



Audit Report

25/08

Funds earmarked for the support of climate change adaptation measures in rainwater management

The audit was included in the audit plan of the Supreme Audit Office (hereinafter “SAO”) for the year 2025 under No 25/08. The audit was managed and the Audit Report prepared by SAO Member RNDr. Petr Neuvirt.

The aim of the audit was to verify whether the funds earmarked for the support of climate change adaptation measures in rainwater management were spent effectively and in accordance with the law.

The audit was conducted with the audited entities between April 2025 and December 2025.

The audited period was 2022–2024; both the previous and subsequent periods were also considered for contextual reasons.

Audited entities:

Ministry of the Environment (hereinafter “MoE”);

State Environmental Fund of the Czech Republic, Prague (hereinafter “SEF”);

City of Hranice;

City of Uherské Hradiště;

City of Řevnice;

Municipality of Přísnotice;

Municipality of Velká Hleďsebe;

Municipality of Unkovice;

Statutory City of Chomutov.

The SAO Board at its 5th meeting held on 30 March 2026

approved by Resolution No 6/V/2026

the **Audit Report** as follows:

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BASIC INFORMATION

1,360.29 km²	Built-up area in the Czech Republic in 2024 (approx. 2% of the territory of the CR)
4%	Increase in built-up area between 2000 and 2024
6,258	Total number of municipalities in the Czech Republic
182	Subsidised municipalities from the NRP or the OPEn21+
3%	Percentage of municipalities that received a subsidy from the MoE
CZK 1.59 billion	Amount of subsidies provided to municipalities by the MoE
293	Number of municipal projects

FINDINGS

Inconsistent system for measuring impacts and effects

In the three subsidy programmes audited, the MoE had set up three different sets of indicators for monitoring and evaluating the effects of the support provided, which does not allow to compare the results between the subsidy programmes or to assess the benefits in terms of progress towards the set objectives.

Deficiencies in systematic management

The MoE has not fulfilled the task of developing a strategic document for rainwater management in urbanised areas. Most of the measures are developed separately, without accounting for the needs of the territory as a whole.

Lagging behind in building green roofs

Available data shows that the Czech Republic is significantly lagging behind Austria and Germany in building green roofs.

Shortcomings in public procurement

In five of the nine projects audited, the SAO found that the beneficiaries had breached Act No 134/2016 Coll., on Public Procurement, thereby restricting competition.

I. Summary and Evaluation

1.1 Between 2015 and 2018, the Czech Republic experienced a multi-year drought that exposed the problem of poor rainwater management in urbanised areas.¹ This while the built-up area of municipalities is continuing to expand. Replacing impermeable surfaces with permeable ones, runoff control, rainwater capture and retention, and building green roofs helps to improve rainwater management. The SAO examined to what extent the subsidies provided by the MoE for these measures contributed to better rainwater management and whether they were spent effectively and in accordance with the law.

1.2 **Between 2021 and 2025, the MoE provided funds in the total amount of CZK 1.84 billion for the improvement of rainwater management in urbanised areas through the Operational Programme *Environment 2021-2027* (hereinafter "OPEn21+") and from the *National Recovery Plan* (hereinafter "NRP"). The MoE granted financial support, among others, to 182 municipalities and 293 projects of these with subsidies of CZK 1.59 billion. The share of municipalities that received a subsidy from the MoE was 3% of the total number of municipalities in the Czech Republic.**

The SAO notes that the results of the support from the audited interconnected subsidy programmes are not mutually comparable. Due to this, it is not possible to compare the amount of rainwater retained and to reliably assess to what extent the funds provided have contributed to improving rainwater management.

In 2019, the MoE prepared a study on rainwater management, in which it recommended measures to adapt to climate change in urbanised areas. However, the MoE did not set any specific measurable targets, temporal milestones or concrete responsibilities for the implementation of the tasks.

The SAO also audited nine specific projects with a total of CZK 129.63 million in funds paid out. The SAO found that the audited municipalities often implemented projects without analysing the needs of rainwater management in their territory as a whole. This reduces the effect of the climate change adaptation funds provided.

The SAO concluded that four beneficiaries spent the funds effectively. For the remaining five audited projects, the SAO concluded that although the beneficiaries spent the funds effectively, they breached Act No 134/2016 Coll.² Most often, they unduly favoured specific construction products, thereby restricting competition.

From the NRP funds of CZK 15.71 billion via the *New Green Savings Programme* (hereinafter "NGS"), only CZK 167.73 million went to rainwater accumulation (rainwater collection) or green roofs. Instead, most of the beneficiaries preferred to support the installation of heat pumps or photovoltaic facilities. According to available data, the Czech Republic is significantly lagging behind Austria or Germany in the development of green roofs.

1.3 The above overall evaluation is based on the following findings:

1.4 The MoE could not evaluate the results achieved with the support for rainwater management as it used different indicators that did not allow to compare the benefits of projects supported from the individual subsidy programmes:

¹ Hereinafter "rainwater management".

² Act No 134/2016 Coll., on Public Procurement.

- Under the Operational Programme *Environment 2014–2020* (hereinafter "OPEn14+"), the MoE provided a total of CZK 559.13 million for a total of 190 projects focused on rainwater management in municipalities. In relation to the audited topic, the MoE monitored only the non-binding indicator of the *volume of retained water*, the achieved value of which under the completed programme was 22,932.34 m³.
 - The MoE provided a total of CZK 776.06 million for the implementation of 190 projects via the SEF from the *National Environment Programme* (hereinafter "NEP") financed from the NRP. For the supported projects, the MoE monitored one binding indicator of the *volume of retained precipitation water*, the commitment of the beneficiaries towards which was 25,580 m³ as at 1 September 2025.
 - As at 1 January 2025, under the OPEn21+, the MoE provided a total of CZK 900.13 million for the implementation of 120 projects. For calls focused on rainwater management, it tracks so-called specific data items (hereinafter "SDI"), but does not systematically use them in the programme evaluation, which reduces the ability to track the actual effects of support. The value of the SDI of the *volume of water retained per year* was 641,153.88 m³/average year.
 - Through the SEF from the NGS Programme financed from the NRP, the MoE provided a total of CZK 167.73 million for accumulation tanks and green roofs on family houses and apartment buildings (3,374 projects). For the area of support for rainwater management, the MoE did not set any measurable targets, although the objective of the NGS Programme was, among others, to specifically improve rainwater management. The SEF collects for the NGS data on the volume of constructed rainwater accumulation tanks and the area of constructed green roofs; the values achieved for each were 25,414.17 m³ and 33,232.58 m² respectively.
- 1.5 The MoE has not fulfilled the task set out in the *National Action Plan on Adaptation to Climate Change* (hereinafter "NAP") to prepare a concept for rainwater management in urbanised areas. The Minister of the Environment was assigned this task by Government Resolution No 34 of 16 January 2017. The MoE only commissioned a study, which did not set any accountability, deadlines or method of evaluating progress towards the set strategic objectives. The study is not binding on any actors.
- 1.6 Furthermore, the SAO notes that the MoE and the SEF did not sufficiently motivate municipalities to use the available support from the OPEn21+ in order to prepare documents necessary for systematic solutions for rainwater management on the territories of municipalities. By examining a sample of projects, the SAO found that, with the exception of one municipality, the projects were implemented without prior analysis of the needs of the entire territory of the municipalities.
- 1.7 As at 1 July 2025, the MoE and the SEF provided subsidies from the NRP through the NGS Programme for measures in family houses and apartment buildings in the total amount of CZK 15,706.19 million. Interest in support for improving rainwater management was significantly lower than that in support for the installation of heat pumps or photovoltaic facilities. Of the total volume of subsidies provided, subsidies for measures aimed at rainwater management accounted for 1% (CZK 167.73 million).
- 1.8 The NGS Programme was funded from the NRP from 2021 to 2023. The beneficiaries implemented most of the projects focused on rainwater management (accumulation tanks, green roofs) as standalone projects. A smaller part of the projects was

implemented in combination with other energy-saving measures, e.g., thermal insulation or heating source replacement. Due to the high interest of applicants for support, the funding sources for the NGS Programme were expanded to also include funds from the Modernisation Fund (hereinafter "MF"). The SAO found that it was no longer possible to implement adaptation measures from the MF funds alone, which further reduced the share of support provided for rainwater management.

