

HUNGARIAN ENVIRONMENTAL PROTECTION LICENSING AND ENFORCEMENT PROCEDURES

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SUMMARY

Besides being the owners, the state operated its properties as repositories of power at the time the laws concerning environmental protection (II. Law of 1976) went into force.

Economic policy was not environmentally friendly, although it was declared as such on paper. Legal measures did not work as part of the market economy and did not even force the entrepreneurs to think over the environmental consequences of their production.

Fining was a dominant part of environmental protection regulations as the participants of the economy had to be kept under the pressure of threatening sanctioning. Until recently the state's company stood against the state's authority; therefore, sanctioning often had to be or could be ignored.

The situation has changed by now, and the state's authority stands against the transforming companies and the new owners of transformed companies. The direct intervention in the authority's work has stopped.

Subsequent to the social and economic changes, privatization is the basis of ownership changes, and it is clear that the elimination of environmental damages can only be done and managed at the time of ownership changes.

Clear sight is made more difficult since the terminated, transforming, and newly established companies and their activities concerning environmental protection can be hardly traced even with the greatest effort. Therefore, the efficiency of controls is deteriorating, with the possibility of eliminating damage decreasing or falling on the state. The low standard of morale in the economy and individual interests coming to the front voluntarily make adherence to the law less significant.

Freedom of enterprise brings up a new type of problem; namely, that the entrepreneur builds on short-term conception and tries to render environmental aspects secondary again. Our valid legal material, which can still be considered based on social principles, must be applied to the economy of private ownership and to actions of entrepreneurs.

A very strong environmental protection authority is necessary for the transformation, to which the governmental department has made the necessary initial steps. The environmental protection section must get a more important role in the distribution of labour of governmental duties.

In order that the organizations of environmental protection authority work according to expectations, they must be:

- Predictable.
- Consistent.
- Appropriately strict.
- Unanimous in the judgement of the same behaviour of environmental exploitation and technology. This can be achieved only by providing the intellectual and financial resources in the ratio of tasks.

1 INTRODUCTION

This report of the actions of the environmental protection authority intends to give a comprehensive view of the activities that will sooner or later hopefully contribute to the improvement of the environment's condition in Hungary.

Here we describe the development of the operating system, its legal, financial, and technological implements, and the experiences of the operation.

We present the condition we aim at and we consider desirable, and we sketch the possible ways for its achievement.

We are also trying to show our official activities with some factual data and characteristic examples. The discussion is supplemented with tables and figures attached in the Appendices.

We try to throw light on the struggle of the environmental authority for meeting the ever increasing expectations of the society and on the other hand with the restricting regulations.

2 THE DEVELOPMENT AND AUTHORITY OF THE ORGANIZATION

The establishment of the environmental protection authority can be separated into three distinguished steps.

- The legal predecessor of the present environmental protection authority was on the one hand established within the water management organization that had century old traditions, and on the other hand in the National Environment and Nature Conservation Office that was established in the 1970's.
- The two organizations, which differed completely both in their traditions and legal regulations, united in 1988 and the KÖVIZIG (Környezetvédelmi és Vízügyi Igazgatóságok; Environmental Protection and Water Management Authorities) organizations were founded.
- The separation of these on 1st December in 1990 brought on the present organization system that carries out duties concerning environmental protection, and the Environmental Protection Supervisory Board and 12 regional environmental protection boards were established.

This way, even according to the foreign experts, one of Europe's most up-to-date special administration department was created in Hungary.

The Environmental Protection Supervisory Board is an administrative body of national authority. It is an independent legal entity under the direction of the Minister of Environmental Protection and Regional Development.

The Environmental Protection Supervisory Board exercises authority (special administration authority) of the second instance in the administration of environmental protection and nature conservation (in two types of environmental protection issues it has the first instance authority). It provides the Minister with data, which accumulated during the activities of the Board for the fulfilment of governmental duties; analyses and evaluates the implementation of regulations; directs the official activities of the regional organizations of environmental protection administration, the execution of duties concerning the elimination of damage, and performs the role of legal representation.

