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Tasks of state administration and local government in the management of illegally disposed waste in the Slovak Republic

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Abstract. The paper deals with the legal requirements for the procedure of local self-government entities (municipalities, cities) and state administration bodies at the local level in case of detection of illegally placed waste. The article also outlines how the person responsible for illegal dumping is identified, what is done if such a person is not identified and how those who have placed waste in black dumps can be punished. The author also points out in this paper the application problems in the application of the legal procedure for dealing with illegally placed waste, the lack of definition of competences between the subjects of local self-government and state administration bodies, as well as proposes certain changes to the legal regulation, which would be possible to eliminate the alleged application problems.

**Keywords:** waste management, state administration, local self-government, competences.

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## I. INTRODUCTION

Almost all municipalities face the negative phenomenon of dumping waste in places that are not intended for this purpose, i.e. in so-called illegal (black) dumps. This problem is particularly serious when such waste ends up in watercourses as a result of rainfall, and ultimately in the groundwater we drink.

When analysing the content of black dumps, it was found that more than 90% of the waste is mixed municipal waste and construction and demolition waste, and this waste also mostly comes from households from the reconstruction, extension or modernisation of family houses or apartments. This fact shows that black dumps are mostly set up by citizens, not companies (Bodíková, 2022). The producers of such illegally dumped waste are different categories of residents; it is not possible to reduce the producers to residents in marginalised communities.

Often, waste is dumped in black dumps by people who are trying to save money and, of course, there is a significant category of people who are not aware of the need to protect the environment (Mátel, 2010, p. 17).

Thus, waste that falls into the category of municipal waste and small construction waste usually ends up in black dumps (see Wright & Boorse, 2011, p. 545-587). The municipality is responsible for the management of this type of waste. The municipality is therefore also responsible for the management of such waste in black dumps, in the form of its legal disposal according to the applicable law. However, state administration bodies, particularly district authorities, as well as police forces, are also involved. The procedure of these authorities in connection with the removal of illegally placed waste is regulated by Act No. 79/2015 Coll. on Waste and on Amendments and Additions to Certain Acts, as amended (hereinafter referred to as the "Waste Act"), and in particular the provisions of Section 15 thereof (see Gašparíková & Takáč, 2019; Ďurďovičová, 2018). This Act has been amended 18 times in its six-year existence. We certainly do not consider the current state amendments to the relatively recently adopted completely new law adequate (Marišová & Valenčíková, 2021, p. 22).

The aim of this paper is to analyse the current legislation in the Slovak Republic regulating the procedure of competent authorities in the management of illegally placed waste, to point out the existing application problems in the application of the legal procedure, as well as the shortcomings of the definition of competences between the subjects of local self-government and state administration. The aim is also to propose certain changes to the legal regulation that could eliminate the alleged application problems.

In the context of the research on the issue, the basic research methods common in legal science were used, namely analysis, synthesis, explanation, interpretation and description. First of all, it was necessary to analyse the current legislation regulating waste management and the determination of the competences of the relevant authorities. Consequently, it was necessary to aggregate the findings into a certain summary relating to the determination of liability for illegal waste disposal and relating to the roles of public authorities in enforcing it. Some of the institutes used in the legislation had to be further interpreted and explained taking into account the subject of the research. In order to identify existing application problems, the method of guided interviews with entities directly involved in the process of illegally disposed waste management, municipalities and district authorities was also chosen.

## II. LEGAL PROCEDURE FOR DEALING WITH ILLEGALLY PLACED WASTE

As mentioned above, the requirements for the procedure of the municipality as well as the district authority are regulated in particular in Section 15 of the Waste Act. This procedure can be divided into relatively separate phases as below.

#### (a) Obtaining information on illegally placed waste

Any natural or legal person may report the illegal placement of waste to the municipality where the waste is located or to the competent District Authority, its Department of Environmental Protection. Similarly, the municipality may reach such a finding through its own investigation or on the basis of a notification from another public authority. The use of the "TrashOut" application, through which suggestions are automatically generated to the municipality concerned, has also been extended.

On the other hand, if the owner, administrator or tenant of the land finds out that waste is placed on it, then he is obliged (not only entitled) to notify the municipality or the district authority within three working days. Failure to comply with this notification obligation is considered an offence for which the municipality may impose a fine of up to 1.500 EUR.