- 1.9 According to available data, the Czech Republic lags significantly behind in the development of green roofs compared to Austria or Germany, both in annual growth in green roofs in terms of area and in per capita area. Of the total area of green roofs built in the Czech Republic between 2021 and 2024, only 8% were supported from the NGS Programme, which reflects the lack interest of applicants.
- 1.10 The SAO concluded in four audited projects that the use of direct or indirect references to specific construction products was not justified and was contrary to the principles set out in Act No 134/2016 Coll. By doing so, the contracting authorities unduly favoured specific products, thus distorting competition. Further the SAO assessed that the above irregularities were indicative of a breach of budgetary discipline.

II. Information on the Audited Area

- 2.1 Rainwater management is a set of technical and nature-based measures aimed at slowing down the outflow of rainwater from an area, improving its retention and returning it to the water cycle as much as possible. In urbanised environments, this is a key tool for adaptation to climate change as it reduces surface runoff during heavy rainfall events, relieves sewerage systems and improves local water balance.
- 2.2 A major problem of urbanised areas is the high proportion of impermeable surfaces that preclude infiltration and accelerate rainwater runoff. Replacing them with permeable surfaces, e.g., green paving, green lawn panels, gravel or drainage layers, or spaced paving, allows seepage to occur directly at the point of impact and significantly reduces the load on sewer systems.
- 2.3 Other measures include accumulation tanks for the use of rainwater in buildings for technical purposes, infiltration structures (seepage blocks, pits and depressions) and nature-based features such as rain gardens, retention pits or green roofs. Taken together, they form the basis of a blue-green infrastructure that improves the resilience of settlements to hydrological extremes and supports the restoration of the small water cycle.

Ministry of the Environment

- 2.4 The MoE is a central state administration authority and supreme oversight body in environmental matters. It is the managing authority for the OPEn21+ and provides funds for financing measures to improve rainwater management. It controls the provision of the SEF funds, which are distributed from the NRP for activities implemented through the NEP and the NGS Programme. It also controls the provision of the SEF funds received from the MF.

State Environmental Fund

- 2.5 On the basis of the agreement on delegation of certain activities and powers of the MoE as the managing authority for the OPEn21+ to the SEF, the SEF performs the role of an intermediary body with respect to the OPEn21+. It also acts as the so-called implementation body³ for the NRP. The SEF receives funds for the implementation of the NRP activities from the MoE in the form of subsidies, and is therefore a beneficiary. The SEF also administers the NEP and NGS programmes. The SEF plays a crucial role of the administrator and manager of funds from the MF.

Strategy on Adaptation to Climate Change in the Czech Republic – 1st update for the period 2021–2030

- 2.6 Adaptation to climate change in the Czech Republic is covered by *the Strategy on Adaptation to Climate Change in the Czech Republic* (hereinafter "Adaptation Strategy").⁴ The Adaptation Strategy summarises the impacts of climate on life in the Czech Republic and presents adaptation measures. The Adaptation Strategy is aimed at addressing all major manifestations of climate change in the Czech Republic. Through the proposed tasks and measures, its goal is to "*increase the Czech Republic's preparedness for climate change – reduce vulnerabilities and increase the resilience of society and ecosystems to climate change and so contain its negative impacts*". The first update of the Adaptation Strategy was adopted by the Czech Government by Government Resolution No 785 of 13 September 2021.
- 2.7 The Adaptation Strategy emphasises sustainable rainwater management and shows that by combining rainwater and greenery in settlements, impacts of most manifestations of climate change in urbanised landscapes can be reduced.

National Action Plan on Adaptation to Climate Change

- 2.8 The *National Action Plan on Adaptation to Climate Change* (hereinafter "NAP") is an implementation document of the Adaptation Strategy and was updated and adopted by Government Resolution No 785 of 13 September 2021 for the period 2021–2025.⁵ The main objective of the NAP is to improve, through the proposed tasks and measures, the Czech Republic's preparedness for climate change. The NAP elaborates the measures listed in the Adaptation Strategy into specific tasks, for which it assigns responsible entities, implementation deadlines, connection of the measures to individual manifestations of climate change and funding sources. The evaluation of the NAP implementation status was published by the MoE in 2025 in the publicly available *Report on Adaptation of the Czech Republic to Climate Change 2025*.

Concept of Drought Protection for the Czech Republic for the Period 2023–2027

- 2.9 *The Concept of Drought Protection for the Czech Republic for the Period 2023–2027* (hereinafter "CDP") was adopted by Government Resolution of 17 May 2023 and complements and elaborates the measures proposed in the Adaptation Strategy and the

³ Implementation body (or intermediary body) means a public or private entity that has been delegated certain functions by the owner of the component.

⁴ Adopted by Government Resolution No 861 of 26 October 2015.

⁵ The first NAP was adopted by Government Resolution No 34 of 16 December 2017.

NAP specifically in the area of impacts of long-term drought.⁶ The measures proposed in the CDP are intended to contribute to the objectives of slowing down water runoff from the landscape, maintaining biodiversity, improving soil conditions, increasing the reliability of water management infrastructure in changing conditions, protecting water resources from contamination, increasing the level of wastewater treatment and promoting food production.

- 2.10 The aim of rainwater management is primarily to maintain natural runoff conditions, reduce the consumption of potable water, protect the quality of surface water threatened by overflow from the relief chambers of interconnected sewer systems, and reduce the need for taking water from water sources.

Study on Rainwater Management in Urbanised Areas

- 2.11 The preparation of the *Study on Rainwater Management in Urbanised Areas* was based on the requirements of the NAP. The main objective of the study was to develop a framework to improve the water regime in urbanised areas in order to adapt them to climate change and improve the quality of life in these areas.
- 2.12 The study describes the current state of rainwater management in urbanised areas of the Czech Republic, identifies the deficiencies of the current state and proposes changes to eliminate the deficiencies and achieve the strategic objectives in the field of rainwater management.

National Recovery Plan

- 2.13 The NRP⁷ is a strategic document on the basis of which the Czech Republic has applied for a financial contribution from the European *Recovery and Resilience Facility* to implement measures and reforms to help recover from the impacts of the COVID-19 pandemic and to support investments in the environmental and digital transformation of the Czech economy. It is implemented under Regulation (EU) 2021/241 of the European Parliament and of the Council⁸ and Regulation (EU) 2023/435 of the European Parliament and of the Council⁹.
- 2.14 The NRP is divided into seven pillars, which further split into components (topic areas) covering specific reforms and investments. Each component has its owner, i.e., the entity responsible for setting up and implementing the components and achieving goals and milestones. The audited area relates to Components 2.5 *Renovation of buildings and air protection* and 2.9 *Biodiversity support and drought management*, the owner of which is the MoE. Measures in the area of rainwater management are implemented within the framework of Investments 2.5.1 *Renovation and revitalisation of buildings for energy savings* and 2.9.2 *Rainwater management in built-up areas*.

⁶ The first CDP was adopted by Government Resolution No 528 of 24 July 2017.

⁷ Council Implementing Decision on the approval of the assessment of the recovery and resilience plan for Czechia, ST_11047_2021_INIT, 31 August 2021.

⁸ Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility.

⁹ Regulation (EU) 2023/435 of the European Parliament and of the Council of 27 February 2023 amending Regulation (EU) 2021/241 as regards REPowerEU chapters in recovery and resilience plans and amending Regulations (EU) No 1303/2013, (EU) 2021/1060 and (EU) 2021/1755, and Directive 2003/87/EC.

National Environment Programme

2.15 The NEP is a subsidy instrument administered by the SEF to finance projects for nature protection, air and water quality improvement, waste management and energy savings. Its use is as a complementary source to EU funds (e.g., OPEn). The area of support from the NEP breaks down into nine priority areas. Funds for rainwater management are provided under Priority Area 1: *Water*, Subarea 5: *Sustainable and efficient water management in municipalities*. Funding for the programme is provided by the SEF from statutory fees, levies and fines for environmental damage and from the NRP.

