



ANNUAL REPORT 2014

CZECH ENVIRONMENTAL INSPECTORATE

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FOREWORD

I was appointed Director of the Czech Environmental Inspectorate on 1 December 2014. I succeeded in the open tender also because I wish to strive for changes in the Inspectorate's existing activity, which I consider one of the key elements of environmental protection.

You will find commented outcomes of the Inspectorate's specific activities on the following pages. However, I would like to inform you about the changes that the new management launched in the last weeks of 2014 and that should become fully effective in 2015.

I regard improvement to the state of the environment as the Inspectorate's primary objective, not only numbers of checks, sanctions imposed and penalty amounts. The inspection work should be done transparently, predictably, justly and without major differences across the regions of the Czech Republic. The emphasis is also on prevention and on remedial measures.

The inspectors' work will be regulated by a code of conduct and the primary criteria for selecting and evaluating all employees will be their expertise, competency and moral integrity. The Czech Environmental Inspectorate will also strive to acquire respected certificates in management quality, sustainable development and anti-corruption measures.

We are opening the institution more for communication with both the lay and professional public and public administration authorities. We are actively integrating ourselves into both actions in the environmental department and in-ternational expert collaboration.



In 2015, the entire Inspectorate and the majority of its employees will become a public service authority pursuant to the Public Service Act.

In conclusion, I would like to express my thanks and great praise to all the employees of the Czech Environmental Inspectorate for their professional performance, patience and cooperation on the implementation of necessary changes which shift the Inspectorate towards fulfilling its main vision. That is to be a respected and effective authority impartially supervising adherence to environmental law.

Erik Geuss
Director of the CEI

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01 | DESCRIPTION OF ACTIVITY

1.1 General information

The Czech Environmental Inspectorate (CEI) was established in 1991 by the Act on the Czech Environmental Inspectorate and its powers in forest protection. The other departments joined in subsequently in 1991-1992. It is an autonomous organisational component of the State founded by the Ministry of the Environment of the CR.

It performs its activity in five areas:

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

At the same time, it applies an integrated approach to environmental protection both based on the Act on Integrated Prevention (IPPC) and the Act on Environmental Impact Assessment (EIA) and in its overall inspection work method.

OVERVIEW OF CEI ACTIVITY

- Supervise adherence to legal regulations on environmental protection;
- carry out inspections/checks;
- impose measures to remedy deficiencies identified and sanctions for non-adherence to laws;
- inspect trade in and handling of endangered animal and plant species and products made from them (confiscate illegally acquired individuals and items);
- restrict or halt operations if they seriously threaten the environment;
- set charges for wastewater discharge and groundwater consumption;
- participate in resolving historical environmental burdens and handling environmental accidents;

- collaborate with inspection authorities of European Union countries and the EU network of inspection bodies (IMPEL);
- elaborate position statements for other authorities;
- handle alerts from citizens and legal entities;
- provide information based on requests pursuant to laws in force;
- inform the public, the media and state administration authorities about environmental data that it acquires in its inspection work.

1.2 Organisational structure

The CEI is divided into 10 territorial inspectorates, two branch offices and the headquarters. As of 31 December 2014, it was employing 551 persons, including 419 inspectors.

Territorial Inspectorates (TI):

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

The CEI Director is appointed by the Environment Minister.



Overview of powers by environmental component

CEI powers		Environmental component				
		Air	Water	Waste	Nature	Forest
Inspection	Inspections, reviews, checks, surveys, etc.	•	•	•	•	•
Sanctions	Penalties for legal entities	•	•	•	•	•
	Penalties for natural persons	•	•	•	•	•
	Restriction or halt of operation	•	•		•	•
Measures	Measures to remedy deficiencies identified	•	•	•	•	•
	Handling of historical environmental burdens		•			
	Register of accidents and cooperation on handling them	•	•	•		
	Interception and confiscation of illegal specimens of endangered animal and plant species				•	
	Confiscation of individuals held illegally, confiscation of products	•			•	
Charges	Charges (wastewater discharge, groundwater consumption)		•			
Statements	Position statements, statements, approvals for authorities	•	•	•	•	•
Alerts	Handling of alerts	•	•	•	•	•

1.3 Inspection work intensity

In 2014, the CEI carried out 14,634 inspections and issued 10,299 conclusive decisions (including 2104 decisions on charges and advances for wastewater discharge and 4906 decisions on changes and advances for groundwater consumption).



02 | DECISION-MAKING IN ADMINISTRATIVE PROCEEDINGS

2.1 Penalties

In 2014, the Inspectorate imposed 2948 penalties (2781 of them entered into legal force in 2014). The total amount of the penalties imposed in legal force was CZK 148,022,282. The average penalty amount was CZK 53,226.

Customs Administration, the Czech Police, the Fire Rescue Service, the Czech Trade Inspection Authority, the Povodí enterprises, the State Navigation Authority, the Czech Mining Authority, court authorities, regional and municipal authorities and institutions, Protected Landscape Area and National Park managements, and others.

2.2 Other decisions

In 2014, the Inspectorate issued 21 conclusive decisions on halting or restricting activity, operation or part of it, 145 conclusive decisions on confiscation of live or dead specimens, 339 conclusive decisions on remedial measures, 3 conclusive decisions on remedial measures to adhere to emission limits, 2104 decisions on charges and advances for wastewater discharge, and 4906 decisions on charges and advances for groundwater consumption.

2.3 Work outside of administrative proceedings

In 2014, the CEI issued 1129 EIA position statements and statements, and 15,557 other position statements and statements (e.g., position statements issued as part of remediation of historical environmental burdens, statements for regional authorities in their administrative proceedings concerning permission of construction of stationary air pollution sources, position statements issued for the Ministry of the Environment (MoE), statements on project documentations in building permit proceedings for water management authorities, position statements on emission limits, etc.).

The CEI collaborates with the Ministry of the Environment and other departmental organisations, the Ministry of Finance, the Ministry of Industry and Trade, the



03 | COOPERATION WITH THE PUBLIC

3.1 Alerts and complaints

The Czech Environmental Inspectorate handles alerts alerting to environmental damage or hazards and complaints on inappropriate conduct of authorities or their procedures, in the legal framework of

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

The CEI and the citizens

Alerts, complaints and petitions are an important element in the CEI communication with the public. Citizens often point out legal violations that would otherwise remain concealed. Alerts and petitions are a starting point

of the CEI's other activity; if a CEI survey identifies any reasons to initiate a proceeding out of authority, then it initiates an administrative proceeding on sanctions or remedial measures. Some alerts and petitions are forwarded to other authorities in jurisdiction for examination.

Complaints on inappropriate conduct of inspectors or procedures of a CEI TI comprise important feedback, which helps the organisation improve its work. Another important aspect of handling of alerts, complaints and petitions is increasing legal awareness among the public concerning environmental protection.

The numbers of alerts received by the CEI TIs in 2014 is shown in the table below. These numbers of alerts were registered by the CEI (received by the CEI mail office). However, not all of the alerts were completely handled in

Numbers of suggested received by CEI TIs in 2014

Territorial Inspectorate	Praha	České Budějovice	Plzeň	Ústí nad Labem	Hradec Králové	Havlíčkův Brod	Brno	Olomouc	Ostrava	Liberec	HQ	Total
Env. component												
Air protection	82	31	27	27	29	38	62	24	21	22	3	366
Water protection	72	51	29	38	26	35	53	23	40	23		390
Waste management	115	55	67	86	36	17	63	27	99	34		599
Nature protection	273	80	80	88	79	89	107	64	96	64		1020
Forest protection	26	23	11	7	23	5	20	7	31	14		167
Integrated agendas	4	0	0	1	3	29	1	33	3	4		78
Total	572	240	214	247	196	213	306	178	290	161	3	2620

2014. Some were forwarded to other public authorities. The majority of the complaints are handled pursuant to Section 175, Para. 4, of Act no. 500/2004 Coll., the Rules of Administrative Procedure. Factually, they are complaints on the procedure of an administrative authority that has not complied with the submitter's idea in its previous submission (alert). A minimal part of the complaints concern "inappropriate conduct of officials".

The CEI HQ performs methodological and inspection work in the area of alert and complaint handling. Alerts received directly by the HQ mail office are delivered to the appropriate territorial inspectorate or HQ expert office with a binding instruction on the method of handling (unless not forwarded to another authority in factual and spatial jurisdiction due to the CEI's lack of jurisdiction).

Toll-free line

Effective as of 1 September 2008, the CEI has run a toll-free phone line (800 011 011). It is a direct free connection between the CEI and citizens. The line is primarily used for receiving citizens' alerts and complaints, and informs citizens about the CEI's legal powers. The line is available every day from 8 a.m. to 4 p.m. It registers 2 queries (alerts) a day on average.

Conclusion

The alert, complaint and petition agenda is a necessary part of the work of each CEI inspectorate. This activity is thus also included in the CEI Statutes and the CEI Organisational Rules. The CEI Headquarters Internal Controlling Department is the methodological controller for this agenda.

▼ Numbers of complaints on inappropriate conduct of inspectors or CEI procedures in 2014

Praha	16
České Budějovice	6
Plzeň	5
Ústí nad Labem	5
Hradec Králové	3
Havlíčkův Brod	2
Brno	8
Olomouc	3
Ostrava	7
Liberec	4
Total	59

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

▲ Development of numbers of alerts in 2010 – 2014 by environmental protection component

3. 2 Provision of information

In 2014, the Czech Environmental Inspectorate handled 262 requests for information, including 76 pursuant to Act no. 106/1999 Coll. on Free Access to Information, and 186 pursuant to Act no. 123/1998 Coll. on Right to Environmental Information.

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

In accordance with Section 18 of the Act, the CEI is publishing an Annual Report for 2014 on its activity in provision of information.

The most requests for information were addressed to the Waste Management Department (23 requests). Forest

Protection Department employees handled 20 requests, Water Protection Department handled 17 requests, the Nature Protection Department 9 requests, and the Air Protection Department 7 requests.

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

Pursuant to this Act, 186 requests were made in 2014; six of the requests were dismissed. The majority were addressed to the Nature Protection Department (55 requests). The Air Protection Department employees handled 48 requests, the Waste Management Department 30 requests, the Water Protection Department handled 27 requests, the Forest Protection Department 18 requests, and Integrated Prevention 8 requests.

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

Requested information pursuant to Act no. 106/1999 Coll.	Number
Number of information requests filed	76
Number of decisions to dismiss a request issued	7
Number of appeals against a decision filed	5
Copy of major parts of each judgment concerning review of legitimacy of decision of applicable entity on dismissal of request for information and an overview of all costs expended by the applicable entity in connection with judicial proceedings on rights and obligations under the Act , including costs of its own employees and of legal representation	0
List of exclusive licences granted, including justification of necessity of granting an exclusive licence	0
Number of complaints filed pursuant to Section 16a, reasons for their filing and brief description of the method of their handling	2 (caused by disagreement with information request handling (information requests were deferred); the complaints were forwarded to the MoE, which confirmed the CEI's procedure.
Other information relating to application of this Act	0

Discussion forum

The Czech Environmental Inspectorate’s web site contains a discussion forum, through which citizens ask various questions concerning the environment. These requests are not included in the record pursuant to the above acts of law. The most common questions in 2014 concerned air protection, notably emission limits, followed by waste management and nature protection. Besides information provided by the CEI pursuant to the acts above, it informs the public in its own initiative in the form of press releases, annual reports, brochures, leaflets, etc.

Development of numbers of information requests from 2009 to 2014

Year	Total requests	Requests pursuant to Act no. 106/1999 Coll.	Requests pursuant to Act no. 123/1998 Coll.
2014	262	76	186
2013	209	55	154
2012	229	63	166
2011	233	44	189
2010	181	36	145
2009	217	62	155



4 | CEI INVOLVEMENT IN ACCIDENT HANDLING

4.1 Central water accident register for 2014

Pursuant to the Waters Act, the CEI has kept a central accident register since 2002. Since 2003, it has effectively col-laborated with the Fire Rescue Service on handling them and providing information about them. The latter is also used for completing information in a separate database.

A total of 178 accidents meeting the definition of Section 40 of Act no. 254/2001 Coll. on Waters were registered in 2014. The number of accidents registered is almost identical to the long-term average. Other events reported were not accidents pursuant to the Waters Act (no extraordinary major water quality impairment or hazard), and were thus not registered in the database, although the CEI handled a number of them.

The most common accidents are still those caused by transport. In 2014, we registered 41 of them, which is 23% of the total number of cases. They are followed in frequency by accidents caused by agricultural activities (9.6%). The death of fish accompanied 26 cases this year, which is 15% of the total. Groundwater was contaminated in 3 cases. The accident originator was known in 113 cases. The CEI investigated or was involved in the investigation of 69 accident cases. The Fire Rescue Service intervened in 115 of the cases registered by the Inspectorate.

4.2 Major accident cases

Accident with a hydrochloric acid spill at km 175 of the D1 motorway

On 21 January 2014, a truck carrying 19,000 litres of HCl had an accident at km 175 of the D1 motorway near

Říčany in the Prague direction. The accident involved a breach of four contains of 1 m³ each and the release of approx. 3500 litres of HCl onto the road and into an adjacent road ditch. The chemical formed a thick fog. The chemical unit of the South Moravian FRS intervened on the spot, delineated a protective zone and the motorway was closed for traffic until around 6.30 p.m. in both directions. This was an extra-ordinary incident. The undamaged containers with HCl were reloaded to a spare truck, and the remaining chemical from the damaged containers was pumped into a tank truck. The rescue and cleaning works were managed by the water manage-



Motorway accident (illustration photo)



Oil spill from an underwater dozer cleaning the river bed

ment authority in consultation with the CEI. The staff of the chemical unit of the South Moravian FRS neutralized the HCl spill with a lime sorbent; no surface water or groundwater contamination occurred. The cleaning works were completed at 4.30 of the next day, when the D1 was reopened for all traffic.

BorsodChem MCHZ, s.r.o.

On 27 January 2014, the destruction of a fitting in the aniline production plant of unit A at BorsodChem MCHZ, s.r.o., led to the release of approx. 1 tonne of nitrobenzene onto a soft surface and partly into a storm sewer. By a lucky coincidence, the spill was detected on

time and an accident closure was used to prevent a nitrobenzene spill into the Odra River. Subsequent CEI inspection work did not identify any breach of regulations, but as a preventive measure, BorsodChem MCHZ, s.r.o., pledged to installed remotecontrolled accident closures in selected storm sewers.

Lovochemie, a.s., Lovosice

The discharge from the WWTP at Lovochemie, a.s., in Lovosice into the Elbe River of wastewater with $\text{pH}=8.5$ and a high ammonia nitrogen content (57 mg/l) led to the formation of loose ammonia (its concentration in the wastewater discharged was identified at 5.8 mg/l). In addition, a low flow rate in the Elbe navigation channel, where the waste-water from Lovochemie WWTP is discharged, was identified at the time of the wastewater discharge (moreover, the wastewater contained increased iron concentration of 20 mg/l). As a consequence of this, a death of fish occurred in the Elbe, under the outfall A of Lovochemie, a.s., on 3 September 2014. The CEI qualified the above facts as a violation of Section 39, Para. 4, item b) of the Waters Act, and imposed a penalty of CZK 100,000 on the company; it entered into legal force on 12 December 2014.

Evropská vodní doprava-sped., s.r.o.

On 25 September 2014, the CEI received a report from the control room at Povodí Labe, state enterprise, on an oil spill from a KOMATSU D155 V underwater dozer, which was dredging the river bed at that time. Approximately 20 litres of gearbox oil were released into the Elbe river at km 734 near the ferry at Dolní Žleb. The FRS was called in, which used sorbent to intercept the oil products spilled and installed a plunge barrier 50 m long at Suchá Kamenice. The spill of approx. 10 litres of petroleum products was reported to German. A similar situation repeated on 16 October 2014, when an estimated 20-30 litres of gearbox oil were spilled into the Elbe at km 731.5. This spill was handled by the water authority in

Děčín on the spot. Like in the previous case, this spill too was reported to Germany. The CEI initiated an administrative proceeding with the accident originator.

Classification of accidents by spilled substance category in 2014

Substance category	Accidents	%
Petroleum products	95	53,4
Wastewater	21	11,8
Chemicals excl. heavy metals	13	7,3
Animal husbandry waste	12	6,7
Sludge and solids	3	1,7
Oxygen deficit	5	2,8
Other substances	14	7,9
Unidentified	15	8,4
Total	178	100

Classification of accidents by main cause of occurrence in 2014

Cause of accident	Accidents	%
Human error	76	42,7
Technical cause	36	20,2
Nature	10	5,6
Unidentified	56	31,5
Total	178	100



5 | CEI ACTIVITY IN 2014

5.1. Air Protection

5.1.1 Overview of inspection activity in 2014

Inspection work in 2014 was carried out by the Air Protection Department inspectors in the full range of powers in both air protection proper and in ozone layer and climate protection. We inspected both performance of duties imposed directly by generally binding national legal regulations and EU regulations and performance of duties set by permits to operate stationary air pollution sources. We carried out 4005 checks, including 43% planned and 57% unplanned. The year 2014 was the year of end of the interim provision of the Air Protection Act, under which operators of stationary air pollution sources whose original operating permits did not comply with requirements of the Air Protection Act, were obliged to apply for a new permit with up-to-date conditions. The CEI considered the updating of the operating permit, which was to harmonise requirements of the new legal system and the set operating conditions, an important tool for air pollution prevention. This was also why we paid a great attention to the existing stationary source operators' performance of their duty to apply for the new permits.

The numbers and distribution of checks carried out in 2014 among the spheres of jurisdiction corresponded the significance of the operations and their environmental impacts. Most of the checks focused on facilities with stationary air pollution sources (3422 checks), related to performance of jobs of entities authorised to measure emissions (205 checks). Fewer checks concerned compliance of requirements on climate protection (289 checks) and the ozone layer protection (60 checks).



In connection with checks of performance of duties when handling regulated substances and fluorinated greenhouse gases, we inspected 20 entities doing operations that require certification from the Ministry of the Environment.

The checks carried out resulted in the initiation of 519 administrative proceedings on violation of duties in air, ozone layer and climate protection. A total of 503 decisions on imposition of penalties (461 initiated in 2014 and 42 initiated in the previous year), totalling

CZK 16,775,000, became conclusive in 2014. In addition to checks of performance of duties of operators of stationary air pollution sources, the departmental inspectors were involved in 298 checks at facilities with integrated permits, where they inspected adherence to all the environmental protection requirements.

5.1.2 Overview of performance of departmental tasks

Five departmental tasks were set for the air protection area for 2014, namely inspection of operation of sources based on and in accordance with permits from air protection authorities, adherence to emission limits, detection of air pollution levels, and record-keeping duties.

The checks found out in 247 cases that operators of stationary air pollution sources as enumerated in Annex 2 to the Air Protection Act had not applied in the set period for issuance of new permits or operated the sources without a permit. The proven delicts led to imposition of penalties totalling CZK 7,260,000. In three cases, the CEI proceeded to halt the sources: namely those operated by Ferrite – Tech s.r.o., Magnety s.r.o. and Slévárny D + D METAL a.s. Requirements made in permits – technical operating requirements – were not observed by inspected operators in 46 cases; these delicts led to imposition of penalties totalling CZK 3,242,000. In 6 cases, we identified combustion of un-permitted fuels in stationary combustion sources, and in one case, incineration of waste in an open furnace. These delicts led to imposition of penalties of CZK 150,000. The unpermitted fuels, combusted in contravention of requirements of combustion device manufacturers and the permit requirements, were contaminated wood waste and scrap particle board.

The operating permits also contain requirements on operation of sources when a threshold for a pollutant air concentration is exceeded (“smog situations”). In 2014,

smog situations were declared for the Ostrava – Karviná – Frýdek-Místek agglomeration (9 days PM10; 1.5 day O3), Třinec District (3 days PM10), the Zlín and Olomouc Regions (3 days, PM10), Prague (6 hours O3), and the Moravian-Silesian Region excluding the Ostrava – Karviná – Frýdek-Místek agglomeration and Třinec District (2.5 days PM10). Regulation of sources for 37 hours due to exceedance of the threshold for PM10 was declared for the Moravian-Silesian Region excluding the Ostrava – Karviná – Frýdek-Místek agglomeration and Třinec District. However, the area contains no stationary air pollution sources included in the regulation system and checked by the Inspectorate during the “regulation” period.

Operating conditions of stationary air pollution sources were checked very frequently in connection with repeated alerts concerning the occurrence of or botheration with odour. Assessment of odour in the air is very difficult. The legal definition of air protection does not permit adequate handling of this issue. Act no. 201/2012 Coll. on Air Protection only lists odour under definitions of pollutants. Odour is only treated in more detail in Decree no. 415/2012 Coll., which proposes measures for operations which may emit pollutants bothering with odour, such as waste and wastewater management, aggregate mixing plants, production and processing of polymers, food and wood processing industry, and animal husbandry. Checks of stationary air pollution sources as potential sources of odour focused on adherence to operating requirements, which may have a direct impact on emissions of odorous substances.

In 36 cases, penalties totalling CZK 2,354,000 were imposed for exceedance of pollutant emission limits. Exceedance of concentration emission limits was proven with results of emission measurements carried out by authorised entities as well as the Inspectorate’s own measuring equipment.

Fugitive emissions of organic pollutants were determined differentially from the consumption of volatile organic compounds and the emission of these substances exhausted from the sources via defined outlets. The most numerous category of emission limit exceedances was carbon monoxide (18 instances), followed by volatile organic compounds (10 instances), nitrogen oxides and particulate matter (5 cases each); the emission limit for asbestos was exceeded once. Several sources, handled as a single administrative delict, exceeded emissions of multiple pollutants. By type of source, emission limits were most frequently exceeded in stationary combustion sources (carbon monoxide, nitrogen oxides, particulate matter), surface treatment plants (volatile organic compounds), a quarry exceeded the asbestos emission limit, and limits were also exceeded by a hazardous (hospital) waste incinerator and a smokery.

