involved forest protection from spread of harmful biotic agents, forest stand renewal and performance of remedial measures.

Liberec TI

We performed 72 inspections in the report period. Checks that were not made will be shifted to 2021 due to the state of emergency and inspection work restrictions caused by the coronavirus crisis. Most of the checks we made focused on comprehensive checks, forest stand renewal (reforestation, stand securing), forest protection from bark beetles, performance of remedial measures, forest protection, forest land fund protection (illegal occupation, etc.) and logging.

We made 9 unscheduled checks, mostly based on suggestions, focused primarily on forest protection from bark beetles, forest damage by logging and timber transport and unauthorised use of forest land for purposes other than performance of forest functions.

The total numbers of checks made do not quite match those shown in the Overview of Forest Protection Department Work. The commented numbers of scheduled and unscheduled checks differ from the table figures by cases where scheduled and unscheduled checks did not lead to reports, resulting in records instead.

4.5.2 Overview of performance of departmental tasks

As in previous years, the departmental task for 2020 is Development of biotic agents and damage to forests by forest traffic. Its objectives were assessment of forest owners' approach to destruction of calamity insect pests and possible associated damage to forests by forest traffic (Section 34 of the Forest Act), as well as objective assessment of contingent logging in terms of utilisation of all available capacity to reduce the processing time for bark beetle-infested timber in forests under all types of ownership. Monitoring under this departmental task made use of all forms of field trips, i.e., as part of regular checks pursuant to the Inspection Act, during investigation of suggestions, tasks preceding inspection, etc. The uniform procedure for assessment of this departmental task was defined by internal regulations, namely standard programmes, defined by FPD Methodological Instruction no. 3/2014.

The following findings can be concluded for the 2020 departmental task:

- The Central Bohemian Region, under the jurisdiction of Prague TI, saw continuing significant gradation of the spruce bark beetle alongside the double-spined bark beetle. There is a calamity outbreak on much of the territory. Its expansion can be expected in future due to its direct relation with climate conditions.

There are continuing problems with finding free logging capacity for timely processing of bark beetle timber and its sale. It is particularly the case with small forest owners (natural persons) rather than large owners and state forests.

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

- In the territory managed by České Budějovice TI, inspections of development of biotic agents report an increase, up to calamity outbreak, of bark insects, namely the spruce bark beetle and the spruce wood engraver. The most affected areas are ORP Vodňany, Písek, Tábor, Jindřichův Hradec, České Budějovice and Prachovice. That means that the outbreak is travelling from the Vysočina Region via the central and northern parts of the South Bohemian Region to the Plzeň Region.

LČR, s.p., responded to the situation in the South Bohemian Region by establishing a separate forest machinery centre.

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

- In the Plzeň Region, Plzeň TI registered the onset of a trend of not using trap trees and beetle traps for swarming monitoring in the latter half of the summer. The capacities shift primarily to active scouting for bark beetles in stands. The state forests largely manage to log bark beetle timber. However, most municipalities and private owners have difficulty with timely processing. ORP in the southern part of the region adjoining the South Bohemian Region are the worst affected.
- Ústí nad Labem TI manages the Ústí nad Labem and Karlovy Vary Regions. In the Ústí nad Labem Region, bark beetles have most severely infested coniferous forest stands in ORP Děčín, Rumburk and Litoměřice, including NP České Švýcarsko. Karlovy Vary Region is coping noticeably better, with the worst bark beetle infestation in ORP Mariánské Lázně and Karlovy Vary, adjoining the Plzeň Region. In the Ore Mountains, along the border with Germany, ORP Kraslice and Ostrov have the worst infestation in poorly accessible "cableway" areas. The greatest proportion of processed bark beetles is reported by LČR, s. p.; the smallest by small forest owners. It is very likely that the processing and clearance of logged active bark beetle trees will continue in 2021 in the above ORP.
- In the territory of Hradec Králové TI, spruces are most affected in the band around Jičín, Nová Paka, Hořice, Dvůr Králové nad Labem and Jaroměř, around Moravská Třebová, Jevíčko, Přelouč and south of Svitavy. In addition, there are growing numbers of dying pines, notably around Hradec Králové, Pardubice and Přelouč. The dying of pines is caused by increasing populations of black pine bark beetles, jewel beetles and other insect pests.

In the Hradec Králové and Pardubice Regions, larger spread of bark beetles was identified mostly in small owners' forests, who do not perform sufficient inspections of their properties. Nevertheless, we also handled cases of neglected forest protection among bigger owners, where it is more dangerous. The bark beetle population was at a high level in 2020. The spread could only be contained by clearance measures. The bark beetle pockets spread into wider areas around Jičín, Nová Paka and Dvůr Králové nad Labem in 2020.

Further development of the insect pests will be dictated by weather. Given the current significant quantities of bark-dwelling pathogenic insects in the forests, we can expect continued withering of spruce forests, particularly in areas outside the native zone, where the spruce is weakened by drought, etc.

Inspections of forest damage by forest traffic identified damage mostly after processing of accidental bark beetle timber and its removal. A problematic fact is apparently that forest owners clear bark beetle timber

mostly by removing it from forests, accompanied in some cases with chemical treatment.

- In Vysočina Region, managed by Havlíčkův Brod TI, vaguely bounded swarming periods were observed as in the year before, and simultaneous swarming and sister generations are the reality. This situation makes it difficult, even impossible in some cases, to apply defensive and protective measures. Laying of trap trees is no longer effective in the current situation and pheromone traps are used only for monitoring.

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

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

The spruce wood engraver, a pest primarily in younger stands, was also found in most of the forest properties. It accompanies the spruce bark beetle regularly. Again, the calamity was strongly affected by the weather in the course of the year. A relatively warm early spring meant a rapid and locally very intensive onset of bark beetle swarming, but the then activity slowed down due to a temperature drop and high precipitation totals. Shallow-rooted spruce stands were even seen in the course of the year to increase their resistance by exuding resin from the boreholes, and the overall stand vitality improved. Thus, the pests completed no more than 3 generations in the year.

In terms of forest protection, practically only contingent logging is done; it is thus the only type of logging used by practically all the owners. It frequently exceeds the planned decennial allowance, so owners are required to apply for an increase, which some fail to do.

Another problem is frequent incorrect or non-existent records on calamity pests as prescribed by the applicable decree.

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

Active scouting for infested trees thus remains the primary forest stand defence method. The most commonly used methods to prevent spread of pests from

cut timber include insecticide spray, insecticide net and MERCATA technique. Mechanical defence, such as woodchipping, is not applicable to this large volume, and harvester bark removal heads are not used widely either.

As for sales and processing capacity, the sales have improved slightly, but only for bigger owners. For small owners, if they do the logging at all, the timber is practically unsellable.

We found no significant negative effects of forest traffic on forest condition in the report period.

- Despite the rainy and colder spring and summer, Brno TI rates the bark beetle development in 2020 as unfavourable. The effects of long-term drought and subsequent development of harmful biotic agents is observable nearly throughout Zlín and South Moravian Regions, with lower-altitude forest stands the most endangered. Although populations did not grow as in previous years, the bark beetle state still intensively spreads the calamity. Spruce stands from the youngest to mature are still infested.

The spruce bark beetle continues to dominate, as does the double-spined bark beetle in higher altitudinal zones. The spruce wood engraver causes intensive death of young stands along with the spruce bark beetle, which no longer concentrates on older stands only. This may have a crushing impact on future conventional forestry. The two supervised regions' entire territory is classified as calamity areas, with practically no larger spruce stands where bark beetle activity has not been registered.

Most of the owners and administrators of forest properties have stopped processing standing dead trees and abandoned the use of defensive measures, focusing all their activity on processing timber with active bark beetles.

The situation has drastic impacts on forest owners, smaller in particular, lacking funds or staff for consistent action against the beetle seen among bigger foresters. The adverse effect of the coronavirus crisis adds to that.

The bark beetle calamity increases the volume of transported timber. This leads to damage to forest tracks and transport machinery. Skidding lines are mostly redeveloped in post-manufacturing. Erosion furrows are a risk in Zlín Region in particular, on flysch bedrock.

- Olomouc TI – spruce stands in Olomouc Region, in ORP Hranice, Lipník nad Bečvou, Olomouc, Šternberk, Mohelnice,

Zlaté Hory and Uničov are mostly withered due to the bark beetle. Extensive clearings exist in these areas. Remnants of stands have been uprooted by destructive winds. Areas with ash trees wither massively due to the pathogen *Chalara fraxinea* (ash necrosis).

Timber processors are still overloaded and timber does not sell. Infested timber often stays in forest deposits, particularly among private owners and some municipalities. Timber prices remain low.

The weather, rainier and colder compared to previous years, led to slower bark beetle development and a decrease in contingent logging. In areas with multiple forest owners where spruce stands have largely disintegrated, it is still difficult, if not impossible, to identify the one responsible for the unlawful condition and penalty liability cannot be set clearly.

Bark beetle calamity processing is still in progress, particularly in Jeseník ORP (Zlaté Hory, Rejvív). In Zábřeh, Mohelnice, Šumperk, Litovel, Konice, Hranice and Prostějov ORP, spruce stands are suffering considerable harm.

Zone 2 of PLA Jeseníky, notably Stará hora, Kobrštejn and Přední Jestřábí up to Rejvív boundary, with large spruce presence, suffers a massive bark beetle infestation and stand disintegration. Intensive clearance logging is in progress there, focused on slowing down the spread of the calamity. Our investigations identified insufficient clearance rates and forest soil disruptions resulting from timber transport.

- The Ostrava TI territory was hit by the bark beetle calamity in 2015. Disintegration of forest stands with a high share of spruce continues in many areas. Spruce stands above 800 m a.s.l. are most damaged, in the mountains of Nizký Jeseník, foothills of the Hrubý Jeseník, Moravian-Silesian and Těšín Beskids, Odra Highland and generally the lower-lying parts of the Moravian-Silesian Region. The bark beetle calamity is subsiding in some areas. The year 2020 had above-average precipitation, slowing down the bark beetle development, so the spruce bark beetle produced only two generations. Small forest owners have difficulty processing infested timber, so some do not respond fast enough to OLH calls. There is still a shortage of processing capacities. In 2021, the weather will again be the critical factor for further spread of bark insects. However, the decreasing area of older spruce stands leads us to assume further reduction in newly infested trees.

- In Liberec Region, the Liberec TI registered damage caused by bark beetles at elevations below 500 m a.s.l., mostly the spruce bark beetle, along with the spruce wood engraver to a lesser extent. We continued to find shortcomings particularly in natural persons' and municipal forests, aggravated by the unfavourable situation on the timber market, shortage of workers and worse cooperation with professional forest managers. No major damage by forest traffic was identified.

Nearly one half of the Liberec Region's territory falls, pursuant to Annex 1 to Public Decree no.

33784/2020-MZE-16212 of 27 Jul 2020, among listed cadastral areas with extraordinarily serious pest calamity. They include notably the western Lužické mountains, Ralsko hills, areas around Hodkovice nad Mohelkou and Semily and the Frýdlant area.

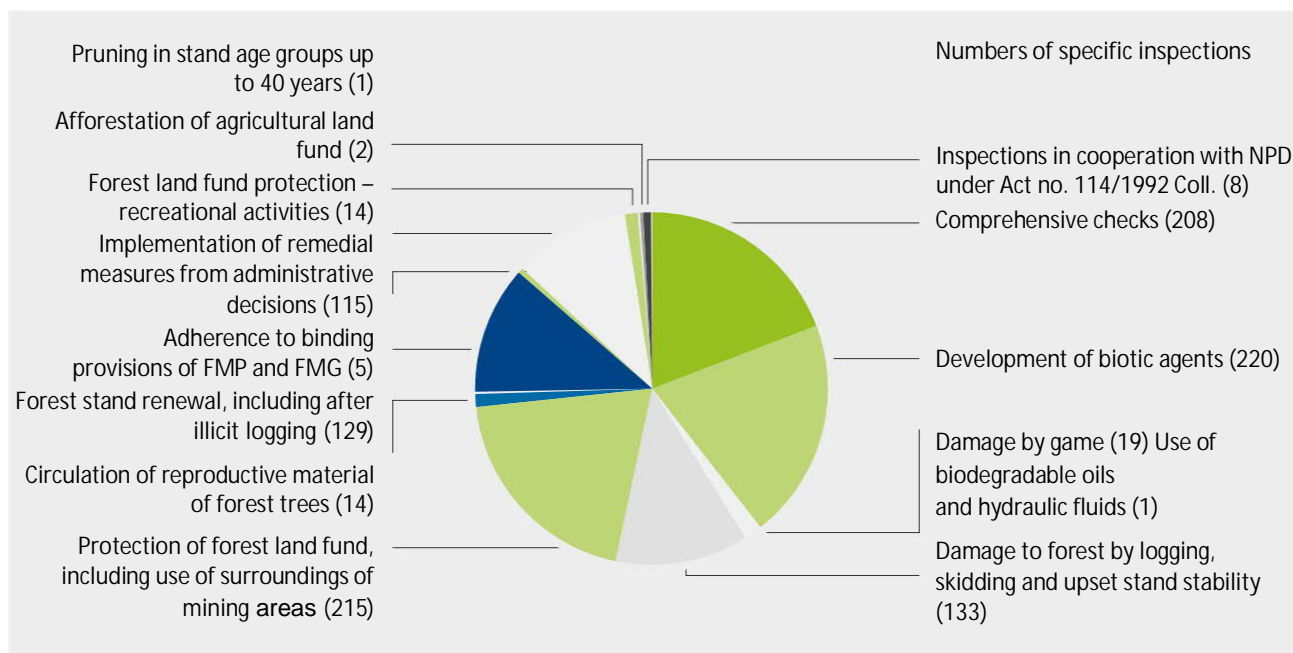
4.5.3 Overview of performance of specific tasks

TI FPD checked 14 topics in both scheduled and unscheduled inspections, namely:

Inspection topic abbreviation	Inspection topic	Number of
Sp 1	Comprehensive checks	208
Sp 2	Development of biotic agents	220
Sp 3	Damage by game	19
Sp 5	Use of biodegradable oils and hydraulic fluids	1
Sp 6	Damage to forest by logging, skidding and upset stand stability	133
Sp 7	Protection of forest land fund, including use of surroundings of mining areas	215
Sp 8	Circulation of reproductive material of forest trees	14
Sp 9	Forest stand restoration, including stands after illicit logging	129
Sp 10	Adherence to binding provisions of FMP and FMG	5
Sp 11	Implementation of remedial measures from administrative decisions	115
Sp 12	Forest land fund protection – recreational activities	14
Sp 15	Afforestation of agricultural land fund	2
Sp 16	Pruning in stand age groups up to 40 years	1
Sp 17	Inspections in cooperation with NPD under Act no. 114/1992 Coll.	8

The above frequencies of specific task checks do not match the total numbers of inspections since many inspections encompass several specific topics

simultaneously. Thus, specific tasks in 2020 involved 1,084 cases under 1,058 inspections.