Operational Programme Environment

2.16 Measures to improve rainwater management in built-up areas were previously supported by the MoE from European funds within the OPEn14+ under Activity 1.3.2 *Ensuring flood protection for built-up areas and rainwater management – so-called "Rainwater collection for municipalities"*. In the first half of 2022, the primary source of support for municipal projects of rainwater management in built-up areas was the NRP. The funds were primarily used to cover the costs of projects submitted under the OPEn14+ for which there were no available EU funds left. The support for rainwater management on the territory of cities and municipalities for public entities continues in the new OPEn21+ programming period under Measure 1.3.4 *Implementation of measures to reduce runoff and to support the infiltration, retention and storage of rainwater, including its reuse; implementation of green roofs; measures promoting the use of greywater; and measures for managed groundwater replenishment*. The OPEn21+ programming document was adopted at the national level by Government Resolution No 855 of 4 October 2021.

New Green Savings Programme

2.17 The NRP funds earmarked for Investment 2.5.1 were provided under the NGS subsidy programme announced by the MoE and administered by the SEF. The aims of the NGS Programme are mainly to improve the energy performance of existing residential buildings and to increase the use of renewable energy sources, but also to adapt residential buildings and human settlements to ongoing climate change. The provision of the NRP funds through the NGS Programme was governed by MoE Directive No 8/2021, which sets out the basic rules, procedures and conditions for the provision of funds.

III. Scope of the Audit

- 3.1 The aim of the audit was to verify whether the funds earmarked for the support of climate change adaptation measures in rainwater management were spent effectively and in accordance with the law.
- 3.2 It was considered effective if for the programmes under review aimed at supporting rainwater management, measurable and verifiable indicators exist and the MoE monitors and evaluates the outputs and results of the projects on the basis of these

indicators, i.e., ensuring the optimal level of achievement of objectives in fulfilling the set tasks.

- 3.3 In the case of the audited projects, expenditure was considered effective if it contributed to fulfilling the purpose of the project and achieving the set objectives and expected results.
- 3.4 The SAO audited the MoE, the SEF and seven other selected beneficiaries.
- 3.5 The SAO audited the activities of the MoE and the SEF related to the provision of funds to support climate change adaptation measures in rainwater management in urbanised areas from the NRP through the NGS and NEP programmes and from the OPEn21+. The SAO focused on how the support system is set up, the administration of applications for support and the provision of funds. Given the context, the SAO also examined the indicators for rainwater management in the OPEn14+.
- 3.6 The SAO also examined under the audit the implementation of changes proposed by the MoE to improve the water regime in urbanised areas to adapt them to climate change, and trends in set indicators for improving rainwater management in urbanised areas.
- 3.7 Subject to audit was Call No 19 of the OPEn21+ with an allocation of CZK 2,166.77 million corresponding to SO 1.3, and Measure 1.3.4 plus Call No 144 of the OPEn14+ with paid out funds of CZK 368.31 million. The audit also covered Investment 2.5.1 of the NRP with an allocation of CZK 3,350 million and Investment 2.9.2 of the NRP with an allocation of CZK 814 million.
- 3.8 Furthermore, the SAO examined compliance of the seven beneficiaries with the conditions of provision of the subsidies, the demonstrability and justification of eligible expenditure, the use of the subsidy funds for the specified purpose and the fulfilment of the objectives and sustainability of the projects. A total of nine projects were selected for the audit, which were supported either from the OPEn21+ or from the NRP through the NEP.
- 3.9 The selected sample of projects was based primarily on the requirement of financial significance and an advanced implementation stage. An overview of the audited projects is provided in Annex 1 to this Audit Report.
- 3.10 The examined volume of funds under the audited projects amounted to CZK 129.63 million – the amount of subsidies paid out from the OPEn21+ or from the NRP through the NEP.

Note: The legal regulations indicated in this Audit Report are applied in their wording effective for the audited period.

IV. Detailed Findings of the Audit

A) National Recovery Plan

- 4.1 The audited area relates to Components 2.5 *Renovation of buildings and air protection* and 2.9 *Biodiversity support and drought management*, the owner of which is the MoE.

Measures in the area of rainwater management were implemented within the framework of Investments 2.5.1 *Renovation and revitalisation of buildings for energy savings* and 2.9.2 *Rainwater management in built-up areas*.

Investment 2.5.1 *Renovation and revitalisation of buildings for energy savings*

- 4.2 The aims of Component 2.5 are to be achieved through support for energy overhauls of residential sector buildings, construction of new residential buildings in higher than mandatory energy standards and also through support for adaptation and mitigation measures for residential sector buildings. One of the aims of Investment 2.5.1 is to reduce water consumption in households and reduce the vulnerability of the residential sector to the effects of climate change in buildings.
- 4.3 The original allocation for Component 2.5 was CZK 16.08 billion, of which CZK 8.46 billion was earmarked for Investment 2.5.1. In 2023, the allocation for Investment 2.5.1 was reduced to a final amount of CZK 3.35 billion. The rationale for this change in allocation was the situation in the context of the war in Ukraine and consequential increase in energy prices.
- 4.4 Investment 2.5.1 was implemented together with Investment 2.5.2¹⁰ through the NGS Programme, which is administered by the SEF and aims, among other things, to adapt residential buildings and human settlements to ongoing climate change.
- 4.5 The measures related to rainwater management, which are implemented for family houses and apartment buildings (hereinafter "FH" and "AB" respectively), fall under the area of support D – *Adaptation and mitigation measures*, specifically Subarea D.2 – *Green roof* and Subarea D.3 – *Rainwater collection*.

→ The MoE did not set measurable targets for Investment 2.5.1 of the NRP in the area of improvement in rainwater management in family houses and apartment buildings, although the objective of the NGS Programme was, among others, to specifically improve rainwater management.

- 4.6 The MoE did set for Investment 2.5.1 two targets related to the reduction of energy consumption and CO₂ emissions. For both targets, a common indicator was used, which reflects annual energy savings in TJ.
- 4.7 Although the SEF monitors for the long-standing NGS Programme two parameters at the level of implemented projects: *Rainwater accumulation tank volume* [m³] and *Total green roof area* [m²], the MoE did not set in the NRP any measurable targets in the area of rainwater management.

NGS calls

- 4.8 On 21 September 2021, the MoE announced through the SEF two calls for applications for support from the NRP through the NGS Programme. Call No 1/2021 was intended for the FH sector and Call No 2/2021 was intended for the AB sector.

¹⁰ Investment 2.5.2 *Replacement of stationary sources of household pollution with renewable energy sources and development of renewable energy sources*.

4.9 The aim of both calls was to reduce energy consumption, increase the share of renewable energy sources and implement adaptation and mitigation measures in response to climate change in existing and newly built family houses and apartment buildings. Supported projects had to be implemented by 30 June 2025.

Table 1: Allocations for NGS calls (in CZK million)

NGS call	Original allocation (21.09.2021 – 22.06.2022)	Change 1 (23.06.2022 – 12.10.2022)	Change 2 (from 13.10.2022 onwards)
Call No 1/2021	6,000.00	10,811.00	14,011.00
Call No 2/2021	5,000.00	5,000.00	1,800.00
Total	11,000.00	15,811.00	15,811.00

Source: announced NGS calls No 1/2021 and 2/2021 and their updates.

Subarea D.2 – Green roof

4.10 Support was granted for the construction of green roofs on family houses and apartment buildings, or on other above-ground structures owned by the applicant and complementary in function to an FH or AB, and they had to be designed in accordance with the document *Standards for Design, Implementation and Maintenance – Vegetation Layers on Green Roofs* prepared by the *Green Roofs* expert section of the *Association for the Establishment and Maintenance of Greenery*.

Subarea D.3 – Rainwater Collection

4.11 Support was available for measures that reduce the amount of potable water in FHs and ABs taken from surface and underground sources. Rainwater management systems and systems for the use of cleaned and treated wastewater were supported, with possible uses for garden irrigation or as utility water.