We inspected adherence to the duty to detect and evaluate air pollution levels with direct measurement, either one-off done by authorised entities or continuous done by the operator. Operators of sources were required to submit reports with measurement results to the Inspectorate by set dates. We found 35 cases of violation of the duty to carry out a one-off emission measurement or evaluate continuous measurement. These delicts led to imposition of penalties totalling CZK 1,250,000. There were 83 cases where operators of sources violated their duty to submit a report with measurement results to the Inspectorate, which yielded penalties totalling CZK 808,500. One authorised entity was penalised with CZK 50,000 for measuring emissions from a source in the operation of which it was involved. The Ministry of the Environment Air Protection Department was informed continuously about deficiencies in the one-off emission measurement reports checked.

Violation of the duty to keep operating records or submit summary operating records, or reports to the IPR, was

proven to operators of stationary air pollution sources in 69 cases. These delicts led to the imposition of penalties totalling CZK 726,500.

The tools for protecting the Earth's climate system – preventing releases of greenhouse gases, gases absorbing radiation in the infrared region present in the atmosphere – is checking adherence to requirements when handling fluorinated greenhouse gas and requirements for facilities integrated into the carbon dioxide permit trading system.

The 289 checks carried out at operators of facilities containing fluorinated greenhouse gases and facilities integrated into the carbon dioxide permit trading system identified 36 administrative delicts, which led to the imposition of penalties totalling CZK 758,000. The delicts consisted in failure to inspect tightness of devices (28 cases) and violation of the record-keeping duty (8 cases). No violations of the set duties were identified at operators of facilities integrated into the carbon dioxide permit trading system.

The ozone layer (stratospheric ozone) protection from effects of substances that damage it (“regulated substances”) comprises prevention of releases of regulated substances from devices that contain these substances, primarily as coolants. Since the regulated substances as coolants are gradually replaced with substances with lower ozone depletion potential (ODP), relatively fewer checks were carried out in this area. The 60 checks identified 9 cases of violation of some of the duties, which led to imposition of penalties totalling CZK 80,000. Again, these were failures to check tightness of devices and violations of the record-keeping and reporting duties.

We also inspected entities doing activities that require certification from the Ministry of the Environment, particularly checks of tightness, servicing and maintenance

of devices containing coolants based on regulated substances and fluorinated greenhouse gases. We identified 7 cases of these activities being done by entities without certification, resulting in the imposition of penalties totalling CZK 170,000.

5.1.3 Performance of specific tasks

Only one specific task was set for the Air Protection Department for 2014: check frequency of replacement of fills of activated carbon adsorbers as per approved operating rules. Under this task, the Air Protection inspectors checked 67 facilities where adsorption of volatile organic compounds on activated carbon as non-polar sorbent is used to reduce emissions of volatile organic compounds. All the checks concerned surface treatment plants, mostly application of paints (paint shops). The methods for monitoring the degree of sorbent saturation and frequency of re-placement are defined in operating rules for these facilities, or directly as part of the operating permit requirements. The degree of sorbent saturation was monitored based on its weight increment in 31 cases, based on consumption of volatile organic compounds in 19 cases, on the number of hours in operation or production cycles in 14 cases, by direct monitoring of organic compound concentrations at the adsorber output in 2 cases, and based on the adsorber pressure loss in 1 case. Failure to comply with the adsorber replacement or regeneration requirements was identified in 4 cases; in 3 cases the delict has been handled in conclusive administrative proceedings on penalties.

A penalty of CZK 80,000 was imposed on the company Blažek Glass s.r.o.; another of CZK 60,000 on Handte Umwelttechnik (CZ) s.r.o., and CZK 400,000 on PETER-GFK spol. s r.o. This specific task also included checks of handling of used sorbent after saturation with volatile organic compounds. In the majority of the cases, 63 out of the total number, the sorbent is regenerated

and ready for repeated use. The sorbent is regenerated both externally by professional companies (Klima-Servis a.s., EKOKYDAL s.r.o., ECO-F a.s., INTERACTION s.r.o., CIPREC FILTR BRNO, Servind Praha s.r.o., RESORBENT, s.r.o., ALFA SYSTÉM s.r.o., Metla s.r.o.), and internally by the operator. In 3 cases, saturated sorbent was submitted for disposal as hazardous was (to the companies Eco, s.r.o., ESET, spol. s r.o., and Marius Pedersen a.s.), and saturated sorbent was used as an input for a different process in one case.

5.1.4 Major cases

EUROVIA Kamenolomy, a.s. (CZK 200,000 penalty)

When inspecting adherence to emission limits, an exceedance of the specific emission limit for respirable asbestos fibres was identified in this company's operation at the Litice quarry, in aggregate processing. The emission limit, set in the permit from the Plzeň Regional Authority at 10,000 fibres/m³, was exceeded severalfold in the different exhaust outlets. The measurements detected concentrations of 24,000 fibres/m³, 47,000 fibres/m³, and 101,000 fibres/m³. The Czech Environmental Inspectorate considers such high emissions of respirable asbestos fibres from aggregate processing a serious problem, because all types of asbestos are evaluated in the IARC (International Agency for Research of Cancer) classification as category 1, i.e., proven carcinogens. The presence of such large amounts of respirable asbestos fibres in aggregate that could have been, and probably has been used for making gravel road top, is alarming.

Energetické centrum s.r.o., Otín, Jindřichův Hradec (CZK 610,000 penalty)

The company Energetické centrum s.r.o. operates energy combustion sources in the village of Otín, including a boiler with a capacity of 21.4 MW, which combusts biomass.

Measurements carried out by the Czech Environmental

In-spectorate identified an exceedance of the emission limit for carbon monoxide; the boiler had been operated for at least 2 days with a defect on the separation device (the fabric particulate matter separator had burnt away), resulting in uncontrolled emissions of dust into the air.

Slévárny D + D METAL a.s., lace of business in Lupenice (CZK 300,000 penalty and halt of operation)

The company Slévárny D + D METAL, a.s., operated an aluminium foundry in the village of Lupenice without permission of an air protection authority, processing an inappropriate input: waste- The high air pollutant emissions bothered the local residents; the operator altered the exhaust of flue gases from the smelter furnace without permission.

5.1.5 Inspection conclusions

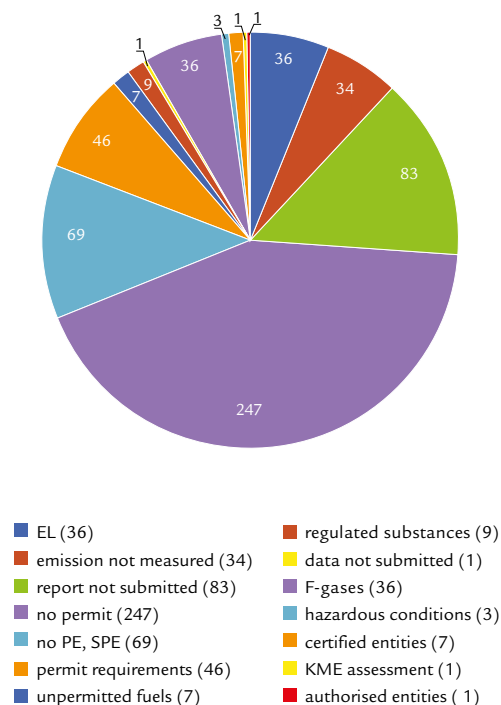
With the checks performed, the Czech Environmental Inspectorate covered the entire range of its powers in the air, ozone layer and climate protection areas, defined in both direct-effect national generally binding legal regulations and EU regulations and in permits from applicable state administration authorities. The application of the legal regulations did not cause any major difficulties.

One difficult area was inspection of adherence to requirements made in certain permits from applicable state administration authorities and approved operating rules, due to some requirements being vaguely formulated or missing. It was for these reasons, for example, that we could not penalise the conduct of some operators during emergency situations accompanied with increased air pollutant emissions (Českomoravský cement, a.s., Radotín cement works – clinker conveyor breakdown and alternative clinker transport by lorries, Synthesia, a.s., Semtín – repeated explosions of storage tanks for the nitration mixture used). Another type of situations dif-

ficult to resolve was alerts to botherance of residents by odour, or odour and smoke, often repeated. These alerts concerned both parts of areas defined as industrial estates and places with isolated sources. Frequently, alerts to botherance with odour or smoke become a tool for settling neighbour disputes.

The checks carried out under the specific task of checking the frequency of replacement of fills in activated carbon adsorbers as per approved operating rules resulted in a finding that monitoring adsorber weight increment is an inappropriate method for determining the replace-

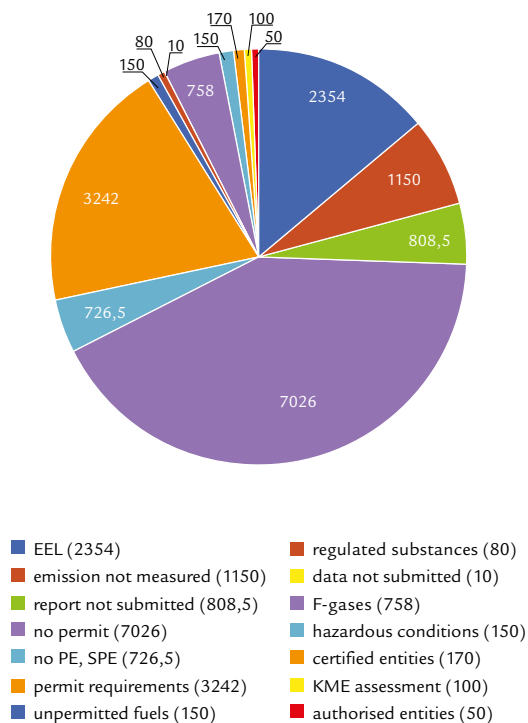
Numbers of delicts handled in 2014 by type



ment frequency, particularly when using materials containing volatile organic compounds with lower boiling point and in combined paint shops, i.e., shops with spraying – drying cycles. Adsorption on activated carbon is not an appropriate method for reducing emissions from sources processing materials containing styrene.

In the area of ozone layer and climate protection, there is a noticeable shift away from the use of regulated substances as coolants and their replacement with fluorinated green-house gases and hydrocarbons.

Penalties imposed in 2014 by delict type



5.2. Water protection and prevention of major industrial accidents

5.2.1 Overview of inspection work in 2014

The Water Protection Department focuses on inspecting duties arising from applicable legal standards (Act no. 254/2001 Coll. on Waters and on amendment of certain acts – the *Waters Act*; Act no. 59/2006 Coll. on Prevention of major accidents caused by selected hazardous chemical substances or chemical preparations and on amendment to Act no. 258/2000 Coll. on Public Health Protection and on amendment of certain acts, as amended, and Act no. 320/2002 Coll. on Amendment and revocation of certain acts in connection with the dissolution of district authorities, as amended – the *Major Accident Prevention Act*; and Act no. 76/2002 Coll. on Integrated prevention and avoidance of pollution, the Integrated Pollution Register and on amendment of certain acts – the *Integrated Prevention Act*).

The cornerstone of the CEI Territorial Inspectorate Water Protection Department (WPD) inspectors' work is checks carried out under planned main and departmental tasks, which focus on priority issues in water protection across the country. These checks concern particularly larger environmental polluters, such as major wastewater treatment plants (WWTP), industrial facilities and sites with historical environmental burdens (HEB). The inspection activity in 2014 followed 2 main tasks and 7 departmental tasks.

Under the specific tasks, the inspectors concentrated on issues in their respective regions. A significant portion of the work comprises unplanned checks, carried out based on alerts, as part of collaboration with other state

administration authorities, when handling accidents or current problems in the jurisdiction of the respective territorial inspectorates, etc. In 2014, the Water Protection Department carried out 3540 checks, including 501 checks of facilities falling under the Integrated Prevention Act.

Administrative proceedings are an integral component of our inspection work. Based on our inspection work, we issued 533 decisions on imposition of sanctions. Out of that, 529 decisions on sanctions totalling CZK 30.8 million entered into legal force in the reporting period. To eliminate deficiencies identified and defective conditions, we issued 105 decisions on remedial measures, out of which 99 became conclusive in 2014.

In the reporting period, the Territorial Inspectorates' Water Protection Departments received 390 alerts, and handled an additional 95 alerts in collaboration with the other departments.

Charges for wastewater discharge into surface waters

In 2014, we issued 1087 charge assessments for the year 2013, setting charges for wastewater discharge into surface waters worth a total CZK 210.1 million. Another 1012 advance assessments were issued for payment of advances in 2015, totalling CZK 224.6 million.

As part of checking the payment duties, inspection laboratories carried out 2991 samplings and wastewater discharge metering was checked at 100 sources.

Charges for groundwater consumption

In 2014, we issued 4479 charge assessments setting charges for groundwater consumption in 2013 totalling CZK 715.1 million. We also issued 4638 advance assessments for advance payments in 2015, totalling CZK 1192.7 million. In addition, 465 decisions in connection with new consumers or amendment or revocation of advance assessments were issued in 2014.

As part of its charge agenda and inspection work, the

CEI has found out continuing exceedance of the annual and monthly limits set in water management authority permits, as well as groundwater consumption without permission. For these delicts, the Inspectorate imposed penalties in 2014 totalling more than CZK 3 million.

In addition to the inspection work, the inspectors developed 2300 statements and position statements, e.g., for applications for subsidies from the State Environment Fund (SEF), for water management authorities, etc.; the largest portion of the position statements is issued as part of environmental impact assessment (EIA) proceedings and for integrated permits.

In active environmental protection, the inspectors cooperate with other state authorities and institutions (water authorities at all levels, the SEF, the Ministry of Finance, Povodí enterprises, the Fire Rescue Service, the T.G.Masaryk Water Research Institute, etc.), and as part of international collaboration, they meet with environmental protection authorities of neighbouring countries and attend meetings of international committees on protection of transboundary waters.

5.2.2 Overview of performance of main and departmental tasks

Checks of environmental component pollution sources with valid integrated permits

The WPD inspectors carried out checks or collaborated with other environmental protection departments on comprehensive checks of selected facilities with integrated permits (IP), i.e., facilities falling under the Integrated Prevention Act (IPPC).

These checks belonged to the plan and timetable for routine checks of IPPC facilities for 2014, set for the TIs, which were coordinated at each TI based on CEI Directorate instruction by an integrated agenda coordinator or inspection guarantor, and also included other,

unplanned extraordinary checks, carried out based on alerts or emergency situations, repeated checks after serious violation of binding IP requirements, etc. In cases where water management issues predominated in the integrated permits, experienced WPD inspectors were selected as the guarantors of these integrated checks (more than one third of such checks at TI on average).

Overall, the WPD inspectors were involved in or carried 501 checks, leading to the initiation of 57 administrative proceedings on penalties or remedial measures, and conclusive imposition of penalties totalling over CZK 8.1 million. In some cases, the proceedings have not been concluded yet.

Checks focusing on adherence to the Waters Act and the Integrated Prevention Act were carried out, for instance, at the following facilities: Řídká Blana landfill, České Budějovice; Masokombinát Plzeň s.r.o.; Farma Loužná s.r.o.; Mileta WWTP Černý Důl; AGROFARM, a.s. Vídeň farm; ASAP s.r.o., Věž; VEPASPOL Olomouc, a.s., Velký Týnec facility, and Tereos TTD, a.s., Dobrovice.

Detailed information on checks carried out pursuant to the Integrated Prevention Act is provided in the chapter Integrated agendas.

In-depth inspections focused on adherence to legal duties at major sources of environmental pollution, notably of surface waters and groundwater

All the territorial inspectorates carried out in-depth inspections of selected sources of pollution connected with independent monitoring and its subsequent assessment.

Under this task, we inspected 10 wastewater treatment plants (WWTP) and 9 industrial facilities. The WWTP inspected were large-scale municipal plants, the majority of which is loaded with a large portion of industrial waste-water (Slovácké strojírny a.s. WWTP in Uher-

ský Brod, Písek WWTP, Ústí nad Labem WWTP, Přerov WWTP) and WWTP handling largely industrial wastewater (ASAP s.r.o. WWTP in Věž, UNIPETROL RPA, s.r.o. WWTP at the Litvínov refinery, Mileta a.s. WWTP in Černý Důl, TREVOS, a.s. WWTP in Turnov-Mašov, Spolana a.s. WWTP in Neratovice).

The treatment plant checks involved verification of efficiency of the technology processes by means of inspection sampling, checks of selected components of the sewerage network, checks of adherence to requirements of permits to discharge wastewater into watercourses, including checks of adherence to WWTP sewerage and operating rules and operating documentation. Where a WWTP handles imported wastewater and effluent, the handling was monitored.

We identified four cases of exceedance of emission limits in the wastewater discharged, and initiated or will initiate administrative proceedings with the entities. A penalty of CZK 130,000 has been imposed conclusively so far; other administrative proceedings are still in progress. The other cases of WWTP checked showed no major deficiencies.

In the industrial facilities (Slovácké strojírny a.s., in Uherský Brod, ASAP s.r.o. in Věž, SPOLANA a.s. in Neratovice, SYNTHOS Kralupy a.s., BorsodChem MCHZ, s.r.o., in Ostrava, PRECIOSA a.s. facility 17 in Jablonné v Podještědí, TREVOS, a.s. in Turnov-Mašov, Petr Březina – APB Plzeň in Losiná, HUTCHINSON s.r.o. in Rokycany), the checks focused primarily on whether the legal entities, handling adverse substances on a larger scale or where such handling is associated with greater risks to surface or groundwater quality, have taken measures to prevent releases into waters or environmental hazards when storing or handling such substances.

A penalty of CZK 20,000 was imposed in one instance of handling adverse substances without an accident plan,

and an administrative proceeding with another company resulted in imposition of measures to eliminate small deficiencies identified in handling of adverse substances and process wastewater in manufacturing and storage buildings.

Inspection of most important municipal WWTP with more than 10,000 equivalent inhabitants (EI)

The main objective of this inspection was to check the water management status of the most important polluters and identification of the actual situation concerning the pollution produced and discharged by each of the sources. The checks focused on adherence to water authority permits, operation of WWTP in accordance with operating rules, and compliance with the Council Directive 91/271/EEC concerning urban wastewater treatment. In 2014, we carried out 143 checks, inspecting a total of 134 municipal WWTP. The balance data for 2013 were inspected in all the municipal WWTP in this category.

According to the balance data for 2013, the municipal WWTP inspected in 2014 had treated a total of 645 million m³ of wastewater. The efficiency of the wastewater treatment in the registered WWTP was 98% for BOD₅, 94.4% for COD_{Cr}, 97.2% for Solids, 72.5% for NTot and 82.1% for PTot.

The majority of the important pollution sources comply with requirements of the Council Directive 91/271/EEC, or measures to comply are in progress. The situation of Prague Central Wastewater Treatment Plant (CWWTP) is still a problem, as it does not conform to the emission limits set by Government Regulation no. 61/2003 Coll. The construction of a new water line that should ensure compliance with these limits has not started yet. Like in 2012, the Pardubice Biological WWTP was found to exceed the pollution limit for Zn in the wastewater discharged. The increased metal concentration was caused

by the reception of wastewater with a high Zn content from Lhotka retention reservoir. We found out increased Zn content throughout the retention reservoir. The source of the contamination was not located.

In connection with emergency situations and for prevention purposes, the inspectors carried out a check beyond the planned checks at the Česká Ves WWTP in connection with disposal of seepage water from Supíkovice landfill during torrential rains at the turn of May and June. The CEI carried out additional surveys at Lanškroun WWTP, which received extinguishing water after a fire in the KOZÁK Svitavy s.r.o. galvanising plant. On the whole, the WWTP handled the accident very well: the majority of the metals were intercepted in the form of sludge, which was then eliminated professionally.

Based on the checks carried out, the inspectors found out that sources of this category do not commit frequent or significant violations of the Waters Act. In 2014, they imposed 3 penalties totalling CZK 240,000 for exceedances of limits set in water authority permits. In one case, the check identified unpermitted discharges of wastewater from a storm separator, and the entity was awarded a penalty of CZK 50,000.

Inspection of municipal wastewater treatment plants in the category from 500 to 10,000 EI

Checks carried out under this task focused primarily on adherence to limits set by water management authority decisions for pollution discharged in wastewater and quantities of wastewater and adherence to other requirements of these decisions. The physical checks focused on the overall operating condition of the WWTP and observance of duties arising from the operating rules. A total of 329 WWTP were checked in 2014. Based on the checks, 51 administrative proceedings were initiated and 32 decisions on penalties totalling CZK 867,000 became conclusive; 19 administrative proceedings on penalties are still in progress. The most common delicts are failure to adhere

to limits set in water authority permits and wastewater discharge without water authority permission.

Additional penalties were awarded for operating WWTP in contravention of operating rules, unpermitted groundwater consumption for WWTP operation, and unpermitted handling of adverse substances. Remedial measures were imposed in 3 cases.

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

Major industrial WWTP include plants discharging waste-water containing particularly hazardous substances into surface waters and sewerage networks. Moreover, they include plants discharging into surface waters wastewater containing higher degrees of hazardous substances and generally adverse substances in a degree that has a significant impact on surface water quality in the watercourse. On the whole, they are larger entities in the machinery, petro-chemical, processing and food industries.

This departmental task involved checks at 108 entities. The checks focused on observance of legal duties in water management, notably compliance with requirements of permits to discharge wastewater into surface waters and sewers. The checks verified efficiency of industrial wastewater treatment, including primary and secondary impacts on water quality in the receiving watercourse. Besides, they identified methods and quality of storage and handling of adverse substances at selected entities.

Exceedance of emission limits in wastewater discharged was detected in 19 cases and interpreted as serious violation of the Waters Act, meeting the requirements for imposition of penalties. As a result, 16 decision on penalties totalling CZK 860,000 became conclusive by the end of 2014. Administrative proceedings on the delicts iden-

tified will be initiated in the 3 remaining cases. Numerous smaller deficiencies that were also identified were handled by imposition of remedial measures.

The highest penalties were imposed for exceedance of emission limits permitted by water authority decisions in wastewater discharged, namely on VINIUM a.s. in Velké Pavlovice (CZK 160,000), Rexam Beverage Can ČR, s.r.o., in Dýšina (CZK 80,000), and Tanex Vladislav, a.s. (CZK 70,000).

Inspection of execution of remediation projects for historical environmental burdens and long-term groundwater accidents

Under this task, the inspectors implemented permanent supervision over the remediation of adverse conditions (environmental burdens) and inspected the current state of handling of cases of long-term groundwater accidents. The WPD inspectors were actively involved in cases where their involvement is necessary, i.e., on sites where remediation had commenced, where new CEI decisions had been issued or updated, where remediation works had been concluded, etc. A necessary component of this task is the inspectors' duty to also assess preparatory and project documentation in terms of achievability of measured imposed.