Regional duties are performed by 12 regional environmental protection boards organized according to catchment areas.

These boards are independent legal entities—publicly financed administrative organizations with independent wage management. They perform the administrative and official duties concerning clean air protection, water quality and quantity protection, and the actions against dangerous effects of waste materials, noise, and vibration in their region.

Since the summer of 1993 environmental protection licenses are issued on the basis of impact studies. They also observe and analyze the region's environmental condition and its protection;

forecast probable, considerable impacts on the environment; and provide concerning data. They operate the information and monitoring system, conduct the regional and technical coordination of tasks requiring more than one office's coordinated participation, and conduct laboratory investigation concerning the administrative duties and the prevention and elimination of damage caused to the environment. Moreover, they prepare the evaluation of environmental developments, investments, and grant applications, and the reports on environmental protection auditing.

The above described sphere of duties of this system does not include the entire scope of environmental protection. The local governments, medical officer service, the plant and soil protection service, and the office of transportation also perform duties of environmental protection in divided authority. Due to the divided authority there are overlaps, and uncoordinated work is quite typical.

3 CONDITIONS FOR OPERATION

3.1 Legal framework for the operation

Article 49 point (1) of the law concerning the protection of the human environment provides that the performance of sectional and official duties of environmental protection falls under the jurisdiction of administrative organizations stipulated in separate regulations.

According to the provision of the aforementioned law, the Government established the Environmental Protection Supervisory Board in the 43/1990. (IX.15) decree.

Under the authorization of the Government, the Minister of Environmental Protection and Regional Development provided the establishment of the environmental protection boards in the 1/1990. (XI.13.) KTM decree.

In the Appendix of the 1/1990. (XI.13.) KTM decree those prevailing laws that stipulate the jurisdiction of the boards are listed. These and other laws that came into effect since form the legal framework of the operation. (See Appendix 1.)

These laws are not the permitting types, but assume the voluntary observance of and adherence to the law. Therefore these are considered indirect implements, and hardly meet the modern preventive principles.

3.2 Personnel conditions of operation

The staff number of the Environmental Protection Supervisory Board is 27 persons, and the staff number of the 12 regional boards is 1,150 persons. Each regional board operates an official department with lawyers, a professional office with experts in every field concerning environmental protection, a laboratory, and administrative and service departments. More than half of the staff are professionals with several diplomas.

3.3 Technical conditions for operation

The Hungarian Republic provides the major part of financing to the boards (more than 90%, the remaining part comes from the boards' own revenue).

The full amount needed for carrying out the official duties is not at the disposal of the boards. Regarding the budget deficit that exceeds 300 billion HUF (3 billion USD), a quick improvement of the situation is not probable.

The most urgent task, besides equipment development, is to accredit a laboratory to each environmental protection board. The first step to this was the regulation of sewage and sewage-sludge investigation procedures.

4 THE RESULTS AND EXPERIENCES OF OPERATION SO FAR

The duties of the boards consist basically of two parts:

- Official activities, which cover licensing, supervision, imposing sanctions, the operation and evaluation of the monitoring system, the direction of damage elimination.
- Tasks concerning the entire scope of environmental protection (e.g., the observation of the environment's condition, establishment and evaluation of tendencies, forecasts of probable environmental impacts, provision of information concerning these, reporting on regulations).

4.1 The boards' duties in the special fields

4.1.1 Water protection

Besides the investigation of sewage discharge into the surface and subsurface waters, the environmental protection boards continuously observe the original condition of surface and subsurface waters in order to measure and determine the effects and extent of changes of intervention during the official activities.

Sampling of the discharge and laboratory examination are always part of the official controls. The results are not only suitable for the determination of pollutant load discharged in the environment, but also for the judgement of the efficiency of sewage purification. Self-control measurements, made by the companies for years, complement the information for the official inspection. Fines for those discharging over the limit are determined on these measurements.