→ *The support for adaptation and mitigation measures in family houses and apartment buildings from the NRP was only marginal compared to the total amount of support granted under the NGS Programme.*

Table 2: Area of green roofs and volume of rainwater collection tanks for FHs and Abs (in CZK thousand)

Call	Number of active projects		Subsidy (in CZK thousand)			Share of subsidy (in %)		Green roof area ¹ (in m ²)	Tank volume ² (in m ³)
	Total	D.2 or D.3	Total	D.2 Green roofs	D.3 Rainwater collection	D.2/ Total	D.3/ Total		
1/2021 FHs	80,028	3,323	14,539,641.82	17,383.38	145,110.38	0.12	1.00	29,677.21	24,893.90
2/2021 ABs	1,183	51	1,166,545.20	1,700.90	3,539.30	0.15	0.30	3,555.37	520.84
Total	81,211	3,374	15,706,187.02	19,084.28	148,649.68	0.12	0.95	33,232.58	25,414.74

Source: prepared by the SAO on the basis of the MoE and SEF data.

Explanatory notes:

¹ Total green roof area (in m²).

² Volume of rainwater accumulation tank (in m³).

4.12 As at 1 July 2025, the MoE provided a total of CZK 15,706.19 million from the NRP through the NGS, of which CZK 14,539.64 million (i.e., 93%) was granted for measures in family houses and CZK 1,166.55 million (i.e., 7%) for measures in apartment buildings. The volume of subsidies provided by the MoE for rainwater collection in FHs and ABs

totalled CZK 148.65 million, and the volume of subsidies granted for green roofs amounted to CZK 19.08 million. The SAO found that the volume of subsidies granted by the MoE under the NGS within the NRP for adaptation measures (rainwater collection and green roofs) was marginal (1%), which was consistent with the lack of interest of applicants.

- 4.13 The SAO also found that the majority of adaptation and mitigation measures under the NGS Programme within the NRP were implemented by the beneficiaries on a standalone basis (85%) and only 15% of the supported measures in combination with energy-saving and CO₂ emission reduction measures. Most of the measures were implemented in family houses (98%).
- 4.14 As at 1 July 2025, the MoE supported projects:
- a) in **family houses**, including the construction of green roofs with an area of 29,677.21 m² (89% of the total area of green roofs implemented) and rainwater accumulation tanks with a volume of 24,983.9 m³ (98% of the total volume of accumulation tanks built);
 - b) in **apartment buildings**, including the construction of green roofs with an area of 3,555.37 m² (11% of the total area of green roofs implemented) and rainwater accumulation tanks with a volume of 520.84 m³ (2% of the total volume of accumulation tanks built).

→ The current source of funding for the NGS Programme, which is the Modernisation Fund, allows support for adaptation and mitigation measures only in combination with other measures.

- 4.15 The MoE, in collaboration with the SEF, responded to the increased interest in support from the NGS Programme within the NRP, as evidenced in the period following the announcement of the NGS calls No 1 and 2, by expanding the sources of funding for the NGS Programme to include the Modernisation Fund. On 15 June 2023, the MoE, through the SEF, announced the HOUSEnerg calls No 2/2023 for family houses with an allocation of CZK 15 billion and No 3/2023 for apartment buildings with an allocation of CZK 2.2 billion.
- 4.16 The SAO found that, in view of the rules and conditions of the MF support, this source of funding for the NGS Programme can no longer be used to support the implementation of adaptation or mitigation measures in residential buildings on a standalone basis. These measures continue to be supported under the NGS Programme within the MF only if implemented in combination with other measures aimed at energy savings and reduction in CO₂ emissions, e.g., thermal insulation of a family house or apartment building or heating source upgrade.
- 4.17 The documented data on the status of implemented projects under the NGS within the MF shows that conditioning support for rainwater management by energy-saving measures as a forced combination further exacerbates the low share of support provided for these measures.

→ A total of 1,626 thousand m² green roofs were built in the Czech Republic between 2021 and 2024, of which only 8% with support from the NGS Programme, which reflects the lack of interest of applicants.

4.18 Data on newly implemented green roofs in the Czech Republic is collected and published by the *Association of Green Roofs and Facades*. According to the published data, 1,626 thousand m² of green roofs were implemented in the Czech Republic between 2021 and 2024.¹¹ By the data submitted by the MoE, projects in family houses and apartment buildings involving the implementation of green roofs with a total area of 124,984.52 m² were supported under the NGS Programme within the NRP and the MF from 2021 until 1 July 2025, of which 114,935.51 m² were in family houses and 10,049.01 m² in apartment buildings or public buildings (within the MF, calls for public buildings were also announced).

→ **Compared to Austria and Germany, the Czech Republic is significantly lagging behind in the construction of green roofs.**

4.19 During the audit, the SAO analysed papers published by the *European Federation of Green Roof & Living Wall Associations*, which is the umbrella organisation for all European national associations dealing with green roofs and green facades.¹² An overview of the annual growth rates in green roof area for the available years and countries is provided in Table 3 below.

Table 3: Annual increase in green roof area in selected EU countries (in m²)

Country	Variable	2020	2021	2022	2023	2024
Germany	Annual increase	7,839,977.00	8,681,416.00	8,701,502.00	10,191,140.00	N/A
	Increase per capita	0.09	0.10	0.10	0.12	N/A
Austria	Annual increase	1,386,507.00	1,513,067.00	1,526,833.00	N/A	N/A
	Increase per capita	0.16	0.17	0.17	N/A	N/A
France	Annual increase	N/A	1 600,000.00	N/A	N/A	N/A
	Increase per capita	N/A	0.02	N/A	N/A	N/A
Czech Republic	Annual increase	312,000.00	355,000.00	396,000.00	495,000.00	380,000.00
	Increase per capita	0.03	0.03	0.04	0.05	0.03

Source: Prepared by the SAO on the basis of data from *Green Market Reports* published on <https://efb-greenroof.eu/publications/>.

4.20 In absolute terms, Germany is the leader in green roof construction, exceeding 10 million m² of annual growth in green roof area in 2023 (among the cities with the largest green roof areas are Munich, Berlin, Stuttgart, Frankfurt and Hamburg). In relative comparison, the fastest rise in green roofs in m² per capita has been in Austria. Compared to Austria and Germany, the Czech Republic is significantly lagging behind. From available publications, one additional figure is 1.6 million m² of green roofs implemented in France in 2021. In per capita terms, this was about the same rate of growth as in the Czech Republic over the same period.

→ **A total of 17% of Czech households living in family houses use rainwater collection in underground tanks.**

4.21 In the audit, the SAO found that there are no public sources available to map the volume of rainwater accumulation in households. The results of representative household

¹¹ The indicator is calculated on the basis of the amount of supplied extensive and intensive roof substrate.

¹² Its main aims are to support and promote these technologies across Europe, share knowledge between Member States and encourage their use to cope with environmental challenges such as climate change and the lack of green spaces in urban areas.

surveys conducted by the STEM Institute for Empirical Research in 2017, 2020 and 2023 are available in the paper entitled *České domácnosti a jejich motivace k (ne)využívání srážkové vody (Czech Households and their Motivation to (Not) Use Rainwater)*. The results of the last survey show that 75% of households living in family houses capture rainwater in barrels or above ground tanks. 17% of households, mainly in new houses, capture water in underground tanks, which were eligible for a subsidy from the NGS.