Thus, if the municipality discovers the existence of a black dump – illegally placed waste from any source, it is obliged to notify the competent District Authority, its Department of Environmental Protection within seven working days of the discovery. It shall also apply vice versa, i.e. the District Authority will also inform the

municipality of the identification of a black dump. If the black dump is located in a protected area, the State Nature Conservancy of the Slovak Republic must also be informed. In the event that illegally placed waste is in a watercourse, on coastal land or in a floodplain, the relevant state water administration authority – the district office and the Slovak Environmental Inspectorate must be notified.

### (b) Identification of the person responsible for the illegal dumping of waste

On the basis of the notifications as well as information from the municipalities, the competent District Office, its Department of Environmental Protection shall carry out a local inspection at the black dump site in order to assess the extent of the dump and the damage to the environment. Based on this circumstance, it may even be a criminal offence of unauthorised disposal of waste pursuant to Section 302 of Act No. 300/2005 Coll. Criminal Act, as amended (hereinafter referred to as the "Criminal Act"), if the damage exceeds the amount of 266 EUR. In determining the amount of the damage, the price at which the waste is normally collected, transported, exported, imported, recovered, disposed of or stored at the time and place of the offence and the price for the removal of the waste from a place not intended for its disposal shall be taken as the basis for determining the amount of the damage. This investigation is therefore carried out by the District Office, the Department of Environmental Protection, which may also request assistance from the Slovak Environmental Inspection. On the basis of the above investigation, it will draw up an expert statement indicating the amount of the damage and whether this amount of damage justifies criminal prosecution (Duska, 2022).

If, from the facts found, the district authority has reasonable grounds to suspect that a criminal offence has been committed (in particular the offence of unauthorised waste management), it shall notify it to the authorities active in the criminal proceedings, i.e. generally to the competent district police department or the district prosecutor's office.

On the other hand, if the amount of the damage does not exceed 266 EUR, or there are no circumstances indicating a criminal offence, then the District Authority, its department of Environmental Protection itself, will initiate proceedings to determine the person responsible for the illegal placement of waste; this procedure is governed by the Act No. 71/1967 Coll. on Administrative Procedure (Administrative Procedure Code), as amended (hereinafter referred to as the "Administrative Procedure Code"), including the time limit for the decision, which is normally 30 days.

First of all, the district authority tries to obtain information about the person who generated the waste, who is usually also the person who illegally disposed of the waste. Such sources of information will be mainly various invoices with names on them, SIPO receipts, envelopes, boxes with address labels, receipts, etc. Consequently, it is a matter for further evidence to prove that such a waste producer has illegally placed it at the site in question. This can be done by the testimony of the producer himself, other persons, or camera for photo tape, etc. In order to obtain supporting documents, the district authority may also ask for the assistance of a police authority. If the person responsible for the illegal dumping is so identified, this shall be stated in the decision and that person shall also be designated as responsible for ensuring that the waste is disposed of within a reasonable period of time for its removal.

In the event that the responsible person cannot be determined in the above manner, the owner, administrator or tenant of the property on which such waste has been illegally placed may also be determined to be responsible for the illegal placement of the waste. However, this only applies if one of the following conditions is met:

- the owner, administrator or tenant of the property has neglected the obligation to take all measures to protect his/her property resulting from legal regulations (e.g. he/she has not fenced the construction site in the intravillan to a height of at least 1.8 m, as it results from the Decree of the Ministry of Labour, Social Affairs and Family of the Slovak Republic No. 147/2013 Coll., which establishes details for ensuring safety

- and health protection during construction work and related works and details on professional competence for the performance of certain work activities in the n. n. p.),
- the owner, administrator or tenant of the property has neglected an obligation resulting from a court decision (e.g. if the court imposes an obligation on the owner of the land to fence it),
- the owner, administrator or tenant of the property has benefited financially or otherwise from the illegal dumping (e.g. has received payment from the waste producer).

If the above conditions are proven, the District Authority, the Department of Environmental Protection, shall designate the owner, administrator or tenant of the property on which the waste has been illegally placed as the person obliged to ensure the disposal of the illegally placed waste and shall also set an appropriate time limit for its removal.

In view of the above, whether the person responsible for the illegal placement of the waste is identified, or the owner, administrator or tenant of the property is identified as such a person because of neglect of one of his/her duties or because of benefit from the placement of the waste, the decision will impose an obligation on such persons to remove the waste, as well as a time limit within which they are to do so. This decision of the district authority is enforceable by administrative enforcement or through a court enforcement, whereby the enforcement will be carried out by substitute enforcement, i.e. another entity (collecting waste in the municipality) will be entrusted to remove the waste at the expense of the responsible person and the costs will be recovered from the responsible person.