4.5.4 Major cases

Prague TI

We imposed a conclusive fine amounting to CZK 380,000 on a natural person for unauthorised use of forest land for purposes other than performance of forest functions (construction and landscaping) at Vrané nad Vltavou. The forest land was occupied without knowledge and consent of applicable public authorities. The CEI FPD decision was appealed against, but the MoE confirmed it.

We imposed a fine of CZK 295,000 on a natural person at Kluk for unpermitted landscaping consisting in dumping 0.6–1 metre of excavated material, constituting a violation of Act no. 289/1995 Coll. on Forests. The company appealed against the decision. The authority of appeal, the MoE, dismissed the appeal and confirmed the CEI decision.



Unlawful use of forest land at Kluk (dumped layer of excavation material)

České Budějovice TI

For repeated non-performance of obligations in forest renewal at Řemíčov, Buková and Mečichov, we imposed a fine of CZK 250,000 on FORESTMAN s.r.o. in September 2020 and set a deadline for implementation of remedial measures.

We imposed a conclusive fine of CZK 80,000 on a natural person for not performing remedial measures ordered in 2019, regarding reforestation of logging clearings sized 0.6 ha at Masákova Lhota.

Plzeň TI

The civic association Balance Architect Group, z.s., since 2015 the owner of forest land at Horní Hradiště, Manětín and Vladměřice, has still not reforested clearings on its forest plots, for which the CEI has repeatedly imposed conclusive fines on it, the last one amounting to CZK 196,000. According to available information, the association's chairman is currently serving a prison sentence. That is the alleged reason for the association's non-activity.

JOPATRANS s.r.o., company in liquidation, has still not reforested logging clearings at Slatina u Horažďovic. Even repeated conclusive fines, the last one amounting to CZK 150,000, have not forced the company to do so.

Ústí nad Labem TI

Ústí nad Labem TI received a suggestion with a request to investigate unauthorized occupation of a part of a plot intended

for performance of forest functions, on which a parking area was built, and unpermitted tree cutting and unlawful depositing of construction material at Jáchymov. The inspection found violation of legal regulations in the area of LIPFF protection by the company STASKO plus, s.r.o. The CEI TI FPD imposed a conclusive fine of CZK 50,000 for the delict.

We imposed a conclusive of CZK 50,000 on Katedrální kapitula u sv. Štěpána v Litoměřicích for neglecting forest protection and creating conditions for actions of biotic agents and abiotic factors.

Hradec Králové TI

We imposed a fine of CZK 200,000 on Enlino a.s. for neglecting forest protection measures. The company failed to clear infested timber on time to prevent negative action of insect pests at Litošice and Sovolusky near Přelouč. The company appealed against the fine to the MoE. The authority of appeal confirmed our decision in full, so it entered into force.

We imposed a conclusive fine of CZK 75,000 on Paul Pecka s.r.o., being a forest owner significantly neglecting forest protection measures against negative action of biotic agents at Lhota u Pecky and Staňkov u Pecky.

Havlíčkův Brod TI

We imposed a fine on SUPREME STORE s.r.o. for long-lasting failure to reforest an area of 1.94 ha at Hrdá Ves, Zlatkov and Věžná. The fine amounted to CZK 388,000. The decision entered into force.



Long-term term failure to reforest land in Žďár nad Sázavou District

We imposed a conclusive fine of CZK 108,000 on Počátky Municipality for failure to arrange timely processing or other clearance of 216 cubic metres of timber infested by bark beetles. The work was not done in spite of repeated checks and calls for processing, leading to spread of biotic agents to surrounding stands.

Brno TI

There was a significant delict proceeding, ending with the imposition of a conclusive fine of CZK 280,000 on a natural person at Všechnice for failing to arrange timely and proper forest renewal on forest land sized approx. 3.35 ha, thus failing to perform remedial measures order, among other things, and creating conditions for action of harmful biotic agents and abiotic factors.



Failure to reforest in time a properly at Všechnice

We imposed a conclusive fine of CZK 90,000 on SUBDEN CONSULT, s.r.o. for a delict consisting in logging at Doubravy in contravention of legal regulations – non-compliance with deliberate logging parameters (maximum clearing size and distance between clearings). It also damaged trees by logging and timber skidding.

Olomouc TI

We imposed a conclusive fine of CZK 20,000 on LIPEKA s.r.o. for shortcomings in forest land fund protection.

Ostrava TI

Due to the coronavirus crisis in 2020, the TI FPD imposed mostly on-the-spot fines.

The greatest conclusive fine of CZK 10,000 was imposed on Budišov nad Budišovkou Municipality for unlawful use and occupation of forest land.

In addition, the inspectors imposed a conclusive fine of CZK 7,000 on Osoblaha Municipality for neglecting forest protection and creating conditions for harmful action of abiotic factors and biotic agents.

Liberec TI

We imposed a conclusive fine of CZK 160,000 on a natural person, being a forest owner neglecting forest renewal, as we found on his forest plots at Bratřikov.

We imposed a conclusive fine of CZK 140,000 on Land Value a.s. for acting in a way that endangered forest environment and created conditions for adverse action of biotic agents and abiotic factors in forests.

4.5.5 Conclusions from inspection work

- The whole report year was significantly affected by the coronavirus pandemic and states of emergency. They were reflected in CEI management measures, particularly limited contact with inspected entities and subsequent cancellation of numerous checks. Many were shifted to 2021.
- The Forest Protection Departments still feel staff shortages, with forest supervision tasks cannot be handled with existing personnel and only major cases are handled. One inspector is in charge of approx. 58 thousand hectares of supervised forest.
- In the area of administration, there were recurring problems with decisions and permits by some authorities (building authorities, forestry public authorities and gamekeeping public authorities). The situation differs by ORP.
- The reduced field supervision work is necessarily reflected in reduced proceedings on fines and remedial measures. The total amount of conclusive fines is the lowest in the past decade.
- Forestry problems in 2020 can be summed up as follows: Favourable precipitation slowed down bark beetle development and increased stand resistance. Two pest swarmings occurred mostly. Forest stands are infested in all regions, bark beetle pockets progress to higher altitudes; weather, and precipitation in particular, will be a limiting factor for bark insect development. A large part of the owners logging active bark beetles along with sterile dead trees had a negative effect on the struggle, as it drained capacity for destruction of active trees.

Lasting problems with bark beetle outbreaks occur in parts of the Moravian-Silesian, Olomouc, Zlin, Vysočina and Plzeň Regions and, last but not least, in the Central Bohemian Region.

Timber sales have registered a relatively positive trend.

A new trend in inspection work, besides continued attention to development of insect pests, will be ongoing inspection of forest renewal after logging (clearings). Forest renewal will become economically difficult for many owners, leading to potential criminal consequences.

We again registered a decline in illicit logging due to falling timber prices and sales caused by massive contingent logging.

The frequency of suggestions and the complexity of their investigation again further reduced the inspectors' capacity for scheduled and crucial work in forest supervision.

Off-road motorcycles and ATVs driven on forest land are still a problem, difficult to solve for the CEI.

We faced recurring problems finding current forest owners due to ownership changes.

- There is a constant and functional trend of respect to forest protection inspectors, particularly noticeable when we send forest owners invitations to remedy shortcomings, which is mostly followed by operative remedy. This considerably reduces the number of delict proceedings, demanding on administrative work.
- A major benefit for the work of forest protection inspectors was the publication of updated and approved "subsidy" FMP and FMO in digital form by the Ministry of Agriculture via the Forest Management Institute. The forest protection inspectors use adopted digital data in their tablets using forestry software. They use them efficiently in field work, e.g., to acquire graphic evidence.
- The coronavirus pandemic precluded the periodic, positively perceived seminar for all the inspectors and representatives of the MoE OVSS, the MoA and other public administration bodies, which greatly contributes to unification of inspection management across the TI FPD.
- Our continuing collaboration with the ÚHÚL is viewed as important, particularly concerning forest tree reproductive material.
- We again regard it as meaningful to consider a meeting between the CEI and the MoE regarding MoE requirements for CEI forest inspection work for 2021.

4.6 CEI involvement in accident resolution

Central register of water accidents

Pursuant to the Water Act, the CEI has maintained a central register of accident since 2002. In 2020, 194 accidents were registered as they factually met the definition of accident pursuant to Section 40 of Act no. 254/2001 Coll. on Waters.

Accidents caused by traffic are still registered frequently. In 2020, we registered 42 such accidents, representing 22% of the total number of cases. This figure decreased by 11% compared to 2019. Fish deaths accompanied 14 cases in 2020, representing 7% of the total.

Groundwater contamination occurred in three cases; groundwater and surface water were contaminated simultaneously in one case. The accident originator was known in 95 cases.

In the course of 2020, 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.

Classification of accidents by main cause in 2020

Cause of accident	No. of accidents	%
Human error	44	22.7
Technical failure	23	11.9
Human + technical factors	31	15.9
Natural factors	19	9.8
Unidentified	77	39.7
TOTAL	194	100

Classification of accidents by pollutant category in 2020

Pollutant category	No. of accidents	%
Petroleum products	109	56.2
Wastewater	11	5.7
Chemicals except heavy metals	19	9.8
Sludge and solids	5	2.6
Waste from animal husbandry	12	6.2
Oxygen deficit	2	1.0
Other pollutants	20	10.3
Unidentified	16	8.2
TOTAL	194	100

Major cases

Accident at Sokolovská uhelná, právní nástupce, a.s., at Vřesová on 20 Feb 2019 – leak of phenol water containing tar.

The company Sokolovská uhelná, právní nástupce, a.s., operated the facility “Vřesová processing plant” in contravention of binding requirements of the integrated permit issued by the Karlovy Vary Regional Authority. The accident involved a leak of hazardous potential pollutants into a storm sewer, then to a final settling pool and then into surface waters. Sampling proved exceedance of maximum permitted concentrations. This emergency affected the quality of surface water in the Chodovský brook for several days and caused major odour pollution in the town of Chodov. Further information about the accident is in 4.2.4 Major cases.



Accident at Sokolovská uhelná, právní nástupce, a.s

Fish kill at Farský water reservoir

The Ústí nad Labem TI investigated an accident in 2020 affecting water quality in Farský water reservoir in Most District, shown as massive biota deaths, leading to the catching and disposal of a great deal more than a tonne of fish. Based on a site investigation and water sample analysis, the CEI detected the cause of the incident. It was caused by a leak of firedamp

containing hydrogen sulphide from an old mine situated below the reservoir bottom, since a part of the water reservoir bottom had collapsed into an old mineshaft. Finding the culprit was pointless (it was an 19th century mineshaft). The water reservoir was filled gradually from the 1970s.

Bečva river accident

On 20 Sep 2020, an accident with a major fish kill occurred on the Bečva river. The contamination affected about 40 km of the watercourse in an area belonging to several municipalities with extended powers in two regions. The CEI provided expert cooperation to all entities involved in tackling the accident. Finding the originator of the Bečva river accident is the subject matter of investigation by authorities of criminal proceedings.

4.7 Integrated agendas

The core of CEI work in the area of integrated agendas is Integrated Pollution Prevention and Control (IPPC). It is an advanced preventive method of regulation of industrial and agricultural activities in relation to the environment that extends beyond the departmental approach and end-of-pipe strategy, which eliminated pollution mostly by installing end-of-pipe separators, filters and other cleaning equipment, often leading only to a shift of the pollution from one environment component to another without protecting the environment as a whole. The main emphasis is on a preventive approach, avoiding pollution before it occurs by choosing appropriate production techniques, i.e., best available techniques (BAT) as well as use of more environmentally friendly materials if possible.

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

Supervision (inspection) is the fundamental activity in this area. The non-supervision work is also important and preventive, e.g., the CEI's expert statements (under EIA, IPPC, etc.).

4.7.1 Legal foundation of work on integrated agendas

Beyond the legal framework of environmental protection, of which the CEI is a part (see 1.1 above), based on the principle of separate definitions for each environmental component under separate acts of law, public administration work (duties and powers) in the area of integrated agendas is delegated to the CEI by other national legal

regulations, i.e., particularly environmental protection legislation as amended and directly applicable EC regulations:

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

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

Integrated agendas total, aggregate data for CEI The work of CEI Departments in respect of integrated agendas done by them directly or in cooperation is notably included in the previous points (4.1, 4.2 and 4.3) of Section 4 of this Annual Report "CEI work in 2020 by department".

The priority in inspections at facilities under the Integrated Prevention Act is compliance with requirements particularly of Sections 19b, 20b, 34 and 37 of the Integrated Prevention Act, implementing Directive 2010/75/EU of the European Parliament and the Council of 24 November 2010 on industrial emissions.

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

In total, the CEI made 937 inspections in the area of integrated agendas in 2020 (998 planned), initiated 83 administrative/delict proceedings, issued 94 decisions and orders, and 98 decisions in force (including from past periods) led to the imposition of fines

totalling CZK 16,431,300. Within that, two decisions on reprimands and three on remedial measures entered into force.

The range of conclusive fines regarding integrated agendas was from CZK 2,000 to CZK 4 million (imposed conclusively on Purum s.r.o. for operating the waste management centre in Mníšek pod Brdy).

The average amount of fine per decision (order) in force, in aggregate for integrated agendas, in the period was about CZK 178,600.

Integrated prevention (Act no. 76/2002 Coll.), aggregate data for CEI

The plan for routine inspections at IPPC facilities for 2020 (675 checks) in terms of compliance with the Integrated Prevention Act and performance of integrated permit (IP) requirements was continuously updated due to the COVID-19 pandemic and repeatedly declared state of emergency, notably by shifting them to 2021. The reduced plan (535) was met (608 checks performed). These figures include extraordinary inspections made based on suggestions, media cases, accidents or non-standard operation, as well repeated inspections based on gross violations of binding requirements of IP (about 12% in total).

In total, the CEI made 608 inspections in the area of integrated prevention in 2020, initiated 78 administrative/delict proceedings, issued 89 decisions and orders, and 93 decisions in force (including from past periods) led to the imposition of fines totalling CZK 16,378,300. Within that, two decisions on reprimands and three on remedial measures entered into force.

The average amount of fine per decision (order) in force for integrated prevention in the period was about CZK 186,100.