Investment 2.9.2 *Rainwater management in built-up areas*

- 4.22 The aim of Component 2.9 *Biodiversity support and drought management* is, among others, to promote rainwater management in urbanised areas, to ensure drought protection and nature-based flood protection. The aim of Investment 2.9.2 *Rainwater management in urban agglomerations* is to improve rainwater management in cities and municipalities. The aims of Investment 2.9.2 are to be achieved, for example, through support for the implementation of surface or underground seepage and retention facilities and underground accumulation tanks for capturing rainwater or green roofs.
- 4.23 The original allocation for Component 2.9 was CZK 2.98 billion, of which CZK 992 billion was earmarked for Investment 2.9.2. For Investment 2.9.2 as well, the allocation was reduced to a final amount of CZK 814 million. The rationale for the change in allocation was the applicants for support withdrawing from the implementation of projects due to an unexpected rise in energy prices, prices of construction work and construction materials and the associated high inflation rate. In 2025, the unused allocation from Investment 2.9.2 in the amount of CZK 178 million was transferred to other components within the NRP.
- 4.24 The MoE set a single objective and indicator for Investment 2.9.2. Specifically, this was Objective 163 *Increasing the volume of rainwater retained by rainwater management measures in urban areas*, which was to be met by 31 December 2025. For this objective, the MoE set the indicator of the *volume of retained precipitation water in m³* and its target value.
- 4.25 The unexpected changes and withdrawals of applicants from the implementation of projects led to the need to adjust the originally set target. The MoE and SEF provided a justification for the change and the European Commission approved reduction of the target. A summary of the set target and indicator, including the change in the target value, is given in Table 4.

Table 4: Objective of Investment 2.9.2

Serial No	Investment	Target title	Measuring unit	Original target		Change		Completion schedule	
				Initial status	Target	Initial status	Target	Quarter	Year
163	<i>Rainwater management in urban agglomerations</i>	<i>Increase the volume of rainwater retained by rainwater management measures in urban areas</i>	Volume of retained precipitation water in m ³	0	40,000	0	20,000	Q4	2025

Source: NRP.

- 4.26 Investment 2.9.2 was implemented by the SEF within the *National Environment Programme*. The funds for rainwater management were provided under Supported Activity 1.5.E *Rainwater management in built-up areas of municipalities*.
- 4.27 In 2021, the MoE announced one non-competitive Call No 10 jointly to ensure the implementation of Investments 2.9.1 and 2.9.2 of the NRP with a total allocation of CZK 1.754 billion. A total of CZK 992 million were earmarked to support rainwater management in municipalities, later on the allocation was reduced to CZK 814 million.

→ *For Investment 2.9.2, the MoE cannot compare the funds spent and the effects achieved in relation to the objectives set out in the strategic documents.*

- 4.28 The SAO found that the binding indicator set by the MoE for Investment 2.9.2 is not linked to strategic documents and does not allow for a comparison between the funds spent and the effects achieved, in particular because it comprises different calculations of the amount of retained rainwater and the reported values are not consistent.
- 4.29 The SAO also found that the MoE did not monitor the projects implemented under this subsidy according to the types of measures supported, which precludes identification of the shares of implemented measures by type and their respective weights in the monitored indicator. It follows from the above that the MoE cannot evaluate the benefits of Investment 2.9.2 for assessing the objectives of the approved strategies.
- 4.30 As at 31 December 2024, the MoE registered a total of 204 active projects under Call No 10/2021, with the reported value of the indicator of the *volume of retained precipitation water* totalling 25,837.68 m³.
- 4.31 By analysing the registered active projects, the SAO audit found an indicative distribution of projects as at 31 December 2024, see Table 5. According to the SAO analysis, the projects most often focused on retention and accumulation of rainwater, followed by projects to replace impermeable surfaces with permeable ones.

Table 5: Overview of projects from Call No 10/2021 by types of measures implemented

Type of measure	Number of projects	Subsidy (in CZK)	Volume of retained precipitation water (in m ³)
Retention/accumulation	114	362,681,049.21	18,425.50
Impermeable surfaces	56	264,614,123.17	2,994.18
Roofs	23	155,182,559.61	525.74
Multifunctional projects	10	32,720,910.70	2,922.26
Water feature	1	3,044,695.26	970.00
Total	204	818,243,337.95	25,837.68

Source: prepared by the SAO on the basis of the MoE and SEF data, active projects as at 31 December 2024.

Explanatory notes:

Impermeable surfaces – replacement of impermeable surfaces; **retention/accumulation** – retention tanks, holding tanks, underground tanks, rainwater accumulation; **roofs** – green roofs, vegetated roofs; **multifunctional projects** – green roofs, impermeable surfaces, retention and accumulation tanks.

- 4.32 According to the interim monitoring report as at 1 September 2025, the SEF registered a total of 190 projects under Investment 2.9.2, or Call No 10/2021, with a contribution of 25,580 m³, according to the selected mandatory indicator, i.e., the volume of retained rainwater, which represents 128% of the target value (of 20,000 m³). A legal act was

issued for a total of 190 applications with the total requested amount of subsidies of CZK 776.06 million, which amounts to 94% of the reduced allocation for Investment 2.9.2. Supported projects had to be implemented by 30 September 2025.

- 4.33 The SAO also verified, on a sample of five projects, whether the MoE, in collaboration with the SEF, issued the legal acts on granting support in accordance with the law, the rules for granting support and the applications for support.
- 4.34 The SAO found that in the case of one audited project, the MoE did not issue an amendment to the Minister's decision (change of legal act) concerning the change of the project completion date. Pursuant to the Minister's decision, the project was to be completed by 30 June 2025. However, on 16 September 2025, on the basis of a change request submitted by the beneficiary, the SEF concluded Amendment 2 to the contract with the beneficiary, which extended the implementation deadline until the end of September 2025, and also extended the deadline for the submission of documents for the final evaluation of the activity until the end of December 2025. The SEF thus drafted and signed Amendment 2 to the contract without a previous amendment to the legal act, i.e., without an amendment to the Minister's decision.

B) Operational Programme *Environment 2021–2027*

- 4.35 In the area of climate and clean energy, the OPEn21+ is one of a number of support programmes that help promote measures to reduce greenhouse gas emissions and adapt to climate change. This means it only provides support for a part of the measures needed and to a limited range of beneficiaries.
- 4.36 By supporting measures under Specific Objective 1.3, the OPEn21+ aims, among others, to help improve poor rainwater management in built-up areas.
- 4.37 In 2023, the allocation for Measure 1.3.4 was increased from the original EUR 74.1 million, or CZK 1.78 billion, to EUR 74.94 million, i.e., CZK 1.8 billion (EUR/CZK exchange rate: CZK 24), i.e. by CZK 20 million.
- 4.38 Within the OPEn21+, the MoE regularly announces, through the SEF, calls for activities related to rainwater management. For most of the activities from Measure 1.3.4, the MoE announced Rolling Call No 19 through the SEF as at 14 September 2022, with an allocation of CZK 1.5 billion. As at the end of 2024, 120 projects with a total EU contribution of CZK 900.13 million were under implementation. The call focused on projects for the implementation of nature-based flood control measures and also on support for the construction of seepage and retention facilities, including support for other measures that contribute to efficient rainwater management.¹³
- 4.39 Special Call No 36 targeting solely the activity *Building technology for the accumulation, treatment and distribution of greywater and rainwater in buildings for flushing and other relevant uses* was announced as at 1 February 2023 (Measure 1.3.4). Three projects were registered under the call, but in the end 0 projects were supported and approved as none met the required criteria.

¹³ Measures 1.3.3 – *Implementation of flood control measures* and 1.3.4 – *Implementation of measures to slow down runoff, for the seepage, retention and accumulation of rainwater, including its further use; implementation of green roofs; measures for the use of greywater; measures for controlled groundwater replenishment.*

4.40 The next Call No 52 focusing on the implementation of nature-based and flood control measures under the ITI (*Integrated Territorial Investments*) facility in agglomerations was announced by the MoE through the SEF as at 2 August 2023. The call includes support for nature-based measures in the landscape and settlements, implementation of flood control measures, implementation of measures to slow down runoff, for the seepage, retention and accumulation of rainwater including its further use, implementation of green roofs, measures for the use of greywater; and measures for controlled groundwater replenishment.¹⁴

Table 6: Calls No 19, 36 and 52, Measure 1.3.4 under the OPEn21+ (as at 1 January 2025) (in CZK)

Measure	Call – code	Applications submitted		Projects under implementation		EU contribution (paid out)
		Number	EU contribution	Number	EU contribution	
1.3.4	05_22_019	184	1,240,533,044	120	900,129,285	116 392 614
	05_23_036	3	5,157,047			
	05_23_052	3	8,314,307			
Sum total		190	1,254,004,398	120	900,129,285	116,392,614

Source: prepared by the SAO on the basis of the MoE data.

