The 11th annual EUROSAI Working Group on Environmental Auditing meeting

15 – 17 October 2013, Prague, Czech Republic

Funds collected in accordance with Act on Hazardous Waste Management

Eva Reková
Details on audit

- **Title of the audit:**
  Funds collected in accordance with Act on Hazardous Waste Management

- **Year of publication:** 2013
Details on audit

• **Type of the audit:**
  Compliance, performance

• **Audited period:**
  2007 – 2011

• **Performance of the audit:**
  July 2012 – January 2013
Aim of the audit

To scrutinize:

- whether the collection of finances collected by law in the disposal of hazardous waste (‘HW’) has changed;
- whether the identified systemic shortcomings in previous audit have been eliminated.
• Ministry of the Environment of the Czech Republic
• State Environmental Fund of the Czech Republic
• Czech Environmental Inspectorate
• Selected operators of landfill sites and facilities

• Act No. 185/2001, on waste and amending certain other acts
Hazardous waste is waste with one or more of the hazardous properties referred to in Annex 2 of Act No. 185/2001.

Hazardous waste may be treated in the following ways: accumulation, collection, buy-up, transportation, warehousing, modification, use and elimination.

One method of elimination of hazardous waste is storage at land surface level or below the surface of land, i.e. landfilling. A fee is charged on this method of disposing of hazardous waste.
System for collection of finances

- **Municipality**
- **Originators of waste**
- **Operators of facilities**
- **Operators of landfill sites**
- **SEF**

- Control power
- Invoice
- The fee for landfilling hazardous waste
- Basic fee component
- Risk fee component
- The fee for landfilling hazardous waste

The 11th annual meeting of the EUROSAI WGEA
Access to information

Reporters = Originators of waste

SEF

Public

Municipality

Other participants in Waste Management

- Region
- Waste Code
- Waste Category

Ministry of the Environment

Czech Statistical Office

The 11th annual meeting of the EUROSAI WGEA
### System for collection of finances

#### Collection of the fee’s risk component

<table>
<thead>
<tr>
<th>Year</th>
<th>Fee risk component (millions of €)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007</td>
<td>4,3</td>
</tr>
<tr>
<td>2008</td>
<td>4,2</td>
</tr>
<tr>
<td>2009</td>
<td>3</td>
</tr>
<tr>
<td>2010</td>
<td>2,4</td>
</tr>
<tr>
<td>2011</td>
<td>2,3</td>
</tr>
</tbody>
</table>

*Source: Ministry of the Environment of the Czech Republic*
System for collection of finances

The fee tariffs are laid down in Annex 6 to Act No. 185/2001.

In 2007 and 2008 the tariff of the fee’s risk component for landfilling hazardous waste was CZK 3,300 per tonne (approximately 130 euros), since 2009 the tariff has been increased to CZK 4,500 per tonne (180 euros).

Exceptions:

- Hazardous waste containing asbestos carries only the basic fee component.
- Placing waste in a landfill as technological material to secure to landfill site (‘technological material’) and waste intended for landscaping is entirely exempted from fees.
Hazardous waste may be used as technological material. This is regulated by Decree No. 294/2005, which Article 6 (3) provides that:

“The quantity of technological material for the technical securing of a landfill site… may amount to at most 25% of the volume of all waste placed in the landfill site for every calendar year.”

25 % OF THE VOLUME ≠ 25 % OF THE WEIGHT
EXAMPLE – technological material

- Municipal waste: 200,000 tons
- Hazardous waste: 100,000 tons

Total waste: 300,000 tons

25% = 75,000 tons

75% of hazardous waste can be placed as technological material without any fee.
Audit approach

Tools and methods:
analysis and comparison of data using cross-check

Key sources:

- Reports on the production and disposal of waste
- Evidence of weighing waste
- Continuous records of waste
- Invoices
- Waybills
Data Processing - cross-check

Operator of Landfill sites; Originators of waste; Czech Environmental Inspectorate; State Environmental Fund of the Czech Republic.