Major inspection findings

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

- Air protection:

- exceedance of emission limits (e.g., carbon and sulphur monoxide),
- non-monitoring of landfill gases in gas collection wells,
- violations of operating rules by not connecting landfill gas collection wells to cogeneration plants.

- Water protection:

- wastewater discharge without a permit,

- excessive discharge of potential pollutants,
- exceedance of groundwater collection limits,
- handling of potential pollutants on hydraulically unsecured surfaces,
- failure to update accident plans,
- failure to monitor (e.g., landfill seepage water before transport to WWTP, water quality in inspection boreholes), failure to make tightness tests.

- Waste management:

- failure to sort waste,
- wrong handling of hazardous waste (waste similar to municipal), handing of waste to an unauthorised entity, failure to keep records, wrong waste production and management reports, failure to report transfer of substances in waste, insufficient documentation of quality of admitted hazardous waste (waste oil),
- storage in the landfill of waste other than permitted,
- insufficient completion of basic descriptions of admitted waste, not measuring dust levels,
- contamination of free ground surface, for example by placement of car wrecks containing hazardous components outside the dismantling hall,
- failure to observe operating rules (technical operating requirements), etc.

- Failure to perform reporting duty under Integrated Prevention Act:

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

- Other violations:

- disagreement of approved documents with facility descriptions,
- facility capacity exceedance,
- violation of equipment disposal requirements,
- operation without IP.

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

Integrated Pollution Register, aggregate data for CEI In terms of compliance with the IPR Act, the CEI inspected 210 facilities in 2020, including 200 inspections as part of integrated inspections (under the Integrated Prevention Act). There were eight separate IPR inspections. Two checks was made in a letter form – comparison against environmental reports in the integrated system for reporting obligations (ISPOP). We scheduled 251 checks, but the COVID-19 pandemic, repeated government-

declared state of emergency and resulting health safety settings for both the CEI and the operators reduced it gradually to 198; we made 210 checks in the end.

The total amount of the fines in force for not observing the reporting obligations for the IPR was CZK 53,000. Given 5 decisions in force, the average fine was around CZK 10,600.

Like in previous years, the penalties imposed were at the lower bound of the statutory range, which is up to CZK 500,000, namely from CZK 5,000 to CZK 15,000 (FEVE s.r.o.).

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

Thus, they were all formal delicts or misunderstandings and late reports, and the CEI treats them as

such. It is almost the rule that big operators of facilities with an IP perform their obligations under respective legislation much better than others, particularly small and medium agricultural operations and facilities. Based on the 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 compliance have been improving, with the numbers

reporting to IPR – name for sum of waste and pollutant transfer in waste – determination from infusion/dry matter.

Environmental harm, aggregate data for CEI

Delict proceedings under Act no. 167/2008 Coll. on Prevention of Environmental Harm and its Remedy and on amendment of certain

acts, were not initiated either based on a request or by authorities.

In 2020, the CEI made 119 inspections of compliance

72 inspections was met. Basic risk assessments were submitted – 50 points were only exceeded in one case, where detailed risk assessment was thus submitted. No delicts were committed.

Specialised integrated agenda coordinators (CIA) in

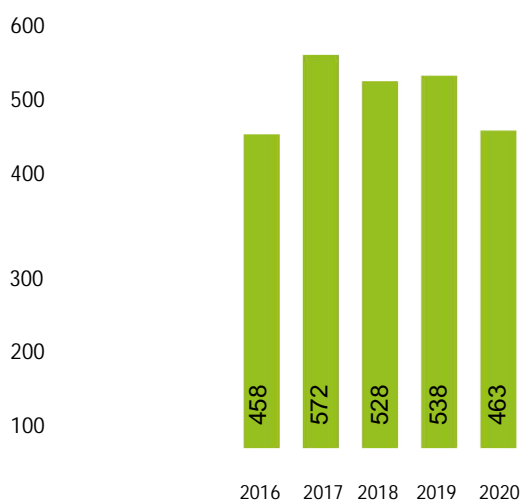
various departments made, participated in, cooperated on or coordinated 463 checks at facilities and businesses. This number includes both inspections under the Integrated Prevention Act and the IPR Act as well as the Act

on Prevention of Environmental Harm. In the study period, the CIA themselves initiated 23 administrative/delict proceedings. The number of decisions on fines (including orders) that entered into force in 2020 was 30; the total amount of fines in force was CZK 3,881,000. Within that, one decision on remedial measures entered into force. We issued no decisions on halting of operations or decisions for failure to cooperated under Inspection Rules, and none entered into force in the report period.

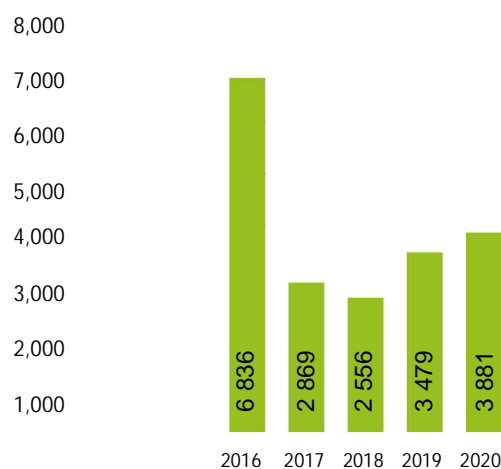
The range of fines in force was from CZK 2,000 to CZK 1 million (imposed on Mondelez CR Biscuit Production s.r.o., the operator of Mondelez facility, including completion of stages I and II, in Opava-Vávrovice).

The average amount of fine per decision (order) in force in the period was about CZK 129,400.

Numbers of facility inspections led by CEI IAD



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



Departmental tasks for IAD

Integrated checks were made as:

- KC, overall check – inspection of entire integrated permit (IP), enabling checks under departmental laws,
- KSL, departmental check – inspection of one or two IP components, enabling checks under departmental laws,
- KIR, IPR check (record keeping and notifications to Integrated Pollution Register under Act no. 25/2008 Coll., or E-PRTR under Regulation (EC) no. 166/2006),
- KEU, environmental harm check – under the Act on Prevention of Environmental Harm, i.e., compliance with requirements of Act no. 167/2008 Coll. and GR no. 295/2011 Coll. (financial provisions; basic or detailed risk assessment),
- KSP, specific check under specific tasks, special focus depending on regional issues,
- multiple checks were made at an advantage, e.g., KC+KIR, KSL+KEU, KC+KIR+KEU.

Specific tasks (KSP)

Specific inspections (KSP) in 2020 included primarily checks whether facilities fall under IPPC (e.g., 3 checks by Hradec Králové TI, resulting in 1 proceeding), as well as checks based on current regional issues (e.g., checks at facilities that have historically committed serious violations of the Integrated Prevention Act, caused accidents, had media coverage, etc.).

Accidents

Integrated agenda coordinators were actively involved in handling 20 accidents or non-standard operating states, e.g., in Ústí nad Labem TI, Brno TI and Liberec TI.

Suggestions and petitions, provision of information

For a summary, see 3.1 “Cooperation with the public” above.

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

Olomouc TI – Among the many suggestions, there was a series of unconventional ones (12), initially warning about alleged environmental harm on sites with historic environmental burdens. After clarification, they changed into suggestions to order remedial measures under the Waters Act, then into requests for information, including disclosure of the environmental contracts, etc.

4.7.3 Non-supervisory CEI work on integrated agendas

This work includes primarily development of expert statements:

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

Besides, coordinators of integrated agendas were actively involved in 2020, where possible, in work of technical workgroups, primarily for the MoE, such as “Regions and Integrated Prevention” and the MIT “Forum for Exchange of Information on BAT”.

Importantly in 2020, IAD inspectors were involved in cross-border cooperation within the IMPEL, where Ing. Barbora Herberková of Brno TI is a member of the Industry & Air expert group.

Due to the coronavirus in Europe, several meetings of the project team under the IED implementation project and of the Industry & Air expert group took place online in 2020. Generally speaking, nevertheless, our activity in the project was considerably reduced compared to previous years due to the situation in Europe.

EIA/SEA

In 2020, the CEI developed 667 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 slight increase in the statements issued (657).

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

The plan subject matter is dominated by farm modernisations, commercial zones, storage and manufacturing premises. We see the storage and manufacturing premises as the biggest problem, as their construction is frequently planned on highest-quality farmland.

Another problem is with projects without a specified purpose for buildings, so that the dispersion studies presented are not a comprehensive assessment of the actual situation after project implementation and during its use. As such, the dispersion studies only assess traffic burdens associated with use. Thus, if the specific purpose of the buildings, or activity that will take place in them, is not clearly defined, it is impossible to assess project impacts on environmental components, because the actual use can be entirely different eventually.

In our opinion, commercial companies' (notifiers') plans to building manufacturing premises (what is more, without a specific purpose) and storage compounds on arable land should not outweigh the public interest in protecting the ALF. Since disused industrial and agricultural compounds are all around the CR (see national brownfield database), it is in the interests of environmental protection to use these sites with priority.

Major EIA cases

Plzeň TI – A very interesting case was the notification of the project Park Mlýnec – Vysočany, building M9 (PLK1923). It concerned new construction of a goods storage and distribution hall, including accompanying buildings and facilities (office building, combined cafeteria and servicing building, gatehouse, waste management area, technical building, fire station, parking area for 822 cars and 87 lorries, layby areas and a retention reservoir. The size was 55 ha.

The Nature Protection Department raised fundamental protests against the plan, since its implementation would disturb the landscape character with the huge mass of the hall, even though it is to be shaded by new plantings, a green roof or a paint coat to merge with the surroundings. Besides, many trees would be cut down, a number of which, largely at Ovčín na Pastvině, are prized for their old age, making a valuable biotope for many organisms, including a lot of cavity trees, for which new plantings cannot substitute for decades. The precious nature of the site is attested by large numbers of animals belonging to endangered species under Annexes II and II of Decree no. 395/1992. The screening concluded that the plan may have an impact on the environment and human health.

The project CPI Park Mlýnec, Arterial Road (PLK1926) was intended on a nearby site. The plan to build a new arterial road, including a bypass connection to the existing CPI Vysočany compound and connection to future halls of CPI Park Mlýnec. It included the construction of a new stretch of road (bypass for the compound CPI Park Mlýnec – Vysočany), connecting roads II/198 and II/605 with a cycling trail, approx. 3.79 km long. Next to the connection, the plan contained a rest area with sanitary facilities for truck drivers and a filling station with 113 bays for

lorries (trucks) and 14 bays for cars. The plan included new arterial infrastructure (water mains, sewerage, natural gas, power lines, telecommunications lines) for connecting to future buildings. The CEI had reservations to the plan notification in terms of both water protection and nature protection, and requested additional assessment under Act no. 100/2001 Coll. The plan lacked a design for hydrotechnical parameters, an assessment of rest area drainage on the receiving water bodies (oil trap and retention reservoir). The Nature Protection Department found, based on a preliminary biological survey, that the plan territory includes a class C area of very high scientific value and extraordinarily frequent presence of specially protected vertebrate and invertebrate species registered in Annexes II and III to Decree no. 395/1992 Coll. The preliminary biological survey identified specially protected species in the genera: whinchat, raven, stork, kite, bunting, sparrowhawk, wryneck, woodcock, snipe, swift, hoopoe, swallow, flycatcher, oriole, shrike, toad, frog, lizard, slowworm, grass snake, ant, swallowtail, bumblebee and river otter. According to the dendrological survey presented, the plan area contains full-grown greenery and non-forest trees and shrubs, and the plan implementation would involve the cutting of 485 trees with a trunk circumference over 80 cm.

The plan screening was terminated based on an application to terminate the assessment process, justified by current developments and changes in investment planning for CPI Park Mlýnec.

Later on, the investor submitted a notification for the plan CPI Park Mlýnec – West (PLK1946), for which it selected a site more favourable in terms of water, nature and landscape protection. The CEI did not request further assessment of the plan, since neither the Water Protection Department nor the Nature Protection Department had any objections to it.

Ostrava TI – construction of a low-temperature drying kiln and pyrolysis unit, MSK2189. This construction project was planned for Haviřov WWTP. The notifier proposed two pyrolysis technology options, HEDVIGA or PYREG. The output material would be sanitized sludge or carbonized sludge for use as a fertiliser component; HEDVIGA technology produces pyrolysis oil too.

The plan was covered by the media, and local inhabitants disapproved of it. The CEI had objections to the plan and requested a full assessment process.

The Regional Authority concluded the screening by ordering a full assessment of the plan.

Brno TI – surface treatment and cataphoretic painting plant – EIA screening, notified by ZAMET, spol. s r.o.

The CEI pointed out incomplete documentation and information in following areas:

- insufficient dispersion study (excluded effects of traffic, background air pollution, obsolete data, etc.),
- insufficient information about intended soil biofilter,
- insufficient information about capacity of municipal WWTP to effectively dispose of industrial wastewater from the project,
- and, most importantly, the CEI pointed out incorrect plan breakdown; see quotation below:

“In the CEI’s opinion, concerning the planned operation expansion, the plan might have been split into several stages, which are presented separately for the environmental impact assessment and permission under special acts of law. This may lead to evasion of the obligation to make an assessment pursuant to the EIA Act, otherwise required for the project as a whole. In this case, the project was broken down into two stages, with the first stage, not implemented yet, was not subject to EIA. Nevertheless, the second stage was then submitted for a simplified proceeding after stage 1, not implemented yet, had not undergone an EIA, which is why both stages should be viewed comprehensively. Phase 2 cannot be viewed as a separate project, taking the situation without phase 1, which has not been implemented yet, as the current situation; both phases together should be viewed as a single project, and assessment pursuant to the Act should be made in that way.”

At the same time, given the intended size of the project, situated in PLA Beskydy and near residential development (nearest residential development 10 m and a sports ground about 25 m from the compound boundary), the CEI regarded its location in the area as inappropriate and required its assessment in the EIA process.

Based on comments and statements received, Zlín Regional Authority issued a screening conclusion stating that the plan may have a negative environmental impact and EIA documentation has to be made.

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

In 2020, the CEI developed 668 statements on applications for integrated permits or changes thereto. This is a slight increase compared to last year (648). In 9 cases, CEI representatives attended face-to-face meetings on applications for integrated permits or changes thereto.