In the course of 2014, the inspectors carried out 476 checks under this task. Increased attention was paid to 17 priority sites (ArcelorMittal Frýdek-Místek, a.s.; BENZINA, s.r.o. Par-dubice filling station; Borsod-Chem MCHZ, s.r.o.; FARMAK, a.s.; ICEC ŠLAPANICE s.r.o.; Jihostroj a.s.; KastorEko, s.r.o.; Kovohutě Příbram nástupnická, a.s.; Magneton, a.s.; MOIS s.r.o.; OKK Koksovny, a.s.; PARAMO, a.s., SPOLANA a.s.; SVA Holýšov a.s. in liquidation; Synthesia, a.s.; UNIPETROL, a.s.; WALTER a.s.), which are on the CEI list of sites approved by the MoE and the Ministry of Finance of the CR (MoF) as having major environmental burdens scheduled for priority resolution.

Remediation of historical environmental burdens (HEB) was completed on 11 sites during the reporting period: on the premises of KARBOX s.r.o., at the Tachov and Čáslav filling stations acquired by BENZINA, s.r.o., in the Bolevec and Doudlevec facilities of ŠKODA a.s., on the premises of CL Servis s.r.o., at Lučební závody a.s. Kolín, on the “Jižní předpolí” site of OZ CHEMIE acquired by BENET GROUP, a.s.; on the site of chemical operations at AERO Vodochody a.s., and on the Březové hory site of DIAMO state enterprise. An important event was the recorded conclusion of the remediation intervention on the “Dioxin” site of SPOLANA a.s., where more than 49,580 tonnes of waste was removed as part of the remediation. The Inspectorate verified that the remediation intervention on the Dioxin site was successfully completed and the set targets had been achieved.

Inspection of industrial entities handling adverse substances

The objective of this departmental task to verify the current situation in the water management security of storage and handling of adverse substances. The checks focused predominantly on large-scale petroleum product storage facilities, oil pipelines, civilian airports, oil refineries, black oil and heating oil stores.

We verified storage and handling of adverse substances as well as the methods and quality of wastewater and rainwater discharges off handling and parking areas, including inspection of relevant documentation (water handling permits, final approval decisions, reports on tightness checks of tanks and pipings, observance and completeness of operating rules and accident procedures and other auxiliary documents).

Under this task, we checked 157 legal entities. Deficiencies were identified in 28 cases and the CEI proceeded to impose penalties. Out of these 28 cases, 18 decisions became conclusive, totalling CZK 426,560. In the other



Elimination of watercourse pollution due to release of adverse substances

cases, the penalty decisions did not become conclusive due to appeals or administrative periods in progress. In one case, the Inspectorate only imposed a remedial measure to eliminate the deficiencies.

The most common deficiencies found at the entities were violation of duties when handling adverse substances and unpermitted handling of surface water and groundwater in the sense of discharges of wastewater without valid permission and exceedance of emission limits.

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

Checks at selected entities focused primarily on compliance with Section 39, as well as other requirements of products, field deposits, stabling areas, dung sites, and operation of biogas stations. We also inspected handling



Rapeseed oil storage in Frýdek-Místek

of waters in pasture areas and water management issues, particularly with a focus on groundwater consumption, operating rules and accident plans.

This water management supervision concerned 158 agricultural entities (including 26 biogas stations and 6 fish ponds). These checks led to the imposition of 35 penalties totalling CZK 1.3 million, 24 measures to remedy defective conditions, and 15 administrative proceedings have not been concluded so far. In addition, decisions on imposition of penalties based on results of inspections carried out in 2013 were issued in 2014. In many cases, checks of agricultural businesses were made outside the plan, based on alerts.

The main deficiencies identified were unpermitted handling of adverse substances, particularly violation of duties pursuant to Section 39 of the Waters Act, as well as operation of hydraulic structures in contravention of

Section 59 of the Waters Act and unpermitted groundwater consumption.

The level of knowledge of legal requirements on water protection and the derived duties has traditionally been better among agricultural business than among farmers. For more information, the checks included familiarisation of the entities inspected with the most important duties pursuant to the Waters Act and its executive decrees (Decree no. 450/2005 Coll. and Government Regulation no. 262/2012 Coll.).

Inspection of compliance with Act no. 59/2006 Coll. on Major Accident Prevention

Checks were carried out based on the annual inspection plan approved by the MoE in collaboration with integrated inspection authorities (State Labour Inspection Office, administrative authorities in fire prevention and population protection, the integrated rescue system, the Czech Mining Authority, regional public health authorities) and regional authorities. The objective of the checks was to inspect all the 124 entities included in category B and selected 32 entities in category A. The number of checks was identical to that in the previous year; the number of entities in category B is constantly growing. The checks at these entities focused on verification of up-to-dateness of primary safety documentation information, verification of correctness and up-to-dateness of internal accident plans, correctness and up-to-dateness for documents used for elaborating the external accident plan, implementation of measures in place to prevent major accidents, compliance with requirements of MoE and regional authorities' statements on safety documentation, and implementation of measures to remedy deficiencies identified in inspection.

Deficiencies when performing duties set by safety documentation were identified at several operators. When such deficiencies are identified, operators cooperate with the CEI and other inspection authorities and the

facts identified are remedied. The deadlines are set in inspection reports or inspection result reports.

Non-existence of an insurance policy was identified at several operators. Operators are required to submit an authenticated copy of such a policy to the regional authority, as required by law, within 30 days of its making. In some cases, deficiencies were eliminated directly during the check. Remedial and elimination measures were also proposed for deficiencies in relation to specialised acts of law.

Administrative proceedings on imposition of penalties pursuant to Section 36, Para. 6 of the Major Accident Prevention Act for violation of provisions of the Act based on checks made in 2013 were carried out in 2014. Specifically, a conclusive and uncontested penalty of CZK 50,000 was imposed on the company STV Group a.s., facility at Mantov near Chotěšov, and a penalty of CZK 50,000, coming into force on 12 February 2012 for its facility at Rataje near Kroměříž. A penalty of CZK 50,000 was imposed on Flaga s.r.o. conclusively in an appeal proceeding; the body of appeal confirmed the penalty in full. An administrative proceeding held with PARAMO, a.s., concerning an administrative delict that the legal entity committed by not proceeding in its activity according to the safety report approved by a decision of Pardubice Regional Authority, thus violating Section 11, Para. 3 of the Major Accident Prevention Act, was also concluded in 2014.

The decision on a penalty amounting to CZK 350,000 became conclusive on 6 November 2014. Operators reported three serious accidents to regional authorities in 2014. However, only one of the instances was classified by the regional authority as a major accident pursuant to the Major Accident Prevention Act. It was caused by a release of nitric acid at a facility of Ing. Petr Švec – PEN-TA s.r.o. in Chrudim. The administrative proceeding was carried out by Pardubice Regional Authority.

Structures were excluded or reclassified in this year due to changes in classification of hazardous substances

contained as well as changes in classified quantities of the substances. In this year, a reason for exclusion of structures was an increase in the number of hazardous substances used in structures in connection with new process equipment construction. Outside the approved inspection plan and in cooperation with regional authorities, we also carried preannounced checks at entities not included, focused on verification of information in reports on non-inclusion of structures or equipment. The quantities of hazardous substances stored at the inspected facilities did not exceed the set limits.

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

The avoidance of occurrence of accidental releases as part of this inspection activity can be regarded as positive in terms of environmental impacts.

5.2.3 Performance of specific tasks

The inspectors' inspection activity in 2014 involved 538 checks under 26 specific tasks. In 2014, we made repeated checks of recreational and balneological facilities, public and non-public fuel filling stations, industrial facilities and chemical operations, and implementation of measures imposed in the previous period. For example, the repeated inventorying of the southern Sušice District, which was transferred under the Plzeň Territorial Inspectorate as part of the territorial reform, very complex from the technical and organisational point of view, was very beneficial.

Important checks included systemic inspections of pollution sources in the buffer zone of drinking water consumption from Želivka, carried out in 2014 by Prague TI in collaboration with Havlíčkův Brod TI. This systemic activity, performed over several years, led to elimination of actual or potential pollution sources, but there are lasting problems primarily with contamination with total phosphorus

and nitrogenous substances, causing eutrophication in the reservoir. The recurrence of pesticide agents in the reservoir tributaries seems to be a big problem.

Under the specific task “Inspection of industrial facilities and structures after change or termination of original activity”, inspectors of Ústí nad Labem TI completed the survey of illegal activity on the premises of WOWITRA s.r.o. in Lovosice, which resulted in an administrative proceeding on the imposition of sanctions. The entity violated the Waters Act in its activity by not safeguarding against releases of adverse substances, including hazardous ones, into ground-water and the rock environment, storing adverse substances in an inappropriate way, not having an accident plant for handling the adverse substances, and not keeping any records on particularly adverse substances used. This violation of the Waters Act led to a penalty of CZK 750,000 for the entity, which became conclusive in 2014.

The results of the inspection work under the specific tasks indicated that the most common violations of the Waters Act were committed in the area of unpermitted handling of waters, i.e., their discharge and treatment. These findings led to the issuance of 80 conclusive administrative decisions on penalties totalling over CZK 1.6 million, and 18 decisions on remedial measures. The penalty amount is not final as some of the administrative proceedings have not been concluded yet.

5.2.4 Major cases

ČOV KLIO – Zličín

In 2014, we continued monitoring and handling accidental pollution of Zličín brook originating from the WWTP of KLIO in Zličín – a waste disposal facility. In connection with the accidental contamination in January 2013, the CEI issued a decision on implementation of remedial measures to eliminate the pollution of the Zličín brook

basin. Remediation works proceeded throughout 2014, but the pollution has not been eliminated so far in spite of all efforts.

A penalty of CZK 5 million was imposed on KLIO, s.r.o., for operating a wastewater treatment plant in contravention of the valid integrated permit, committed in October to November 2013. The penalty was reduced to CZK 4 million by the body of appeal.

Despite the supervision by the CEI, Prague Municipal Authority (PMA) staff, the watercourse manager, the municipal police and the municipal district authority, the company caused several accidental contaminations of the water-course again in 2014.

The investigation into the accidental contamination of the Zličín brook in October 2014, in cooperation with PMA staff, found out that effluents stored in the facility were deliberately pumped right into the Zličín brook. This was followed by an unannounced investigation of the Water Protection and Waste Management Departments in the WWTP in order to identify the current quantities and types of waste stored. This intervention included a hiring of an expert company to collect inspection samples and analyse them.

OLEO CHEMICAL, a.s., in Liberec

On 30 August 2013, the CEI carried out an unannounced check at the Liberec facility of OLEO CHEMICAL, a.s. The check was made based on a telephone alert to serious contamination of the bed of the Doubský brook downstream of the party's facility, and subsequent part of the Lužická Nisa river bed, with an unknown substance. At the time of the check, wastewater containing glycerol and extractable substances was leaving the oil separator outlet for the Doubský brook surface water in contravention of the water handling permit issued by Liberec Regional Authority (IP). The first decision on the matter with a penalty of CZK 150,000 was revoked by the body of appeal. Nevertheless, a new administrative

proceeding was initiated with the company pursuant to an MoE decision, resulting in a penalty of CZK 100,000. This decision was confirmed by the body of appeal and became conclusive.

5.2.5 Inspection conclusions

The Inspectorate performed a wide range of checks in the water protection area pursuant to applicable legal standards. Comparing the results with the averages for 2011, 2012 and 2013, all the activities registered an increase in 2014. The number of checks at entities with integrated permits increased substantially, in fact doubled, in connection with the adoption of an amendment to the Integrated Prevention Act (Act no. 69/2013 Coll.). The inspectors put an emphasis on checks of major sources of pollution discharging wastewater and major industrial and agricultural businesses.

Renovations of structural and equipment components of WWTP and implementation of best available technologies have led to improved quality of wastewater discharged particularly in plants for more than 10,000 EI, thus resulting in a significant decrease in the pollution released into surface waters. Our inspection findings indicate that major sources do not have constant problems with adherence to legislation. Violations of the Waters Act consisting in exceeding emission limits set by water authority permits were only identified sporadically among the large WWTP. The CEI perceives this fact as a positive finding and proof of the constantly improving state of quality of wastewater discharged. Attention still needs to be paid to operation of WWTP of smaller capacity, where more numerous exceedance of emission limits was identified. The most common administrative delicts when handling waters continue to include groundwater consumption in contravention of water authority permits or without permission.

In the area of handling of adverse substances, we identi-

fied deficiencies particularly among smaller operators. The most common deficiency was inadequate safeguarding of storage facilities for adverse substances. We also found deficiencies in preventive checks of storage facilities by operators (failure to carry out tightness checks) and completeness of accident plans. The long-term results of the inspection work indicate a necessity to focus on medium and small-scale business in the coming years, as they show lower legal awareness of the legislation in force in the area of water management.

The inspection work indicates that completing remediation works on a number of sites where funds guaranteed by contracts with the MoF have been spent but the CEI requirements have still not been met, will be difficult in the coming years, particularly with reference to the allocation of money, which falls under the powers of the MoF. This is why it is very difficult for the CEI to enforce the implementation of measures imposed. Remediation of contaminated sites where the originator is not known or has ceased to exist is also uncertain in terms of financing of the required remediation works.

The structure of the inspection work and the actual content of the WPD checks are still considerably influenced by the amount of administrative operations. A perceptible increase has been registered in alerts, many of which have a totally marginal environmental impact but where the investigation, acquisition of evidence and information is always more time-consuming and administratively more complex than for planned checks and larger pollution sources.

The existence of the CEI has to be constantly present in the polluters' awareness, not only as a supervision authority but also a highly professional organisation capable of handling problems and helping eliminate the causes of adverse environmental effects of polluters' activities. In the coming years as well, the inspectors will

cooperate with all other environmental protection authorities and do prevention by informing and instructing businesses and the general public about duties arising from legislation so that entities inspected become capable of actively protecting the environment themselves.

5.3 Waste management, chemical substances and biocidal agents

5.3.1 Overview of inspection activity in 2014

In 2014, inspectors of the Waste Management Department (WMD) carried out 3422 checks in the areas of waste management, packaging and chemical substances. Out of this number, 42% were planned checks (1442) and 58% were unplanned (1980 checks). In 2014, the Territorial Inspectorates' Waste Management Departments handled 599 alerts, which was 67 more than in 2013. The Waste Management Department inspectors carried out 424 checks as part of their duties under Act no. 76/2001 Coll. on Integrated Prevention (including 332 checks together with inspectors of other departments). Based on conclusions and findings from the checks, 3 reports on the commission of crimes were filed due to suspicion of crimes committed when handling waste and other crimes. The WMD inspectors cooperated in tackling 14 accidents.

In the reporting period, violation of legal regulations under the WMD powers identified led to initiation of 1051 administrative proceedings and issuance of 1038 decisions on imposition of penalties and 12 decisions on imposition of remedial measures. Out of that, 969 decisions on penalties totalling CZK 68,373,000 became conclusive.

An integral part of the Waste Management inspectors' work is elaboration of position statements and state-

ments for other state administration authorities, such as regional authorities, the Ministry of the Environment and the State Environmental Fund. In 2014 alone, the Waste Management Departments issued 304 position statements.

In 2014, the CEI WMD handed 131 alerts over to other state administration authorities for investigation; this mutual cooperation with other state administration authorities is particularly important in very important cases for the resolution of which the CEI is often not fully authorised. The cooperation with other state administration authorities in 2014 included the CEI's active involvement in a project of the Institute for Sustainable Development of Towns and Municipalities, focusing on prevention of theft of metal objects and their submission for waste collection and repurchase. The CEI both cooperated on developing a methodology for performance of checks by municipalities and shared its experience of inspections at meetings with regional authorities and municipalities with extended powers.

5.3.2 Overview of performance of departmental tasks

Waste disposal and treatment facilities

In 2014, we carried out 315 checks at entities operating waste disposal facilities. As of the end of 2014, conclusive sanctions totalling CZK 2,120,000 were imposed for violations identified in 62 cases. The Inspectorate carried out 133 checks under this departmental task based on alerts. In 2014, we checked 93 landfills, 15 waste incinerators, and 25 waste treatment facilities. The remaining checks were carried out at other facilities (such as illegal waste disposal in landscaping).

The waste disposal facilities checked included landfills, incinerators, waste treatment facilities (decontamination processes, neutralisation station), and sites where waste handling is not permitted and where waste, chiefly

construction and demolition waste, is deliberately deposited – disposed of.

Checks of illegal waste deposition (unauthorised facilities), including deposition of construction waste and soil, were carried out by the Inspectorate in 2014 mostly based on alerts received. The reason is that unauthorised handling of construction and demolition waste is perceived by the public as a highly adverse practice.

Landfills

Like in previous years, the Inspectorate primarily checked in 2014 those repositories intended for disposal of hazardous waste, followed by landfills of other categories (i.e., other waste and inert waste landfills).

Checks in 2014 identified violations of the Waste Act and the Integrated Prevention Act among landfill operators, as well as one instance of violation of the Integrated Pollution Register Act and a violation of the inspection rules. It can be generally summarised, however, that the majority of the landfills inspected showed no major violation of applicable legal regulations. More significant deficiencies were identified in isolated cases, mostly in municipal waste landfills and one hazardous waste landfill.

Findings from checks of waste disposal facilities were mostly classified as violations of the Integrated Prevention Act. Specifically, these included failure to observe requirements of the facility operating rules, i.e., waste was accepted by the facility without a basic waste description (BWD) or the BWD was only completed formally, without adequately describing properties of the waste being accepted in terms of suitability of accepting the waste at the facility.

Checks at landfills identified relatively large areas of the landfills (primarily slopes) that were not secured with material or waste intended for technical security, or in-

sufficient construction of barriers separating sectors was identified. The landfill checks also paid attention to the use of construction elements (or construction materials), their re-reporting in the waste records, and reporting of waste used as technical security of the landfills.

Waste incinerators, waste treatment facilities and other facilities (illegal waste disposal)

In 2014, the CEI WMD inspected incinerators for hazardous and municipal waste, facilities for waste treatment before disposal, and entities that deposited waste – notably construction waste – without permission.

It can be concluded from the checks carried out that operators of incinerators and other waste disposal facilities are adequately familiar with the waste legislation, and no major defects were identified in 2014.

The deficiencies identified are largely of an administrative nature (failure to keep records or incomplete waste records and reporting on waste production and handling, etc.).

The majority of the deficiencies identified for which the CEI has run administrative proceedings on imposition of penalties were found at entities that handled waste in facilities not intended for that purpose or where waste handling was not permitted. Cases of illegal waste deposition outside approved facilities are often complicated by the fact that originators of the waste cannot be identified, or where the originator is found, it is often in liquidation or insolvency proceedings and cannot be forced to remove the illegally brought waste. The CEI sees this as a major problem, and will continue large-scale inspection of sites affected by illegal activities of various entities.

Waste reuse facilities

Waste reuse facilities include various types of facilities for waste handling, such as composting plants, facilities for processing, treatment and recycling (or regeneration)

of waste, and the largest portion are facilities for waste reuse in the form of landscaping and land reclamation.

Checks focused on reuse of waste soil or construction waste on the land surface (i.e., landscaping activities) are carried out based on alerts received. The overwhelming majority of cases of illegal utilisation of waste in facilities not intended for that purpose are caused by the entities' legislative ignorance. The checks are carried out to the extent of the Waste Act and its executive decrees.

In 2014, we carried out 374 checks at waste reuse facilities. Based on the results of these checks, 99 administrative proceedings on penalties were conducted by the end of the year. The total amount of conclusively imposed penalties was CZK 7,995,000. We made 123 checks under this de-partmental task based on alerts received.

Waste reuse in landscaping and land reclamation – modification of construction and demolition waste

In 2014, we checked 131 facilities doing modifications, processing or regeneration of waste and 166 sites of landscaping or land reclamation works.

Most often, the Inspectorate found out that the waste is handled in facilities not intended for that purpose, or that the facilities are operated in contravention with approved operating rules or approvals granted. The checks were often faced with a problem connected with the definition of a by-product or the transition from waste to non-waste. The essential problem is the inspected entities' view consisting in their regarding of excavated soil and construction waste after modification as materials, not waste, without securing the reuse of these materials in accordance with other legal regulations.

Based on the findings from 2014, the CEI sees an important issue of demolition waste containing asbestos construction elements (sewerage pipes, roofing, etc.). Insufficiently sorted demolition waste enters the recycling

plant and from there, recycled material. The only chance of avoiding this unsound practice is proper primary sorting during demolition works.

Major inspection events included surveys during the optimisation of a railway corridor, including collection of soil samples and verification of their quality with chemical analyses, and checks focused on railway station renovations. The objective of these inspection surveys pursuant to the Waste Act was to identify and verify whether works are done in accordance with relevant documents issued.

When investigating several alerts received, the CEI closely collaborated with municipal authorities, trade licence authorities and building authorities of local jurisdiction. The collaboration was done notably in connection with checks of performance of legal duties in the area of waste management by natural persons not doing business, including so-called "illegal dumps".

Reuse of biodegradable waste

In 2014, the CEI carried out checks at 52 facilities for reuse of biodegradable waste. Specifically, we carried out checks at 31 composting plants, 6 biogas stations, 9 facilities doing waste biodegradation, as well as investigation into 7 cases of handling WWTP sludge.

A significant portion of the CEI's work relating to checks of facilities for reuse of biodegradable waste comprise checks at composting plants.

The issue of composting plants is currently very topical, because based on the EU requirement to reduce the quantity of deposition of biodegradable waste in landfills, municipalities have been required as of 2015 to implement separate collection of biodegradable waste. Facilities for its re-use – primarily composting plants – are built in order to process the biodegradable waste production. Since the number of composting plants has grown remarkably in recent years, the CEI has come across with

deficiencies during some of its checks that are caused by insufficiently handled operation of these relatively novel facilities. The reason is the often low qualification of the facility managers and workers, who are not capable of handling potential problems (adherence to the composting process rules, in-adequate compost quality inspection, sales of compost made). In some cases, the checks have found out that composting plants were equipped partly or fully with non-functional equipment. In 2014, violations were identified in approx. 50% of the composting plants checked.