4.41 The above calls were in follow-up to Call No 144 under the OPEn14+.

4.42 Within Call No 144 of the OPEn14+, a total of CZK 368.31 million were paid out to the beneficiaries for 384 projects, while 217 projects with an EU contribution of CZK 2,308.47 million could not be supported due to lack of available funds. The SEF notified the beneficiaries of the availability of support for these projects under Call No 10/2021 from the NRP. The reason for the exhaustion of the allocation for the rolling call from the OPEn14+ of CZK 1 billion was the submission of one project with a requested subsidy of CZK 1.2 billion from the EU funds (according to the rules, under rolling calls, support may be granted to projects that meet the criteria, in the order in which they are submitted).

4.43 The MoE monitors and evaluates for the OPEn21+ as main and binding indicators that have no predictive value in the area of rainwater management. These are the indicators of *green infrastructure built or upgraded within the context of adaptation to climate change* [hectares] and the *number of inhabitants benefiting from measures to protect against climate-related natural disasters (other than floods or fires)*.

4.44 The MoE also monitors SDIs for relevant calls aimed at supporting rainwater management that parameters of which generally complement the monitoring indicators, but are not carried over e.g., into the performance framework of the Operational Programme and their fulfilment is not binding. Nevertheless, the SDIs are linked to indicators in the approved strategies and allow to compare the funds spent and the effects achieved. Their reporting may entail a higher error rate due to changes implemented in supported projects. The SAO audited four projects from Call No 19 and found that the applicants had omitted to fill in some of the parameters when submitting the application and were not subsequently prompted by the evaluator and the officer to add the missing data.

¹⁴ Measures 1.3.1 – *Support for nature-based measures in the landscape and settlements – CF (Cohesion Fund)*, 1.3.3 and 1.3.4.

4.45 By analysing the specific data items in projects as at 1 January 2025, the SAO’s audit found an indicative distribution of the projects, see Table 7. According to the SAO analysis, the projects most often focused on retention and accumulation of rainwater, followed by projects to replace impermeable surfaces with permeable ones.

Table 7: Overview of SDIs, number of projects and achieved values of SDIs as at 1 January 2025 (Measure 1.3.4)

Code	Name of SDI	Number of projects	Value of SDI	Unit of SDI
91	Area from which rainwater runoff from the territories concerned is slowed down	115	435,625.33	m ²
92	Volume of water retained per year	116	641,153.88	m ³ /average year
93	Retention volume of constructed facilities	32	11,062.00	m ³
94	Accumulation volume of constructed facilities	33	5,140.27	m ³
95	Irrigated area	14	133,555.40	m ²
97	Area of impermeable surfaces replaced	69	90,673.51	m ²
98	Area of newly constructed permeable surfaces	46	27,034.85	m ²
100	Accumulation capacity of roofs of buildings with accumulation ability	4	1,996.78	m ³ /average year
101	Area of implemented green roofs	6	8,434.56	m ²
102	Total area of roofs on the buildings and structures concerned	7	9,750.06	m ²
105	Height of installed green roof above ground	6	28.30	m
106	Maximum height of the ridge or highest point of the roof	6	40.40	m

Source: prepared by the SAO on the basis of the MoE data.

→ Municipalities were not interested in support from the OPEn21+ for the preparation of conceptual adaptation documents.

4.46 A need for a multidisciplinary and systematic approach permeates all strategic documents dealing with the area of rainwater management. In 2021, the MoE commissioned the *Analysis of documents for systematic rainwater management in municipalities*. The main purpose of the paper was to explore documents that are necessary for a conceptual approach to rainwater management in the territories of municipalities in coordination with municipal planning, and to provide reference data for the OPEn21+ in terms of the possibilities of financial support for the preparation of such documents.

4.47 On the basis of the analysis and the need for a systemic approach to adaptation of municipalities to climate change, it was proposed that the preparation of two comprehensive documents – an *urban runoff master plan*¹⁵ and an *extreme precipitation drainage plan* – be supported within the OPEn21+.

4.48 The SAO found that the local self-governing units were not interested in the support intended for the preparation of these key conceptual documents. The MS2021+ monitoring system data valid as at 23/09/2025 shows that only one project was implemented.

¹⁵ The *urban runoff master plan* combines the *rainwater management implementation plan* (in terms of normal and heavy rainfall), subtasks from the *rainwater management standards*, the *drainage master plan* and the *blue-green infrastructure master plan*.

4.49 The SAO found that only less than half of the regions of the Czech Republic (6) and only a quarter of the total number of municipalities with extended powers (51) had prepared an adaptation strategy, which should require, among other things, the preparation of a plan for the implementation of rainwater management.

4.50 Furthermore, the SAO found on the sample of nine projects that only one beneficiary implemented a total of three audited projects on the basis of its own conceptual document dealing with rainwater management on the territory of its municipality. The other six audited municipalities did not have a document addressing rainwater management in the municipality.

C) Beneficiaries' procedure for selecting suppliers

4.51 In the audit of the projects, the SAO also examined whether the beneficiaries carried out supplier selection in accordance with Act No 134/2016 Coll.

→ The beneficiaries unjustifiably favoured specified products used in the construction industry, thereby distorting competition.

4.52 Three audited municipalities breached Act No 134/2016 Coll. by making direct or indirect references in the tender specifications to specific products used in the construction industry. This use of direct or indirect references to specific products in the above cases was not justified by the subject matter of public procurement. The beneficiaries should have defined the technical specifications in a sufficiently precise, complete and comprehensible manner, using a general description of the subject matter of public procurement and the technical specifications, i.e., without references to specific brands of products.

Table 8: Overview of projects – use of direct or indirect product references (in CZK)

Subsidy	Project registration number	Applicant	Simplified subject matter of the contract	Estimated value of the public contract	Winning tender price	Subsidy (legal act)
OPEn21+	CZ.05.01.03/04/22_019/0000561	Municipality of Přisnotice	Replacement of impermeable surfaces – roads	45,376,966	49,729,794	49,334,837
OPEn21+	CZ.05.01.03/04/22_019/0002265	Municipality of Unkovice	Replacement of impermeable surfaces – roads	32,000,000	19,798,738	14,144,742
NEP-NRP	5211000066	Statutory City of Chomutov	Kindergarten renovation, green roof	15,832,170	14,886,773	3,836,904
NEP-NRP	5211000067	Statutory City of Chomutov	Kindergarten renovation, green roof	19,651,783	19,436,131	8,554,491

Source: prepared by the SAO on the basis of data from the audited entities.

→ The beneficiary breached the public procurement principles.

4.53 One of the beneficiaries breached Act No 134/2016 Coll. by failing to comply in awarding a small-scale public procurement contract with the principles of transparency, proportionality, equal treatment and non-discrimination, as it selected the contractor for subsidy management under the project only on the basis of previous experience, thus restricting the possibility of participation of multiple suppliers and the possibility of reviewing the actions related to contractor selection. The winning tender price was CZK 189,000 excluding VAT.

→ *These actions of the beneficiaries suggest a breach of budgetary discipline.*

4.54 The above breaches directly related to the purpose for which the subsidies were provided, occurred before the receipt of the funds and persisted at the time of receipt of the funds, which indicates a breach of budgetary discipline under Act No 218/2000 Coll., on Budgetary Rules and on Amendments to Certain Related Acts (budgetary rules).

D) Indicators for the evaluation of support to improve rainwater management

4.55 The SAO audit analysed the indicators, parameters and benchmarks set by the MoE in collaboration with the SEF for monitoring and evaluation of subsidy programmes aimed, inter alia, at supporting rainwater management in urbanised areas. The audit focused specifically on the analysis of indicators monitored under the OPEn14+ and OPEn21+, and the NRP Investments 2.5.1 and 2.9.2 implemented under the NGS and NEP programmes. The results of the analysis are summarised in Annex 2 of the Audit Report.