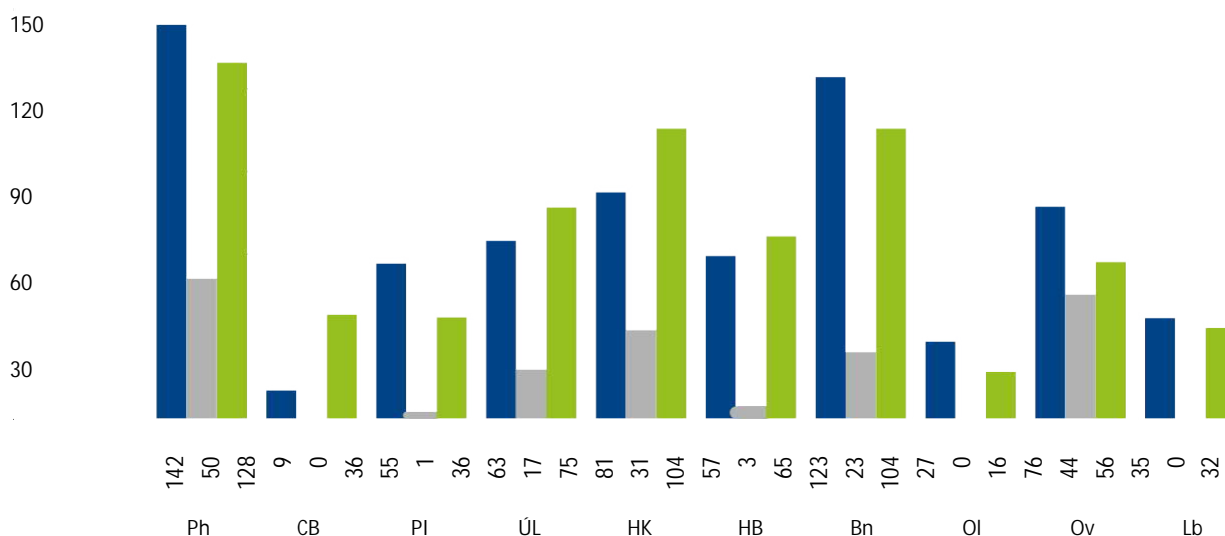
The CEI applies a uniform position in its statements on IP changes consisting in increasing landfill capacity, pointing to expected legislation changes in the area of waste management and the ban on landfilling mixed municipal waste after 2030, when the amount of waste deposited should decrease significantly.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

Other expert statements

In addition, coordinators of integrated agendas of the CEI TIs and HQ made or cooperated on another 192 statements on EMAS, under the Safe Business programme, and environmental audits, etc., as shown in the chart.

- Statements on IP applications and (aggregate for CEI): 668
- Other statements and dealings: 192 (169 TIs + 23 HQ)
- EIA/SEA (aggregate for CEI): 667 (654 TIs + 3 HQ)

Statements issued by CEI TI and HQ in 2020



Reports on inspection

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

The CEI Territorial Inspectorates post these inspection reports to the IS IPPC at appropriate time.

Since 15 Aug 2016 (change of record-keeping in IS IPPC), the IS has identified the posting of 3,470 reports on inspection by the CEI (mostly CIA).

4.7.4 Major cases from inspection work

Greatest fines:

OI Ostrava – Mondelez CR Biscuit Production s.r.o. – Mondelez facility, including completion of stages I and II, in Opava-Vávrovice.

The operator committed numerous violations of IP requirements, namely groundwater collection (totalling 13 thousand cubic metres from wells for a year without a permit), wastewater discharge (23 thousand cubic metres) into surface waters without a permit, failure to monitor quality of infiltrating rainwater, WWTP operation without a permit (no requirements, operating and accident rules, etc.), failure to inform about several changes to facility operation – we imposed a fine of CZK 1 million, in force on 28 Oct 2020.

Havlíčkův Brod TI – KRONOSPAN OSB, spol. s r.o. The inspected facility "KRONOSPAN – Particleboard Manufacturing" is the site of activity in category

6. 1. c) Industrial manufacturing of one or more of the following types of wood-based boards: oriented particleboard, particleboard or fibreboard, with a manufacturing capacity over 600 cubic metres a day.

The inspection identified violation of requirements of chapter (A) Emission limits, air, water and noise protection measures and associated monitoring, item (a) Air, requirement 5, and item (b) Water, surface water collection, requirements 1 and 2

– Air, requirement 5: cover recycled material crusher and truck unloading to conveyor to reduce discharge of dust particles into the air. Transport treated air mass from the stationary source into the air via an exhaust pipe with a fabric filter.

Deadline: no later than 24 Nov 2019. During physical tour of the compound on 3 Dec 2019, the CEI found out that the ZENO recycled material crusher was not covered and the air mass was not exhausted into the air via a fabric filter.

- Water, requirement 1: Permission to collect surface water from the Jihlava river by means of existing collecting equipment owned by České dráhy, a.s., on plot no. 6214 and plot no. 525/3 in Jihlava, left bank, river km 136.520, hydrological ID number 4 16 01-049, HGR 655. JTSK coordinates of collection point: X=1128643, Y=668324. Collection purpose: industrial use for wood manufacturing and fire prevention.

Permitted collection: Average collection: 12.8 l/s, Maximum collection: 15.4 l/s, Maximum monthly collection: 40,000 m³, Maximum annual collection: 410,000 m³. This binding operating requirement of the integrated permit was violated by exceeding the maximum allowance (15.4 l/s) in July 2018 repeatedly (7 times) for surface water collection from the Jihlava river.

- Water, requirement 2: The facility operator is required to suspend surface water collection if the flow rate in the Jihlava at Jihlava – Dvorce (indicator: 465000) decreases below Q364 (current flow rate in valid hydrological series).

The flow rate in the Jihlava remained below Q364 throughout August 2018, meaning the defendant had to suspend surface water collection, yet it collected 14,765 m³ of surface water from the Jihlava river.

By doing so, the inspected entity violated its obligation pursuant to Section 16, Para. 1, item (a) of the IP Act, thus committing a delict against Section 37, Para. 4 of the IP Act, for which the CEI imposed a fine totalling CZK 660,000 on it in a delict proceeding. The decision entered into force on 30 Oct 2020.

Liberec TI – On 15 Jan 2020, a decision on a delict entered into force, based on inspections made in 2019 at EKO Volfartice. The proceeding was led by a CIA, imposing a fine of CZK 265,000 for non-compliance with air protection requirements by not covering a part of landfill gas collecting wells and not furnishing them with a warning sign "Explosion Risk", and for operating a facility in contravention of operating rules, for exceeding the annual design processing capacity of MMW sorting plant with biological stabilisation (MMW treatment and production of recycled construction material with the identification "construction and land reclamation mixture SRS/3"), for accepting waste not included on the list of permitted waste types, and for keeping the active area of the landfill larger than 1/6 of the total horizontal size of the landfill and not covering it sufficiently with suitable waste on the day of inspection.

Example of positive CEI pressure on operators:

Ostrava TI- AVE CZ odpadové hospodářství s.r.o., facility:
Remedial measures, Ostramo lagoons.

The pressure gasworks of Sokolovská uhelná at Vřesová, which used the waste from Ostramo lagoons, terminated its operation in August 2020. The operator arranged removal to Germany for reuse/disposal. The last train to Vřesová (24 containers) was dispatched on

28 May 2020, carrying 358 tonnes of treated waste. The operator declared it impossible to meet 31 Dec 2020 as the deadline for removing sludge from the compound and asked for an extension, of which all authorities disapproved. On 19 Dec 2020, the last train carrying excess sludge left the Ostramo lagoons (91,562 tonnes removed in total).



Lagoon compound, excess sludge extraction

4.7.5 Conclusions

Organisational problems

In light of the epidemiological situation, the year 2020 was more demanding on mutual safety between inspected entities and representatives of inspecting authorities. A larger part of the time allocated for inspection was spent checking submitted documents in the office. Physical inspection as such focused predominantly on checking process equipment, etc., striving to minimise contact with the inspected persons. This means that inspection reports were against made from the CEI offices. Finalization of the inspection reports was more time-consuming than in ordinary operation. On the other hand, this method permitted more detailed insight into the issues.

The inspection work plan was adjusted operatively in 2020 to the changing situation, and this is expected to continue in 2021. The assumption is to prioritize checks

whose dates are nearing the end of the three-year cycle and at facilities showing discrepancies vis-a-vis requirements of integrated permits or departmental regulations. Additional facilities to be inspected will be selected according to the plan and, in the case of obstacles, e.g., bad epidemiological situation, with respect to the three-year cycle, shifting them to the following year. These operative changes require cooperation of environmental protection departments, as they interfere with their inspection work plans.

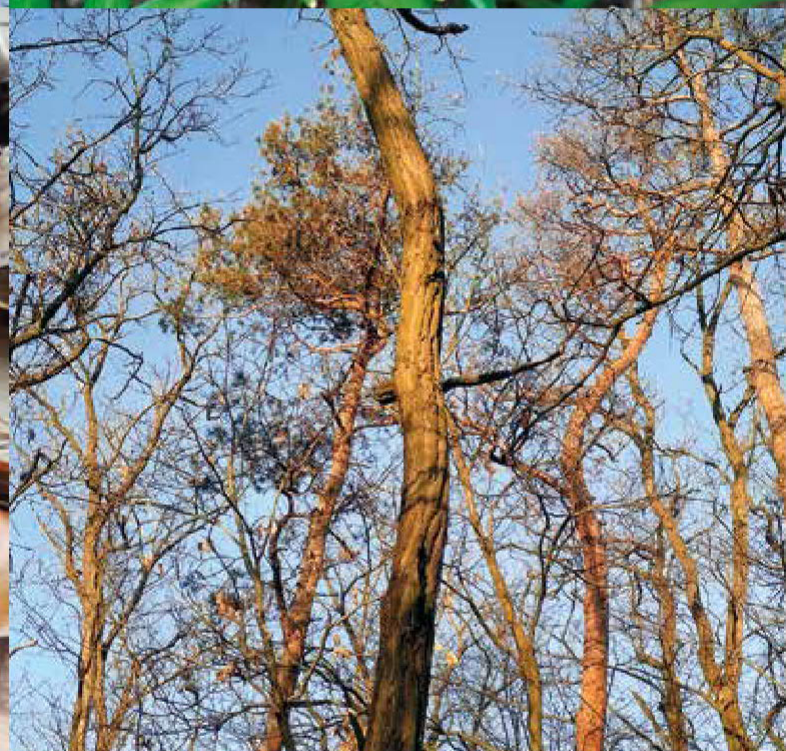
The amended Integrated Prevention Act meant a relatively substantial increase in the extent of obligations for operators (baseline reports already on the first change), regional authorities (conclusions on BAT and exemptions), the CEI and RPHA (more inspection work, reports on inspections).

Collaboration, prevention

We also actively cooperate with other public authorities, particularly regional authorities, which permit operation of facilities under the Integrated Prevention Act. The purpose of the collaboration is an effort to improve IP quality, their agreement with current facility status, formulation of individual binding operating requirements that are enforceable, and thus achieving high-quality environmental protection.

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

However, the CEI does not focus strictly on imposition of fines only, but cares for prevention and applies soft methods as well.



5 ETHICS AND INTEGRITY, ANTI-CORRUPTION ACTIVITY, SOLUTIONS

5.1 Ethics and integrity

Ethical rules

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

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

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

Reporting suspicion of illicit or corruption conduct

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

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

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

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

Information about the CEI investigators and options for reporting suspicion of illicit or corruption conduct are published on the CEI web site (www.cizp.cz).

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

5.2 Anti-corruption programme

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

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

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

COMPLAINTS AND DATA PROTECTION

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

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

The current CEI IAP is published on the CEI web site (www.cizp.cz Anti-corruption programme).

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

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

No corruption cases have been reported in the past five years (2016-2020). Likewise, no contracts with partners and suppliers have been terminated or not renewed due to violation of corruption regulations.

5.3 Complaint handling

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

No relevant suspicions of corruption conduct pursuant to Government Regulation no 145/2015 were reported to the CEI in 2020. Nine submissions were delivered to the e-mail address prosetrovatel@cizp.cz. Among them, none were relevant reports of suspicion of corruption conduct in a service authority. All the submissions were handed under Section 42 or Section 175 of the Rules of Administrative Procedure. No written reports were cast in the marked box.

Complaints over inappropriate inspector conduct or TI procedure

As part of its work, the CEI also investigates complaints made under Section 175, Para. 4 of Act no. 500/2004 Coll., Rules of Administrative Procedure, as amended, including complaints both about the authority's procedure and inappropriate conduct of its officials, but they are minimal (www.cizp.cz/Podavani-podnetu-stiznosti). Complaints about inappropriate conduct of CEI inspectors or proceedings of territorial inspectorates constitute an important feedback that helps the organisation improve its work. The CEI investigates the facts stated in the complaint and, based on the investigation, finds it justified, partly justified or unjustified. In 2020, the CEI received 54 complaints, of which 49 were not found justified. Five other complaints were found partly justified. An overview of the complaints broken down by territorial inspectorates is shown in the table below.

Numbers of complaints about inappropriate conduct of inspectors or TI procedure in 2020

Territorial Inspectorate	Number of received complaints	Within that,		
		justified	partly justified	unjustified
Praha	7	0	0	7
České Budějovice	1	0	0	1
Plzeň	6	0	0	6
Ústí nad Labem	3	0	1	2
Hradec Králové	5	0	0	5
Havlíčkův Brod	1	0	0	1
Brno	8	0	0	8
Olomouc	1	0	0	1
Ostrava	4	0	0	4
Liberec	5	0	1	4
Headquarters	13	0	3	10
Total	54	0	5	49

Employee complaints about employment issues

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

The CEI received no complaints about employment procedures in 2020. The CEI was not fined or otherwise penalized for non-compliance with legislation and regulations in the social (employment) area.

5.4 Data protection and legislative compliance

The CEI states that it did not receive any complaints for 2020, and its conduct or procedures were not the subject matter of complaints about violation of privacy, trade secret, loss of data or unauthorised publication of data. Likewise, the CEI did not fail to comply with any law or regulation in the social (employment) area or in use of products and services. The CEI registered one forced entry into a building, where a password-protected laptop was stolen. The offence was reported to the Czech Police and the Office for Personal Data Protection.

In 2020, the CEI paid:

- CZK 10,201 in fines for traffic offences,
- a payment assessment related to violation of budgetary discipline under project OP LZZ amounting to CZK 160,126,
- CZK 1,271 in costs of appeal proceeding in connection with cancellation of a fee.

6 TENDERS AND SUPPLY CHAIN IN 2020

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

Supply chain

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

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

Moreover, currently needed servicing and expert training. Purchase of personal protective equipment, machinery and laboratory equipment for CEI departments for improved inspection work performance.

In 2020, we concluded 54 public contracts worth above CZK 50,000 excl. VAT, totalling CZK 28,000,000 excl. VAT. The largest public contracts included, for example, Service and System Support to ICT Infrastructure for the CEI as a whole, Supply and Implementation of Centralised Log Storage and Management System for all types of sources in the CEI as a whole, Air-conditioning Modernization for Hradec Králové TI, Supply and Implementation for Computer Network Monitoring Tool.