However, such a procedure may also result in a failure to identify the person responsible for the illegal dumping. In such a case, the District Office, its Department of Environmental Protection shall discontinue the proceedings due to the absence of grounds for initiating the proceedings ex officio and shall state its finding in the statement of reasons. Such a decision shall not preclude the reopening of the proceedings for the determination of the person liable, if new circumstances or evidence come to light.

# (c) Designation of the person responsible for ensuring the recovery or disposal of illegally disposed waste

However, even if every effort is made, it is not certain that the person responsible for the illegal placement of the waste will be identified and ordered to remove it. On the other hand, it cannot be the case that a black dump will not be removed in a reasonable time so as not to endanger life, health, property or the environment. In such cases, the District Authority, Department of Environmental Protection, therefore conducts proceedings for the determination of the person obliged to ensure the recovery or disposal of illegally placed waste.

These proceedings are also conducted during criminal procedure (if total damage exceeds 266 EUR), because the criminal proceedings are taking place over a long period of time and the need to remove the black dump cannot bear such a delay. Of course, it is necessary to wait for authorities active in the criminal proceedings to document the clues and evidence needed for the purposes of criminal proceedings. Illegally disposed waste can only be treated or disposed of after a positive opinion of the authority active in the criminal proceedings (police).

In the procedure for the determination of the person obliged to ensure the recovery or disposal of illegally disposed waste, the District Authority, Department of the Environment Protection shall state in the decision that it shall ensure the recovery or disposal of illegally disposed waste in accordance with the law within a specified reasonable period of time, so as not to endanger human life or health or to damage the environment, and at its own expense:

- the municipality on whose territory the waste was illegally placed, if it is municipal waste or small construction waste,
- the District Authority, its Department of environmental protection, if the waste is other than municipal waste and small construction waste, or

- the holder of the illegally placed waste or the owner, administrator or tenant of the property on which the illegally placed waste is located, only if they express an interest in ensuring the recovery or disposal of the illegally placed waste.

The persons so designated shall ensure the recovery or disposal of the illegally placed waste within the time limit specified in the decision and at their own expense. Funding from the Environment Fund may also be made available for this purpose. However, if the person responsible for the illegal dumping is identified (new facts or evidence come to light) or convicted of a criminal offence of illegal waste disposal in criminal proceedings, compensation for the costs incurred in removing the illegally dumped waste can be sought against that person.

It is evident from the above that the legal procedure of identifying the person responsible for illegal waste dumping and subsequently determining the person obliged to ensure the removal of waste is a relatively complicated and time-consuming process, requiring the activity of several entities, in particular the District Authority, the Department of Environmental Protection, the municipality, authorities active in the criminal proceedings, the Slovak Environmental Inspectorate, etc. As a result of the length of time these processes take, the public interest in the rapid removal of the illegal black dumpsite and in ensuring order and cleanliness in the municipality may be undermined.

Therefore, municipalities have the possibility to recover or dispose of illegally placed municipal waste and small construction waste themselves at their own expense, immediately after its detection and without the need for the implementation of the above mentioned procedural procedures by the district authority. The municipality is obliged to inform the District Office, Department of Environmental Protection, about the application of this procedure within three working days after its discovery.

In the current conditions, it is rather a rule that the removal of illegally placed municipal waste and small construction waste is ensured by the municipality after its detection, due to the above-mentioned circumstances about the time duration and inefficiency of the processes of identifying the responsible person and determining the person obliged to ensure the recovery or disposal of the waste. In the case of municipal waste or small construction waste, this will be the municipality anyway, but after a bureaucratic procedure and after a long time. It is also not surprising to find that district offices are not staffed to effectively implement the processes prescribed by law.

### (d) Enforcement of liability against persons responsible for illegal dumping

The activity consisting in dumping waste in a place other than that provided for by law or designated for that purpose may give rise to various legal consequences. As stated above, the person who did so is liable for the costs associated with the removal of the illegally placed waste. However, in addition to such a reparative sanction, a punitive sanction is also an option. Depending on the perpetrator, the degree of culpability and the amount of environmental damage, a criminal offence or an administrative offence may have been committed. A different public authority is competent to hear and determine each of these types of offences (Ružička, 2019).

The possibility of criminal liability has already been mentioned. Pursuant to § 302 sec. 1 of the Criminal Code applies: "Whoever, even negligently, handles waste on a small scale in violation of generally binding legal regulations shall be punished by imprisonment for up to two years.".