→ *In subsidy programmes focused on rainwater management, the MoE monitors indicators that are not comparable and thus cannot evaluate the contributions of all subsidy programmes to the set objectives of the approved strategies.*

4.56 For the OPEn14+, the MoE set the non-binding indicator of the *volume of retained rainwater* and, for Activity 2.9.2 of the NRP, as a binding indicator, its equivalent *volume of retained precipitation water*. These indicators are not linked to the indicators set by the MoE in the strategic documents for assessing progress. Moreover, none of the indicators allows for a comparison between the funds spent and the effects achieved, in particular because they are based on different methods of calculating the amount of retained rainwater and the reported values are inconsistent.

4.57 In the OPEn21+, the MoE monitors mainly general indicators of green infrastructure or the number of inhabitants benefiting from the measures. These indicators are not directly related to retention, seepage or accumulation of rainwater and do not allow for the measurement of the actual benefits of the projects. In the OPEn21+, the MoE also monitors non-binding SDIs, which, however, are linked to the indicators set by the MoE in the strategic documents for assessing progress and which allow for a comparison of the funds spent and the effects achieved, see also clauses 4.44 and 4.45.

4.58 In the NGS Programme, the MoE does not monitor any indicator for the amount of retained rainwater. The SEF, as the administrator of the NGS Programme, monitors two non-binding parameters, which are *green roof area* and the *rainwater accumulation tank volume*. Both these indicators are linked to the indicators set by the MoE in the approved strategies and allow for a comparison of the funds spent and the effects achieved. There may be some risk in that these are non-binding, internally monitored indicators, the achievement of the target values is not binding and the data registered are those entered by the beneficiaries in the application for support, which may not correspond to the actual project implementation due to implementation changes.

→ *The MoE does not monitor and evaluate the indicators of "impermeability of the surface" and "share of adapted buildings", although it has set these indicators in the Adaptation Strategy specifically for the assessment of rainwater management.*

- 4.59 The SAO audit also examined the indicators set by the MoE in strategic documents to monitor progress in the area of rainwater management.
- 4.60 The SAO found that the MoE last assessed two indicators from the Adaptation Strategy – the *share of adapted buildings* and *impermeability of the surface* – in 2017, as part of the *Assessment of vulnerability of the Czech Republic in relation to climate change as of 2017*. In the following years, the MoE no longer evaluated these indicators, the interpretation of the evaluation of these indicators in terms of further trends over periods of time is thus problematic.
- 4.61 The SAO found that the MoE does not yet systematically monitor the percentage of permeability in built-up areas. For evaluation of the indicator of *impermeability of the surface*, the MoE usually provides the indicator *share of built-up area*, which is monitored by the Czech Office for Surveying, Mapping and Cadastre. The trends in this indicator from 2000 until 2024 are shown in Table 11. The tendency of this indicator is negative, i.e., built-up areas and courtyards were constantly increasing over the period under review. The total built-up area in 2000 was 1,305.22 km², reaching 1,360.29 km² by 2024. This means that between 2000 and 2024, the built-up area increased by 4.2%.

Table 9: Development of built-up areas and courtyards between 2000 and 2024

Year	Area (km ²)	Year	Area (km ²)	Year	Area (km ²)	Year	Area (km ²)	Year	Area (km ²)
2000	1,305.22	2005	1,300.78	2010	1,313.66	2015	1,321.19	2020	1,332.77
2001	1,306.66	2006	1,301.94	2011	1,316.91	2016	1,322.17	2021	1,338.98
2002	1,305.87	2007	1,305.74	2012	1,318.00	2017	1,323.33	2022	1,345.19
2003	1,306.10	2008	1,309.33	2013	1,320.90	2018	1,324.63	2023	1,353.66
2004	1,303.07	2009	1,311.27	2014	1,321.92	2019	1,328.67	2024	1,360.29

Source: prepared by the SAO on the basis of the MoE data.

→ **The MoE did not conduct an annual evaluation of the indicators¹⁶ it had set for monitoring progress in the area of rainwater management in the Concept of Drought Protection for the Period 2023–2027.**

- 4.62 The SAO found that the MoE cannot evaluate most of the set indicators annually. For certain subsidy programmes, the MoE monitored, at project level, indicators that do not allow for an evaluation of the objectives set out in the CDP, and, for certain non-project indicators, does not have a system in place to obtain the necessary data and information.
- 4.63 For example, the MoE does not monitor and evaluate the implementation of the tasks from the *study on rainwater management in urbanised areas*, although their fulfilment is a requirement of the NAP (2021), and the MoE has chosen the *number of completed tasks from the study* as an indicator for evaluating progress in meeting the CDP.

E) Insufficient conceptual work of the MoE

→ **The MoE has prepared a study on rainwater management in urbanised areas, which, however, is not binding on any actors and its strategic objectives are difficult to implement.**

¹⁶ Number of completed tasks from the study on rainwater management in urbanised environments; accumulation volume of constructed facilities; volume of rainwater used; area of newly constructed permeable surfaces and green roofs; area of impermeable surfaces.

- 4.64 The SAO found that the MoE had not fulfilled the task set out in the NAP (in 2017), which is to prepare a concept for rainwater management and submit it to the Government for approval.¹⁷ The MoE was assigned this task by Government Resolution No 34 of 16 January 2017.
- 4.65 In 2019, the MoE submitted to the Government of the Czech Republic for information the *Study on Rainwater Management in Urbanised Areas*, which, however, does not fulfil the characteristics of a strategic document according to the Methodology for the Preparation of Public Strategies, which the ministries are meant to refer to according to Government Resolution No 318 of 2 May 2013. The SAO found that the study is not binding on any actors. In fact, the MoE did not set, in respect of the implementation of the changes it proposed in the study, any accountability, criteria for measuring success, implementation deadlines, or how the achievement of the set strategic objectives is to be evaluated.

→ The exemptions from charges for the discharge of rainwater into combined public sewer system have not yet been removed.

- 4.66 In the Czech Republic under Act No 274/2001 Coll.¹⁸, there is an obligation to pay a charge for the discharge of rainwater into public sewerage system. However, due to statutory exemptions, this obligation does not apply to all entities. This amounts to a breach of the “polluter pays” principle. The act largely applies to business properties and public buildings, while households are exempt from the charge.¹⁹ The current status thus is not conducive to motivating property and land owners to retain/use water so that it is not discharged into combined sewer system. The costs associated with the treatment of water diluted with rainwater are shared among all customers.
- 4.67 The removal of exemptions from the Water Supply and Sewerage Act has not yet been effected, although it is a priority measure mentioned across strategic and conceptual documents that relate to the topic of rainwater management in urbanised areas. This includes, e.g., a task set out in the NAP (2021), the responsible entity for which is the Ministry of Agriculture with the MoE as the co-responsible entity, which was to be completed as early as in 2023.²⁰
- 4.68 A major obstacle to the fulfilment of the task is the lack of coordination and cooperation between the responsible entity and the co-responsible entity for the measure, although both entities are bound by Government Resolution No 785 of 13 September 2021, in which the Government ordered the members of the Government to implement, within their respective areas of accountability, the tasks contained in the NAP (2021 version) in

¹⁷ Task 10_1.1 *Update the draft Concept of Rainwater Management in Urbanised Areas, taking into account the approved Adaptation Strategy of the Czech Republic and new insights, and submit it to the Government for approval.*

¹⁸ Act No 274/2001 Coll., on Water Supply and Sewerage for Public Use and on Amendments to Certain Acts (Water Supply and Sewerage Act).

¹⁹ Pursuant to the provisions of Section 20(6) of Act No 274/2001 Coll., the obligation to pay for the discharge of rainwater into public sewerage system does not apply to areas of motorways, roads, local roads and special purpose roads open to the public, areas of national and regional railways including fixed facilities necessary for the direct provision of safety and continuity of railway traffic, zoological gardens, public and non-public burial grounds and areas of real estate designated for permanent housing and households.

²⁰ NAP (2021), Task 4_1.9 *Propose a system for the gradual removal of exemptions from charges for the disposal of rainwater in the Water Supply and Sewerage Act.*

accordance with the Adaptation Strategy. According to *the Report on Adaptation of the Czech Republic to Climate Change 2025*, the reason for the failure to fulfil the task is the lack of political pressure and interest on part of other entities. The SAO also found that the calculation of impacts of the removal of exemptions from the Water Supply and Sewerage Act on municipal budgets at approximately CZK 3 billion, which is included in the status report for 2024, is entirely outdated as it is an estimate from 2013, i.e., a calculation based on prices and data that are at least 12 years old.