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

In connection with the announced amendment to Act no. 134/2016 Coll. on Public Procurement as of 2021, the CEI started in 2020 to apply rules of socially and environmentally responsible procurement and innovation as widely as possible. We divided public contracts into parts to allow participation of smaller contractors, and reserved public contracts as much as possible for suppliers employing disabled people.

Environmental requirements were also applied to the public contract for advertising materials. It was divided into nine parts, under which we screened six contractors, i.e., 11% of new contractors, by way of screening using environmental criteria.

When screening public contract suppliers in the social area, we always audited the selected supplier for compliance with statutory requirements, contracting authority requirements and the bidding price. The below-limit public contract entitled Provision of Reception Desk Services in Liberec TI Building and the above-limit public contracts entitled Provision of Cleaning Services in Ostrava TI Building and Provision of Cleaning Services in CEI Buildings, divided into two parts: Ústí nad Labem and Liberec, were reserved for contractors employing persons with disabilities – so-called reserved contracts, where the contractor has to prove meeting of the criterion with a confirmation from a job centre. In the above public contracts, we screened four contractors, i.e., 7.4% of new contractors, in terms of criteria of impact on society.

7 EMPLOYEE ENVIRONMENT AND HUMAN RESOURCES

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

As of 31 Dec 2020, the CEI had 546 employees, including 307 women and 239 men. CEI employees work at inspectorates in 10 regions. Most of the employees work in professional positions (77.1%) and are tertiary graduates (81.5%). Employees with more than 10 years of CEI experience make up 59.5% of the staff.

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

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

Year	2016	2017	2018	2019	2020
Total employees as of 31 Dec Dec	539	536	550	557	546
Prague and Central Bohemia	65	57	62	62	62
České Budějovice	39	38	36	39	36
Plzeň	44	43	44	43	43
Ústí nad Labem	47	48	49	50	52
Hradec Králové	42	42	44	44	44
Havlíčkův Brod	35	37	37	38	36
Brno	50	51	54	55	51
Olomouc	34	34	34	36	34
Ostrava	44	47	47	46	48
Liberec	31	32	32	33	30
Headquarters (Prague)	108	107	111	111	110

Classification of employees by education and sex, as of 31 Dec 2020

Education attained	Males	Females	Total	%
Primary	0	0	0	0
Secondary professional	0	5	5	1.1
Complete secondary	1	11	12	2.3
Complete secondary professional	10	64	74	13.8
Higher vocational	2	5	7	1.3
University	226	222	448	81.5
Total	239	307	546	100

Duration of employment, as of 31 Dec 2020

Duration	Quantity	%
Up to 5 years	173	31.7
Up to 10 years	48	8.8
Up to 15 years	116	21.2
Up to 20 years	95	17.4
Over 20 years	114	20.9
Total	546	100

Staff numbers by employment and contract type

Year	2016	2017	2018	2019	2020
Staff as of 31 Dec, total	539	536	550	557	546
Percentage of staff covered by collective agreement	100	100	100	100	100
Staff in top management (managers + heads of departments) (civil servants)	14	14	15	17	17
within that, females	2	2	2	2	2
within that, males	12	12	13	15	15
Professional staff (civil servants)	431	429	437	446	421
within that, females	205	205	217	229	213
within that, males	226	224	220	217	208
Supporting staff (staff in employment)	94	93	98	94	108
within that, females	81	81	86	86	92
within that, males	13	12	12	8	16
Employment for an indefinite period of time	497	493	492	504	505
within that, full-time	489	486	484	490	496
within that, part-time	8	7	8	14	9
Employment for a definite period of time*	42	43	58	53	41
within that, full-time	40	42	53	52	40
within that, part-time	2	1	5	1	1
FEMALES, as of 31 Dec	288	288	305	317	307
Employment for an indefinite period of time (females)	260	259	269	278	278
within that, full-time	254	253	262	266	269
within that, part-time	6	6	7	12	9
Employment for a definite period of time (females)	28	29	36	39	29
within that, full-time	26	28	33	38	29
within that, part-time	2	1	3	1	0
MALES, as of 31 Dec	251	248	245	240	239
Employment for an indefinite period of time (males)	237	234	223	226	227
within that, full-time	235	231	222	224	226
within that, part-time	2	1	1	2	1
Employment for a definite period of time (males)	14	14	22	14	12
within that, full-time	14	14	20	14	11
within that, part-time	0	0	2	0	1

* Definite period: pursuant to Section 21 of the CSA, civil servants who have not passed the servant exams are admitted for a definite period. As soon as they pass the servant exams, their contract changes to an indefinite period.

7.1. HR management

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

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

In 2020, the HR department work focused on coping with the COVID-19 pandemic and smooth CEI operation. The consequence of the pandemic was the need to make agreements on work from a different place, covering home office work.

Employment

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

At the end of the year, the CEI had 28 vacant systematized jobs. A remaining current task for CEI management is stabilisation and development of key professions. The average percent of voluntary fluctuation is low in the CEI (6.4%).

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

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

Total number, share of new employees and employee fluctuation rate

Newly admitted employee and employee leaving the organization, fluctuation rate in 2016-2020

	2016	2017	2018	2019	2020
Employees admitted in the year, total	51	49	59	54	43
within that, females	32	37	33	39	28
up to 30 years	8	10	16	9	5
aged 30-50	22	23	13	22	16
aged over 50	2	4	4	8	7
within that, males	19	12	26	15	15
up to 30 years	7	2	7	3	5
aged 30-50	7	4	10	6	6
aged over 50	5	6	9	6	4
Total employees as of 31 Dec	539	536	550	557	546
Total number of employees leaving the organization in the year	43	55	51	50	55
within that, males	19	23	25	19	16
up to 30 years	1	3	1	2	1
aged 30-50	10	7	15	6	7
aged over 50	8	13	9	11	8
within that, females	24	32	26	31	39
up to 30 years	3	4	4	5	4
aged 30-50	16	18	13	16	16
aged over 50	5	10	9	10	19
% of voluntary fluctuation * (excludes forced departures, including due to organisational changes, retirements, departures due to injury or death)	4.1	7.2	4.8	6	6.4
% of total employee fluctuation Total number of terminated employments in the period (year) × 100 / average registered number of employees in the year.	8	10.2	9.5	9	10.1

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

Overview economic, health and social employee benefits (except pension scheme), relating to full-time employees for an indefinite period of time, 2020

	Staff in top management (managers + heads of departments) //civil servants//	Staff – professional employees //civil servants//	Supportive staff //employed employees//
Average monthly number of employees in the year	17	421	108
Collective agreement	YES	YES	YES
% of staff covered by collective agreement	100 %	100 %	100 %
Employee life insurance	NO	NO	NO
Healthcare allowance	YES	YES	YES
Disability insurance, insurance against permanent consequences of injury	NO	NO	NO
Parental leave	as per LC	as per LC	as per LC
Financial support for supplementary pension scheme	YES	YES	YES
Increased severance payment on departure due to organisational changes under Collective agreement	NO	NO	NO
Managerial life insurance, incapacity for work insurance	NO	NO	NO
Sick leave (5 days/year)	YES	YES	YES
13 th salary	NO	NO	NO
Meal allowance	YES	YES	YES
Company catering services	NO	NO	NO
Protective beverages and vitamin products	NO	NO	NO
Children's recreation allowance	YES	YES	YES
Family recreation allowance	YES	YES	YES
Work with seniors	NO	NO	NO
Anniversary rewards	YES	YES	YES
University tuition fees for employees	NO	NO	NO
Culture and sports allowance	YES	YES	YES
Monetary rewards and gifts	YES	YES	YES
Reward for standby duty (by law), not a benefit	NO	NO	NO
Social assistance	YES	YES	YES
Annual holiday extension by 1 week per calendar year above baseline	NO	NO	NO
Interest-free loans	YES	YES	YES

Diversity and equality of opportunities

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

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

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

A separate presentation is dedicated to equal opportunities as part of admission training. Passing the equal opportunities e-learning course was required for every newly admitted and existing employee in 2020.

CEI employee-management relationships

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

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

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

Composition of managing bodies and employee categories in 2020

	Males	Females	Total
Staff in top management (managers + heads of departments) /civil servants/	15	2	17
Employees – expert employees /civil servants/	208	213	421
Supportive staff /employed employees/	16	92	108
Total	239	307	546

7.2 Education

A total of 4,650 employees were trained in attendance courses, conferences and e-learning courses in 2020. The number includes training schemes, divided into:

- Internal courses: CEI large-scale training (19 events, 334 participants, 110 hours),
- External courses: Individual training (80 events, 208 participants, 607 hours),
- Conferences (9 events, 20 participants, 77 hours),
- E-learning training (45 events, 4,088 participants, 526 hours).

The numbers exclude training mandatory by law, which was attended by 1,661 employees in 2020. This training is divided into:

- OHS for management members (50 participants),
- OHS for employees (331 participants),
- FS for management members (50 participants),
- FS for employees (336 participants),
- First aid (8 participants),
- Drivers (452 participants),
- Work at height (434 participants).

Compared to 2019, there were great changes in the training structure caused by the COVID-19 pandemic. Training involving personal attendance was reduced and conferences were suspended, but e-learning training courses multiplied.

Training, study, practice and courses

	Males	Females	Total
Average hours of all training types per year per employee out of average monthly employee numbers	79.7	94.6	82.9
Average hours of all training types per year per employee as of 31 Dec	80	95	83
Staff in top management (managers + heads of departments) /public servants/	72	68	71
Employees – expert employees /public servants/	81	88	85
Supportive staff /employees in employment/	70	117	77

7.3 Occupational health and safety

Occupational safety principles

Occupational health and safety are among the CEI's fundamental priorities. The guideline "OHS organisation and management" was issued in 2018, defining primarily work of expert CEI employees, who work in a very diverse and demanding environment of various companies and sites, where they inspect facilities with pollution sources or investigate environmental damage or hazards; the Annex on personal protective equipment for our employees was amended in 2020.

The guideline "Fire prevention organisation and implementation" was amended.

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

The CEI carries out periodic safety training for its employees, and all its employees are familiarised with both general and internal occupational health and safety regulations in force. All the CEI employees are given protective equipment

assuring maximum safety depending on their work description pursuant to standards, and are replaced with new ones on the first sign of damage.

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

Injuries, lost days and absence

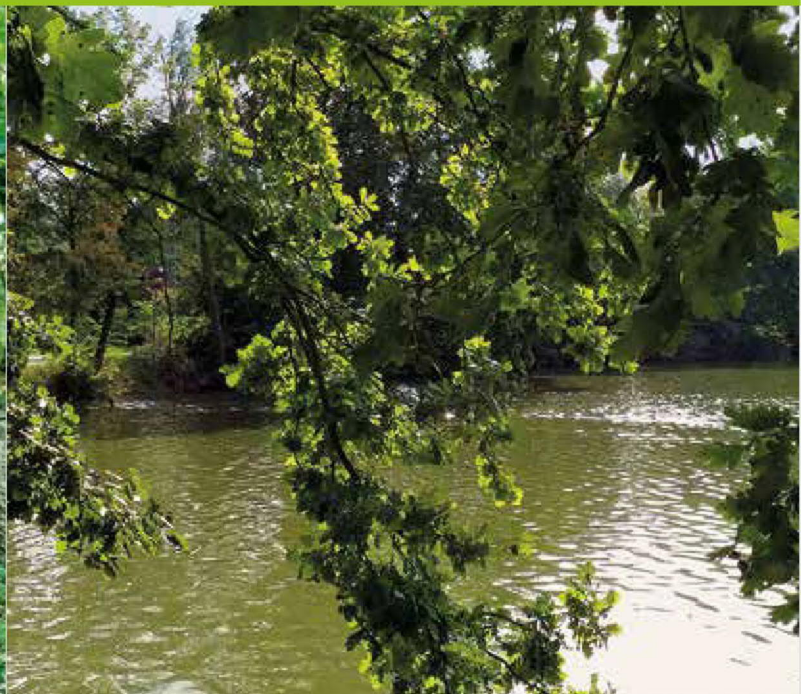
The high effectiveness of OHS management and employee discipline are illustrated by zero injuries in 2020. The principal causes of occupational injuries are unpredictable work risks and human error. There were no fatal injuries or occupational diseases in 2014-2020. All workplaces consistently register all injuries, including investigation into their causes.

Injuries, diseases, missed days and absence of CEI employees

	Unit	2016 males	2016 females	2016 total	2017 males	2017 females	2017 total	2018 males	2018 females	2018 total	2019 males	2019 females	2019 total	2020 males	2020 females	2020 total
Average monthly number of employees in year	absolute no.	251	288	539	251	289	540	245	294	539	243	310	553	237	309	546
Number of all occupational injuries	absolute no.	0	3	3	0	1	1	0	0	0	0	0	0	0	1	1
Number of registered occupational injuries leading to incapacity for work for at least 3 days. (GRI Injury)	absolute no.	0	2	2	0	1	1	0	0	0	0	0	0	0	1	1
Total number of serious occupational injuries leading to hospitalization longer than 5 days	absolute no.	0	1	1	0	0	0	0	0	0	0	0	0	0	1	1
Total number of absence days due to injury and occupational disease (GRI lost day)	days/ shifts	0	59	59	0	12	12	0	0	0	0	0	0	0	88	88

Injuries, diseases, missed days and absence of CEI employees

	Unit	2016	2017	2018	2019	2020
Injury frequency (Number of registered occupational injuries per 100 employees) (Cz standard)	relative no.	0.37	0.19	0.00	0.00	0.18
Average number of lost calendar days per registered occupational injury	absolute no.	29.50	12.00	0.00	0.00	88.00
Absence due to disease, occupational and other injuries (% of total time worked) (Cz standard)	%	4.05	4.04	3.65	4.63	6.19
Unscheduled absence rate Absence due to unscheduled absence: disease, occupational and other injuries (% of scheduled time) (GRI Absentee rate)	%	3.30	3.39	3.07	3.84	5.67
Percentage of incapacity for work Share of number of lost calendar days of incapacity for work times 100 in number of calendar days times number of employees GRI Lost day rate)	%	0.03	0.01	0.00	0.00	4.84
LTIFR (Lost Time Injury Frequency Rate) Represents number of injuries after at least three days of incapacity for work divided by total number of hours worked expressed in millions of hours.	absolute no.	2.19	1.07	0.00	0.00	0.00



8 ENERGY AND MATERIAL INTENSITY OF CEI ACTIVITY

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

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

Energy audits and building energy intensity passports exist for all buildings where the CEI has the right to manage state property. These inputs have resulted in measures implemented in order to reduce the energy consumption. Windows of the CEI Headquarters and Brno TI were renovated in 2020. There is a plan to insulate

the roof envelope of Plzeň TI building, install LED lights and fluorescent tubes and purchase domestic appliances with higher energy efficiency across the organisation.