If we are talking specifically about the crime of illegal waste disposal, the main reason for committing it is to gain an economic benefit. For the perpetrator, it is economically more profitable to take the waste, for example, to a field, a forest, a river, etc., than to legally dispose of it, according to the law. The second, and no less common, cause is the indifference of perpetrators to environmental protection (Kučerová, 2019, p. 80).

In order to meet the elements of the offence in question, it is necessary that the damage to the environment exceeds the amount of 266 EUR. As the damage to the environment increases, or if damage to life and health also occurs, the penal rate increases.

As regards the subjective aspect of this offence, since the amendment to the Criminal Act No. 174/2015 Coll. (from 1 September 2015), which completed the transposition of Art. 3 of Directive 2008/99/EC of the European Parliament and of the Council of 19 November 2008 on the protection of the environment through criminal law, the proceedings referred to in Art. 3(b) and (c) of this Directive are punishable when committed 'intentionally or at least with gross negligence'. As a result, negligence is sufficient to fulfil the formal elements of the offence of illegal waste disposal (Čentéš, 2020, p. 663). Such a criminal offence may be committed by both a natural person and a legal person (Section 3 of Act No. 91/2016 Coll. on the Criminal Liability of Legal Persons and on Amendments and Additions to Certain Acts, as amended).

If a natural person commits the act of illegal waste placement, but the amount of damage to the environment does not exceed 266 EUR, it would be a misdemeanor under Section 115(1)(a) of the Act. 1(c) of the Waste Act, which the municipality is competent to deal with. A fine of up to 1.500 EUR may be imposed in ordinary misdemeanor proceedings. At the same time as imposing a fine, the municipality is entitled to impose measures on the person responsible for the offence to remedy the consequences of the unlawful act (e.g. to remove the waste at its own expense). A fine of up to 33 EUR may be imposed in the case of block proceedings and up to 250 EUR in the case of order proceedings, but no remedial measure may be imposed. The incomes from these fines are revenue for the municipality's budget. The misdemeanor is dealt with by the municipality within the framework of the misdemeanor proceedings according to Act No 372/1990 Coll. on misdemeanors, as amended, with subsidiary application of the Administrative Procedure Code.

Finally, such an act of illegal waste placement may also be an administrative offence, provided that it is committed by a natural person – entrepreneur or legal entity, provided that the act is not treated as a criminal offence (as a rule, when the amount of damage to the environment does not exceed 266 EUR). This administrative offence is dealt with by the District Office, Department of Environmental Protection, which may impose a fine of between 4.000 EUR and 350.000 EUR. This administrative offence shall be dealt with in the ordinary administrative procedure under the Administrative Procedure Code. The imposition of fines in this case should be seen as a manifestation of the application of the 'polluter pays' principle. According to this principle, whoever imposes burdens on the environment is obliged to bear the costs necessary to remove such burdens and to restore the state of the environment or to prevent the occurrence of future environmental burdens (Košičiarová, 2009, p. 23).

### III. APPLICATION PROBLEMS AND POSSIBLE SOLUTIONS

In connection with the research on the issue, guided interviews were also conducted with representatives of district authorities and selected municipalities in the territory of the Košice and Nitra regions. The results of these guided interviews were one of the sources of information on possible application problems in the context and application of the procedure for the management of illegally disposed waste.

First of all, the legal process for dealing with illegally dumped waste is lengthy, bureaucratic and inefficient. This was also identifiable within the previous section of this paper. As part of the process, the first step is to identify the person responsible for the illegal dumping. This procedure is then followed by a procedure for the determination of the person obliged to ensure the recovery or disposal of the illegally disposed waste. If the person who illegally placed the waste is identified, then either a misdemeanor, administrative offence or criminal proceedings follow, the purpose of which is to repress the offender. Various public authorities, such as district authorities, police forces, municipalities and environmental inspectorates, are also involved in these proceedings.

In our view, the procedure for finding the person responsible for the illegal dumping carried out by the district authority is an inappropriate instrument. Firstly, the district authorities are not sufficiently staffed, nor do they have

the investigative capacity necessary to reach the necessary conclusions. A better solution would be to make the identification of those responsible for illegal waste dumping as the task of the police from the beginning (i.e. not only if the amount of damage exceeds 266 EUR, in which case it is a criminal offence). After identifying such a person and according to the environmental damage found, they would refer the case to the municipality for misdemeanour proceedings, or to the district authority for administrative offence proceedings, or they would proceed with criminal proceedings. Alternatively, further proceedings could only be conducted in the context of criminal proceedings, as discussed below. Of course, the district authority would provide the necessary assistance, especially in the scope of determining the amount of environmental damage.