The decree stipulating the sewage fine, on the other hand, is out of date, since the sum of imposed fines has no deterring effect. The fines that were determined according to the 3/1984. (II.7.) OVH decree of 1982-1983 prices are quite low. The fines have doubled since 1st January 1994, but their effect will appear only on fines imposed in 1995.

4.1.2 Soil protection

The soil is the only one among the elements that should be protected which is covered by no environmental protection regulation. Soil pollutants are not specified, and no discharge limits are determined for them. The Supervisory Board initiated the amendment of the law when the law concerning the land was modified.

The need for regulations concerning soil protection and the permitted pollutant concentration limit in the soil firmly appear in practice (e.g., in connection with the cleaning of the former Soviet army barracks, and spills of other dangerous waste and materials). To overcome this problem, in the case of the former Soviet army barracks, the Supervisory Board issued temporary guidelines to the boards based on the Dutch regulations.

4.1.3 Clean air protection

The sphere of duties concerning clean air protection is divided among three departments (environmental protection, public welfare, and transportation) and the local governments. Actions of the environmental protection boards only extend to the determination of emission limits, the checks on self-declarations, and imposition of fines according to the ruling concerning clean air protection (21/1986. [VI.2.] MT decree).

It would be important if we could control everyone emitting pollutants with instrumental investigation along with their self-declaration. The conditions for this are not available at the moment; thus, a large part of the decisions and fine-imposing resolutions are based on self-declarations.

The present unmanageable situation would be temporarily improved if uniform data bases were established at the boards that were available for everyone.

4.1.4 Protection from noise and vibration

Duties in connection with protection from noise and vibration were also distributed among three departments (environmental protection, public welfare, and transportation) and the local governments.

Since the 12/1984. (V.12.) MT decree was put into force, actions concerning noise protection were conducted at the environmental protection boards on a good professional basis, which gradually developed.

The absence of good conditions for efficient work, on the other hand, is preventing such actions as the recording of all noise resources, preparation of a noise map, and the amendment of regional and community development plans with a noise protection section. A procedure at present is typically started after the filing of a complaint.

4.1.5 Protection against the harmful effects of waste

This field causes the greatest tension at the boards and with the clients as well. Meanwhile, here is the society's greatest contradiction between expectations and patience.

The 56/1981. (XI.18) MT decree which was modified on several occasions, the most recently by the 27/1992. (I.30.) governmental decree, is rather out-of-date legal material. The individual official decisions, therefore, are quite varied. This is supported also by the fact that most of our decisions questioned before a court are concerned with dangerous waste material.

The environmental protection authorities have licensing authority concerning dangerous waste, although the society's expectations include other production waste and the waste materials of the communities.

The conditions for transporting waste material within the country and over the border are unsettled. Due to the lack of regulation, we cannot stop the mass inflow of products and equipment that can be applied for proper use for a short period of time but become waste soon.

Priority in our actions against the harmful effects of waste must be given to prevention. The adoption of waste-sparing technologies, recycle of produced waste material, the producers' responsibility concerning the further course of the generated waste material, its minimalization, and the enforcement of a regional approach must be supported for the achievement of this goal. The present legal background is contradictory to the preventive approach.

4.2 Conducting environmental protection measurements

The boards carry out three different types of measuring tasks:

- Measurements to substantiate official decisions.
- Measurements and evaluation of data that help the observation of the environment's condition in the boards' jurisdictions.
- Measurements to back up the classification and extent of extraordinary pollution and the estimation of the necessary extent for the elimination of damage.

The environmental protection measuring network examines usually 4,500 national, 5,000 local surface, and 1,700 subsurface water samples. In addition, 700 soil and waste samples, 2,000 to 3,000 extraordinary pollution samples, and 5,100 sewage samples are examined. The number of sampling points for clean air protection is more than 600.

We believe that many more examinations would be necessary for well-founded official decisions and for the maintenance of the environment at a higher quality level. This capacity can be achieved with either extensive or intensive development.