The vehicle fleet was renovated in 2019, replacing 9 petrol and diesel cars with CNG cars. In the coming years, the CEI plans to gradually replace about 30% of cars fuelled by petroleum-based products with cars with hybrid propulsion.

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

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

	2016		2017		2018		2019		2020	
	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste	Hazardous waste	Other waste
Total production	25	60,049	29	42,324	27	43,960	37	85,510	25	50,551

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

CEI energy, fuel and water consumption

	Fuel type or energy type	Unit	2016	2017	2018	2019	2020
Purchased and consumed energy sources	Petrol	L	75,294	68,172	63,165	61,791	37,465
	Diesel	L	43,709	50,289	51,243	50,120	36,425
	Electricity*	kWh	475,838	511,156	462,409	592,471	437,085
	natural gas	m ³	98,912	93,601	93,397	80,866	82,249
	Thermal energy	GJ	1834	1589	1681	2032	1517
Water consumption from municipal supply or other utility		m ³	8145	10,822	6769	6840	3934

* The origin of electricity supplied to CEI as an end customer by EP Energy Trading a.s. in 2020 was: 23.2% from coal, 15.8% from nuclear installations, 1.2% from natural gas, 56.3% from renewables, including guarantee of origin, 1.5% from secondary energy sources, and 2.0% from other sources.

9 ECONOMY

In 2020, the CEI operated with non-investment budgetary funds amounting to CZK 463,677,270.23 (including NNV of CZK 39,304,687.23) and with investment funds of CZK 45,816,367.33, including NNV (unspent expense claims) of CZK 21,626,435.45).

The CEI also managed non-budgetary fund limit of CZK 1,896,323.

Drawing of non-investment expenditures for

Indicator	Adjusted budget	Drawing	Balance
Salaries of employed employees	43,923,202.00	36,449,682.00	7,473,520.00
Salaries of civil servants – SZ	223,546,794.00	223,546,794.00	0.00
WPD	3,239,247.00	2,424,195.00	815,052.00
Severance pay	5,263,472.00	2,461,901.00	2,801,571.00
Insurance – SS+HI	94,136,378.00	88,635,691.00	5,500,687.00
Total wage expenditures	370,109,093.00	353,518,263.00	16,590,830.00

Indicator	Adjusted budget	Drawing	Balance
Other current non-investment expenditures	80,887,624.23	52,546,069.69	28,341,554.54
Transfer to CSNF	5,188,176.00	5,188,176.00	
Non-budgetary resources	1,896,323.00	777,658.58	1,118,664.42
Total current non-investment expenditures	87,972,123.23	58,511,904.27	29,460,218.96

Indicator	Adjusted budget	Drawing	Balance
Non-investment expenditures – mobile phone	500,000.00	0.00	500,000.00
Non-investment expenditures – computer	3,500,000.00	2,765,116.20	734,883.80
Non-investment expenditures – chip cards	8344.40	3438.00	4906.40
Non-investment expenditures – technical and non-technical security	787,710.00	787,710.00	
Non-investment expenditures – AM, access	800,000.00	0.00	800,000.00
Total non-investment expenditures	5,596,054.40	3,556,264.20	2,039,790.20

Drawing of investment expenditures for 2020

Indicator	Adjusted budget	Drawing	Balance
CIS functionality	556,600.00	556,600.00	
CEI intranet	143,990.00	143,990.00	
Technical and non-technical security	7,253,196.17	7,253,196.17	
EIS	33,880.00	33,880.00	
Web site production	600,000.00		600,000.00
Account management (HR)	800,000.00		800,000.00
AM – access control	400,000.00		400,000.00
Multifactor identification	1,550,000.00		1,550,000.00
Printing provision	700,000.00		700,000.00
IDM – identity management	1,400,000.00		1,400,000.00
CAIS	5,000,000.00		5,000,000.00

Infrastructure at TI	1,600,000.00	890,365.19	709,634.81
2 printer renewal	167,738.28	167,738.28	
Fireproof doors	193,479.00	193,479.00	
Outer door frames	262,207.00	262,207.00	
Ol Brno building modernisation	910,000.00		910,000.00
Air handling at Brno TI	420,000.00		420,000.00
Pacifik expenses	850,000.00		850,000.00
Liberec TI – ESS and EFS	1,730,689.62	1,730,689.62	
Ústí nad Labem TI – ESS and EFS	1,147,106.40	1,147,106.40	
Ústí nad Labem TI – remote gate control	223,647.93	223,647.93	
Brno TI – air-conditioning	786,894.46	786,894.46	
HK TI – air-conditioning	4,750,000.00		4,750,000.00
Lázně Kynžvart	220,000.00	131,210.00	88,790.00
Plzeň TI – roof	644,000.00		644,000.00
Lázně Kynžvart connection	407,000.00		407,000.00
HK TI – ESS	90,024.00	90,024.00	
CB TI – ESS	89,000.34	89,000.34	
Prague TI – ESS	95,556.60	95,556.60	
HB TI – ESS	77,517.44	77,517.44	
Liberec TI – ESS	75,722.28	75,722.28	
UL TI – ESS	91,134.78	91,134.78	
Plzeň TI – ESS	106,720.79	106,720.79	
HQ – ESS	92,502.08	92,502.08	
Brno TI – ESS	100,000.00		100,000.00
Ostrava TI – ESS	100,000.00		100,000.00
Car purchases	4,931,906.00	3,199,213.36	1,732,692.64
Car purchases	1,600,000.00		1,600,000.00
Pacifik air-conditioning	274,282.80	274,282.80	
HB – lift	1,288,000.00		1,288,000.00
Liberec TI – telephone exchange	194,794.00	194,794.00	
Aggregated projects	3,858,777.36		3,858,777.36
Total investment expenditures	45,816,367.33	17,907,472.52	27,908,894.81
Total investment and non-investment	509,493,637.56	433,493,903.99	75,999,733.57

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

The non-investment expenditure saving of CZK 29,460,219.96 is related to the extension of supervisory duties; furniture purchases were not made in full, and another reason is that many of the repairs and services could not be implemented due to the complicated epidemic situation.

We did not spend all the funds on ICT, primarily due to restricted maintenance and

record services and cancellation of support to our geographic information system.

The saving of EDS/SMVS non-investment expenditures amounting to CZK 2,039,790.20 is caused by shifting these projects to 2021.

The savings of investment expenditures of CZK 24,050,117.45 resulted from not drawing funds for projects approved in 2020. They were projects in ICT (CZK 11,159,634.81) and operating investments (CZK 12,890,482.64). All the unspent investment funds are transferred to 2021, when they will be implemented.

9.2 Use of reserve fund and other non-budgetary resources

The CEI did not use the reserve fund in 2020. The balance of the reserve fund as of 31 12 2020 was CZK 0.

Non-budgetary resources

UEC not profiling	39,304,687.23
Insurance premium	1,896,323.00

Unspent expense claims in past years were spent on the following:

- 115V02100D002 Assurance of functionality of CEI Central Information System – released claim of CZK 556,600.00, spent CZK 556,600.00;
- 115V02100D023 CEI intranet – released claim of CZK 143,990.00, spent CZK 143,990.00;
- 115V02100D024 Implementation of technical and non-technical security measures – released claim of CZK 8,040,906.17, spent CZK 8,040,906.17;
- 115V02100D029 Economic information system – released claim of CZK 33,880.00, spent CZK 33,880.00;
- 115V03100D006 Multifactor identification of users – released claim of CZK 1,558,344.40, spent CZK 3,438.00;
- 115V03300D002 HQ fireproof door supply – released claim of CZK 193,479.00, spent CZK 193,479.00;
- 115V03300D003 HQ door frame supply – released claim of CZK 262,207.00, spent CZK 262,207.00;
- 115V03300D013 Liberec TI (ESS and EFS renovation) – released claim of CZK 1,730,669.62 – drawn CZK 1,730,669.62;
- 115V03300D014 Ústí nad Labem TI (ESS and EFS renovation) – released claim of CZK 1,147,106.40, spent CZK 1,147,106.40;
- 115V03300D015 Ústí nad Labem TI (remote gate control) – released claim of CZK 223,647.93, spent CZK 223,647.93;
- 115V03400D003 Installation of Trade Fides ESS end devices for Hradec Králové TI – released claim of CZK 90,024.00, spent CZK 90,024.00;
- 115V03400D004 Installation of Trade Fides ESS end devices for České Budějovice TI – released claim of CZK 89,000.34, spent CZK 89,000.34;
- 115V03400D005 Installation of Trade Fides ESS end devices for Prague TI – released claim of CZK 95,556.60, spent CZK 95,556.60;
- 115V03400D006 Installation of Trade Fides ESS end devices for Havlíčkův Brod TI – released claim of CZK 77,517.44, spent CZK 77,517.44;
- 115V03400D007 Installation of Trade Fides ESS end devices for Liberec TI – released claim of CZK 75,722.28, spent CZK 75,722.28;
- 115V03400D007 Installation of Trade Fides ESS end devices

for Liberec TI – released claim of CZK 91,134.78, spent CZK 91,134.78;

- 115V03400D009 Installation of Trade Fides ESS end devices for Plzeň TI – released claim of CZK 106,720.79, spent CZK 106,720.79;
- 115V03400D010 Installation of Trade Fides ESS end devices for HQ – released claim of CZK 92,502.08, spent CZK 92,502.08.

NNV not profiling

	3,082,774.00	5011
	4,978,447.00	5013
	1,703,292.00	5021
	970,472.00	5024
	3,354,069.00	5031
	1,131,955.00	5032
	129,848.21	5132
	894,738.30	5137
	667,836.94	5139
	26,870.00	5151
39,304,687.23	465,342.17	5152
	719,255.00	5153
	1,010,406.99	5154
	991,862.03	5156
	70,000.00	5161
	1,469,014.51	5162
	734,132.90	5163
	169,225.35	5164
	708,470.00	5166
	732,732.94	5167
	4,244,593.75	5168
	5,637,880.83	5169
	2,844,297.31	5171
	1,509,551.00	5192
	3,000.00	5362
	160,126.00	5363
	894,494.00	5424

9.3 Total income assessment

The CEI's total income in 2020 was CZK 4,286,008.04.

Budgetary income	Approved budget	Adjusted budget	Reality
2132	350,000.00	350,000.00	329,138.16
2313	3,600.00	3,600.00	0.00
2310	0.00	0.00	1,886.00
2322	0.00	0.00	2,009,925.00
2324	1,146,400.00	1,146,400.00	1,159,294.88
4132	0.00	0.00	56,505.00
3113	0.00	0.00	729,259.00
Total	1,500,000.00	1,500,000.00	4,286,008.04

Breakdown of income from sales of immovable property, non-budgetary funds, etc.:

2132 – This budget item contains income from office space rent at Havlíčkův Brod and Liberec TI.

2133 – This budget item contains income from movable asset rent at Havlíčkův Brod TI. They include primarily a power drill, welder, grinder, power saw, charger, angle grinder, screw tap kit, ladder, etc.

2310 – This budget item contains income from purchase of personal protective equipment.

2324 – This budget item contains income from costs of proceedings, distraintments and disciplinary fines.

2322 – This budget item contains income from insurance payouts – compensations from insurance company.

4132 – This budget item contains income from unspent wage funds for Dec 2020.

3113 – This budget item contains income from sales of long-term tangible assets.

10 FINANCIAL STATEMENT AS OF 31 DEC 2020

Balance sheet

Period Jan 2020 – Dec 2020

Item number	Item name	Synthetic account	GROSS	CORRECTION	NET	PREVIOUS PERIOD
TOTAL ASSETS			894,828,915.72	354,802,534.01	540,026,381.71	511,474,801.67,
A.	Fixed assets		802,318,488.20	354,802,534.01	447,515,954.19	446,312,552.36
A.I.	Long-term intangible assets		45,047,003.43	35,821,762.11	9,225,241.32	4,259,916.19
A.I.1.	Intangible research and development results	012				
A.I.2.	Software	013	27,914,827.16	18,696,348.84	9,218,478.32	3,019,954.19
A.I.3.	Valuable rights	014	183,000.00	180,593.00	2,407.00	5,762.00
A.I.4.	Emission permits and preference limits	015				
A.I.5.	Low-value long-term intangible assets	018	16,944,820.27	16,944,820.27		
A.I.6.	Other long-term intangible assets	019				
A.I.7.	Unfinished long-term intangible assets	041	4,356.00		4,356.00	1,234,200.00
A.I.8.	Advances granted for long-term intangible assets	051				
A.I.9.	Long-term intangible assets scheduled for sale	035				
A.II.	Long-term tangible assets		757,271,484.77	318,980,771.90	438,290,712.87	442,052,636.17
A.II.1.	Land	031	12,527,113.00		527,113.00	12,516,935.00
A.II.2.	Cultural items	032	11,491.00		11,491.00	11,491.00
A.II.3.	Buildings	021	511,948,105.59	144,845,445.00	367,102,660.59	369,669,161.43
A.II.4.	Individual tangible moveable assets and sets of tangible moveable assets	022	132,835,054.13	74,432,350.64	58,402,703.49	59,855,048.74
A.II.5.	Cultivation wholes of permanent	025				
A.II.6.	Low-value long-term tangible assets	028	99,702,976.26	99,702,976.26		
A.II.7.	Other long-term tangible assets	029				
A.II.8.	Unfinished long-term tangible assets	042	196,744.79		196,744.79	
A.II.9.	Advances granted for long-term tangible assets	052				
A.II.10.	Long-term tangible assets scheduled for sale	036	50,000.00		50,000.00	
A.III.	Long-term financial assets					
A.III.1.	Property interest in entities with decisive influence	061				
A.III.2.	Property interest in entities with substantial influence	062				
A.III.3.	Debt securities held until payable	063				
A.III.4.	Long-term loans	067				
A.III.5.	Long-term time deposits	068				
A.III.6.	Other long-term financial assets	069				