Waste collection and repurchase facilities

In 2014, the CEI WMD inspectors carried out 344 checks at facilities for waste collection and repurchase, including both stationary facilities and so-called mobile facilities. In particular, the operation of so-called mobile facilities – imagine a conventional lorry – appears to be a long-term problem in terms of both feasibility of effective inspection and transparency of waste handling.

Based on the checks at waste collection and repurchase facilities in 2014, the Inspectorate initiated 91 administrative proceedings and issued 166 decisions on imposition of penalties. During the reporting period, 157 of the decisions became conclusive, imposing penalties totalling CZK 13,427,000. Conclusive penalties of CZK 2,000,000 each were imposed on two companies for particularly serious and repeated violations of the Waste Act. Although the CEI has dealt with the issue of waste collection and repurchase facilities for many years, it can be concluded that business entities still continue committing the same violations of the Waste Act. These include primarily operation of facilities in contravention of regional authority decisions granting approval to operation of these facilities, and operation of facilities in contravention of approved operating rules. In a number of cases, the Inspectorate found out that waste is handled in the form of collection and re-purchase in (facilities) places

where it is not permitted. In 2014 as well, the CEI made checks at facilities for collection and repurchase of metal waste, where the cooperation of all the applicable state administration authorities appears crucial.

Facilities for collection, repurchase and processing of car wrecks

In 2014, the CEI WMD carried out 179 checks concerning handling of car wrecks. The CEI has made periodic checks in both facilities for handling car wrecks that possess appropriate licences issued by regional authorities and facilities that handle car wrecks without permission. A total of 121 checks were made in the first quarter of the year as extra-ordinary unplanned checks based on a request of the Ministry of the Environment (MoE). Virtually all of these checks were made as not announced in advance. During the checks made under this action, the inspectors focused particularly on performance of the duty of operators of facilities for collection, repurchase and processing of car wrecks to make a written agreement with accredited representatives and manufacturers of the selected vehicles. The Waste Act allows a regional authority to revoke its consent with operation of a facility in case the scrap yard does not have such an agreement. Where the Inspectorate found an absence of such an agreement, it informed the respective regional authority about it. In 2014, the Inspectorate initiated 69 administrative proceedings regarding violation of legal duties at car scrap yards, and issued 103 decisions on imposition of penalties. During 2014, an entire 95 of the decisions became conclusive, imposing penalties totalling CZK 2,704,000. The average penalty amounted to CZK 28,500; the highest conclusively imposed penalty was CZK 200,000. According to inspectors' findings, the situation has not improved perceptibly compared to previous years. There are still a great number of authorised facilities being operated in contravention of approved operating rules, and the Inspectorate has dealt with cases of inexpert disassembly of car wrecks in unsecured areas done by natural persons.

In addition, the CEI handled several cases in 2014 where a vehicle accepted to an appropriate collection facility and registered in the records system as a wreck was then again driven on roads, which was a fact established, e.g., by the police during routine road checks.

Collection of used products

Under this departmental task, the Inspectorate carried out 151 checks; 49 decisions on imposition of penalties totalling CZK 770,000 became conclusive in 2014.

As concerns duties relating to tyres, the Inspectorate found out that smaller car importers in particular (incl. used cars, e-shops and tyre shops) had not noticed the duty to register in the MoE List, and we frequently came across failure to produce and submit annual reports of used tyre collection. The CEI checks thus also contributed to better information about new legal duties and their ex-post performance. However, these entities still have to demonstrate in the annual report for 2014 the legally defined and achieved degree of used tyre collection; it seems that Internet e-shops in particular will have difficulty meeting this obligation in the absence of any collective system.

In recent years, the Inspectorate's checks have increasingly often come across exportation of used tyres into third countries; it is obvious in most cases that the tyres cannot be used any further and are therefore waste, largely obtained from used tyre collection at tyre shops.

Another problematic commodity exported from the Czech Republic is refrigerator compressors, which are most commonly destined for end processing in Pakistan. The chief problem here is the quality of disposal of oils with coolant residues at the processing facilities, and unified classification under the correct catalogue numbers according to the Waste Catalogue during the exportation process as such. The Inspectorate thus dealt with repeated returns of compressor shipments intercepted in

Germany, because the applicable supervision authorities identified presence of unremoved hazardous substances in the compressors as the waste was leaving the EU.

Based on an agreement with the MoE, the CEI carried out a targeted inspection in 2014 focused on performance of duties of operators of solar power plants under the Waste Act. Approximately one third of the solar power (PV) plant operators inspected did not meet their obligation to have a contract with one of the collective system operators.

One important issue, which also overlaps into the departmental tasks dealing with checks at collection and repurchase facilities, is the repurchase of electrical appliances. The Inspectorate had repeatedly found waste electrical appliances or their parts during checks at waste metal repurchasing facilities, some of which are produced by illegal dis-assembly right in the recycling yards, because some components in particular (compressors, electric motors, printed circuit boards, cables, etc.) are an attractive economic commodity. However, this activity produces illegal dumps, potential leaks of hazardous substances, accumulation of burnt waste components that are thus made useless for further reuse, etc.

Inspections of industrial facilities and other waste originators

As part of inspection on performance of duties of waste originators in 2014, the Inspectorate checked 922 entities, including 230 based on alerts received. In 2014, we carried out 214 administrative proceedings on imposition of penalties, and the total amount of penalties imposed under this departmental task was CZK 7,862,000.

Generally speaking, large companies in particular observe requirements of the Waste Act. This is significantly aided by employing environmental specialists, as well as voluntary certification of companies.

Municipalities as waste originators also often have professionals specialised on these issues among their staff. An interesting phenomenon is the growing and significant portion of checks based on alerts. As concerns violations of the Waste Act identified, they are still dominated by imperfect sorting of waste generated, incorrect keeping of continuous records, and the frequently related erroneous reports to the Integrated Reporting Duty System (ISPOP), and handing of waste over to unauthorised persons. It is also useful to point out another violation of the Waste Act: the Inspectors were sporadically not permitted by the entity to carry out the inspection.

It can be concluded from reactions of representatives of the entities checked (primarily the company environmentalists) that the inspection work also works as a prevention for the managers of the entities checked, who then tend not to underestimate the waste management issues (incl. investment in proper security of waste handling).

Inspection of duties under the Packaging Act

In 2014, we carried out 143 checks of performance of duties pursuant to Act no. 477/2001 Coll. on Packaging; in connection with this inspection activity, a total of 77 decisions imposing sanctions totalling CZK 4,115,000 became conclusive.

One half of the checks were carried out at entities not performing their duties at all. They were both entities selected by inspectors (or based on alerts), and entities reported in alerts from customs authorities. It can be concluded that the violations identified were important mainly because most often they concerned packaged goods sold to consumers. Subsequently, consumers place the packaging into a network financed by other required entities that perform their duties properly, and may thus unfortunately incur costs of packaging for which they bear no responsibility.

In addition, the Inspectorate also checked companies producing wine in the CR in the reporting period. These checks identified major violations of duties. The entities checked did not perform their duty at all even though they introduced significant quantities of packaging (hundreds of tonnes) on the market every year and supplied retail chains with their products. Other entities that were found to violate their duties under the Packaging Act were electronics e-shops. These entities also failed to perform any duties relating to the packaging they introduced on the market.

The most serious violations were identified based on collaboration with customs authorities (notably Plzeň CA). Based on 17 alerts handled by Plzeň TI, we inves-

Numbers of checks carried out and administrative proceedings by used product collection type

Total checks	Batteries, appliances	Tyres, oils	Final sellers	PV power plants	Others*
151	41	22	22	59	8
Penalties					
49	8	15	1	21	4
Penalty amounts (CZK)					
770 000	96 000	392 000	5 000	167 000	110 000

* Checks of electric waste processors, used product handling facilities, etc.

tigated the importation of tens to hundreds of tonnes of packaging from China. Based on these investigations, 13 sanctions totalling CZK 1,863,000 became conclusive. Additional cases will be concluded in 2015. Generally speaking, entities checked based on alerts by customs authorities did not communicate with the CEI. When carrying out a check at the entity's registered address, it is not found there, the place only bearing its identification. These are typically buildings where multiple companies are based.

Based on a request of the Ministry of the Environment, the CEI inspected 48 entities that perform their duties relating to packaging introduced on the market or in the circulation by themselves in organisational and technical aspects, at their own expense, and are registered on the MoE List of Entities. Checks at some of these entities found out that they were no longer required to be registered on the MoE List because they had ceased to introduce packaged goods on the market, or ceased to operate. No violations of the law were identified at most of the entities alerted to by the MoE in this year. We mostly found violations of the duties to keep records and submit reports on waste and packaging handling, and only in entities handling low volumes of goods. There was only one case where the Inspectorate found a violation of the duty for a significant amount of packaging (about 160 t) in importation of sanitary equipment that was distributed further.

Inspection of compliance with the Chemical Act

In 2014, the Inspectorate carried out a total of 712 checks under the Chemical Act no. 350/2011 Coll. (including the EU legislation – REACH, CLP and the Detergent Regulation). These checks focused primarily on duties when marketing chemical substances and mixtures (registration, classification, packaging, labelling, safety data sheets, notifications, etc.). A significant part of the checks focused on the highly complex European



REACH regulation (325 entities), and inspection activity was commenced in connection with an amendment to the Chemical Act, focusing on handling of chemical substances and mixtures by subsequent users. In addition, we inspected duties under the CLP (97 checks) and the Detergent Regulation (8 checks). The checks concerned manufacturers in the CR in 11% of the cases, importers from third countries (non-EU) in 15%, subsequent users in 22%, and distributors in 63% of the cases (including those marketing chemicals originating from the EU in the Czech Republic).

The majority of the substances or mixtures checked in 2014 originated from countries outside the CR. Imported products and products from other EU countries were also more frequently found to violate the chemical regulations than domestic products.

Besides checks under the Chemical Act and the related EU

regulations, the Inspectorate also carried out 96 checks based on 11 notifications received from the RAPEX system (EU Rapid Exchange of Information System on hazardous consumer products of non-food nature). For violations of the Chemicals Act and related regulations, the Inspectorate imposed 182 penalties totalling CZK 7,133,500. The majority of these penalties concerned classification of chemical mixtures and their improper packaging and labelling. A significant part of the violations and penalties concerned failure to perform duties under the REACH (such as safety data sheets and substance registration). The Inspectorate also handled 2 cases forwarded by the European Chemicals Agency (ECHA), which concerned Czech companies. We forwarded 5 cases to colleagues at inspectorates abroad (relating to, e.g., wrong classification of mixtures marketed in the CR, restricted substances and safety data sheets).

In 2014, we carried out 61 so-called thematic checks, focused on performance of certain duties or certain regulated entities. Among others, the inspectors focused on late pre-registration of chemicals or substances of very high concern (SVHC) contained in object. In connection with our new powers pursuant to the inspection rules (enabling check purchases), we carried out first checks of chemical substances and mixtures sold via the Internet. These thematic checks identified 16 cases of violation of the chemical regulations, and led to imposition of penalties totalling CZK 347,000. Besides, we also carried out checks of liquids for electronic cigarettes (e-liquids) as part of an action initiated in 2013.

In 2014, the Inspectorate established very useful collaboration with the Toxicology Information Centre (TIC), which informs physicians and the public on cases of acute poisonings. The CEI was informed about 65 chemical mixtures that had caused an accident and about which TIC staff had not found information in the Chemical Mixture Register kept by the Ministry of Health. This made the TIC's role in informing about the poisoning

progress more difficult. CEI inspectors investigated whether suppliers of these mixtures had complied with their reporting duty for the Chemical Mixture Register and other requirements for chemical mixtures marketed in the CR. This collaboration enables us to target checks at mixtures that pose real threats to human health.

In addition, the Inspectorate focused in 2014 on importation of chemical substances and mixtures (e.g., metals, fertilisers, paints, fuels and oils) as part of the follow-up phase of the pan-European inspection project REACH-EN-FORCE 3. The second phase of this project put more emphasis on inspecting "exclusive representatives" representing importers. Checks at these exclusive representatives required information exchange among inspection authorities in various countries. Out of the 19 checks, 3 cases of violation of chemical legislation were identified. The checks were made in the same way in all the EU countries and their results are thus comparable.

5.3.3 Overview of performance of specific tasks – priorities

In 2014, based on newly identified or lasting problematic cases, the Territorial Inspectorates identified in their respective areas of jurisdiction priority tasks for intense supervision activities, i.e., in-depth or more frequent inspection checks. They included intense inspection and supervision over waste handling during construction of a railway corridor and renovation of a railway line, as well as checks of reuse of composting plant outputs and reuse of certified products on ground surface; attention was also paid to a decontamination and recycling centre treating waste contaminated with petroleum products.

5.3.4 Inspection conclusions

The CEI's activity in the waste management sphere in 2014 did not differ in any substantial aspects from that in the previous years. Most of the entities at which the

CEI carried out checks were duly performing their duties under legal standards on waste management, chemical substances and packaging. This is attested by the fact that violations of legal regulations were identified at approximately every third entity checked. In spite of this positive fact, however, it must be said that the Inspectorate continues to handle major cases of waste handling where legal standards are circumvented or violated in order to maximise profits from the business. In these cases, the Inspectorate strove to impose sanctions at such amounts that make the illegal activity unprofitable.

In the area of waste management, a great importance is attributed to cases of unauthorised handling of waste originating from construction or demolition works, because the risk with this type of waste of often not their qualitative composition but their quantity. Unauthorised deposition of such waste in various unpermitted land-scaping works then leads to anthropogenic burdening of sites. Of course, handling of hazardous waste is another area where profits are maximised to the detriment of adherence to legal standards.

A continuously recurring problem is an inspected entity not allowing inspection performance and not cooperating on it. The non-transparency of waste handling by such entities is perceived very negatively by the Inspectorate, and we then proceed to imposition of sanctions and sometimes even filing motions to take away respective licences. Conversely, an entity's cooperation with the inspectors carrying out their inspection work has been a major extenuating factor even if deficiencies have been found, particularly where the entity has remedied its errors without delay.

In addition, the Inspectorate continued in 2014 its good cooperation with other state administrative authorities, and established cooperation with new organisations, such as in the area of health protection (Toxicology Information Centre as mentioned above). This coopera-

tion has substantially contributed to prevention of impacts on human health of improper handling of chemical substances, thus also contributing to making the inspection work more effective.

Based on the existing findings, obtained not only in 2014 but also previous years, the Inspectorate will continue to do intense inspection work with the aim to provide good environmental protection.

5.3.5. Major cases

Pragač s.r.o.,

In 2014, the penalty of CZK 250,000 imposed on the company Pragač, s.r.o., for violation of the Waste Act became conclusive after an appeal. The violation consisted in the entity depositing 6989 m³ of waste (soil) on leased land in Lelekovice cadastral area. The entity accepted the soil from the originator and deposited it on the land, where no land-scaping works had been permitted by a building authority. The entity argued that it was only depositing the soil “temporarily” and that it would use it somewhere (in unspecified construction projects) at some (unspecified) point in future. The entity deposited another 250 m³ of soil on a land plot in Slatina cadastral area. The body of appeal confirmed the penalty.

Magnesium Elektron CZ s.r.o. (positive case)

The company Magnesium Elektron CZ s.r.o. was selected based on the Headquarters' request for an in-depth check of waste handling by an entity selected by the relevant TI. The objective of the check was to carry out an indepth investigation in the entity's handling of waste in its facility for smelting and casting of magnesium alloys, including recasting of products (refining, production of castings). The company obtained an integrated permit in 2008, specifying among other things requirements for handling the cinder: the company was to develop and build its own capacities for reprocessing and reuse of the cinder. The company had thus implemented a line for

crushing the magnesium cinder and magnetic separation of metals, where the metallic and non-metallic components are separated, the metallic portion goes back for smelting and the non-metallic one can be used as a fertiliser. In April 2012, this fertiliser was registered by decision of the Central Institute for Supervising and Testing in Agriculture under the name “Maglit 100, Po-tassium fertiliser with magnesium”, and the company has since not considered this processed cinder to be waste. It sells this fertiliser on a contractual basis.

During the investigation, the Inspectorate did not identify any violations of legal regulations on waste management, because the company has also met all the requirements for being able to requalify the processed cinder as a non-waste product.

Car wrecks handled by a natural person licensed to do business

In 2014, a check was carried out at a natural person licensed to do business, whose business activity comprised operation of a facility for reuse and disposal of waste – car wrecks. The CEI check found out that the person generally handled the car wrecks admitted and the waste produced

by the facility operation (such as waste tyres and wheel hubs, axles, disassembled doors, bumpers, parts of bodywork, radiators, engines, brake discs) mostly outside the spaces (garage) intended for waste handling. The adjacent orchard and meadow (i.e., places not intended for the purpose) contained about 100 car wrecks and “vehicles” (vehicles with registration papers “imported” from abroad for spare parts and vehicles whose licence plates were stored in the repository). The scrap yard operator did not keep accurate records on car wrecks admitted and methods of their processing, because they did not state truthful information in the information system for tracking the flows of selected car wrecks. Moreover, they did not keep any records of materials and parts for reuse, and had not made a written agreement with any accredited representatives or manufacturers of selected cars. Before the issuance of the penalty decision, the operator cleared all the car wrecks, waste and “vehicles” away from the orchard and the meadow.

For the violations of the Waste Act demonstrated, the entity was awarded a penalty of CZK 70,000, which the body of appeal confirmed in full, adding that also the car wrecks “imported” for spare parts were waste pursuant to the Waste Act.

Sanctions against a natural person licensed to do business for repeated violations of the Waste Act in operating a collection and repurchase facility

In 2014, the penalty imposed by the CEI on a natural person licensed to do business operating a collection and repurchase facility became conclusive. The entity had been awarded a penalty amounting to CZK 26,000 for its violations of the Waste Act. A subsequent check carried out by the Inspectorate at the same entity in 2013 found out another violation of the Waste Act, consisting in the entity having repurchased from a natural person a stolen electric motor from a fan of an electric train unit, i.e., waste clearly showing characteristics of a part of industrial machinery. A penalty of CZK 50,000 was imposed for this administra-



Unpermitted landscaping works

tive delict. The entity appealed against this decision. The body of appeal confirmed the Inspectorate's contested decision. Due to repeated material violations of duties under the Waste Act, the Inspectorate applied the Waste Act provisions to request the respective regional authority to assess or examine whether conditions have been met for revocation or modification of the decision granting approval for the operator to run the facility.

Interesting case on the chemical substance agenda: Valmont trading, s.r.o.

The company Valmont trading, s.r.o., was awarded a penalty of CZK 700,000 by Prague Territorial Inspectorate in 2014. The company had imported to the CR nicotine-containing mixtures designed as liquids for electronic cigarettes. The company failed to classify the hazard of some of the mixtures in accordance with the Chemicals Act; the mixtures should have been classified as harmful to health and toxic, respectively. Not performing the classification for such hazardous mixtures is a fundamental violation of the Chemicals Act and is potentially highly dangerous. Moreover, the company committed a violation of the Chemicals Act regarding the labelling of these mixtures, and a violation of the REACH regulation relating to safety data sheets.

5.4 Nature protection and CITES

5.4.1 Overview of inspection activity in 2014

In 2014, inspectors of all the Nature Protection Departments (NPD) carried out 911 planned checks out of a total of 2909 checks. The planned work includes performance of departmental and specific tasks. The unplanned work is the result of alerts received and own findings in connection with inspection work.

Nature Protection Department inspectors issued 738 conclusive decisions in 2014, including 560 on penalties,

18 on remedial measures, and 15 on restriction or half of operation. The total amount of the penalties imposed was CZK 12,017,100; this divides into CZK 10,385,500 for legal entities and natural persons doing business, and CZK 1,631,600 for natural persons not doing business. The total amount of conclusively imposed penalties increased year on year; the difference was about CZK 100,000. In addition, we issued 145 decisions on confiscation illegally kept animals and 16 preliminary measures. Compared to 2013, the number of reports on commitment of crimes did not change, staying at 14. In 2014, appeal proceedings judged on penalties imposed by the Inspectorate totalling CZK 6,700,500; decisions on appeal totalling CZK 5,239,500 became conclusive. The total amount of penalties was reduced by almost 22% by the body of appeal, which is a noticeable improvement compared to the last year, when the reduction was 40%.

In 2014, the number of alerts investigated nation-wide increased compared with previous years (867 in 2012, 891 in 2013, 1020 in 2014). The distribution of the increase was uneven; the year-on-year increase in the number of alerts handled by some TI was significant. The amount of work associated with handling of alerts continues to be huge. Almost 50% of the alerts were justified, meaning that the Inspectorate proceeded in almost half the cases to further investigation of the alerts, followed by offence or administrative proceedings. A minor part of the alerts was handled in collaboration with another CEI department. As in previous years, the overwhelming majority of the alerts dealt with protection of trees growing outside forest, both within municipal limits and extensive felling of trees in the open country.

CITES

In 2014, CEI inspectors carried out 592 checks under Act no. 100/2004 Coll. (CITES Act). Out of the checks, 84% concerned imports and exports via international airports, inland customs authorities and customs mail, i.e., international trade in endangered species; 16% of the



Hunting trophies imported via Václav Havel Airport

checks concerned intra-EU trade in CITES specimens. At present, 80% of all the CITES inspection work is done by the International Biodiversity Protection and CITES Department of the CEI Headquarters, which deals primarily with the international aspects of the CITES treaty (checks of imports and exports, international collaboration), investigations into material violations of the law, and cooperation with authorities involved in criminal proceedings, and also provides professional services for other CEI inspectors and state administration authorities.

Out of checks of CITES specimens being imported or exported, 19% of the checks identified violations of laws, i.e., every fifth shipment checked was not okay. The greatest number of shipments of animals, plants and products made from them originates from Asia. In 2014, we registered an increasing trend of shipments of dried invertebrates (butterflies) via mail (112 checks) and increased numbers of shipments of ivory sent illegally to Vietnam in Vietnamese passengers' luggage. A very serious trend is the growing share of Vietnamese nationals

in violation of CITES and wildlife legislation. In 2014, perpetrators of Vietnamese nationality was identified in 36% of the cases. These included very serious offences, such as trade in ivory, tiger bones, rhinoceros horns, etc. The CEI conducted 150 penalty proceedings, imposing CITES penalties totalling CZK 376,200 (conclusive decisions); significant cases are handed over for investigation to authorities involved in criminal proceedings and the CEI does not conduct sanction proceedings. In 139 cases, we proceeded to confiscation of specimens; we confiscated 4474 specimens and 92 kg of sahlep (powder made from orchid tubers). The CEI assisted in seven house searches and actions done by authorities involved in criminal proceedings – CEI inspectors were involved in the actions as expert consultants.