<table>
<thead>
<tr>
<th>Year</th>
<th>Partner</th>
<th>Invoice</th>
<th>Date of Issue</th>
<th>Weight (t)</th>
<th>RFC (Kč)</th>
<th>Waybill</th>
<th>Date</th>
<th>Code of Waste treatment</th>
<th>Code of Waste</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>AHV ekologický servis, s.r.o.</td>
<td>2150062059</td>
<td>2.3.2009</td>
<td>0,46</td>
<td>0</td>
<td>43039</td>
<td>9.2.2009</td>
<td>BN12</td>
<td>070513</td>
</tr>
<tr>
<td>2009</td>
<td>AHV ekologický servis, s.r.o.</td>
<td>2150062059</td>
<td>2.3.2009</td>
<td>0,66</td>
<td>0</td>
<td>43040</td>
<td>9.2.2009</td>
<td>BN12</td>
<td>170503</td>
</tr>
<tr>
<td>2009</td>
<td>AHV ekologický servis, s.r.o.</td>
<td>2150062059</td>
<td>2.3.2009</td>
<td>0,50</td>
<td>0</td>
<td>43042</td>
<td>9.2.2009</td>
<td>BN12</td>
<td>120114</td>
</tr>
<tr>
<td>2009</td>
<td>ECO - F a.s.</td>
<td>2150062505</td>
<td>4.3.2009</td>
<td>22,04</td>
<td>0</td>
<td>43394</td>
<td>11.2.2009</td>
<td>BN12</td>
<td>100308</td>
</tr>
<tr>
<td>2009</td>
<td>ECO - F a.s.</td>
<td>2150062505</td>
<td>4.3.2009</td>
<td>21,72</td>
<td>0</td>
<td>43651</td>
<td>13.2.2009</td>
<td>BN12</td>
<td>100308</td>
</tr>
<tr>
<td>2009</td>
<td>AHV ekologický servis, s.r.o.</td>
<td>2150062059</td>
<td>2.3.2009</td>
<td>9,72</td>
<td>0</td>
<td>43731</td>
<td>13.2.2009</td>
<td>BN12</td>
<td>170503</td>
</tr>
<tr>
<td>2009</td>
<td>AHV ekologický servis, s.r.o.</td>
<td>2150062059</td>
<td>2.3.2009</td>
<td>0,26</td>
<td>1170</td>
<td>44032</td>
<td>18.2.2009</td>
<td>BD1</td>
<td>160506</td>
</tr>
<tr>
<td>2009</td>
<td>AHV ekologický servis, s.r.o.</td>
<td>2150062059</td>
<td>2.3.2009</td>
<td>0,54</td>
<td>0</td>
<td>44061</td>
<td>18.2.2009</td>
<td>BN12</td>
<td>170503</td>
</tr>
<tr>
<td>2009</td>
<td>ProfiOdpady s. r. o.</td>
<td>2150062493</td>
<td>4.3.2009</td>
<td>21,30</td>
<td>0</td>
<td>44105</td>
<td>18.2.2009</td>
<td>BN12</td>
<td>100308</td>
</tr>
<tr>
<td>2009</td>
<td>ECO - F a.s.</td>
<td>2150062505</td>
<td>4.3.2009</td>
<td>23,30</td>
<td>0</td>
<td>44049</td>
<td>19.2.2009</td>
<td>BN12</td>
<td>100308</td>
</tr>
<tr>
<td>2009</td>
<td>ProfiOdpady s. r. o.</td>
<td>2150062493</td>
<td>4.3.2009</td>
<td>10,58</td>
<td>0</td>
<td>44437</td>
<td>23.2.2009</td>
<td>BN12</td>
<td>100308</td>
</tr>
<tr>
<td>2009</td>
<td>AHV ekologický servis, s.r.o.</td>
<td>2150062059</td>
<td>2.3.2009</td>
<td>0,38</td>
<td>1710</td>
<td>44453</td>
<td>23.2.2009</td>
<td>BD1</td>
<td>160506</td>
</tr>
<tr>
<td>2009</td>
<td>ECO - F a.s.</td>
<td>2150062505</td>
<td>4.3.2009</td>
<td>23,62</td>
<td>0</td>
<td>44639</td>
<td>25.2.2009</td>
<td>BN12</td>
<td>100308</td>
</tr>
<tr>
<td>2009</td>
<td>Purum s.r.o.</td>
<td>2150062746</td>
<td>4.3.2009</td>
<td>4,10</td>
<td>0</td>
<td>44685</td>
<td>25.2.2009</td>
<td>BN12</td>
<td>120114</td>
</tr>
</tbody>
</table>
Results

Development of disposal by landfilling for selected hazardous waste landfill sites

![Graph showing the development of disposal by landfilling for selected hazardous waste landfill sites from 2007 to 2011. The graph includes data for carrying a fee and exempted from the fee. The percentages for each year are as follows: 2007 - 7.21%, 2008 - 4.65%, 2009 - 2.76%, 2010 - 2.51%, and 2011 - 1.51%.]
System for collection of finances

Technological material for securing landfill sites

Operators of landfill sites

Landfilling

80 € per tonne

SEF + Municipality

64 € per tonne + 248 € per tonne = 312 €
Main audit findings

In the period from 2007 to 2011 a growing difference between the quantity of chargeable and not chargeable landfilling of hazardous waste was detected in the audited sample of landfill operators.

One of the main reasons for the State Environmental Fund’s falling revenue from the risk fee component is that the system enables the hazardous waste to be disposed of in ways exempted from fees even though this hazardous waste is actually being placed in landfill sites.
Recommendation

Based on this audit, the SAO recommends that the system for collecting finances by law in the disposal of hazardous waste, including the powers of the concerned bodies, and the use of hazardous waste placed in landfill sites should be reassessed, with a categorical definition of the quantity of landfilled hazardous waste in units of weight or a stipulation of a single conversion coefficient for landfilled hazardous waste.
Thank you very much for your attention