4.3 Extraordinary pollution and damage elimination

About 3,000 occasions of extraordinary pollution are reported to the boards in a year in Hungary. These reports call for immediate actions regarding the possible damage to the environment.

Water, air, and soil pollution are all found in these extraordinary events. The causes of pollution are various, too (industrial discharge, inappropriate storage of waste, accidents), but anomalies also occur due to weather conditions (a low water level makes the water quality deteriorate, and pollutants get washed in). Pollution is increasing in connection with road transportation (fuel transportation, etc.) and pollution related to economic crimes has also occurred (household fuel turned into diesel oil, unlicensed waste import).

These cases do not only mean extra and unexpected tasks for the boards, but they have considerable publicity because of society's sensitivity. Therefore, they carry great importance in environmental policy. The entire work concerning environmental protection is concluded from our activities in connection with these events.

The boards do not have authority over an independent damage elimination apparatus, nor is its establishment planned. The necessary staff for damage elimination is borrowed from the partner organizations (water management, fire department, civil defence, entrepreneurs) according to the given task. The coordination of the elimination of damage and its environmental protection classification are the boards' responsibility.

Every board office possesses a cellular telephone for the coordination of damage elimination and performance of duty. Managers and employees are on call for 24 hours a day. About 0.5 to 3 hours are necessary for the operation of the system from the time of observation.

Those who cause damage are more often unable to eliminate or finance the elimination of damage; therefore, the whole cost of elimination is borne by the government. There are more and more discovered waste deposits and irresponsible entrepreneurs without legal successors to fulfil their irresponsibilities.

Considering all the above, the creation of a central fund, in which payment would be compulsory according to production value and environmental risk is imperative. The fund could be used according to a previously established order of national priority and the reported pollution's impact on the environment.

4.4 Administrative duties involving several special branches

In addition to the evaluation of the environment's condition, development, investment, privatization, as well as the enforcement of environmental interest in bankruptcy procedures and liquidations are all the concerns of every branch.

The regulation of environmental impact studies, issued in June 1993, is a tool in the hands of legal executives with which they are able to ensure the implementation of environmental protection requirements in the various stages of investment and development. Its application, however, would be even more efficient if the rule allowed the start of actions professionally and ensured the necessary sanctions.

The goal of environmental auditing prior to privatization or transformation is to establish the financial and personnel conditions for the handling of environmental damages.

The content requirements of the submitted documents during auditing and the methods of handling environmental damages are not specified by regulations. Their lack could be temporarily and partly addressed by a rescript of the Supervisory Board. Almost 300 ministerial statements were made this way.

4.5 The domestic and foreign relationships of the environmental protection authority

The operative official organization's most important connection is the Ministry for Environmental Protection and Regional Development, which provides supervision over it.

The direction system has recently stabilized. It is very clear that the Ministry cannot exclude the accumulated data and expert knowledge of the boards' for its task to perform the legislative and evaluation duties of the environment's condition. The appropriate forums have been established for that.

The international relationships of the Supervisory Board and the regional boards are restricted to cooperation among the authorities (Basel Convention, Agreement on Border Waters).

In addition to the legal obligations (with the VIZIG, ÁNTSZ, local governments) we have made agreements with the fire department and water managing organizations so that we can make our work more effective. There are partial agreements with the police and civil defence forces. Their extension to full-range agreements are under preparation. We also plan to settle the cooperation relationship with the National Headquarters of Customs, which is now occasional and not effective.

4.6 Results and some typical problems

In Section 4 in which we summarized our experiences so far, we made some general statements about the operation of the special fields. These will serve the preparation of a considerable improvement of our work's quality and efficiency. In this section we list some summarizing and explanatory figures, and show some typical problems.

Water protection: The boards gave the opinion of the special departments for issue of 3,800 different water licenses in connection with the protection of the quality and quantity of waters. The sum of imposed sewage fines is 280 to 320 million HUF, which is based on almost 500 decisions. Seven thousand cases of investigations and 20,000 measurements were completed for that. The typical problem of water protection is that the protection of the long-range water bases is unsolved because of the confusion in ownership relations. Water quality regulation in the protection of surface waters that is based on loading capacity and considers special surface features is missing.