In 2014, we continued our cooperation with the Czech Customs Authority and the Czech Police on significant cases of illegal trade with rhinoceros horns, ivory and tiger bones. The 7th annual three-day seminar CITES Treaty Enforcement in the Czech Republic was organised in 2014; it was intended for inspectors, police, customs authorities, state attorneys and judges. It was attended by 120 invited people, including four state attorneys. It presented current cases, methods of illegal trade, use of forensic methods in detecting crimes and offences on wildlife, risks of introduction of dangerous diseases, etc.

GMO (Act no. 78/2004 Coll., as amended)

In 2014, we carried out 35 checks pursuant to the GMO Act, including 25 checks focused on entities handling GMO in a contained handling regime in risk categories 1, 2 and 3; 5 checks focused on introduction to the environment (i.e., field experiments), 5 were monitoring of sites with potential GMVR during vegetation. A sanction of CZK 10,000 was imposed for non-compliance with requirements of a decision permitting introduction to the environment (a field experiment).

The inspection activity proceeded according to the CEI

TIs' internal inspection plans based on CEI HQ recommendations. Checks of contained handling focused primarily on entities checked for the last time three or more years before, and some selected entities handling primarily based on notifications. We inspected all the field experiments permitted by the MoE for 2014. These comprised field experiments with transgenic maize NK603 (biggest experiment in the EU), transgenic plum tree clone C5, transgenic flax, and transgenic barley grown on two sites.

Checks at entities carried out in the course of 2014, both planned and unplanned, identified no deficiencies directly threatening the environment or serious violations of Act no. 78/2004 Coll., as amended. In a handful of cases, the checks identified only small deficiencies mostly of an administrative nature, which were mostly eliminated by the entities checked immediately after the notification, or by the dates set by the Inspectorate. In early 2014, an international audit was carried out at an entity handling GMO in risk category 3. It did not prove any errors in compliance with all the requirements made for this risk category.

In May 2014, a conference of the EEP (*European Enforcement Project on Contained Use and Deliberate release of GMOs*) took place in Malmö, Sweden, attended by a CEI representative. The EEP associates GMO inspectors in EU countries, and GMO-related issues in the EU and globally are discussed at the annual conferences.

In the course of 2014, the CEI received two alerts from supervision authorities. One indicated contents of added genetically modified rapeseed in ordinary rape seeds. An investigation and analysis found out that the content

of the genetically modified rapeseed was below the limit. However, the occurrence of GMO mixed in seeds has shown a slightly increasing trend in recent years, and the issue undoubtedly deserves attention.

The other alert reported occurrence of Amflora GM potato plants on sites of their previous growing in 2014. Monitoring was carried out in cooperation with BASF, and its results led to a recommendation to continuously destroy the growing plants (from June to October). Measures were defined to minimise further occurrence of these plants from micro-tubers (they persist in soil for up to several years). No potato growing is allowed on these sites for a period of two years after the last finding of GM potatoes. The monitoring will continue in 2015. In 2014, eleven CEI inspectors checked compliance with requirements on GMO handling in the CR.

Zoos (Act no. 162/2003 Coll., as amended)

The CEI carried out inspection of zoological gardens in 2014 in connection with the periodic checks of licensed zoos, organised by the Species Protection and International Commitment Implementation Department of the MoE along with the MoE and CEI Zoo Committee.

In the course of 2014, we carried out planned checks at 13 zoological gardens, which identified no conflict with Act no. 162/2003 Coll., thus the requirements in the zoo operating licences. These fall within the CEI powers and inspection.

As part of other checks (pursuant to Act no. 11/1992 Coll.¹ and Act no. 100/2004 Coll.²), including checks of zoological gardens, the CEI found minor deficiencies mostly related to administrative paperwork concerning

¹ Act no. 114/1992 Coll. on Nature Conservation and Landscape Protection, as amended

² Act no. 100/2004 Coll. on Protection of Wild Animals and Plants by regulating trade in them and other measures to protect these species, and on amendment of certain acts (the Endangered Species Trading Act)

exemptions from ban on breeding specially protected species. These deficiencies concerned permits issued by regional authorities, which contravened Act no. 114/1992 Coll. in several cases. These deficiencies are currently being handled in an administrative proceeding.

5.4.2 Overview of performance of departmental tasks

Inspections of agricultural business entities under Cross Compliance project with a focus on defined inspection requirements

In 2014, the Inspectorate checked 333 agricultural entities, where we assessed compliance with inspection requirements on farming arising from Council Directive No. 79/409/EEC on protection of wild birds in 243 cases, and compliance with requirements arising from Council Directive No. 92/43/EEC on protection of habitats. In accordance with the defined requirements, the checks focused primarily on trees growing outside forest, water-courses and alluvial plains, registered nesting places of target bird species, and sites of community importance. In terms of the departmental task, there were 3 important cases of violation of the inspection requirement focused on protection of trees outside forest (SMR 1/2), in the areas of jurisdiction of Havlíčkův Brod, Hradec Králové and Liberec TIs. In all the cases, we filed a motion to the SAIF to reduce the agricultural subsidies, and administrative proceedings on penalties are currently in progress with two of the entities. Another case of felling and damaging of trees was handled under an administrative proceeding on penalty, because we failed to prove any connection with agricultural activity. A conclusive penalty of CZK 70,000 was imposed on the legal entity. Another administrative proceeding dealt with damage to a prominent landscape feature (water-course) in connection with driving cattle, and the natural person doing business was awarded a penalty of CZK 7000. In addition, a TI checked three entities in connection with

possible damage to a SCI as consequence of improper agricultural activity. In all the cases, the situation was caused by an entity different from the subsidy applicant.

Additional, less significant errors were handled by arrangements on the spot or reports on inspection findings, specifying the method and deadline for elimination of the deficiencies. The purpose of the agreed measures was to minimise or prevent potential environmental damage. An example of such a measure is the requirement to relocate a field dung site, implementation of fencing to prevent contact of farm animals with water-courses or trees, or achievement of accord between reality and records on landscape features.

Inspectorate-wide check in the Ore Mountains area – Natura 2000 sites under the jurisdiction of Ústí nad Labem Regional Authority

On 17-19 June 2014, we carried an inspectorate-wide check, under which NPD inspectors checked 14 construction projects and 6 sites of community importance (SCI); another 4 checks focused on forestry methods on selected sites (renovation of substitute tree stands and application of chemical preparations to exterminate rodents in forest stands). The selected projects and SCI are located in the Novodomské rašeliniště – Kovářská Special Protection Area (SPA; promulgated by Government Regulation no. 24/2005 Coll.) and Eastern Ore Mountains SPA (promulgated by Government Regulation no. 28/2005 Coll.), under the territorial jurisdiction of the Ústí nad Labem Regional Authority, or in their immediate vicinity.

The objective of the checks was to enforce and inspect adherence to state-guaranteed nature protection interests when implementing projects on sites included in the Natura 2000 system in the Ore Mountains, and check the protection of the Novodomské rašeliniště – Kovářská and Eastern Ore Mountains SPAs and the SCIs in the Ore Mountains. When checking the projects, the Inspectorate focused on

the EIA processes for the projects, integration of requirements of inquiry proceeding conclusions or EIA position statements relating to nature and landscape protection interests in subsequent administrative proceedings and and meeting of requirements aiming at protection of state-guaranteed nature protection interests defined in the respective decisions.

When checking the SCIs, we examined compliance with requirements on protection of SCIs pursuant to Section 45, Para. 2 of the NLP Act and the form of protection pursuant to Section 45, Para. 3 and 4 of the NLP Act

The following recommendations arose from the SCI checks: Klínovecké Krušnohoří SCI – backfill drains in Horská louka u Háje NR and make repeated checks of the Vápenka site due to its disruption by off-road motorcycles.

Novodomské a polské rašeliniště SCI – renew the stripe marking by Novodomské rašeliniště NNR and install new information signs by former Bučina NR.

Sanctions have been imposed for some of the violations of the NLP Act. One compensatory measure was imposed pursuant to Section 86 of the Act. An important case of violation of species protection interests when re-locating the driving range of a golf course in Cínovec will only be concluded in 2015 based on an expert assessment made by the NLPA.

Inspections of application of Section 9 of Act no. 114/1992 Coll., focusing on imposition of substitute plantings by nature protection authorities, and their implementation

Under this task, TI NPDs carried out 96 checks focused on both implementation of imposed substitute plantings and performance of public administration related to their imposition. We found out that municipal authorities make insufficient use of the opportunity to impose substitute planting pursuant to Section 9 of the Act. In many cases,

planting is not required at all, particularly if an authority should impose planting on its own municipality, or in cases where felling and substitute planting is done as part of greenery renewal projects in municipalities. Generally speaking, the smaller the municipality, the fewer substitute plantings are imposed. Many municipal authorities continue to commit serious errors consisting primarily in imposing of legally unenforceable duties, such as missing tree species specifications, planting locations, deadlines for the plantings, or imposition of substitute plantings on plots where they are factually impossible (e.g., with continuous multi-storey tree vegetation).

An integral part of checks at municipal authorities is their familiarisation with legislation in force, MoE methodological instructions and provision of other information, e.g., on existing judgments concerning specific cases.

As part of the checks of substitute plantings imposed, we found out that their majority had been implemented in accordance with the decisions issued. In some cases, we found violations of law consisting, e.g., in failing to make the imposed substitute planting, not respecting defined tree parameters (trees planted were smaller than was imposed), and some did not respect the location specified for the planting; there were also cases of damage of the substitute plantings imposed by nature protection authorities as compensation for felling of non-forest trees.

Sanction proceedings were conducted with entities committing violations of law. With respect to the preventive nature of this inspection activity, the CEI Nature Protection Department will continue dealing with this issue in the coming periods.

Checks of operation of small hydropower plants

In the course of 2014, the TI NPDs in cooperation with TI Water Protection Departments carried out 68 checks focused on observance of minimum residual flow rates

in watercourse beds downstream of SHP water intake points. The checks were carried out in compliance with the 2014 NPD binding methodological instruction for inspecting operation of SHP and other hydraulic structures from the nature protection point of view.

CEI inspectors found violations of law in connection with SHP operation in 26 cases, which is practically 1/3 of the SHP checked. Out of those, 22 cases were violations of the Nature and Landscape Protection Act, and sanction proceedings were or still are held with the entities. The other cases were violations of the Waters Act, either investigated by Water Protection Departments or handed over as alerts to local water management authorities.

The specification of this task turned out to be highly appropriate and the selection of entities, made with knowledge of the field conditions, documented a high degree of environmental exploitation. As a result of this, the CEI Nature Protection Department decided to deal with this issue continuously in the coming period.

Inspections of zoos focused on specially protected species

This departmental task is planned for two years, i.e., until the end of 2015. Its objective is to collect information relating to breeding of specially protected species (SPS) in Czech zoos based on exemptions. During these checks, we concentrate on comparing the situation of SPS breeding and the validity of exemption permits to be possessed by the entities. Given some complexity of this task, its implementation period has been set at two years, after which it will be evaluated.

5.4.3 Performance of specific tasks

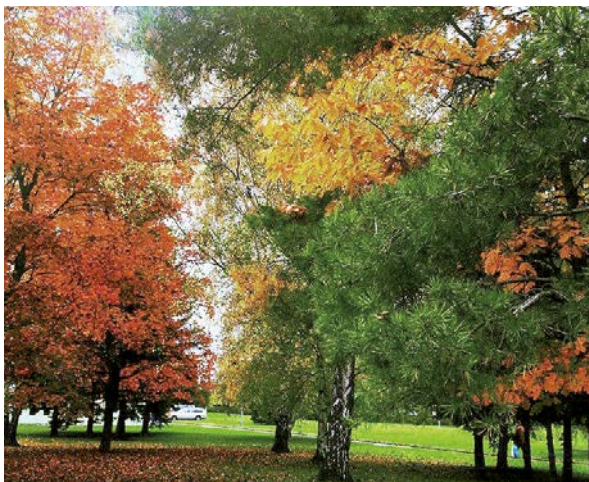
Protection of non-forest trees and prominent landscape features

The TI NPD deal with this issue in checks at road managers, watercourse managers, and construction companies

implementing regionally important projects. The range of violations of duties under the NLP Act is wide. As concerns trees, they included damage to root system when maintaining roadside ditches, damage to avenues by road managers making inappropriate cutting, unpermitted felling of trees in connection with road reconstruction, or major root damage when building sanitary sewers. Checks of water-course and alluvial plain prominent landscape features found out unpermitted interventions of water-course managers, as well as other entities, consisting in felling bank tree stands or trees in alluvial plains; cases of dumping redundant construction material in alluvial plains or even water-course beds were identified.

Species protection and wild bird protection

The CEI has consistently carried out checks focused on endangerment to nesting areas and biotopes of specially protected species of animals and wild birds. It occurs when renovating residential buildings, during landscaping works, and maintenance of fishponds and water-courses. A latent problem that the Inspectorate has come across in its work is non-observance of the NLP Act when thermally insulating buildings used by swifts and bats for nesting. Inappropriately timed construction work thus leads to unpermitted disturbance or even killing of animals. Timely checks of gas heating systems managed to save several colonies of hibernating bats. There are also relatively frequent cases of illegal interference with the aquatic environment, which is a biotope for numerous specially protected species. Cases handled concerned mud removal from fishponds and reservoirs, which had adverse impacts on amphibians and specially protected fish species. Excavation of sediment from watercourse beds in turn resulted in disruption to the biotope of protected shell species. In addition, the CEI checked observance of the legal protection of wild birds in connection with construction of transparent noise-reducing walls along roads. The inspection proved that specific transparent walls cause mass deaths of birds, which cannot



see them while in flight and collide with them fatally. In this respect, we made entities in charge equip transparent sections of noise-reducing walls with vertical opaque stripes, the effectiveness of which is proven. In Prague, the CEI actively contributed to protection of birds living on the Vltava river or near it. In the past, there were cases of injuries or death when birds collided with tram overhead lines.

The Inspectorate cooperated on implementation of a measure consisting in installation of scare-aways on overhead lines on Prague bridges, and on a ban on fireworks in the alluvial valley of the Vltava in Prague and implementation of a new regime with several signal cracks preceding the actual fireworks.

5.4.4 Major cases

Harmful interference with PLF, death of specially protected species – Povodí Labe

On 25 October 2012, the CEI carried out an investigation on land on both banks of the river Elbe between the Lysá nad Labem and Čelákovice locks on the Elbe. The reason for the inspection investigation was to verify facts

stated in an alert: whether manipulation with the river water level – reducing it by 2 metres – resulted in a mass death of molluscs situated on the banks exposed due to the water level decrease.

The CEI Prague TI imposed a penalty of CZK 1,000,000 on the state enterprise Povodí Labe for the illegal acts pursuant to Section 88, Para. 2, item e) of Act no. 114/1992 Coll., because by manipulating with the water level of the main bed of the Elbe river in the course of October 2012, the organisation committed a legal wrong, consisting in making a harmful interference with a prominent landscape feature without the consent of a nature protection authority, and not proceeding so as to prevent excessive deaths of plants and animals, molluscs in particular. At the same time, it caused deaths of specially protected animal species on the scale of at least several tens of thousands of the critically endangered species the Painter's Mussel. Povodí Labe ap-pealed against the penalty decision, but the MoE dismissed the appeal and confirmed the CEI's decision.

5.4.5 Position statements, statements and cooperation with other authorities

There is a constant trend of providing statements on projects in all stages of the EIA process. The CEI makes statements on a great number of documentations, notifications and assessments, about 700 annually. The CEI makes reservations and comments on documentations and projects presented.

Almost every documentation requires careful study, regardless whether the plan is simple and in a naturally poor area or whether a naturally rich area is concerned or the documentation is significantly faulty. Although a number of notifications do not contain even the most basic information about the areal conditions relating to legitimate protection interests, the CEI's requirements are

largely not accepted by respective authorities, frequently with a reference that the applicable nature protection authority makes no comments on the project plan.

The CEI's cooperation on nature protection also consists in consultations, expert assessments, and engagement in activities of authorities involved in criminal proceedings as expert consultants. In the last year as well as the previous years, the Inspectorate cooperated with other nature protection authorities at both the municipal and regional authority level and that of the MoE.

In some regions, we established cooperation with expert non-governmental organisations such as the Czech Society for Ornithology and the Czech Bat Conservation Society. Cooperation with the Nature and Landscape Protection Agency has been traditional, and includes management of protected landscape areas, where the CEI uses its expert knowledge and experience when commissioning expert assessments. Our pre-existent good cooperation with the Czech Police and the Customs Authority intensified in the course of the year in connection with investigation of specific cases.

In 2014, the Inspectorate made 14 reports on the commitment of crimes in connection with nature protection.

5.4.6 Inspection conclusions

Our inspection work in 2014 was influenced by the adoption of Decree no. 189/2013 Coll. on protection of trees and permission of their felling, which meant a significant change in felling trees on land owned by natural persons, and its amendment effective as of November 2014.

In its inspection work, the CEI's Nature Protection Department increasingly comes across a totally formalist approach to state administration performance in nature protection, particularly at municipal authorities of all levels. Nature protection authorities are often aware

of practical impunity in case they violate relevant legal regulations, whether in process or material respects, and such violation does not become dangerous to society at the level of a crime.

Thus, based on alerts, the Inspectorate mostly deals with factual or impending damage to interests protected by law that would not occur or its consequences would not be so grave if the state administration was performed properly. The CEI continues to regard as necessary to pay attention to checks of implementation of substitute plantings, particularly in towns and cities, which are facing the risk of decrease in greenery due to significant tree felling. It is useful and desirable to consistently check these measures and substitute plantings imposed.

The Nature Protection Department will continue to make checks at municipal authorities, because the supervision work turns out to be necessary in this area due to recurrent errors, and not only formal. Given the great extent of violations of law in the area of tree protection by both legal entities and natural persons, flawless performance of state administration in this area appears to be indispensable. We see it as a very serious problem that in the case of permission to fell trees, a municipal authority decides about its own municipality's applications. The advisory board of the Minister of the Interior on the Rules of the Administrative Procedure issued its position statement no. 133/2014 on 14 February 2014 on bias of a municipal mayor and deputy mayor in cases where the municipality is party to a proceeding; however, application of this position

A substantial part of the inspection agenda comprised checks at agricultural business entities under the Cross Compliance process. The results of checks made in 2014 indicate that no major violation of nature and landscape protection legislation occurred in this area. Maintenance and improvement of the state of the natural environment requires awareness-raising work among farmers.

One of the most serious problems was the extensive unpermitted felling of trees along railway lines carried out systematically and deliberately based on internal regulations of the railway manager. Due to the seriousness and extent of the issue, we will pay attention to it in 2015 as well, when the decision on restriction of activity concerning this will have become conclusive. The supervision will therefore focus on compliance with the decision.

5.5 Forest protection

5.5.1 Overview of inspection activity in 2014

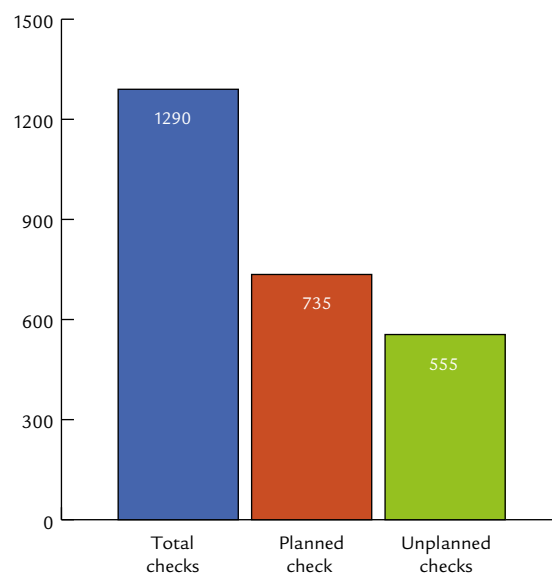
In 2014, the inspection work of the Forest Protection Department was done by 44 inspectors. This was an increase of two compared to 2013, as a result of filling existing vacations. Therefore, one inspector was in charge of 60,736 ha of forest on average in 2014.

The powers in forest protection were defined by an unchanged legal framework. It comprises primarily Act no. 282/1991 Coll. on the Czech Environmental Inspectorate and its powers in forest protection, Act no. 289/1995 Coll. on Forest and amendment of certain acts (Forest Act), Act no. 149/2003 Coll. on the circulation of reproductive materials of tree species significant for forests and amendment of certain acts, Act no. 114/1992 Coll. on Nature Conservation and Landscape Protection, Act no. 255/2012 Coll., on Inspection (Inspection Rules), Act no. 500/2004 Coll., the Rules of Administrative Procedure, as amended by Act no. 413/2005 Coll., and CEI internal regulations.

Inspectors of the CEI Territorial Inspectorates carried out 1 290 checks, including 735 planned and 555 unplanned checks. Compared to the plan, the number of the planned checks carried out was 117 more as a result of checking properties of small-scale forest owners in territories of municipalities with extended powers. There were also 68 multi-departmental check, involving

all the Inspectorates. They included, above all, checks in cooperation with nature protection authorities (Č. Budějovice TI with Šumava NP; Plzeň, H. Brod, Brno and Olomouc TI), waste management authorities (Brno and Olomouc TI), and Water Protection Departments (Brno and Olomouc TI). As in the past, these checks were aimed primarily at sites with increased protection.