Balance sheet
Period Jan 2020 – Dec 2020

Item number	Item name	Synthetic account	GROSS	CORRECTION	NET	PREVIOUS PERIOD
A.III.7.	Acquired long-term financial assets	043				
A.III.8.	Advances granted for long-term financial	053				
A.IV.	Long-term receivables					
A.IV.1.	Long-term returnable financial aids granted	462				
A.IV.2.	Long-term receivables from ceded credits	464				
A.IV.3.	Long-term advances granted	465				
A.IV.4.	Long-term receivables from guarantees	466				
A.IV.5.	Other long-term receivables	469				
A.IV.6.	Long-term advances granted for transfers	471				
A.IV.7.	Long-term mediation of transfers	475				
B.	Current assets		92,510,427.52	92,510,427.52		65,162,249.31
B.I.	Inventory		21,327.90	21,327.90		
B.I.1.	Material acquisition	111				
B.I.2.	Material in store	112	21,327.90	21,327.90		
B.I.3.	Material on the way	119				
B.I.4.	Unfinished production	121				
B.I.5.	Self-made semifinished products	122				
B.I.6.	Products	123				
B.I.7.	Goods acquisition	131				
B.I.8.	Goods in store	132				
B.I.9.	Goods on the way	138				
B.I.10.	Other inventory	139				
B.II.	Short-term receivables		49,988,289.43	49,988,289.43		33,018,630.24
B.II.1.	Clients	311	263.83	263.83		
B.II.2.	Bills for cashing	312				
B.II.3.	Receivables for discounted securities	313				
B.II.4.	Short-term advances granted	314	2,776,573.00	2,776,573.00		2,569,187.24
B.II.5.	Other receivables from main operation	315	47,177,870.60	47,177,870.60		30,448,643.00
B.II.6.	Short-term returnable financial aid granted	316				
B.II.7.	Short-term receivables from ceded credits	317				
B.II.9.	Receivables for employees	335	2,883.00	2,883.00		800.00
B.II.10.	Social security	336				
B.II.11.	Health insurance	337				
B.II.12.	Pension plans	338				
B.II.13.	Income tax	341				
B.II.14.	Other taxes, charges and other similar pecuniary performance	342				
B.II.15.	Value added tax	343				

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Balance sheet

Period Jan 2020 – Dec 2020

Item number	Item name	Synthetic account	GROSS	CORRECTION	NET	PREVIOUS PERIOD
B.II.16.	Receivables from entities except selected governmental institutions	344				
B.II.17.	Receivables from selected central governmental institutions	346				
B.II.18.	Receivables from selected local governmental institutions	348				
B.II.19.	Receivables from tax administration	352				
B.II.20.	Clearance from tax redistribution	355				
B.II.21.	Receivables from distraintment and other handling of foreign assets	356				
B.II.22.	Other receivables from tax administration	358				
B.II.23.	Short-term receivables from guarantees	361				
B.II.24.	Fixed time operations and options	363				
B.II.25.	Payables from unfinished financial operations	369				
B.II.26.	Receivables from financial security	365				
B.II.27.	Receivables from bonds issued	367				
B.II.28.	Short-term advances granted for transfers	373				
B.II.29.	Long-term mediation of transfers	375				
B.II.30.	Costs of future periods	381				
B.II.31.	Incomes from future periods	385				
B.II.32.	Active estimate accounts	388				
B.II.33.	Other short-term receivables	377	30,699.00		30,699.00	
B.III.	Short-term financial assets		42,500,810.19		42,500,810.19	32,143,619.07
B.III.1.	Asset securities for trading	251				
B.III.2.	Credit securities for trading	253				
B.III.3.	Other securities	256				
B.III.4.	Short-term time deposits	244				
B.III.5.	Other current accounts	245	41,361,394.38		41,361,394.38	30,982,738.78
B.III.6.	State financial asset accounts	247				
B.III.7.	Treasury and state debt liquidity control accounts	248				
B.III.8.	Accounts for tax sharing and split management	249				
B.III.9.	Current account	241				
B.III.10.	Current account CSNF	243	1,138,241.81		1,138,241.81	1,159,706.29
B.III.14.	Current accounts of state organisational component funds	225				
B.III.15.	Postage stamps	263	1,174.00		1,174.00	1,174.00
B.III.16.	Money on the way	262				
B.III.17.	Checkout	261				

Balance sheet

Item number	Item name	Synthetic account	CURRENT PERIOD	PREVIOUS PERIOD
TOTAL LIABILITIES			540,026,381.71	511,474,801.67
C.	Equity capital		451,287,852.73	449,976,682.89
C.I.	Accounting entity property and adjusting items		488,915,507.33	488,643,027.07
C.I.1.	Accounting entity property	727,35	727,056,740.25	727,056,740.25
C.I.2.	Privatisation fund	402		
C.I.4.	Exchange rate differences	405		
C.I.5.	Pricing differences on initial use of method	406	-238,435,713.18	-238,435,713.18
C.I.6.	Other pricing differences	407	-28,185.74	
C.I.7.	Adjustments to previous accounting periods	408	22,000.00	22,000.00
C.II.	Accounting entity funds		1,138,241.81	1,159,706.29
C.II.2.	Cultural and Social Needs Fund	412	1,138,241.81	1,159,706.29
C.II.4.	Reserve fund from other means	414		
C.III.	Economic result		-3,930,356,630.54	-3,502,208,888.65
C.III.1.	Economic result for current accounting period		-428,147,741.89	-420,175,347.48
C.III.2.	Economic result in approval proceeding	431		
C.III.3.	Economic result in previous accounting periods	432	-3,502,208,888.65	-3,082,033,541.17
C.IV.	Income and expenditure account of budgetary activity		3,891,590,734.13	3,462,382,838.18
C.IV.1.	Income account of state organisational components	222	-4,286,008.04	-1,852,933.87
C.IV.2.	Special expenditures account	223	433,493,903.99	447,577,398.13
C.IV.3.	State budget activity account	227		
C.IV.4.	Aggregated incomes and expenditures of previous accounting periods	404	3,462,382,838.18	3,016,658,373.92
D.	External resources		88,738,528.98	61,498,118.78
D.I.	Reserves			
D.I.1.	Reserves	441		
D.II.	Long-term payables			
D.II.1.	Long-term credits	451		
D.II.2.	Long-term returnable financial aid received	452		
D.II.3.	Long-term payables from bonds issued	453		
D.II.4.	Long-term advances received	455		
D.II.5.	Long-term payables from guarantees	456		
D.II.6.	Long-term bills for payment	457		
D.II.7.	Other long-term payables	459		
D.II.8.	Long-term advances received for transfers	472		
D.II.9.	Long-term mediation of transfers	475		
D.III.	Short-term payables		88,738,528.98	61,498,118.78
D.III.1.	Short-term credits	281		
D.III.2.	Discounted short-term bonds (bills)	282		
D.III.3.	Short-term payables from bonds issued	283		
D.III.4.	Other short-term loans	289		
D.III.5.	Suppliers	321		
D.III.6.	Bills for payment	322		
D.III.7.	Short-term advances received	324	87,705.00	87,705.00
D.III.8.	Payables from split management	325	700,960.00	718,827.00
D.III.9.	Short-term returnable financial aid received	326		
D.III.10.	Employees	331		
D.III.11.	Other payables towards employees	333	16,461,683.00	15,023,085.00

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Balance sheet

Item number	Item name	Synthetic account	CURRENT PERIOD	PREVIOUS PERIOD
D.III.12.	Social security	336	6,601,506.00	6,091,368.00
D.III.13.	Health insurance	337	2,847,816.00	2,627,838.00
D.III.14.	Pension plans	338		
D.III.15.	Income tax	341		
D.III.16.	Other taxes, charges and other similar pecuniary performance	342	2,877,671.00	2,444,326.00
D.III.17.	Value added tax	343		
D.III.18.	Payables to entities except selected governmental institutions	345		
D.III.19.	Payables to selected central governmental institutions	347	33,581,234.60	22,441,050.60
D.III.20.	Payables to selected local governmental institutions	349	23,743,450.00	11,630,550.00
D.III.21.	Tax advances received	351		
D.III.22.	Tax overpayments	353		
D.III.23.	Payables from indirect tax returns	354		
D.III.24.	Clearance from tax redistribution	355		
D.III.25.	Payables from distraintment and other handling of foreign assets	357		
D.III.26.	Other payables from tax administration	359		
D.III.27.	Short-term payables from guarantees	362		
D.III.28.	Fixed time operations and options	363		
D.III.29.	Payables from unfinished financial operations	364		
D.III.30.	Payables from financial securing	366		
D.III.31.	Payables from subscribed unpaid securities and shares	368		
D.III.32.	Short-term advances received for transfers	374		
D.III.33.	Long-term mediation of transfers	375		
D.III.34.	Payables from treasury and state debt liquidity control	248		
D.III.35.	Expenditures of future periods	383		
D.III.36.	Revenues from future periods	384		
D.III.37.	Passive estimate accounts	389		
D.III.38.	Other short-term payables	378	1,836,503.38	433,369.18

Profit and loss statement

Item number	Item name	Synthetic account	Current period		Previous period	
			Main operation	Economic activity	Main operation	Economic activity
A.	TOTAL COSTS		433,031,381.24		422,902,590.32	
I.	Costs of operation		431,459,616.88		422,881,060.51	
1	Consumed materials	501	5,231,443.23		7,431,477.48	
2	Energy consumption	502	5,485,522.95		5,353,860.87	
3	Consumption of other unstorable supplies	503				
4	Goods sold	504				
5	Capitalisation of long-term assets	506				
6	Capitalisation of current assets	507				
Jul	Change in own production inventory	508				
8	Repair and maintenance	511	5,065,525.26		3,910,314.28	
9	Travel costs	512	1,470,317.51		3,711,375.30	
10	Representation costs	513	131,782.44		198,915.80	
11	Capitalisation of internal services	516				
12	Other services	518	25,347,904.08		24,375,815.01	
13	Wages and salaries	521	266,661,692.00		256,902,676.00	
14	Mandatory social insurance	524	88,631,983.00		86,546,230.00	
15	Other social insurance	525				
16	Mandatory social expenditures	527	5,854,743.22		5,215,320.00	
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	294,901.44		140,948.00	
21	Indirect tax returns	539				
22	Contractual penalties and interest on	541				
23	Other penalties	542	168,898.00		1,055,407.68	
24	Donations and other gratuitous	543				
25	Materials sold	544				
26	Deficits and damages	547				
27	Fund generation	548	5,188,176.00		4,901,298.00	
28	Depreciation of long-term assets	551	16,456,137.47		17,119,892.57	
29	Sold long-term intangible assets	552				
30	Sold long-term tangible assets	553	467,259.00			
31	Land sold	554				
32	Reserve generation and clearance	555				
33	Corrective item generation and	556				
34	Costs of excluded receivables	557				
35	Costs of low-value long-term assets	558	4,991,281.85		6,014,323.98	
36	Other operating costs	549	10,079.43		1,235.54	

Profit and loss statement

Item number	Item name	Synthetic account	Current period		Previous period	
			Main operation	Economic activity	Main operation	Economic activity
II.	Financial costs		1,571,764.36		21,529.81	
1	Sold securities	561				
2	Interest	562	1,523,893.00			
3	Exchange rate loss	563	-5,283.12		21,529.81	
4	Costs of real-value repricing	564	53,154.48			
5	Other financial costs	569				
III.	Costs of transfers					
1	Costs of transfers of selected central governmental institutions	571				
3	Costs of transfer pre-financing of selected central governmental	575				
I	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		4,883,639.35		2,727,242.84	
I.	Operating revenues		4,882,974.35		2,720,577.84	
1	Revenues from own product sales	601				
2	Revenues from service sales	602	917,195.17		970,831.97	
3	Revenues from rental	603	329,138.16		347,496.87	
4	Revenues from goods sold	604				
5	Revenues from administrative charges	605				
Jul	Revenues from court charges	607				
8	Other revenues from own activities	609				
9	Contractual penalties and interest on	641				
10	Other penalties	642	631,601.00		908,201.00	
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	729,259.00			
15	Revenues from sales of land	647				
16	Fund drawing	648				

Profit and loss statement

			Current period		Previous period	
Item number	Item name	Synthetic account	Main operation	Economic activity	Main operation	Economic activity
17	Other operating revenues	649	2,275,781.02		494,048.00	
II.	Financial revenues		665.00		6,665.00	
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	665.00		6,665.00	
III.	Revenues from taxes and fees					
1	Revenues from natural person income	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				
Jul	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	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	-	-428,147,741.89		-420,175,347.48	
2	Economic result for current accounting period	-	-428,147,741.89		-420,175,347.48	

11 OVERVIEW OF MEETING OF GRI STANDARD INDICATORS

Overview of meeting of GRI standard indicators

Indicator number	Published indicator name	Chapter	Location in report, page
	GENERAL DISCLOSURES		
	Organisation profile		
102-1	Organisation name		Endpaper and Contacts, Abbreviations and
102-2	Primary brands, products and services		irrelevant
102-3	Organisation registered office address		Endpaper and Contacts, Abbreviations and
102-4	Countries where organisation active		Czech Republic
102-5	Ownership nature and legal status	1.1 Role of the CEI	State organisation, p. 8,
102-6	Markets served		irrelevant
102-7	Organisation size	Summary information about activity in 2016-2020, 1.3 Intensity of inspection work	4-5, 11
102-8	Employee numbers	7 Employee environment and human	82-86
102-9	Organisation supply chain	6 Tenders and supply chain	81
102-10	Major changes	Foreword	1-3
102-11	Precautionary principle – Principle 15 of Rio Declaration	1.1 Role of the CEI; 4. CEI work in 2020 by department	All scheduled inspections and all CEI prevention activity Pp. 8-9, also Chapter 4, pp. 19-77
102-12	Externally developed economic, environmental and social charters, sets of policies	5 Ethics and integrity	78
102-13	Membership in associations	3.3 International collaboration	16-17
	Strategy		
102-14	Declaration of highest-ranking person responsible for decisions made by organisation	Foreword	1-3
102-15	Description of key impacts, risks and opportunities	Foreword	(Future targets defined under Acts of law, specifically annually see Work Plan at www.cizp.cz/ Plany-cinnosti) pp. 1-3
	Ethics and integrity		
102-16	Values, principles, standards and norms of conduct in organisation	1.1 Role of the CEI: Legal framework of CEI activity 5. Ethics and integrity; 6 Tendering	8-9; 78, 81
102-17	Internal and external mechanisms for reporting concerns of unethical or illicit conduct	5 Ethics and integrity	78
	Organisation management		
102-18	Organisation management structure		10, http://www.cizp.cz/Organizacni-struktura
	STAKEHOLDER ENGAGEMENT		
102-40	List of stakeholder groups interested in organisation activity	3 Dealings with stakeholders	13-17
102-41	Collective agreement	7 Employee environment and human	83
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