List of abbreviations

AB	apartment buildings
Adaptation Strategy	<i>Strategy on Adaptation to Climate Change in the Czech Republic</i>
CDP	<i>Concept of Drought Protection</i>
CR	Czech Republic
EU	European Union
FH	family houses
MF	Modernisation Fund
MoE	Ministry of the Environment
N/A	not available, not applicable
NAP	<i>National Action Plan on Adaptation to Climate Change</i>
NGS	<i>New Green Savings Programme</i>
NEP	<i>National Environment Programme</i>
NRP	<i>National Recovery Plan</i>
OPEn14+	<i>Operational Programme Environment 2014–2020</i>
OPEn21+	<i>Operational Programme Environment 2021–2027</i>
SAO	Supreme Audit Office
SDI	specific data items
SEF	State Environmental Fund of the Czech Republic
VAT	value added tax

List of Annexes

- Annex 1: Overview of audited projects
- Annex 2: Overview of indicators for rainwater management in the MoE subsidy programmes
- Annex 3: Overview of the amounts of subsidies to municipalities for improving rainwater management

Overview of audited projects

Table 10: Audited projects from Investment 2.9.2 of the NEP under the NRP

Project number	Project title	Beneficiary	Subsidy paid out (in CZK)	Volume of retained precipitation water (in m ³)
5211000045	Renovation of surfaces and rainwater management at the site Řevnice - Vrážka	City of Řevnice	44,361,829.37	761,800
5211000066	Green roof of the kindergarten at Palackého Street, house number 4059	Statutory City of Chomutov	3,825,791.69	2,109
5211000067	Green roof of the kindergarten at Zahradní Street, house number 5185		8,521,942.10	7,452
5211000083	Construction of a children's traffic park and a parking lot with a water-permeable surface in KOVO Park		6,632,623.86	6,880
5211000072	Rainwater management in built-up areas, Přemyslova Street, Chomutov, near the Kamencové jezero site	Municipality of Velká Hleďsebe	3,038,300.68	38,060
Total			66,380,487.70	816,301

Source: prepared by the SAO on the basis of the MoE and SEF data.

Table 11: Audited projects under Activity 1.3.4 of the OPEn21+

Project registration number	Project title	Beneficiary	Subsidy paid out (in CZK)	Volume of water retained per year (in m ³ /average year)	Area of impermeable surfaces replaced (in m ²)	Area of newly constructed permeable surfaces (in m ²)
CZ.05.01.03/04/22_019/0002265	Safe pavements, parking spaces and rainwater disposal – Unkovice, Hlavní Street and K Rybníku Street	Municipality of Unkovice	4,105,738.61 ¹	129.70	565.00	321.00
CZ.05.01.03/04/22_019/0002325	Komenský parking lot in Hranice	City of Hranice	5,652,244.35	1,127.00	1,786.55	65.84
CZ.05.01.03/04/22_019/0000541	Replacement of impermeable surfaces – keeping water in the landscape, Uherské Hradiště, Okružní Street	City of Uherské Hradiště	4,194,864.17	551.06	920.12	58.00
CZ.05.01.03/04/22_019/0000561	Rainwater management at the Za Humny site, Přísnovice	Municipality of Přísnovice	49,301,175.56	4,995.00	5,457.00	587.00
Total			63,254,022.69	6,802.76	8,728.67	1,031.84

Source: prepared by the SAO on the basis of the MoE and SEF data.

Explanation:

¹ Project under implementation, at the time of the audit only a part of the subsidy provided had been paid out.

Table 12: Overview of indicators for rainwater management in the MoE subsidy programmes

Subsidy programme	Indicator, parameter, benchmark	Binding by legal act	Indicator type	Unit	Achieved value	Actual indicator value as at (date)	Link to strategy
NGS (Investment 2.5.1 of the NRP)	Green roof area	NO	Internal (SEF)	m ²	124,984.52	30.06.2025	YES/CDP
	Rainwater accumulation tank volume	NO	Internal (SEF)	m ³	88,803.45	30.06.2025	YES/CDP
NEP (Investment 2.9.2 of the NRP) ²¹	Volume of retained precipitation water	YES	Main	m ³	25,580.41	01.09.2025	NO
OPEn14+ (Activity 1.3.2) ²¹	Volume of retained rainwater	YES	Main	m ³	22,932.34	29.09.2023	NO
OPEn21+ (Activity 1.3.4)	Volume of rainwater used	NO	Internal	m ³ /year	N/A	01.01.2025	YES/CDP
	Area from which rainwater runoff from the territories concerned is slowed down	NO	SDI	m ²	435,625.33	01.01.2025	YES/CDP
	Volume of water retained per year	NO	SDI	m ³ /year	641,153.88	01.01.2025	YES/CDP
	Retention volume of constructed facilities	NO	SDI	m ³	11,062.00	01.01.2025	YES/CDP
	Accumulation volume of constructed facilities	NO	SDI	m ³	5,140.27	01.01.2025	YES/CDP
	Irrigated area	NO	SDI	m ²	133,555.40	01.01.2025	NO
	Area of impermeable surfaces replaced	NO	SDI	m ²	90,673.51	01.01.2025	YES/CDP
	Area of newly constructed permeable surfaces	NO	SDI	m ²	27,034.85	01.01.2025	YES/CDP
	Accumulation capacity of roofs of buildings with accumulation ability	NO	SDI	m ³ /average year	1,996.78	01.01.2025	YES/CDP
	Area of implemented green roofs	NO	SDI	m ²	8,434.56	01.01.2025	YES/CDP
	Total area of roofs on the buildings and structures concerned	NO	SDI	m ²	9,750.06	01.01.2025	YES/CDP

Source: prepared by the SAO on the basis of the MoE and SEF data.

²¹ How the indicator is calculated at project level:

Replacement of impermeable paved surfaces with permeable paved and permeable surfaces: *Volume of retained precipitation water / volume of retained rainwater* [m³] = volume of newly infiltrated water in model rainfall.

Building permeable paved surfaces: *Volume of retained precipitation water / volume of retained rainwater* [m³] = volume of theoretically infiltrated water in model rainfall versus the volume of the same if the area concerned had tarmac surface (with runoff coefficient 1.0).

Tanks, pits, seepage facilities, etc.: *Volume of retained precipitation water / volume of retained rainwater* [m³] = design (maximum operating) volume of the tank, pit, seepage facility, etc.

Green roofs: *Volume of retained precipitation water / volume of retained rainwater* [m³] = volume of newly retained water in the functional roof profile in model rainfall.

Table 13: Overview of the amounts of subsidies to municipalities for improving rainwater management (in CZK)

Variable			Total	Statutory cities	Cities	Townships	Municipalities
Total number of municipalities in the Czech Republic (2025)			6,258	27	583	232	5,416
Number of municipalities that received a subsidy from the MoE			234	18	91	12	113
Percentage of municipalities that received a subsidy from the MoE for rainwater management			4%	67%	16%	5%	2%
Amount of subsidies provided to municipalities by the MoE			1,910,084,582.12	597,012,714.74	867,956,547.83	55,323,565.36	389,791,754.19
Number of implemented projects			388	66	170	13	139
- of which:	NRP, (NEP)	Amount of subsidies	732,787,709.11	181,759,523.71	353,270,688.80	43,161,111.61	154,596,384.99
		Number of projects	184	32	70	8	74
	OPEn14+	Amount of subsidies	320,590,070.64	114,035,353.99	123,114,808.77	6,627,946.88	76,811,961.00
		Number of projects	95	15	45	2	33
	OPEn21+	Amount of subsidies	856,706,802.37	301,217,837.04	391,571,050.26	5,534,506.87	158,383,408.20
		Number of projects	109	19	55	3	32

Source: prepared by the SAO on the basis of data from the MoE, SEF and the Czech Statistical Office.