Number of checks in 2014

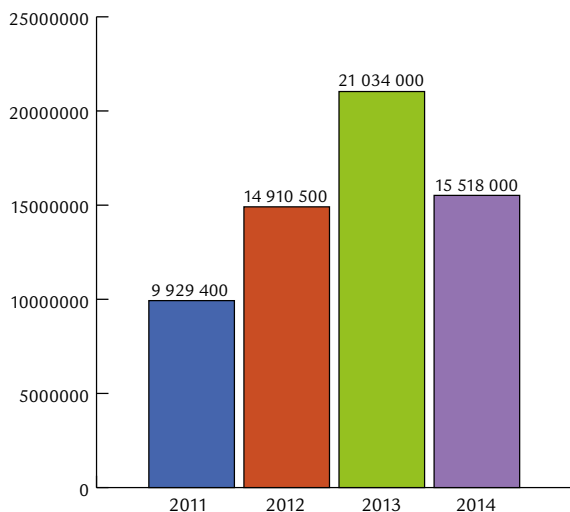


The total number of checks was 98 more than in 2013. We checked all types of forest property ownership. The lower number of checks in state properties was due to the good quality of management in these forests. During the year, we issued 360 position statements in EIA processes and 308 other position statements, assessments and statements.

Territorial inspectorates issued 236 decisions on penalties for administrative delicts in 2014. A total of 204 decisions became conclusive, including 13 cases from previ-

ous years. The sum of the penalties was CZK 15,518,000, which was CZK 5,516,000 less than in the previous year. The different TI FPDs contributed to the penalty sum as follows. Prague: CZK 1,373,000; České Budějovice: CZK 2,493,000; Plzeň: CZK 2,089,000; Ústí nad Labem: CZK 1,031,000; Hradec Králové: CZK 1,571,000; Havlíčkův Brod: CZK 543,000; Brno: CZK 3,185,000; Olomouc: CZK 1,098,000; Ostrava: CZK 1,525,000; Liberec: CZK 610,000.

Conclusive penalties in CZK in 2011–2014



The sum of the penalties showed a growing trend in 2011–2013 chiefly due to illegal logging, which were increasingly frequent administrative delicts. The decrease in the sum of penalties in 2014 was caused by fewer administrative delicts due to illegal logging. The administrative decisions imposed 223 remedial measures; 210 decisions became conclusive, including 6 from previous years. Thanks to their educational and

preventive role, the measures became an important tool for achieving a legitimate state in forestry.

Due to appeals against decisions on penalties (236 issued) and remedial measures (223 issued), bodies of appeal dealt with 72 cases (approx. 16% of the cases), the majority of which the MoE bodies of appeal confirmed. Some cases were returned for new hearings; penalties were reduced in exceptional cases, and annulled in isolated cases. The proportion of successful first-instance administrative decisions and the majority confirmation of administrative decisions in appeals proceedings is proof of the good quality of the TI FPD administrative work. Courts dealt with 11 cases in the last year (10 under Prague TI and 1 under Ostrava TI).

In 2014, two preliminary measures were imposed, one by Brno TI (to prevent further damage to forest stands during land reclamation works) and one by Ostrava TI (relating to damage to forests due to logging, dragging and disruption of stand stability).

There was only one case of a halt or restriction to activity by a conclusive decision of H. Králové TI, concerning a ban on wastewater discharge onto forest land, and 2 cases at Ostrava TI, concerning damage to forests due to logging, dragging and disruption of stand stability.

Forest Protection Departments handled 167 alerts and petitions (12 more than in 2013), mostly relating to logging, consequences of timber dragging, and violations of the Act on Protection of Land Intended for Forest Functions. Internal audits indicated that the alerts were handled within the defined periods. The majority of the alerts were unjustified. Justified submissions were followed by administrative proceedings on penalties or remedial measures. In the last year, 3 reports on the commitment of crimes were filed: 2 by Č. Budějovice TI and 1 by Liberec TI. They all concerned illegal logging.

5.5.2 Performance of departmental tasks

Following negotiations with the MoE, two departmental tasks were set for the TI FPDs, namely:

- illegal logging; and
- damage to forest stands of age class I and II by game.

Illegal logging

Illegal logging was checked both as part of planned inspection and based on alerts. In total, illegal logging was the subject of 97 checks, and findings were dealt with in 43 cases. Administrative proceedings on penalties were, or still are, held in 31 cases, and administrative proceedings on remedial measures in 2 cases. Out of that, 29 decisions on penalties totalling CZK 4,530,000 became conclusive. The structure of the inspection findings by TI was as follows:

- Prague TI FPD dealt with 7 cases of illegal logging on 3.42 ha with a conclusive penalty of CZK 46,000. The trend of illegal logging in Central Bohemian Region is growing;
- The České Budějovice TI FPD also dealt with 7 cases of illegal logging, producing 4.86 ha of clearings and 1672 m³ of wood mass. Four penalties totalling CZK 1,122,000 became conclusive;
- Plzeň TI FPD dealt with 9 cases of illegal logging on 5.54 ha, concerning 1815 m³ of wood, with 6 conclusive penalties totalling CZK 766,000;
- Ústí nad Labem held 5 administrative proceedings concerning 5.00 ha and 1500 m³ of wood logged. In connection with this, 3 penalties worth CZK 385,000 and 2 remedial measures became conclusive;
- There were 8 cases of identified violations of the Forest Act in the territory of Hradec Králové TI FPD. Three penalties totalling CZK 207,000 became conclusive; perpetrators of two serious cases were not found. Illegal loggings were detected on 15.56 ha, producing 2941 m³;
- Havlíčkův Brod TI FPD only handled one case of illegal

logging amounting to 244 m³. It resulted in a continuous deforested clearing of 1.2 ha. A penalty of CZK 260,000 was imposed and became conclusive;

- likewise, Brno TI FPD handled one case of illegal logging of 400 m³, resulting in a clearing on 1.8 ha and a conclusive penalty of CZK 400,000;
- 2 cases of illegal logging were handled by Olomouc TI FPD. They led to 2 decisions on penalties totalling CZK 275,000, which have not come into force yet. From the previous years, 7 penalties totalling CZK 1,000,000 became conclusive. The illegal logging was 419 m³ on 2.58 ha;
- In addition to cases ongoing from 2013, Ostrava TI FPD dealt with 6 cases of illegal logging. Four penalties totalling CZK 729,000 became conclusive. The illegal logging was 778 m³ on 2.59 ha;
- Liberec TI FPD handled one case of illegal logging in an estimated amount of 500 m³ on 1.95 ha. The case resulted in a report on the commitment of a crime.

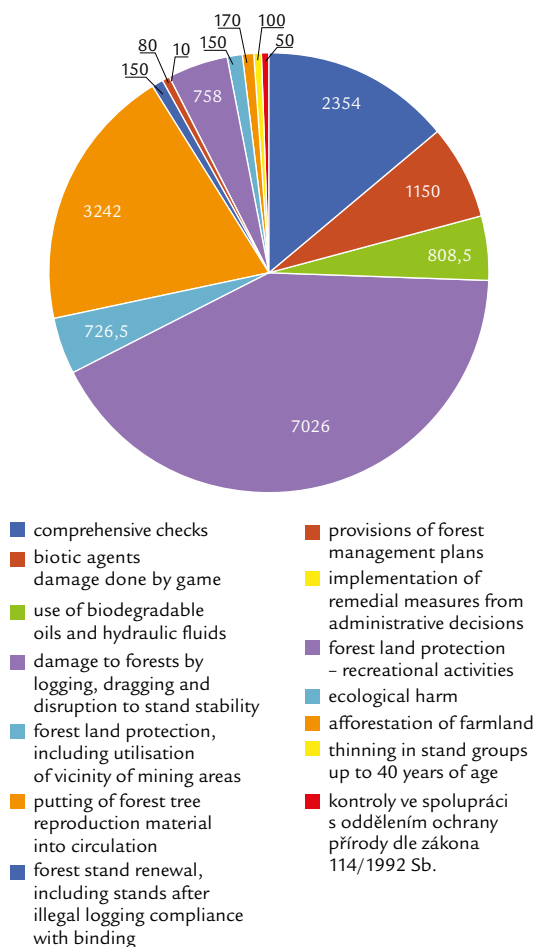
Damage to forest stands of age class I and II by game

This task received attention both as part of comprehensive checks and as part of checks organised primarily for this damage, totalling 230. Their results concerning the areas of potential threats or damage to the forest environment can be concluded as follows: administrative proceedings dealt with 14 cases (9 by Č. Budějovice TI, 1 by H. Králové TI and 4 by Brno TI), leading to the conclusive imposition of remedial measures in 13 cases. No penalties were imposed. No major deficiencies occurred in the majority of the cases. Damage to young forest stands by game owned by a natural person in Rakovník district remains problematic. Several administrative proceedings based on checks made in 2012-2013 have been held with this person. There is a serious situation with unsustainable numbers of the sika deer in the northern part of Plzeň Region and the southern part of the Karlovy Vary Region.

5.5.3 Performance of specific tasks

In 2014, we worked on 15 specific inspection topics, namely as follows:

Numbers of checks and topics of specific checks carried out in 2014



- damage to forest by logging, dragging, disruption of stand stability – 254 checks;
- protection of forest land including utilisation of vicinity of mining areas – 222 checks;
- putting of forest tree reproductive material into circulation – 79 checks;
- renewal of forest stands, including stands after illegal logging – 332 checks;
- compliance with binding provisions of forest management plans – 113 checks;
- implementation of remedial measures from administrative decisions – 238 checks;
- protection of forest land – recreational activities – 77 checks;
- ecological harm in forests – 1 check;
- afforestation of farmland – 2 checks;
- thinning intervention in stand groups up to 40 years of age – 67 checks;
- checks together with Nature Protection Departments pursuant to Act no. 114/1992 Coll. – 9 checks

These inspection topics were pursued by both comprehensive checks and specialised inspection events focused on one or more of the topics. In total, we checked 2034 inspection topics in 1290 planned and unplanned checks.

5.5.4 Major topics in 2014

- illegal logging;
- damage done by game;
- violations of law when renewing forest stands and their subsequent safeguarding;
- forest protection – insect pests;
- protection of forest land;
- reproductive material of forest trees put into circulation.

5.5.5 Major inspection findings

The major inspection findings in 2014 related to the following activities in forests:

- illegal logging;
- damage done by game;
- failure to afforest clearings after illegal logging;
- failure to afforest clearings older than 2 years;
- failure to safeguard young forest stands;
- illegitimate allocation of cuts to unsafeguarded young forest stands;
- damage to forest land when logging and dragging logs;
- forest contamination with waste and litter;
- illegal occupation of forest land;
- bark beetle increases (serious situation in districts of Hranice, Lipník nad Bečvou, Olomouc, Šternberk and Zábřeh in Olomouc Region). Conversely, the status of insect pests in Šumava NP is better; the situation is more favourable compared to previous years;
- notching of trees;
- non-compliance with Act no. 149/2003 Coll. on forest tree reproductive material;
- violation of the Forest Act when afforesting farmland.

The above basic list of problems in forests was connected with often difficult and professionally demanding administrative proceedings, restraining a large part of the inspectors' capacity. An increase in qualified resistance of transgressors results in reducing the time needed for field inspection work. We must repeatedly mention problems with functioning of some profes-



Poškození půdního krytu, kořenového systému stromů s následnou erozí – CHKO Český les

sional forest managers and state forest management authorities.

5.5.6 Major cases of administrative delicts

- a penalty of CZK 1,281,000 to Eko Motol CZ s.r.o. in an appeals proceeding for threatening the forest environment due to failure to comply with a conclusive remedial measure to stabilise the wall of a landfill in Prague 5 (Prague TI);
- recurring administrative delicts handled with a natural person Rakovník district, relating to problems with

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

Year	2008	2009	2010	2011	2012	2013	2014
Quantity (m ³)	119 603	199 000	343 000	235 000	75 500	40 770	22 900

afforestation of farmland and forest management (6 administrative proceedings on penalties and 3 remedial measures carried out in 2014). This natural person's complaints (9) and requests for information (29) seriously paralyse Prague TI;

- illegal logging of 300 m³ by the company SAFETY CZECH, s.r.o., in private owners' forests at Něchov; penalty of CZK 300,000 imposed for failure to implement a remedial measure imposed, and another penalty of CZK 20,000 (Č. Budějovice TI);
- illegal logging of 459 m³ by the owner, Wide Poster, s.r.o., at Světlá pod Javořicí with a penalty of CZK 800,000, including a report on the commitment of a crime, which the Police subsequently deferred as the clearing was smaller than 1.50 ha (Č. Budějovice TI);
- damage to ground cover when dragging logs in Bohemian Forest PLA as part of works organised by T.E.P. HOLZ, s.r.o., resulting in deep ruts in a slope, soil erosion and torn tree root system with a conclusive penalty of CZK 800,000 (Plzeň TI);
- notching of trees upon change of owners at Lužice u Mostu on an area of 6 ha, amounting to at least 1500 m³ of timber mass. Submitted to the Police as an investigation against unknown perpetrator (Ústí nad Labem TI);
- check of nursery centres of Wotan Forest a.s., leading to a penalty of CZK 250,000 for violating Act no. 149/2003 Coll. (Hradec Králové TI);
- non-observance of legal periods after illegal loggings on 5 clearings totalling 9.29 ha; 4 penalties totalling CZK 650,000 imposed on 3 entities (Hradec Králové TI);
- unpermitted logging in stands below 80 years of age on 0.56 ha and damage to dragging line 250 m long at Modlíkov u Přibyslavi by RODANEX s.r.o., with a penalty of CZK 260,000 (H. Brod TI);
- non-implementation of remedial measures by Wood-Steel a.s. in the form of remediation of a dragging line at Horní Bečva in zone II of a PLA, with a conclusive penalty of CZK 1,200,000 (Brno TI);



Unauthorised logging with an exceedance of the clearing size, allocation to unsafeguarded forest stands, and logging of stands below 80 years of age at Crhov by TEXTRON CONSULTING s.r.o.

- failure to properly renew forest at Drásov by JOPATRANS s.r.o. with a conclusive penalty of CZK 650,000 (Brno TI);
- illegal logging by a natural person on 1.80 ha at Obora u Boskovic with a conclusive penalty of CZK 400,000 (Brno TI);
- illegal logging by TEXTRON CONSULTING s.r.o. with an exceedance of the clearing size resulting in 4.27 ha of clearings and unsafeguarded stands at Crhov, with a penalty of CZK 500,000 (Olomouc TI);
- wilful illegal logging of underage and of-age trees in the Armáda ski resort at Dolní Lomná with a penalty of CZK 3,800,000 from a repeated proceeding at a body of appeal;
- a penalty of CZK 290,000 imposed on SOLARBEN, s.r.o. for unlawful use of forest land for purposes other than forest functions at Žizníkov (Liberec TI)

It is clear from the overview of major cases that the CEI identifies primarily deficiencies in forest renewal, damage to forest soil and illegal logging. Cases of such logging, particularly by small forest owners as well as those done on behalf of various companies or natural persons, often lead to administrative delicts in forest renewal that are difficult to resolve. Therefore, inspection activity will continue to focus on forest properties with a history of illegal logging or changes in forest ownership.

5.5.7 Cooperation with other authorities and problems doing inspection work

The cooperation of the majority of TI FPDs with state forest management authorities works well (Č. Budějovice, Hradec Králové, Brno, Liberec); some TIs cooperate with minor reservations (Olomouc). The cooperation with the Czech Police is also functional, particularly as concerns up-to-date information about suspicious entities, addresses and contact details for persons engaged in administrative proceedings but not accepting mail, as well as in penal proceedings. There is room for improvement in the area of off-road motorcycle and quad bike rides damaging forest soil, and detection of perpetrators of illegal logging.

Cooperation with offices of the Forest Management Authority concerning trade in forest tree reproductive material has been repeatedly positively evaluated.

In order to improve information for inspection activity pursuant to Act no. 149/2003 Coll., the CEI considers it important to gain access to the non-public part of the ERMA II database. An absence of amendment to Act no. 282/1991 Coll. makes inspection work difficult; powers and responsibilities of forest managers are not handled adequately in legislation; it is difficult to prove creation by forest owners of conditions for action of harmful biotic and abiotic agents in relation to imposition of penal-

ties pursuant to Section 4, item c) of Act no. 282/1991 Coll. The option to use distraintment, or other alternative vehicles (non-pecuniary performance) on forest owners who fail repeatedly and long to implement remedial measures or pay penalties imposed is not adequately legally defined.

There are problems with lack of communication by entities in the form of not accepting mail and not responding to summons, which protracts resolution of cases. A chronic problem is the authentication of forest management records, where state forest authorities do not enforce compliance with Section 40 of the Forest Act (keeping of forest management records). It is then almost impossible, e.g., to authenticate compliance with maximum logging quotas, apply Sections 32 and 33 of the Forest Act when authenticating and enforcement of urgent action by owners, followed by potential logging that may be illegal.

Another problem is the identification of current owners (forest property sales, inheritance) if changes are not reported to municipal authorities. These changes are often made deliberately in order to avoid the duty to reforest, and to make access to other logging sites (develop a new management plan) for properties over 50 ha. There was no significant progress in the last year in enforcing penalties, particularly from recidivists, via customs and distrainer offices.

5.5.8 Inspection outcomes in 2014 and direction of inspection work for 2015

The Inspectorate's mission – predictable and objective assessment of forest condition and fulfilment of forest functions – was successfully fulfilled. Some TIs registered an increase in both the frequency and complexity of administrative proceedings (for example, Prague TI carried

out 75 administrative proceedings – the all-time record). These proceedings bound a considerable part of the inspectors' professional and time capacities due to the duty to furnish evidence.

In the coming period, we will continue to pay attention to illegal logging, because they can be expected to increase due to the favourable timber selling prices. Logging on non-forest land is becoming a problem, and we will pay attention to it both in terms of legal qualification and in the form of direct field checks. The issues of unpermitted construction, dumps, unlawful landscaping operations and damaging of forest soil with forest traffic, logging and recreational activities still pose a threat to the state of the forest environment. The CEI will continue its preventive and aware-ness-raising activity aimed at forest owners via soft inspection work methods, i.e., increasing their knowledgeability and professional consultation work. The penalty institute will be applied especially in cases of gross, wilful or repeated violation of laws.



6 | INTEGRATED AGENDAS

The professional departments of the CEI provide an integrated approach to environmental protection via co-ordination and cooperation of experienced inspectors specialised on these agendas. The fundamental part of work in the area of integrated agendas is supervisory (inspection) work, followed by largely preventive activities, such as issuance of position statements and statements (as part of EIA, IPPC, etc.).

6.1 Legal framework for activity in integrated agendas

Obligations and powers of the CEI in this area as well are delegated by legal regulations of the CR on environmental protection and directly applicable EC regulations, i.e., notably the following:

- Act no. 76/2002 Coll. on Integrated Pollution Prevention and Control (IPPC), the Integrated Pollution Register and amendment of certain acts (the Integrated Prevention Act). The essence of this crucial act in integrated agendas is to achieve maximum possible prevention of industrial pollution of all environmental components and environment protection as a whole;
- Act no. 100/2001 Coll. on Environmental Impact Assessment and amendment of certain associated acts;
- Act no. 167/2008 Coll. on Ecological Harm Prevention and Remedy and amendment of certain acts;
- Act no. 25/2008 Coll. on the Integrated Environmental Pollution Register, integrated system for performance of reporting duties and amendment of certain acts (the IPR Act), in connection with
- Regulation (EC) No 166/2006 of the European Parliament and of the Council of 18 January 2006 concerning the establishment of a European Pollutant Release and Transfer Register (E-PRTR).

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

6.2.1 Summary data

Activity relating to integrated agendas carried out by the CEI professional departments is included in Part 5 – CEI activity in 2014 by department. In total, the CEI integrated agenda work involved 1061 checks, initiation of 169 administrative proceedings, issuance of 154 decisions on penalties and orders, and 170 decisions (incl. from previous years) led to conclusive imposition of penalties totalling CZK 18,053,420.

Due to the integrated nature of the agendas, the conclusive penalties imposed ranged from CZK 2000 (for Integrated Pollution Register – IPR) to CZK 4,000,000 (for IPPC at the KLIO, s.r.o., wastewater treatment plant). The average amount of penalty imposed per decision/order in force (conclusive) in this year was approx. CZK 106,200.

Coordination of integrated agendas

In close collaboration with the expert departments, specialised CEI TI Integrated Agenda Coordinators (IAC) were involved in, cooperated on or coordinated 436 checks at 337 facilities and operations. This number includes checks pursuant to the Integrated Prevention Act, the IPR Act and the Ecological Harm Prevention Act. In the reporting periods, IAC themselves initiated 61 administrative proceedings. The number of decisions on penalties (including orders) entering into force in 2014 was 62; the total amount of penalties in force was CZK 4,590,000.

Here, the amounts of penalties in force ranged from the CZK 2000 mentioned above (for IPR) to CZK 800,000 (for IPPC at FEREX-ŽSO spol. s r.o.). The average amount of penalty imposed per decision/order in force (conclusive) in this year was thus approx. CZK 74,200.

The CEI checks identified violations of legal regulations in environmental protection, notably non-compliance with binding operating requirements set by Integrated Permits (IP), such as:

- pollutant emissions (e.g., carbon monoxide);
- water handling (limits for consumption, handling of hazardous substances, such as digestion effluent transport plan) or waste handling;
- operating rules (technical operating requirements, etc.).

Besides, there were cases of failure to report pursuant to the Integrated Prevention Act:

- report with data on compliance with integrated permit requirements;
- summary operating records from air pollution sources;
- above-threshold transfers or leaks, e.g., of ammonia;
- failure to report emergency situations;
- failure to report changes in integrated permits, etc.

Other violations were non-compliance with requirements set for disposal of equipment, and even operation without an IP.

A separate chapter concerns amendments to departmental acts of law and their reflection in IP.

Upon violations of Act no. 86/2002 Coll. on Air Protection, identified, e.g., during a check under the Integrated Prevention Act, no administrative proceeding was conducted if the duty in question is no longer required in the new Act no. 201/2012 Coll. This act came into effect on 1 September 2012 (in connection with Constitutional

Act no. 2/1993 Coll., as amended by Constitutional Act no. 162/1998 Coll., the Charter of Fundamental Rights and Freedoms, Art. 2, Para. 3: “Everybody can do what is not forbidden by law, and nobody may be forced to do what law does not impose.”).

This is of relevance under the Eco-Audit amendment to the Waste Act no. 169/2013 Coll., effective as of 1 October 2013 (e.g., consent to handle hazardous waste when collecting it).