Thus, it follows from the foregoing that separate proceedings for the determination of the person responsible for the disposal of the waste have no reason. The purpose of this procedure would be fulfilled more efficiently if the identification of the person responsible for the disposal of the waste were a phase of the misdemeanor proceedings (in the form of clarification of an offence) or criminal proceedings (in the form of preparatory proceedings), or part of the administrative proceedings for an administrative offence. Of course, in all these proceedings, the investigative part should be carried out by the Police Force, which is equipped with the appropriate instruments. However, this cannot be stated in relation to district authorities and municipalities. They would then decide on the sanction on the basis of the information from the investigation provided by the Police Force.

As mentioned above, illegal dumping of waste can lead to various types of penalties. If the offender is a natural person and the environmental damage does not exceed 266 EUR, then the penalty is imposed in the misdemeanor proceedings conducted by the municipality. If such an act is committed by a legal entity or a natural person entrepreneur, and the damage to the environment does not exceed 266 EUR, then the administrative offence procedure is carried out by the district authority, the department of Environmental Protection. However, if the amount of damage exceeds 266 EUR, it is a criminal offence, which is investigated by the police and decided by the courts. We consider that it would be more appropriate to unify the punitive means in the case of illegal waste disposal. Given that this is a fundamental problem in society, it would be most appropriate to criminalise all acts of illegal waste disposal, i.e. regardless of the amount of environmental damage. This would strengthen the deterrent effect of the sanction, the investigation would be carried out by the police authorities in all cases, and conflicts in the competences of all public authorities involved would be eliminated.

Also, the current legislation very poorly reflects the responsibility of owners, tenants or property administrator for the removal of waste that is illegally placed on their land. Their liability only comes into consideration in very limited cases (if they have not fulfilled an obligation under the law, a decision or if they have benefited from the placement of the waste). Given this limited responsibility of owners, tenants or administrators, the municipality is usually responsible for the removal of the waste. This is often limited by the financial possibilities of the municipality.

In order to improve the process of dealing with illegally placed waste, it would be preferable if owners, tenants or property administrators were automatically responsible for the removal of waste that is illegally placed on their properties. This is also related to the principle that ownership is binding. They could only be relieved of this responsibility if it is proven that another person placed the waste on the property. That is, if this would be proven in misdemeanour, criminal or administrative offence proceedings. Liability of the municipality for removal of the waste would only arise if the person who illegally placed the waste is not identified, nor is the owner, tenant or property administrator identified or known.

We believe that the above proposals would improve the process of dealing with illegally disposed waste, eliminate (at least partially) existing application problems, as well as eliminate conflicts in competences between municipalities and district authorities.

#### IV. CONCLUSION

The current legislation divides competences in relation to the illegal dumping of waste between district authorities and municipalities. The competences of the district authority include, in particular, the conduct of proceedings for the identification of the person responsible for the dumping of the waste and, subsequently, proceedings for the identification of the person obliged to ensure the recovery or disposal of the waste. For non-municipal waste, the district authority will be the obliged person. The district authority will also deal with administrative offences of legal entities or natural persons – entrepreneurs in case of proving illegal waste placement.

On the other hand, the competences of the municipality include in particular to ensure the recovery or disposal of illegally disposed municipal and small construction waste, whether voluntarily or compulsorily, by virtue of the fact that the municipality will be determined to be obliged to do so by the district authority. At the same time, the municipality is also responsible for dealing with misdemeanors consisting in illegal waste placement in relation to natural persons, which it can also deal with in block or order proceedings.

In view of the previous experience and the staffing capacity of the district authority, we consider that the competence of the district authority to conduct proceedings to establish the person responsible for the illegal dumping of waste is being exercised inefficiently. It would be preferable if this activity were carried out by the Police Force with the strengthening of the so-called Enviropolice component. Subsequently, the clarified acts and their perpetrators would be referred to criminal proceedings, misdemeanor proceedings or administrative offence proceedings. Alternatively, there would be a unification of the punishment for such actions only in the level of a criminal offence. It would also be preferable to strengthen the responsibility of owners, tenants and property administrator for the removal of illegally placed waste.

In the framework of this paper, the legal conditions for the management of illegally disposed waste have been examined and certain application problems have been identified. At the same time, certain options were suggested, consisting in changes to the legislation, which could minimise the aforementioned application problems. In further research on the issue, however, we plan to deal with the legal regulation in other countries in order to compare and find the optimal model in the Slovak Republic as well..

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