Clean air protection: The number of fined companies was 600 to 700 in 1993, compared to 1,000 to 1,200 fined companies in 1991 to 1992. The sum of imposed fines decreased at the same ratio. This is only partly due to the decrease in production with its associated decrease in emission. The other reason is the unsettled regulations.

The unknown offenders who burn waste in open areas present a great problem. Sanctions against them can only be inflicted if the offender who burnt waste without a permit is known and his intentions proved. In four cases of fire last year we could not take any measures. To prevent the occurrence of further such cases the Supervisory Board initiated the modification of the relevant regulations. According to the modification, the owner of the waste would be always held responsible for the burning of the waste.

Noise and vibration protection: The number of complaints stand at about 300 to 500 per year. The most frequent sources of complaints are the noises from small businesses operating around housing estates, road transportation, and lately the noise caused by the motors of hang-gliders and helicopters. According to our measurements, the noise level is 10 to 15 dB over the limit day and night along major roads crossing towns. Therefore, the boards appear firmly when plans of new tracks are judged.

Dangerous waste: The boards bring an ever-increasing number of decisions (900 to 1,000). Within this, the number of fines and the sum of imposed fines is constant (190 cases, 200 million HUF). The number of checks is appropriate for the number of staff (though it does not reach the desirable level). The most serious problems are the importation of waste, which increased beyond the point of manageability; used car tires and junk car wrecks; the citizens' movements against neutralizing capacities; and the discovered illegal waste deposits.

5 THE OUTSIDE OPINION OF OFFICIAL WORK

5.1 Administrative procedures

One of the major reasons for establishing the Supervisory Board was that a well-prepared official organization would bear responsibility over the consequences of its decisions before a court.

The XXVI law of 1991 allows the contesting of administrative decisions before a court. So far, 86 decisions of the Supervisory Board have been challenged in a court (55 of which dealt with dangerous waste).

Forty-two lawsuits were won, forty are pending, and four cases were lost. These figures qualify our professional work.

The sum of imposed fines in the contested decisions was close to 425 million HUF (from which 332 million HUF was charged for dangerous waste).

The following lessons can be learned from the administrative procedures:

- Clients bring an action against the judgement of the appeals court, especially if it includes a fine, if it is not unlawful, because the procedure has a postponing effect.
- The charge for an administrative procedure is low (6,000 HUF), which encourages the client to bring a lawsuit instead of paying the fine.
- The administrative procedures are not fully developed yet.
- A major portion of the contested cases concerned dangerous waste.

Thus we find it important to establish a uniform legal system concerning environmental protection (of which the modification of regulations concerning dangerous waste is the most urgent); meanwhile, the possibility of the implementation of decisions independently from a court procedure must be re-examined.

5.2 Prosecutor's investigations

The official work of the Supervisory Board and regional boards is constantly under the supervision of the Supreme Prosecutor's Office in the framework of a comprehensive inspection program.

Tasks concerning the protection of water quality and quantity were analysed in the second half of 1992. In regards to the merits of the case, the Supreme Prosecutor did not make any statement and the practice of law application was praised. On the basis of the prosecutor's investigation, the Supreme Prosecutor initiated the modification of regulations.

Our actions regarding dangerous waste were under inspection in the first half of 1993. A protest was submitted on only one occasion as the result of an inspection, not against the merits of the case but concerning matters of form. The Supreme Prosecutor stated that the work of the Supervisory Board and regional boards is typically legal. On the basis of the investigation, the Supreme Prosecutor again advocated the urgent modification of regulations with regards to dangerous waste.

On the basis of the very tight control of the judges and prosecutors, it can be stated that aside from the typical mistakes of the existing legal cases, the boards make every possible effort to resolve any issues, with the exclusion of cases that concern breaking the law.