6.2.2 Integrated Pollution Register

In terms of compliance with the IPR Act, we checked 360 operations in 2014, including 323 checks as part of planned integrated inspection (under Act no. 76/2002 Coll.). There were 21 stand-alone checks, and 1 check was carried out via correspondence – comparison of environmental reports in the integrated system for performance of reporting duties (ISPOP).

The total amount of conclusively imposed penalties for non-compliance of IPR reporting duties was CZK 507,000. Given the number of 32 decisions, the average penalty amount was about CZK 15,800.

As in the previous years, the penalties were at the lower bound of the legal range: from CZK 2000 to CZK 55,000 (Hyundai Motor Manufacturing Czech s.r.o.), primarily in the form of orders and on-site orders pursuant to Section 150 of the Rules of Administrative Procedure.

Violations of legal regulations in the IPR area included primarily failure to report on time, reporting of wrong data, and failure to report transfer of waste or pollutants in waste.

Therefore, these deficiencies in relation to the IPR supervision work are generally only operators’ formal environmental transgressions, or misunderstandings and delayed reports, and the CEI handles them as such. It is almost the rule that large facility operators with integrated permits perform their legal obligations far better than other

entities, mostly small and medium-sized agricultural business and facilities. These smaller entities typically do not have adequate knowledge of the IPR. Based on the progressive results of the CEI's inspection activity in the IPR area, however, it can be concluded that the awareness of obligations under applicable legislation and compliance with them are generally improving, thus decreasing the numbers of administrative delicts.

Ecological harm

No administrative proceedings pursuant to Act no. 167/2008 Coll. on Ecological Harm Prevention and Remedy has been initiated, based either on a request or the official authority.

In 2014, the CEI carried out 152 checks of compliance with the Ecological Harm Prevention and Remedy Act. Basic risk assessments were presented: there were only 2 cases of exceedance of the 50 points; this led to submission of de-tailed risk assessments. No administrative delicts were committed.

The massive amount of queries induced by the amendment to the Act, such as concerning classification by activity, has now subsided.

Alerts and petitions

Integrated Agenda Coordinators were actively involved in handling 78 alerts and petitions, chiefly in cases concerning the powers of multiple professional departments. The main task for the IAC was to ensure a coordinated approach when handling such cases. A number of checks, including unannounced ones, were carried based on alerts, e.g., at facilities in category 5.4 Landfills admitting over 10 t a day or with a total capacity over 25,000 t, except inert waste deposits. Additional alerts related to illegal dumps, dumping in small watercourses, and low flow rates downstream of small hydropower plants.

Accidents

Integrated Agenda Coordinators were actively involved in handling 11 accidents at IPPC facilities; some the most important being the following:

The energy facility operated by Synthesia, a.s., where an emergency was caused by burning heating oil as a consequence of work with an oxyacetylene burner when removing some equipment (boilers). A check carried out by the Air and Water Protection Departments of the Hradec Králové TI identified no violation of the Integrated Prevention Act or the applicable departmental laws (the Air Protection Act and the Waters Act).

6.3. CEI non-supervision work on integrated agendas

This work involves primarily drafting of position statements and statements, namely:

- in environmental impact assessment processes (EIA, SEA);
- on applications for issuance of integrated permits or amendment to integrated permits;
- for subsidies under Operational Programmes Environment;
- on environmental management and auditing systems (as part of EMAS/EMS registration);
- on facility operating permits from air protection point of view for IPPC facilities;
- as part of the Safe Enterprise scheme;
- on environmental audits;
- on requests for information under Act no. 123/1998 Coll., Act no. 106/1999 Coll., etc.

In 2014, the CEI was actively involved in development of new legislation on integrated agendas, namely:

- a bill to amend Government Regulation no. 145/2008 Coll. laying down a list of pollutants and thresholds and data required for reporting into the Integrated En-

vironmental Pollution Register in light of the Eco Audit, i.e., the government-approved “Measure to boost competitiveness and growth of business in the CR by eliminating redundant requirements of environmental legislation”;

- a bill amending Act no. 100/2001 Coll. on Environmental Impact Assessment and amendment to certain acts, as amended, and other associated acts of law. The primary objective was to ensure compatibility of the Czech legal definition of environmental impact assessment with the so called EIA Directive of the European Parliament and of the Council no. 2011/92/EU, i.e., to remedy some deficiencies in the Directive transposition contested against the CR.

In addition, the Integrated Agenda Coordinators were actively involved in 2014 in the work of technical working groups, particularly at the MoE and the MoIT, such as “Regions and Integrated Prevention” and the “BAT Information Exchange Forum”.

EIA/SEA

In 2014, the CEI developed 1129 statements on plans, documentations, assessments, policy notifications and policy drafts as part of the EIA/SEA process. The number of statements issued was 10% more than in the last year (1070).

It can be concluded, as in previous years, that the quality of notifications submitted in 2014 still showed certain deficiencies. In particular, data on inputs and outputs, their assessment or alternative option designs were missing.

Major EIA cases

Gravel extraction and processing in Uherský Ostroh 2
– The CEI pointed out the deficiencies identified in its statement on the documentation. Since the project site is located in the outer area of buffer zone II of the Bzenec accumulation area, and might very seriously disrupt the

underground drinking water source Bzenec – Komplex (the most important drinking water source for the population of

South Moravia), the CEI recommended against the implementation of the plan according to the documentation submitted. An assessment of the project environmental impacts was submitted in March 2014. In its statement, the CEI disagreed with the assessment author on that it would constitute an insignificant or acceptable influence on the aquatic environment in the case of this major drinking water source, providing a supply for approx. 100,000 people. The CEI again highlighted the potential endangerment and vulnerability of the underground drinking water source, and continues to recommend against the project implementation in its statement on the EIA assessment.

Kravaře-Štítina, flood protection measures in the Opava flood plain and gravel extraction – CEI disapproval due to water protection concerning the project, because it comprises not flood protection measures but rather resource extraction. The plan will be assessed in the full extent of the EIA process.

Expansion of Pod vysokou horou ski resort in Vrbno pod Pradědem – Construction of a ski resort proposing extensive forest clearance, approx. 22 ha. The CEI disapproved of the plan due to forest protection (extensive deforestation, soil erosion, unclear position on implementation of required measures). The plan was assessed with a full EIA. The MoE issued an affirmative position statement on the plan, although the CEI issued a disapproval of the assessment. Based on the CEI’s requirements, the extent of the felling (deforestation) was reduced to approx. 10 ha.

Applications for issuance of integrated permits.

In the area of integrated prevention, the CEI actively co-



operates with regional authorities; this cooperation includes issuance of statements on integrated permits and, much more frequently, on major amendments to integrated permits. In 2014, the CEI made 904 statements on application for issuance or amendment of integrated permits. In 32 cases, CEI representatives attended oral negotiations on applications for issuance or amendment of integrated permits.

ZEVO, spol. s r. o. - BPS Velký Karlov – In December 2010, the CEI received a notification of commencement of a proceeding relating to an application for the issuance of an integrated permit for ZEVO, spol. s r.o., for the company's biogas station at Velký Karlov. The proceeding on issuance of the integrated permit was suspended by the regional authority and the company was invited to complete details in the application. The company appealed against the decision suspending the proceeding, and the MoE decided that the operator had to furnish details relating to the project environmental impact assessment within 30 days of effect of the resolution. The application was accompanied with the information that the EIA documentation was in progress. Based on the MoE position statement, both processes (EIA and IPPC) can proceed in parallel, but the EIA process has to be completed with priority, and its conclusions have to be considered when issuing the IP. Brno TI made its statement on the IP appli-

cation in May 2011. An oral negotiation on the application for the IP issuance took place on 13 June 2011 in the presence of CEI staff, and the proceeding was halted based on statements presented and comments made in them, because the operator revoked the application during the meeting. The EIA process for the facility was completed in 2013, and the operator did not apply for an integrated permit in 2014.

Other position statements and statements

CEI TIs additionally made 501 statements for the SEF CR.

Moreover, the Integrated Agenda Coordinators elaborated or cooperation on 361 more position statements on ISO 14001, as part of the Safe Enterprise scheme, on applications for registration in the EMAS scheme, on environmental audits, etc.

Inspection reports

Pursuant to Section 20b, Para. 9-11 of the Integrated Prevention Act, the CEI is also required to elaborate inspection (on-site investigation) reports and publish them in the IPPC information system run by the MoE.

The CEI Territorial Inspectorates are bound by, and adhere to, dates for posting the inspection reports in the IPPC IS, i.e., within 4 months of the inspection/on-site investigation date. As of 31 December 2014, a total of 547 inspection reports had been posted. Due to the 4-month posting period, the numbers of reports posted do not match the number of checks in 2014.

6.4 Major inspection cases

AHV ekologický servis, s.r.o., Svojšice facility – The CEI carried out a check of compliance with the requirements of the integrated permit and other environmental laws at the Svojšovce facility of AHV ekologický servis on 5-6 March 2013. The CEI investigation found out that AHV,

being the operator of the facility, did not comply with requirements of the integrated permit, affecting all the environmental components, and requirements under Act no. 25/2008 Coll.

The Inspectorate imposed a penalty of CZK 700,000 for the violation of the IP Act. The company AHV appealed against the Inspectorate's decision on the imposition of the penalty. However, the body of appeal dismissed the appeal and confirmed the Inspectorate's decision in full. The company AHV also violated Act no. 25/2008 Coll. by not reporting a transfer of hazardous waste in 2010 to the IPR and not keeping proper records of data necessary for authentication of pollutants subject to IPR reporting, specifically transfers of pollutants in waste in 2010 and 2011. The Inspectorate imposed a penalty of CZK 50,000 for this violation.

The company AHV appealed against the Inspectorate's decision on the imposition of the penalty. The body

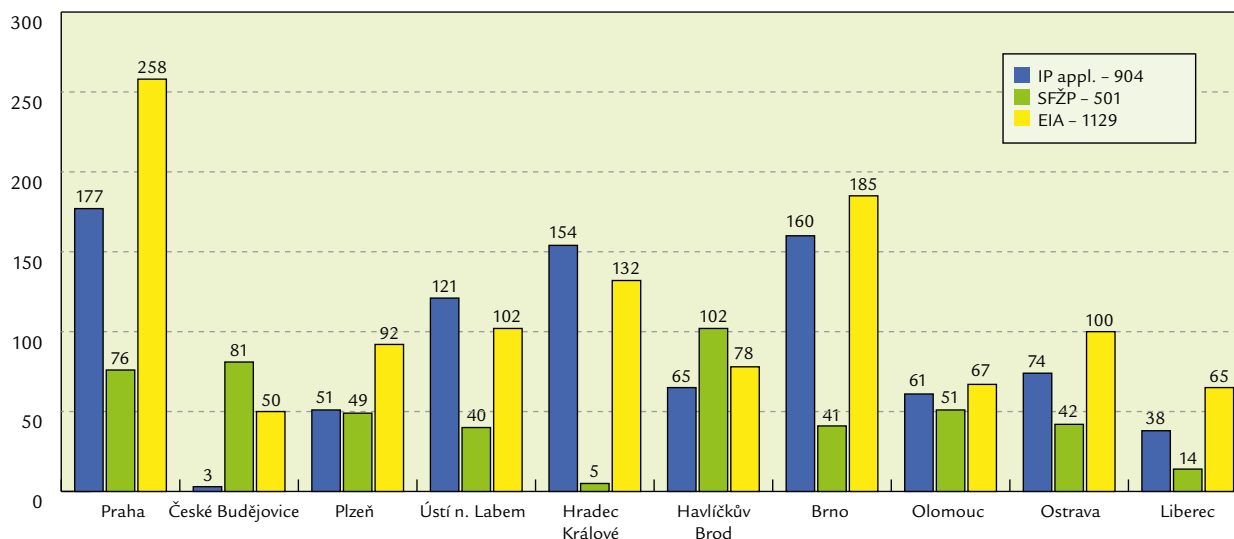
of appeal dismissed the appeal and confirmed the Inspectorate's decision in full.

ANIVEG ECO s.r.o. – WOWITRA s.r.o. The IAC imposed a penalty of CZK 500,000 on the company ANIVEG ECO s.r.o. pursuant to Section 37, Para. 4, item b) of the Integrated Prevention Act by decision of 21 March 2014.

The penalty concerned operation of an organic derivative manufacturing facility in contravention of requirements of the integrated permit (non-compliance with requirements for equipment disposal), and the decision entered into force on 23 April 2014.

Amendment no. 2 to the IP for "Organic Derivative Manufacturing", which entered into force in the appeal proceeding on 7 June 2014, the regional authority specified WOWITRA s.r.o. as the facility operator instead of ANIVEG ECO s.r.o. WOWITRA s.r.o. is the owner of the plant in which the facility had been located (WOWITRA

Position statements and statements issued by CEI TIs



s.r.o. destroyed the facility equipment completely, but the plant still contains a large quantity of adverse and hazardous substances and chemicals as well as waste, which significantly endanger the local environment). By a decision of 22 April 2014, the Ústí nad Labem TI WMD imposed a penalty of CZK 1,000,000 on WOWITRA s.r.o. for commitment of 4 administrative delicts under Act no. 185/2001 Coll. on Waste, against which the company appealed, and the MoE confirmed the penalty amount. The decision came into force on 16 June 2014.

In April 2014, WOWITRA s.r.o. sold the entire plant to a Beyne Bruno Beatrice, a natural person of Belgian citizenship (incorporated in the Cadastre on 12 August 2014). From the environmental protection point of view, however, WOWITRA s.r.o. continues to be the facility operator according to the integrated permit in force. It must also be stated that no works aiming at decontaminating the site have been commenced so far. Based on other findings of our inspectors, the CEI has initiated a new administrative proceeding on the imposition of another penalty with the inspected entity.

A risk analysis is being elaborated (commissioned by Lovosice municipality, possibly to be funded by the SEF) and the water management authority (Lovosice municipal authority) is also about to initiate a proceeding on imposition of remedial measures. Since the Lovosice municipal assembly and Ústí nad Labem regional assembly have tentatively promised to allocate funds in their budgets for performing the duty (according to the Waters Act, if the required entity fails to implement a measure imposed, it has to be implemented, at its own expense, by the authority that issued the decision, and then only exact the expenses from the required entity), this solution appears to be the most convenient.

6.5 Conclusion

Violations of duties in operating facilities with integrated permits shows a decreasing trends, since comprehensive checks have been made at all the facilities and the operators are now aware of their legislative duties and comply with them.

In its activity, the CEI does not strictly focus only on imposition of penalties: it pays attention to prevention and also uses so-called soft methods; it also actively cooperates with other state administrative authorities, notably regional authorities, which permit operation of facilities pursuant to the Integrated Prevention Act. The objective of this cooperation is to improve the quality of integrated permits and thus ensure a high quality of environmental protection.

Nevertheless, the gradual increase in amendments to integrated permits leads to increasing complexity of checks carried out. Therefore, checks in the area of integrated prevention require precise preparation and adequate time allocation.

The recent amendment to the Integrated Prevention Act has resulted in a rather substantial increase in the extent of duties for operators (base reports already on the first amendment), regional authorities (BAT conclusions and exemptions), the CEI and regional public health authorities (increased inspection, inspection reports).



7 | INTERNATIONAL COOPERATION

In 2014, we made 53 journeys abroad, in which 102 employees participated. One of our most important international activities is cooperation in the IMPEL, a network for implementation and enforcement of environmental law and an international association of organisations dealing with implementation and enforcement of environmental law.

The mission of the IMPEL is to contribute to environmental protection by participating in effective implementation and enforcement of EU environmental law through capacity building, best practice sharing, provision of handbooks and tools, promotion of cooperation and provision of feedback to legislators and regulators on practicability and enforceability of environmental legislation. The core of activity are individual projects.

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Under the IMPEL, there were two IMPEL General Assemblies, and CEI inspectors were involved in the work of Cluster I (improvement of permission and enforcement) and Cluster II (TFS – transboundary transport of waste), and like every year, they attended the TFS Conference, with the main topic of boosting cooperation of environmental protection authorities and customs authorities when detecting illegal transboundary transport of waste. Besides, our inspectors were engaged in the IMPEL projects “Meeting of contact persons for transboundary transport of waste” and “Landfill checks”. We were members of the project team of “Definition of criteria for risk analysis and setting of priorities for inspection pursuant to the Industrial Emissions Directive” and actively participated project team meetings. Since nature protection was included in the IMPEL work programme in 2013, our inspectors also participated in two projects focused on this area, namely “Illegal killing of birds” and “Nature protection when permitting and inspecting industrial facilities, implementation of Art. 6(3) of the Habitats Directive”. Our inspector was also in-

vited as an expert team member to the first IRI (voluntary audit of the inspection and supervision system), focusing on nature protection.

In the area of the international CITES treaty, CEI inspectors represent the Czech Republic at meetings of expert groups and committees focused on enforcement of laws on protection of endangered species. Above all, they include the EU Wildlife Enforcement Group, which met twice in Brussels in 2014. Of great importance is also our cooperation within the Interpol Wildlife Working Group, assisting in investigation of serious international cases. In 2014, our inspector attended the 25th meeting of the Interpol Wildlife Working Group, where she presented the exposed cases of trade in rhinoceros horns, and she also gave a lecture at the CITES Workshop, intended for inspectors and police officers in Serbia.

A CEI representative attended the ECHA (European Chemicals Agency) Forum, serving exchange of information about enforcement of the REACH regulation. Based on a treaty with Slovakia, we made several journeys abroad dealing with water, nature and forest protection.

In the area of executive international relationships, our inspectors represented the Czech Environment Department at meetings of international committees on transboundary, or great river, protection (International Commission for the Protection of the Oder and the Elbe, the Danube Commission, Austrian Boundary Waters). The majority of the journeys abroad were made in order to honour the CR's commitments in international organisations, treaties and protocols on the one hand, and activities directly related to our EU membership on the other. On the whole, the CEI expended CZK 357,957.93 on the journeys abroad; a large part of the costs was funded directly from the EC budget.



8 | HUMAN RESOURCES

8.1 HR management

The work of the HR Department in 2014 concentrated primarily on good and timely implementation of legislative changes in the area of labour law, wages and training at the CEI. During the entire reporting period, all the staff of the Human Resources Department contributed to flawless and timely response to new legislative definitions.

As of 31 December 2014, there were 551 employees at the CEI. The average converted annual registered number of employees for 2014 was 543.61 persons.

The HR Department continued to pay great attention to constantly improving communication between the CEI managerial staff and the HR Department, so that each of the managers was able to do good human resources work in their units in addition to their expert work. Like every year, the dominant task of the HR Department was to make economical and sensible use of the wage funds allocated.

Basic personnel data

Employment duration at the CEI – as of 31 December 2014

Duration	Number	%
up to 5 years	119	21,6
up to 10 years	150	27,2
up to 15 years	101	18,3
up to 20 years	93	16,9
over 20 years	88	16
Total	551	100

Employee classification by age and gender – as of 31 December 2014

Age	Men	Women	Total	%
under 20 years	0	0	0	0
20 - 29 years	9	15	24	4,3
30 - 39 years	76	72	148	26,9
40 - 49 years	54	93	147	26,6
50 - 59 years	90	94	184	33,5
60 years or more	37	11	48	8,7
Total	266	285	551	100
%	48,3	51,7	100	x

Employee classification by education and gender – as of 31 December 2014

Attained education	Men	Women	Total	%
Primary	0	0	0	0
Secondary technical	1	4	5	0,9
Complete secondary	3	15	18	3,3
Complete sec. technical	21	81	102	18,5
Higher technical	3	2	5	0,9
Tertiary	238	183	421	76,4
Total	266	285	551	100

Summary information on employment starts and ends in 2014

	Number
Admissions	40
Departures	41

8.2 Training

In 2014, employee training was done in accordance with Directive no. 5/2012 on CEI Staff Training.

The compulsory training for newly admitted employees proceeded in accordance with Government Resolution no. 1542/2005. It comprises introductory admission training, attended by 34 employees on four dates. This part of the training in the attendance form was provided by the CEI Headquarters for both the Territorial Inspectorates and the Headquarters in terms of both organisation and lecturing. The objectives are familiarisation with specific CEI issues, basic knowledge and legal standards necessary for work in state administration.

Another mandatory part of the training is follow-up admission training, provided by the Ministry of the Interior as the professional guarantor for the reporting period. In nine e-learning courses, it was successfully taken by 24 employees. The main contents are basics of legal awareness, rules of administrative procedure, public administration in the CR, public finance, the EU basics, etc. Both professional clerks and inspectors attended theoretical and practical specialisation training as part of in-depth training. It was completed by 6 employees on 4 dates. The specialisations were on waste management, air, forest and nature protection and a focus on CITES issues.

The language tuition option for documenting knowledge under the State Authority Staff Linguistic Qualification System was not utilised in 2014. Due to funding cuts, other language tuition was only done as part of an exemption related to the need to converse in English as granted by the Inspectorate Director. Additional staff training made use of the Institute for Public Administration in Prague, our own instructors and external agencies. The training form was typically attendance-based,

but free and e-learning courses of the Institute for Public Administration in Prague were also used. The total number of attendances in these training activities was 1459. The events were mostly aimed at specialised professional training. For example, this area includes very successful training on administrative law, where three workshops were organised in cooperation with the Legal Department. Training on the administrative law basics was attended by 43 employees; 78 attended the advanced course.

In addition, the legal domain included 5 workshops on the new Inspection Rules and 5 on the new Civil Code. Attention was also paid to eGovernment issues, with both at-tendance-based and e-learning courses. The e-learning course “Training in Ethics” was also very attractive, and taken successfully by 219 employees.



9 | ECONOMICS

In 2014, the CEI managed budgetary non-investment funds amounting to CZK 309,581,030.04, and budgetary investment funds of CZK 18,443,999.76. The total budgetary funds were therefore CZK 328,025,029.80.

In addition, the CEI managed a limited amount of non-budgetary funds of CZK 3,316,861.90. A breakdown is shown in the annex on non-budgetary funds.