Indicator number	Indicator name	Chapter	Location in report, page
	Identified serious aspects and boundaries		
102-45	All entities contained in consolidated organisation financial statement		CEI
02-46	Procedure for determining report contents and topic boundaries	1.1 Role of the CEI; 4. CEI work in 2020 by department	Report contents are defined by legally defined jurisdiction, internal structure and duties of the CEI. Pp. 8–9, also Chapter 4, pp. 19-77
102-47	Major report topics	1.1 Role of the CEI; 4. CEI work in 2020 by department	Report contents are defined by legally defined jurisdiction, internal structure and duties of the CEI. Pp. 8–9, also Chapter 4, pp. 19-77
102-48	Corrections of information provided in previous reports		No changes
102-49	Major changes since last report period		No changes
102-50	Report period for information provided		2020,
102-51	Date of last previous report		Fourth CEI GRI report, first in May 2018
102-52	State cycle		annual
102-53	Contact point for issues relating to report or its contents		tel.: 222 860 111, podatelna@cizp.cz
102-54	Statement on report agreement with GRI		Endpaper
102-55	GRI contents index	11 Overview of meeting of GRI standard indicators	104
102-56	External report audit		not audited externally
	Management Approach		
103-1	Explanation of basic topics and their boundaries	1.1 Role of the CEI; 4. CEI work in 2020 by department	Report contents are defined by legally defined jurisdiction, internal structure and duties of the CEI. Pp. 8–9, also Chapter 4, pp. 19-77
103-2	Management approach – complaint mechanism	5.3 Complaint handling	79–80

Indicator number	Published indicator no.	Chapter	Location in report, page
	SUB-CATEGORY: SOCIETY/COMMUNITY		
	Anti-corruption activity		78
205-1	Total number and percentage of operations assessed for risks related to corruption and identified major risks	5.2 Anti-corruption programme	78
205-2	Communication and training on anti-corruption policies and procedures	5.2 Anti-corruption programme	78
205-3	Confirmed cases of corruption and measures	5.2 Anti-corruption programme	78
	SPECIFIC DISCLOSURES		
	CATEGORIES: Environment		
	Materials		
301-1	Materials used by weight or volume	8 Energy and material intensity	91
	Energy		91
302-1	Energy consumption by organisation	8 Energy and material intensity	91
	Water		91
303-5	Total water consumption	8 Energy and material intensity	91
	Wastewater and waste		91
306-2	Total waste weight by type and disposal method	8 Energy and material intensity	91
	Auditing of environmental impacts of suppliers		
308-1	Percentage of new suppliers subjected to screening using environmental criteria	6 Tendering	81
	CATEGORY: Social area		
	SUB-CATEGORY: EMPLOYMENT PROCEDURES AND DIGNIFIED WORK CONDITIONS		
	Employment		84–86
401-1	Total number, share of new employees and employee fluctuation rate	7.1 HR management	85
401-2	Employee benefits	7.1 HR management	86
	Employee-management relationships		84 86–87
402-1	Minimum notice periods relating to operating changes, including specification in collective agreements	7.1 HR management	84
	Occupational health and safety		88–89
403-8	Percentage share of total workforce represented in formal committees for occupational health and safety associating employees and management	7.3 Occupational safety	88 (100%)
403-9 403-10	Injury types and injury rate, occupational diseases, lost days and absence, and total number of related fatal occupational injuries	7.3 Occupational safety	88–89
	Training and education		87
404-1	Average number of training hours per year	7.2 Education	87
	Diversity and equality of opportunities		86–87
405-1	Composition of managing bodies and employee categories	7.1 HR management	86–87
	Equal remuneration of men and women		86–87
405-2	Share of base pay and remuneration of women to men by employee category and major operating site	7.1 HR management	86–87

Indicator number	Published indicator no.	Chapter	Location in report, page
	SUB-CATEGORY: HUMAN RIGHTS		
	Non-discrimination		79–80
406-1	Total number of cases of discrimination and remedial action taken	5.3 Complaint handling	79–80
	Supplier assessment in terms of impacts on society		81
414-1	Percentage of new suppliers subjected to screening using criteria of impact on society	6 Tendering	81
	Auditing of supplier procedures in employment law		81
414-2	Major current and potential adverse impacts on employment law procedures in supply chain and action taken	6 Tendering	81
	SUB-CATEGORY: LIABILITY FOR PRODUCTS AND SERVICES		
	Customer data protection		79–80
418-1	Total number of justified complaints about violation of customer privacy and loss of customer data	5.4 Data protection and legislative compliance	79–80
	Legislative compliance		79–80
419-1	Pecuniary value of major fines and non-pecuniary penalties for non-compliance with social and economic legislation and regulations	5.4 Data protection and legislative compliance	79–80

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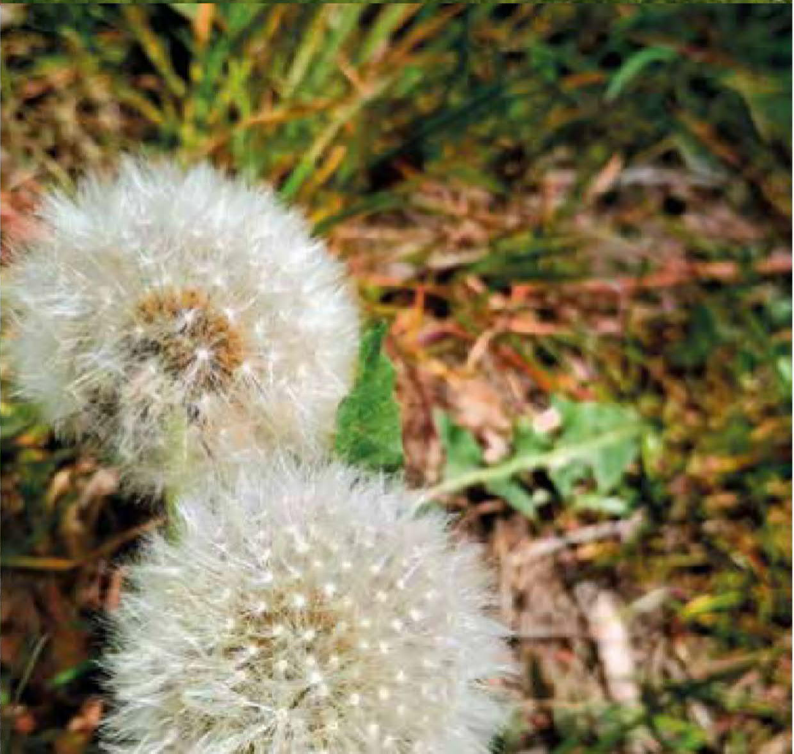
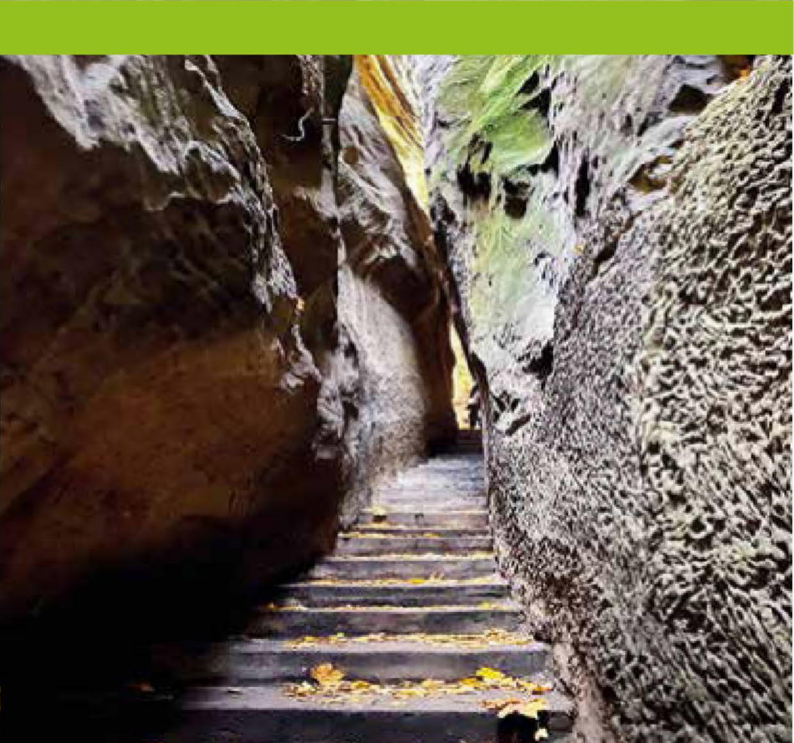
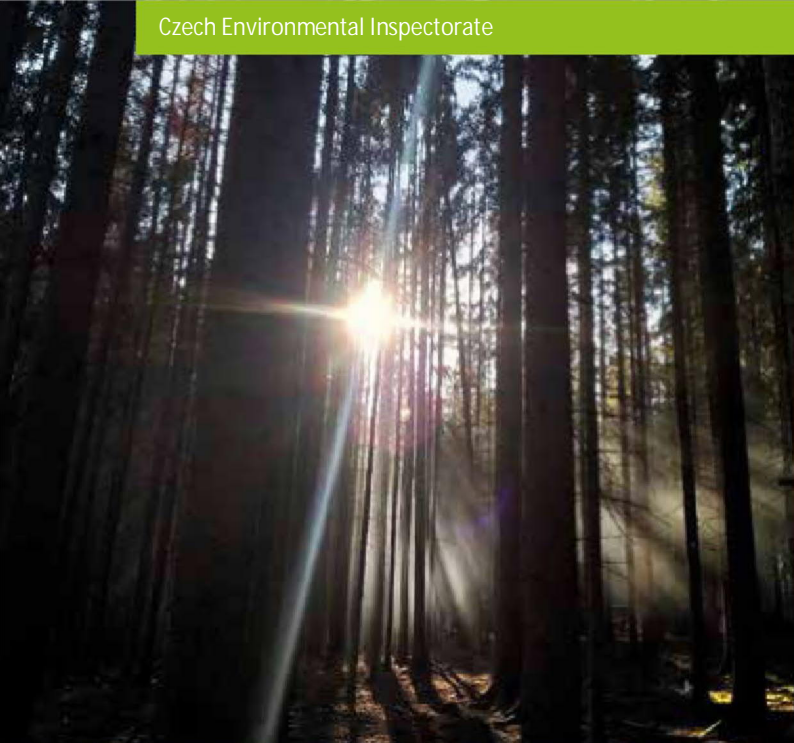
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LIST OF ABBREVIATIONS

ALF	Agricultural land fund
BAT	Best available techniques
BDW	Biodegradable waste
BGS	Biogas station
BOD	Biochemical oxygen demand
BWWTP	Biological wastewater treatment plant
CC	Cross Compliance (political tool for implementing minimum standards in public health protection, animal health and wellbeing, plant health and environment – soil, water, biodiversity protection, etc.)
CEI	Czech Environmental Inspectorate
CEI IAP	CEI internal anti-corruption programme
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, Treaty of Washington
CLP	Regulation of the European Parliament and the Council (EC) no. 1272/2008 of 16 December 2008 on classification, labelling and packaging of substances and mixtures
COD	Chemical oxygen demand
ČRS	Czech Fishing Union
CSA	Civil Service Act
ČSO	Czech Society for Ornithology
CSNF	Cultural and Social Needs Fund
CWWTP	Central wastewater treatment plant
DPB	Sections of soil blocks
EC	Emission ceiling
ECA	Communication from the European Commission “EU actions to improve environmental compliance and governance”
ECHA	European Chemicals Agency
EDS/SMVS	Records and subsidy system and management of state-owned assets
EEA	European Economic Area
EEE	Electric and electronic equipment
EFTA	European Free Trade Association
EI	Equivalent inhabitants
EIA	Environmental Impact Assessment
EH	Environmental harm
EL	Emission limit
EMAS	Environmental Management and Audit System
EMS	Environmental Management System
ENV	Environment
EU	European Union
FMG	Forestry management guidelines
FMP	Forestry management plan
FMR	Forestry management records
FP	Fire prevention
FPD	Forest Protection Department

FRS	Fire Rescue Service
GIOS	Główny Inspektorat Ochrony Środowiska, Polish Environmental Inspectorate
GMO	Genetically modified organisms
GMVP	Genetically modified vascular plants
GRI	Global Reporting Initiative
HEB	Historic environmental burdens
HQ	CEI Headquarters
IA	Integrated agendas
IAD	Integrated Agendas Department
IMPEL	Network of environmental inspection authorities of EU states
IP	Integrated permit
IPPC	Integrated Pollution Prevention and Control
IPR	Integrated Pollution Register
IRI	Impel Review Initiative (voluntary evaluation of organisations integrated in the international network of inspectorates and agencies in environmental protection)
IRS	Integrated Rescue System
IS IPPC	IPPC information system
ISPOP	Integrated system for reporting obligations
KRNAP	Krkonoše National Park
LČR	Lesy České republiky, s. p.
LF	Legal force
LIPFF	Land intended for performance of forest functions
LS	Forest administration
MoA	Ministry of Agriculture of the Czech Republic
MoE	Ministry of the Environment of the Czech Republic
MoF	Ministry of Finance of the Czech Republic
MIT	Ministry of Industry and Trade 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
NNV	Unspent expenditures claim
NO	Hazardous waste
NP	National Park
NPČS	České Švýcarsko National Park
NPD	Nature Protection Department
NPŠ	Šumava National Park
NR	Nature Reserve
ODP	Ozone depletion potential
OHS	Occupation Health and Safety
OERES	Environmental Risk and Damage Department
OLH	Professional forestry manager
ORP	Municipality with extended powers

OVSS	Public Administration Execution Department
PCB	Polychlorinated biphenyls
PCDD/PCDF	Polychlorinated dibenzodioxins and polychlorinated dibenzofurans
PČR	Czech Police
PLA	Protected Landscape Area
PLF	Prominent landscape feature
PM	Particulate matter
RAPEX	Rapid Alert System of Non-Food Products (European Union rapid alert information system on dangerous consumer products of non-food characteristics)
RA	Regional authority
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
RMD	Road and Motorway Directorate
RPHA	Regional Public Health Authority
RPLF	Registered prominent landscape feature
RS	Regulated substances
SAIF	State Agricultural Intervention Fund
SCI	Site of Community Importance
SEA	Strategic Environmental Assessment
SEF	State Environmental Fund
SEI	Slovakian Environmental Inspectorate
SHPP	Small hydropower plant
SPA	Specially protected areas
SPS	Specially protected species
TI	Territorial Inspectorate
TZS	Technical landfill security
ÚHÚL	Forest Management Institute
VLS ČR	Vojenské lesy a statky České republiky, s. p.
WEEE	Waste electric and electronic equipment
WMD	Waste Management Department
WPD	Water Protection Department
WWTP	Wastewater treatment plant



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