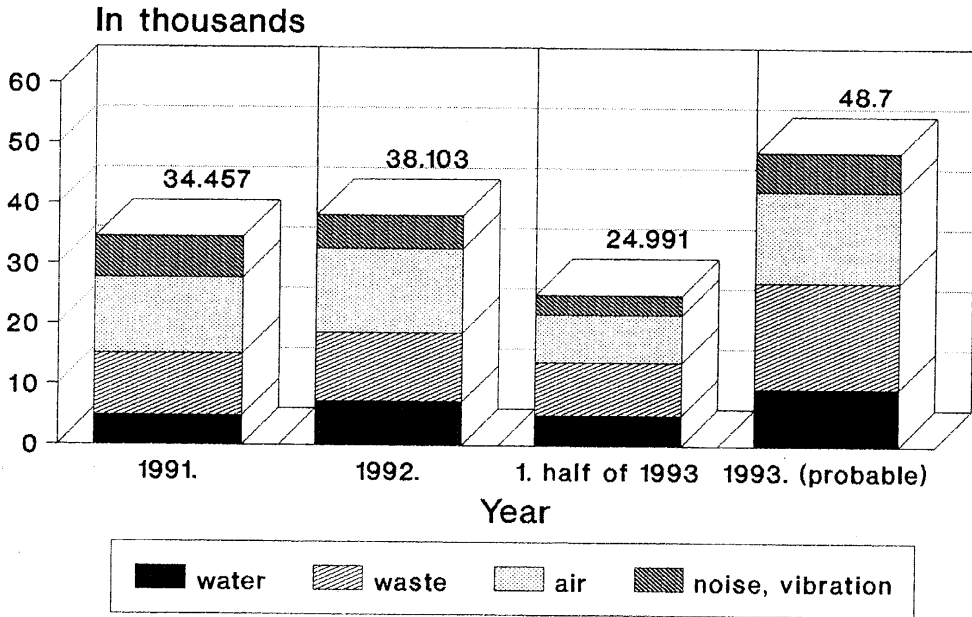
Appendix 1.

Original jurisdiction of the environmental protection boards:

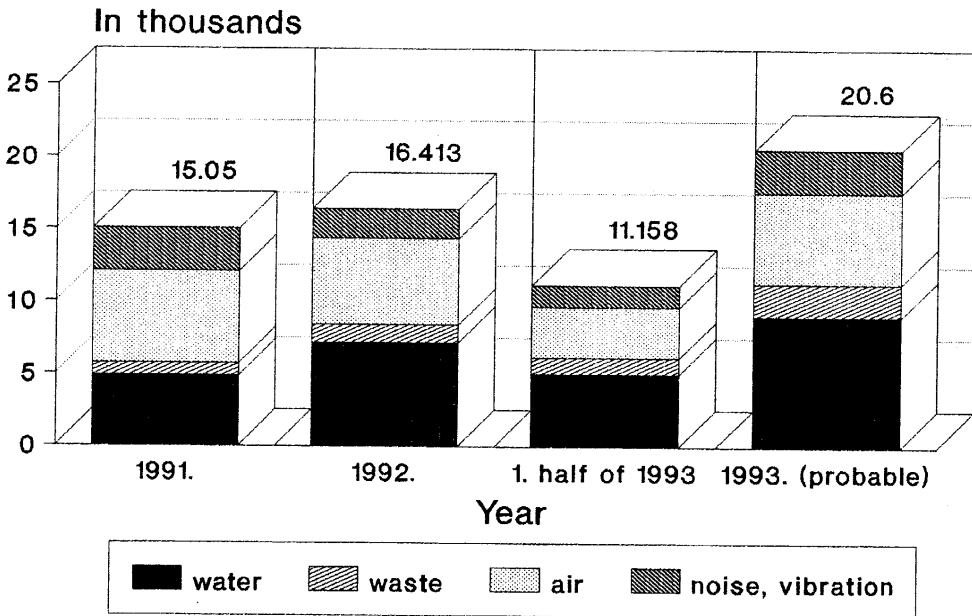
1. Compel the producer to submit an application concerning the classification of a newly defined waste.
2. Grant exemption from under the obligation of making a material balance with regards to activities in connection with dangerous waste materials.
3. Permit the construction of a simplified material balance.
4. Grant exemption from the prohibition of mixing water with dangerous waste material, which was not generated in an aqueous medium.
5. Permit the treatment of dangerous waste material in the existing equipment or establishment.
6. Give authorization for the receipt of dangerous waste for its treatment.
7. Give prior consent to the establishment of a dump for dangerous waste or the installation of equipment for the neutralization of dangerous waste materials.
8. Specify the method of storage of dangerous waste that is different from the provisions of the law in the storage area of a plant.
9. Permit the place, time, method, and conditions for the treatment of dangerous waste.
10. Compel the producer to make proper use of his existing equipment and establishments.
11. Compel the producer to use appropriate treatment of the existing dangerous waste in his possession, its report, and keeping the record up to date.
12. Order the restriction of activities creating dangerous waste and the suspension of the operation of premises, factories, factory units or machines.
13. Order the termination of activities on the spot in case of direct and severe risk of pollution of the environment due to dangerous waste.
14. Overrule restrictions concerning dangerous waste before the complete elimination of malpractice.
15. Stipulate the necessary actions for the prevention of environmental pollution in the case of an operation breakdown or other extraordinary event.
16. Order the handover of dangerous waste to those who possess an appropriate storage place and the neutralizing equipment for its treatment.
17. Compel the producer to provide treatment or temporary storage of soil polluted during his activities.
18. Compel the producer to pay dangerous-waste fines.
19. Issue previous licenses for the import of waste.
20. Impose fines for unlicensed importing of waste material or for the importing or usage different from that specified in the license.
21. Order the reestablishment of the original situation, or the neutralization or usage of waste material in the case of unlicensed importing.
22. Have a professional investigation conducted in the case of unlicensed importing of waste materials.
23. Specify a limit of noise output when a new plant that's not providing service is established or when an old one is renovated, expanded, modernized, or in the case of major construction work.

24. Stipulate the application of instruments that decrease noise and vibration in cases of new road, railway, or civil airport construction, or in case the traffic relations considerably and permanently change due to renovation and modernization.
25. Specify noise limits for existing establishments that are not servicing enterprises.
26. Establish new noise limits in cases of reported change in noise output after the specification of noise limits has been determined in establishments that are not servicing enterprises.
27. Suspend or restrict those activities of the establishment not servicing enterprises which produce dangerous levels of noise and vibration.
28. Compel the payment of noise and vibration fines in the case of companies not providing service activities.
29. Specify emission limits for new establishments that do not provide service and which cause air pollution.
30. Specify an emission limit in the case of change of technology of a localized establishment that does not provide service and which causes air pollution.
31. Specify an emission limit which is lower than the regional emission limit of a localized establishment that does not provide service and which causes air pollution (special limit).
32. Specify an emission limit of an operating, localized establishment that does not provide a service and which causes air pollution.
33. Compel the operator of an operating, localized establishment that does not provide service and which causes air pollution to install an extractor air cleaner device.
34. Specify a limit that is lower than the regional limit for an operating, localized establishment that does not provide service and which causes dangerous air pollution.
35. Compel the operator of an operating, localized establishment that does not provide service and which causes dangerous air pollution to modernize the technology or to take other measures.
36. Compel the legal person or organization not possessing legal personality or the private entrepreneur operating a localized establishment that does not provide service and which causes dangerous air pollution to pay an air pollution fine.
37. Permit, with the exception of waste of plant origin or derived from agricultural production, the burning of waste in the open air.
38. Permit, with the exception of waste of plant origin or derived from agricultural production, the burning of waste in traditional power generating equipment.
39. Permit the provision of data with contents different from that stipulated in the law for operating localized establishments that do not provide service and which cause air pollution.
40. Specify, by special state resolution, the storage possibilities and conditions of sewage for sewage dischargers, in the cases in which the sewage storage does not belong in another authority's jurisdiction.
41. Alter, suspend, and cancel licenses stipulating the conditions of sewage placing that do not belong under the jurisdiction of other authorities.
42. Compel the termination of the cause of damage when water is dangerously polluted.
43. Restrict or prohibit the activities that cause the discharge of dangerous materials which pose a risk to or can infect and severely pollute waters.