Drawing of non-investment expenditures for 2014

Indicator	Adjusted budget	Drawing	Balance
Wages	176 506 235,00	176 506 235,00	
Wages – purpose funds	1 660 000,00	1 660 000,00	
Other personal expenditures	300 900,00	300 900,00	
Severance pay	102 000,00	102 000,00	
Insurance – social + health	60 149 106,00	60 149 106,00	
Insurance – social + health – purpose funds	564 400,00	564 400,00	
Wage expenditures total	239 282 641,00	239 282 641,00	

Indicator	Adjusted budget	Drawing	Balance
Other ordinary non-investment expenditures	56 799 994,00	51 373 026,36	5 426 967,64
Transfer to Cultural and Social Fund	1 765 062,00	1 765 062,00	
Transfer to Cultural and Social Fund – purpose funds	16 600,00	16 600,00	
Non-budgetary source – CEI	3 316 861,90	3 119 663,36	197 198,54
Non-budgetary source – increment for insurance premiums	329 319,00	329 319,00	
Total ordinary non-investment expenditures	62 227 836,90	56 603 670,72	5 624 166,18

Indicator	Adjusted budget	Drawing	Balance
Non-investment expenditures – Wage and personnel information system	427 856,00	0,00	427 856,00
Non-investment expenditures – ICT	3 691 876,74	2 785 240,57	906 636,17
Non-investment expenditures – IT acquisition in 2014	3 950 819,40	3 950 819,40	0,00
Total non-investment expenditures - ISPROFIN	8 070 552,14	6 736 059,97	1 334 492,17
Total non-investment expenditures	309 581 030,04	302 622 371,69	6 958 658,35

Drawing of investment expenditures for 2014

Indicator	Adjusted budget	Drawing	Balance
Total investment expenditures	10 914 168,76	2 598 578,00	8 315 590,76
Wage and personnel information system	1,00	0,00	1,00
Safeguarding functionality of CIS	2 000 000,00	580 800,00	1 419 200,00
Eco-friendly heating – Ústí nad Labem	567 567,00	34 000,00	533 567,00
Lagging of NE facade and ceiling	751 807,00	751 807,00	0,00
Entry door replacement – HQ	250 000,00	250 000,00	0,00
Eco-friendly heating – Brno	265 537,00	265 537,00	0,00
Cooling unit replacement – Liberec	444 932,00	444 932,00	0,00
Office construction – Ústí nad Labem	278 157,00	271 502,00	6 655,00
Window replacement – Ústí nad Labem	2 587 249,00	0,00	2 587 249,00
Car purchases in 2014	3 768 918,76	0,00	3 768 918,76

Non-budgetary source – NAR			
Data back-up	1 500 000,00	1 316 688,00	183 312,00
Aggregated project	6 029 831,00		6 029 831,00
Total investment expenditures	18 443 999,76	3 915 266,00	8 498 902,76
Total expenditures	328 025 029,80	306 537 637,69	21 487 392,11

9.1 Overview of transfers of budgetary fund savings to the unspent expenditures statement

The non-investment expenditure saving of CZK 5,624,166.18 was the result of an increase in non-investment funds for property repairs by CZK 3,000,000 for the CEI on 28 July 2014, which it was not able to spend by the end of 2014 (unspent balance of CZK 1,612,000); besides the CEI did not spend the funds in the item “Other services” (unspent balance of CZK 2,431,000).

In addition, unspent expenditures (UEE) from previous years of CZK 197,198.54 remained unspent.

The saving of ISPROFIN non-investment expenditures of CZK 1,334,492.17 was caused primarily by spending the non-budgetary source of CZK 1,191,876,74 on the ICT operation project.

The saving of investment expenditures of CZK 8,498,902,76 was the result of not spending the investment expenditures for “Window replacement at Ústí nad Labem TI” of CZK 2,587,249.00 and “Car purchases in 2014” of CZK 3,768,918.76. Both the projects were shifted to 2015.

In addition, the projects “Safeguarding functionality of CIS” and “Eco-friendly heating at Ústí nad Labem TI” were not completed.

9.2 Use of Backup Fund, other non-budgetary sources, Cultural and Social Fund

The CEI did not use the Backup Fund in 2014. The Backup Fund balance as of 31 December 2014 was CZK 0.

The unspent expenditures from previous years were spent on: Project 115V02100D001 – Data back-up at the Headquarters and TI; UEE amounting to CZK 1,500,000.00 was earmarked, and CZK 1,316,688.00 actually spent.

9.3 Overall income valuation

Overall incomes of the CEI were CZK 3,817,135,57 in 2014.

Non-budgetary sources

UEE non-profiling	3 316 861,90	
UEE profiling	0,00	
Insurance premiums	329 319,00	

UEE non-profiling		
3 316 861,90	30 000,00	5 166,00
	1 879 307,10	5 169,00
	922 100,00	5 171,00
	485 454,80	5 137,00

Total incomes

Budgetary incomes	Approved budget	Revised budget	Drawing
2132	280 000,00	280 000,00	401 931,64
2133	3 000,00	3 000,00	3 300,00
2310	0,00	0,00	7 708,00
2322	50 000,00	50 000,00	37 242,00
2324	2 430 000,00	2 430 000,00	2 569 063,93
2329	20 000,00	20 000,00	0,00
3111	0,00	0,00	14 400,00
3113	0	0,00	365 600,00
4132	0	0,00	417 890,00
Total	2 783 000,00	2 783 000,00	3 817 135,57



10 | OVERVIEW OF TERRITORIAL INSPECTORATES' ACTIVITY

Overview of territorial inspectorates' activity in 2014

Territorial Inspectorate	Number of inspectors	Number of checks	EIA position statements and statements	other position statements and statements	Penalties			Other decisions					Charge agendas		Number of accidents registered	Number of alerts and petitions handled	Number of alerts made to state administration authorities	Number of reports on commitment of crimes
					All decisions on penalties issued in reporting period	All decisions on penalties entering into force in reporting period	Total amount of penalties in force (CZK)	Number of decisions in force – halting or restriction of activity, operation or part of it	Number of decisions in force – confiscation	Number of decisions on remedial measures in force in reporting period	Number of decisions on remedial measures on emission limits	Seizure and suspension of certificate of hazardous properties of waste	Number of decision issued on charges and advances for wastewater discharge	Number of decision issued on charges and advances for ground-water consumption				
PH	56	2057	258	3427	336	280	27262395	1	5	41	0	0	360	728	42	572	122	1
ČB	30	966	50	630	286	269	13096889	0	0	80	0	0	159	562	16	240	51	4
PL	34	1437	92	777	308	275	15706565	1	2	41	3	0	134	514	3	214	44	3
UL	42	1378	102	1137	223	220	14787791	5	0	23	0	0	256	351	28	247	60	0
HK	35	1427	132	748	269	273	12870080	3	6	25	0	0	198	686	25	196	89	2
HB	29	1322	78	782	360	348	7259975	3	1	24	0	0	149	566	8	213	74	3
BR	46	1743	185	3171	371	354	21876857	2	0	32	0	0	387	647	24	306	99	2
OL	27	1567	67	401	239	221	8099420	0	0	29	0	0	136	391	17	178	36	0
OV	40	1534	100	1428	345	331	19970270	4	5	10	0	0	237	212	23	290	36	3
LI	26	679	65	340	120	117	6940640	1	0	34	0	0	88	249	17	161	37	1
HQ	42	524	0	2716	91	93	151400	1	126	0	0	0	0	0	0	3	0	1
Total	407	14634	1129	15557	2948	2781	148022282	21	145	339	3	0	2104	4906	203	2620	648	20



11 | CLOSING OF BOOKS AS OF 31 DECEMBER 2014

Balance sheet

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD			
		CURRENT			PREVIOUS
		Gross	Correction	Net	
		1	2	3	
TOTAL ASSETS		774 704 182,16	284 804 545,15	489 899 637,01	518 601 191,13
Fixed assets		741 613 188,22	284 804 545,15	456 808 643,07	480 394 853,96
Long-term intangible assets		36 699 854,56	31 852 681,10	4 847 173,46	4 346 325,06
Intangible research and development results	012				
Software	013	26 334 198,04	22 103 709,58	4 230 488,46	4 297 070,06
Appraisable rights	014	183 000,00	147 115,00	35 885,00	49 255,00
Emission permits and preferential limits	015				
Small long-term intangible assets	018	9 601 856,52	9 601 856,52		
Other long-term intangible assets	019				
Incomplete long-term intangible assets	041	580 800,00		580 800,00	
Alignment account for technical valuation of long-term intangible assets	044				
Advances provided for long-term intangible assets	051				
Long-term intangible assets intended for sale	035				
Long-term tangible assets		704 913 333,66	252 951 864,05	451 961 469,61	476 048 528,90
Land	031	12 526 284,00		12 526 284,00	13 076 594,00
Cultural objects	032	11 491,00		11 491,00	11 491,00
Structures	021	484 384 753,66	95 497 317,00	388 887 436,66	401 814 707,76
Standalone tangible chattels and sets of tangible chattels and sets	022	113 877 463,30	63 375 205,35	50 502 257,95	61 145 736,14
Cultivated wholes of permanent vegetation	025				
Small long-term tangible assets	028	94 079 341,70	94 079 341,70		
Other long-term tangible assets	029				
Incomplete long-term tangible assets	042	34 000,00		34 000,00	
Alignment account for technical valuation of long-term tangible assets	045				
Advances provided for long-term tangible assets	052				
Long-term tangible assets intended for sale	036				

ITEM NAME		SYNTHETIC ACCOUNT	PERIOD			
			CURRENT			PREVIOUS
			Gross	Correction	Net	
			1	2	3	
Long-term liquid assets						
property interests in entities with decisive influence	061					
property interests in entities with substantial influence	062					
Debt securities held until maturity	063					
Long-term loans	067					
Long-term time deposits	068					
Other long-term liquid assets	069					
Acquired long-term liquid assets	043					
Advances provided for long-term liquid assets	053					
Long-term receivables						
Provided returnable long-term financial assistance	462					
Long-term receivables on ceded credit	464					
Long-term provided advances	465					
Long-term receivables on liability	466					
Long-term receivables on instruments co-financed from abroad	468					
Other long-term receivables	469					
Long-term provided advances for transfers	471					
Current assets			33 090 993,94		33 090 993,94	38 206 337,17
Inventory						
Material acquisition	111					
Material in store	112					
Material on the way	119					
Incomplete production	121					
Own-produced semi-products	122					
Products	123					
Goods acquired	131					
Goods in store	132					
Goods on their way	138					
Other inventory	139					

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD			
		CURRENT			PREVIOUS
		Gross	Correction	Net	
		1	2	3	
Short-term receivables		2 365 057,87		2 365 057,87	2 836 989,10
Customers	311				
Bills for collection	312				
Deliverables on discounted securities	313				
Short-term provided advances	314	2 309 122,49		2 309 122,49	2 708 454,72
Other receivables on main activity	315	4 500,00		4 500,00	5 245,00
Provided returnable short-term financial assistance	316				
Short-term receivables on ceded credit	317				
Receivables from employees	335	51 435,38		51 435,38	116 085,38
Social security	336				
Health insurance	337				
Pension savings	338				
Income tax	341				
Other direct taxes	342				
Value added tax	343				
Other taxes and levies	344				
Receivables from selected central governmental institutions	346				
Receivables from selected local governmental institutions	348				
Receivables from tax administration	352				
Settlement of tax redistribution	355				
Receivables from distraintment and other handling of others' property	356				
Other receivables from tax administration	358				
Short-term receivables on liability	361				
Fixed time operations and options	363				
Receivables from financial security	365				
Receivables on issued bonds	367				
Short-term receivables on instruments co-financed from abroad	371				

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD			
		CURRENT			PREVIOUS
		Gross	Correction	Net	
		1	2	3	
Short-term provided advances for transfers	373				
Costs of coming periods	381				
Incomes of coming periods	385				
Estimation accounts, active	388				
Other short-term receivables	377				7 204,00
Short-term liquid assets		30 725 936,07		30 725 936,07	35 369 348,07
Property securities for trading	251				
Debt securities for trading	253				
Other securities	256				
Short-term time deposits	244				
Other current accounts	245	29 607 892,80		29 607 892,80	34 395 239,80
Managed fund accounts	247				
Summary accounts	248				
Accounts for sharing taxes and separate administration	249				
Current account	241				
Cultural and Social Fund current account	243	1 114 374,27		1 114 374,27	969 672,27
Current accounts of state organisational component funds	225				
Duty stamps	263	3 669,00		3 669,00	4 436,00
Money on the way	262				
Cash	261				

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD	
		CURRENT	PREVIOUS
		1	2
TOTAL LIABILITIES		489 899 637,01	518 601 191,13
Own capital		460 085 982,97	484 276 517,09
Accounting unit assets and adjusting items		488 557 351,07	495 022 418,17
Accounting unit assets	401	726 993 064,25	733 458 131,35
Privatisation fund	402		
Exchange rate differences	405		
Pricing differences on initial method application	406	-238 435 713,18	-238 435 713,18
Other pricing differences	407		
Corrections for previous periods	408		
Accounting unit funds		1 178 045,35	1 098 943,35
Cultural and Social Fund	412	1 178 045,35	1 098 943,35
Backup Fund composed of improved economic results	413		
Backup Fund from other sources	414		
Economic result		-1 665 063 475,05	-1 344 538 403,91
Economic result for current accounting period		-320 525 071,14	-309 667 988,94
Economic result in approval proceeding	431	-974 049 857,39	-664 381 868,45
Economic result for previous accounting periods	432	-370 488 546,52	-370 488 546,52
Income and expenditure account for budgetary management		1 635 414 061,60	1 332 693 559,48
Income account for state organisational components	222	-3 817 135,57	-5 324 840,49
Special income account	223	306 537 637,69	295 763 548,18
State budget management account	227		
Aggregated incomes and expenditures for previous years	404	1 332 693 559,48	1 042 254 851,79
External sources		29 813 654,04	34 324 674,04
Backup			
Backup	441		
Long-term liabilities			
Long-term credit	451		
Accepted returnable long-term financial assistance	452		

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD	
		CURRENT	PREVIOUS
		1	2
Long-term liabilities from issued bonds	453		
Long-term accepted advances	455		
Long-term liabilities from security	456		
Long-term bills to pay	457		
Long-term liabilities from instruments co-financed from abroad	458		
Other long-term liabilities	459		
Long-term accepted advances for transfers	472		
Short-term liabilities		29 813 654,04	34 324 674,04
Short-term credit	281		
Discounted short-term bonds (bills)	282		
Short-term liabilities from issued bonds	283		
Other short-term loans	289		
Suppliers	321		
Bills to pay	322		
Short-term accepted advances	324	347 577,24	347 324,24
Liabilities from separate administration	325		
Accepted returnable short-term financial assistance	326		
Employees	331		
Other liabilities towards employees	333	13 707 458,00	12 506 738,00
Social security	336	5 592 132,00	7 247 297,00
Health insurance	337	2 396 907,00	
Pension savings	338		
Income tax	341		
Other direct taxes	342	2 153 044,00	1 883 824,00
Value added tax	343		
Other taxes and levies	344		
Liabilities towards entities outside selected govt. inst.	345		
Liabilities to selected central govt. institutions	347		
Liabilities to selected local govt. institutions	349		
Liabilities to association members	351		

ITEM NAME	SYNTHETIC ACCOUNT	PERIOD	
		CURRENT	PREVIOUS
		1	2
Liabilities to association members	353		
Liabilities to association members	354		
Liabilities to association members	355		
Liabilities to association members	357		
Liabilities to association members	359		
Short-term liabilities from security	362		
Fixed time operations and options	363		
Liabilities from unfinished financial operations	364		
Liabilities from financial security	366		
Liabilities from subscribed unpaid securities and interests	368		
Short-term liabilities from instruments co-financed from abroad	372		
Short-term accepted advances for transfers	374		
Costs of coming periods	383		
Incomes of coming periods	384		
Estimation accounts, passive	389		
Other short-term receivables	378	5 616 535,80	12 339 490,80

Profit and loss statement

Item name	Synthetic account	Current period		Minulé období	
		Main activity	Economic activity	Main activity	Economic activity
		1	2	3	4
TOTAL COSTS		325 335 536,82		315 870 490,89	
Costs of activity		323 666 121,22		315 846 124,63	
Material consumption	501	3 366 807,66		3 738 293,36	
Energy consumption	502	10 865 679,25		11 018 344,84	
Consumption of other non-storable supplies	503				
Goods sold	504				
Activation of long-term assets	506				
Activation of current assets	507				
Change in own-production stock	508				
Repairs and maintenance	511	5 180 732,78		4 606 446,32	
Travel costs	512	2 121 859,93		1 944 870,73	
Representation costs	513	192 758,80			
Activation of internal services	516				
Other services	518	32 748 570,08		35 221 304,37	
Wage costs	521	179 153 375,00		171 939 150,00	
Mandatory social insurance	524	60 637 450,00		58 159 960,00	
Other social insurance	525				
Mandatory social costs	527				
Other social costs	528				
Road tax	531				
Property tax	532	2 796,00		2 796,00	
Other taxes and levies	538	198 754,38			
Indirect taxes returned	539				
Contractual penalties, interest on late payment	541				
Other penalties	542	1 587 392,00			
Donations and other non-pecuniary deliveries	543				
Material sold	544				
Deficits and damages	547	7 204,00			

Item name	Synthetic account	Current period		Minulé období	
		Main activity	Economic activity	Main activity	Economic activity
		1	2	3	4
Creation of funds	548	1 781 662,00		1 709 000,00	
Long-term asset write-off	551	19 162 917,79		20 672 183,52	
Long-term intangible assets sold	552				
Long-term tangible assets sold	553	224 800,00		6 034 232,08	
Land sold	554	14 400,00			
Backup creation and settlement	555				
Corrective item creation and settlement	556				
Costs of discarded receivables	557				
Costs of small long-term assets	558	6 402 472,09		1 168 075,37	
Other costs of activity	549	16 489,46		-368 531,96	
Financial costs		1 669 415,60		24 366,26	
Securities and interests sold	561				
Interest	562				
Exchange rate loss	563	21 043,60		24 366,26	
Costs of re-appraisal with real values	564	1 648 372,00			
Other financial costs	569				
Costs of transfers					
Costs of transfers of selected central governmental institutions	571				
Costs of shared taxes and levies					
Costs of shared natural person income tax	581				
Costs of shared legal entity income tax	582				
Costs of shared value added tax	584				
Costs of shared excise taxes	585				
Costs of other shared taxes and levies	586				
Income tax					
Income tax	591				
Additional income tax levies	595				

Item name	Synthetic account	Current period		Minulé období	
		Main activity	Economic activity	Main activity	Economic activity
		1	2	3	4
TOTAL REVENUES		4 810 465,68		6 202 501,95	
Revenues from activity		4 786 469,68		4 568 565,59	
Revenues from own product sales	601				
Revenues from service sales	602	1 714 349,12		1 628 936,10	
Revenues from rental	603				
Revenues from goods sold	604				
Revenues from administrative fees	605				
Revenues from judicial fees	607				
Other revenues from own performance	609				
Contractual penalties, interest on late payment	641				
Other penalties	642	2 293 387,56		2 123 677,49	
Revenues from discarded receivables	643				
Revenues from asset sales	644				
Revenues from long-term intangible asset sales	645				
Revenues from long-term tangible asset sales, except land	646	365 600,00		364 157,00	
Revenues from land sales	647	14 400,00			
Drawing on funds	648				
Other revenues from activity	649	398 733,00		451 795,00	
Financial revenues		23 996,00		1 633 936,36	
Revenues from sales of securities and interests	661				
Interest	662				
Exchange rate profits	663				
Revenues from re-appraisal with real value	664	14 080,00			
Revenues from long-term liquid assets	665				
Other financial revenues	669	9 916,00		1 633 936,36	
Revenues from taxes and levies					
Revenues from natural person income taxes	631				

Item name	Synthetic account	Current period		Minulé období	
		Main activity	Economic activity	Main activity	Economic activity
		1	2	3	4
Revenues from legal entity income taxes	632				
Revenues from social insurance	633				
Revenues from value added tax	634				
Revenues from excise taxes	635				
Revenues from property taxes	636				
Revenues from energy taxes	637				
Revenues from road tax	638				
Revenues from other taxes and levies	639				
Revenues from transfers					
Revenues from transfers of selected central governmental institutions	671				
Revenues from shared taxes and levies					
Revenues from shared natural person income tax	681				
Revenues from shared legal entity income tax	682				
Revenues from shared value added tax	684				
Revenues from shared excise taxes	685				
Revenues from shared property taxes	686				
Revenues from other shared taxes and levies	688				
ECONOMIC RESULT					
Economic result before taxation	-	-320 525 071,14		-309 667 988,94	
Economic result in current accounting period	-	-320 525 071,14		-309 667 988,94	

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ABBREVIATIONS AND ACRONYMS

BAT	Best available technique	ISPROFIN	Information System for Programme Financing
BOD	Biochemical oxygen demand	MoE	Ministry of the Environment
CEI	Czech Environmental Inspectorate	NP	National Park
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora	MoIT	Ministry of Industry and Trade
CLP	Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures	NLPA	Nature and Landscape Protection Agency
COD	Chemical oxygen demand	NNR	National Nature Reserve
CR	Czech Republic	NPD	Nature Protection Department
ECHA	European Chemicals Agency	NR	Nature Reserve
EI	Equivalent inhabitants	PLA	Protected Landscape Agency
EIA	Environmental impact assessment	PLF	Prominent Landscape Feature
EMAS	Environmental Management and Audit System	PV	Photovoltaic (power plant)
EMS	Environmental Management System	RAPEX	Rapid Alert System of Non-Food Products
ERMA II	Reproductive material register	REACH	Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency
E-PRTR	European Pollutant Release And Transfer Register	RIA	Railway Infrastructure Administration
EU	European Union	SAIF	State Agricultural Intervention Fund
FPD	Forest Protection Department	SCI	Site of Community Importance
GMO	Genetically modified organisms	SEA	Strategic Environmental Impact Assessment
IA	Integrated agendas	SEP	State Environmental Fund
IAC	Integrated Agenda Coordinator	SHP	Small hydropower plant
ICT	Information and communications technologies	SVHC	Substances of very high concern
IMPEL	Network of EU countries' environmental inspection authorities	TFS	Transboundary waste transport
IP	Integrated permit	TI	Territorial Inspectorate
IPPC	Integrated Pollution Prevention and Control	TIC	Toxicology Information Centre
ISPOP	Integrated system for performance of reporting duties	WMD	Waste Management Department
IPR	Integrated Pollution Register	WPD	Water Protection Department
		WWTP	Wastewater treatment plant

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