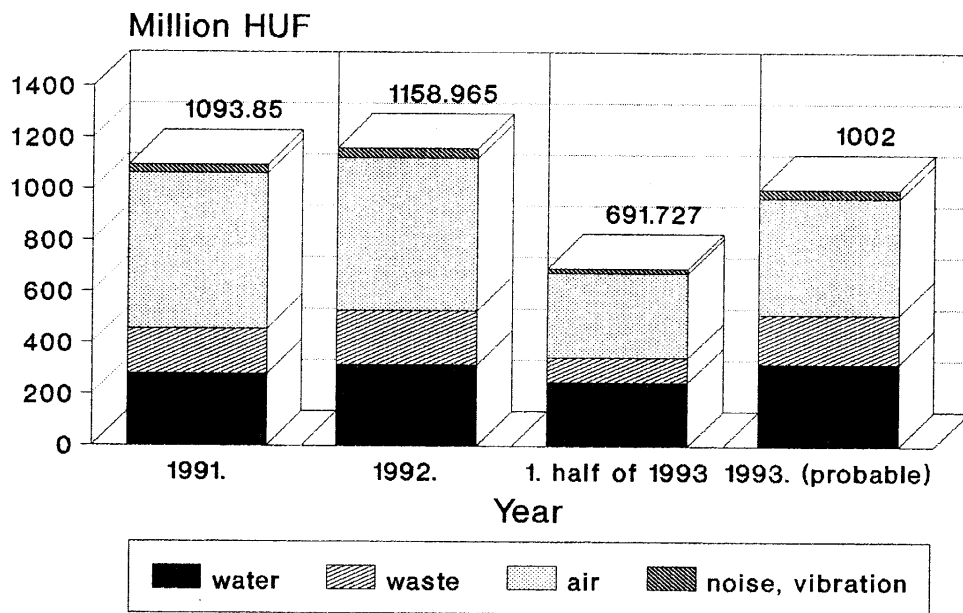
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44. The operation of the company is suspended until the water infection or severe pollution is stopped or the risk of its occurrence is stopped.
 45. Specify, modify, and cancel special discharge limits on sewage in living water.
 46. Compel the payment of sewage fines.
 47. Stipulate the submission of a detailed environmental impact study on the basis of a preliminary impact study, and specify the issues and requirements needed for the preparation of the study.
 48. Issue environmental protection licenses on the basis of the preliminary impact study.
 49. Reject the application for an environmental protection license on the basis of the preliminary impact study.
 50. Issue environmental protection licenses on the basis of the detailed impact study.
 51. Reject applications for environmental protection licenses on the basis of the detailed impact study.
 52. Compel the payment of fines in the case of the application of materials that destroy the ozone layer and are unlicensed according to the 13/1992. (V.12.) KTM decree.
 53. Compel the termination of activities using materials that destroy the ozone layer and are unlicensed according to the 13/1992. (V.12.) KTM decree.



Appendix 2. The number of cases at the environmental protection boards.



Appendix 3. The number of issued decisions at the environmental protection boards.



Appendix 4. Figures of imposed fines at the environmental protection boards.

Appendix 5. Summary of Litigious Matters at the Environmental Protection Boards

	Number of Cases	Sum (HUF)	Number of Final Cases		Number of Pending Cases
			Won	Lost	
Sewage	10	73708648	8	1	1
Dangerous Waste	55	331797000	25	2	28
Air	1	6378000			1
Noise, Vibration	13	10834548	8	1	4
Nature, Conservation	6	640000	1		5
Others	1				1
TOTAL	86	423358196	42	4	40