# Some dogmatic and practical issues of liability for damage caused by legislation in breach of EU law

**(PhD thesis' main statements)**


**Supervisor:**
**Prof. Dr. András Osztovits**
**university professor**

**Prepared by:**
**dr. Eszter Ocskó**

**Károli Gáspár University of the Reformed Church in Hungary**
**Postgraduate Doctoral School of Law and Political Sciences**
**Head of the Postgraduate Doctoral School: Prof. Dr. Éva Jakab university professor, CSc, MTA**

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# 1. Background and purpose of the research

The question of the ascertainability of the State's liability for damages is one of, if not the most sensitive areas of jurisprudence and law enforcement. It is one of the most sensitive areas of law and jurisprudence. The question of the liability of public authorities for damages is, on the whole, a very broad one. It includes, if only broadly defined, the liability of the judiciary (courts, prosecutors, lawyers, etc.), the executive and the legislature. Studies and monographs on the subject have focused primarily on the liability of the judiciary and the executive. My own area of investigation, on the other hand, has been the question of responsibility for legislation.

The possibility of holding a given power, such as the state, accountable is not only a function of the specific legislation, but also of the tendency of the power in question to self-criticism. In the present context, the latter condition is all the more important since the state itself is the author of the legislation and thus also sets the limits of its own accountability. This raises the question: "Who guards the guardians?" [1]

Legislation is undoubtedly an activity of public authority, aimed at developing the rules of the law in force and correcting any errors that may be inherent in it.[2] The development of European law in the 20th century has led to a transformation of the system of customary and judge-made law, which has been replaced by conscious legislation. The result of this is the wave of codification that we have seen in the last century, of which Hungary has been a part. Alongside the advance of codification, 'quality lawmaking' has emerged as an expectation in society. Meeting this expectation affects both the legislation itself and the process. The legislation should be simple and clear, and the process should be evidence-based and transparent. In the context of liability arising from 'quality legislation', the question that could be considered a classic one must be asked: can the State, which fulfils its public duty in legislating, be held liable to the individual subject in private law? Can it derive liability for damages from this? Should EU law, national law or a combination of the two be used to determine this? Where is a possible limit?

[1] JUVENALIS: *Satire* 6.347-8. Sed quis custodiet ipsos custodes?

[2] TAMÁS András: *Legistica: a jogalkotástan vázlata* Budapest, Nemzeti Közszolgálati és Tankönyv Kiadó, (2013) 103.o.

Even so, the choice of topic was broad in view of the interdisciplinary nature of the research objective. The aim of the thesis was thus to examine the conditions for establishing state liability for damages arising from EU legislation. It is true that other legislative acts are touched upon in the thesis, but the focus is on legislation that is contrary to EU law. In this respect, there is EU legislation, which is otherwise fleshed out by the case-law of the CJEU. Given the primacy of EU law, these rules must apply in proceedings before national courts, as EU law is decentralised, i.e. it is enforced through national bodies. As regards procedural law, it is clear that there is no uniform procedural code of private law at EU level, so national rules must apply to the proceedings to establish the liability of a Member State for damages arising from an EU infringement. At the same time, there are principles laid down by the CJEU which must be applied in the proceedings of the national court when it applies its own procedural law. Among other things, the principle of effectiveness of EU law[3] and the principle of equivalence[4] are principles which require national courts to apply their own national rules in the absence of uniform EU rules.

In a number of judgments, but first in the Francovich and Others judgment[5], the CJEU has held Member States responsible for inadequate national legislation. But there is a process for establishing liability. In its case law, the CJEU has gone from general to objective liability and has defined a set of conditions which must be met in order to impose liability. Within this and the procedural framework outlined above, the question can be asked again: under what circumstances is a Member State liable in civil law terms for an EU infringement? How can this be deduced? Are there legal provisions, either at EU level or in domestic law, under which a claim can be brought? Has the relevant EU case-law sufficiently developed and circumscribed the provisions along which the national court must proceed when examining the question of liability? Is there sui generis liability under EU law, or must the legal basis be assessed on the basis of national rules? Think here of wrongfulness, imputability, which can be problematic to assess. Does this liability apply to individuals? To whom and against whom is it possible to claim damages? And if the answer to the previous questions is "yes", is it possible in practice to bring such a claim before a national (domestic) court?

[3] The principle of effectiveness, or effective judicial protection, obliges Member State courts to ensure that national remedies and procedural rules do not render claims based on EU law impossible in practice or excessively difficult to enforce.
[4] The principle of equivalence requires the same remedies and procedural rules to be available to claims based on European Union ('EU') law as are extended to analogous claims of a purely domestic nature.
[5] EUB C-6/90 és C-9/90. joined cases – *Francovich* (19.11.1991.)

It should be stressed that the development of EU case law covers a period of less than ten years. Over the last twenty years, there has been little new in the way of national judgments on liability for damages that could be of assistance to national enforcement. However, a new civil code has entered into force in Hungary, and the codification of this new code has again raised the need for regulation. It is well known that this was not included in the final text. The question may arise: is it necessary to include this type of liability in a private law code? Does it belong there? Or is there a sui generis EU legal liability for Member States, which obviates the need for codification, as the legal basis for liability is to be found in EU law? If this can be said, is the national legislation such that this legal basis can be enforced? If not, is it compatible with EU law?

The topicality of the question is that the case-law of the Hungarian courts is far from being fully developed, still less uniform in recent times. This is reflected, for example, in the case known as the Metro-case[6] and the case concerning the solidarity contribution[7]. Hungarian case-law has also drawn contradictory conclusions from the judgments in the Gambling Act cases[8], where one chamber of the Curia found an infringement but dismissed the claim for damages for lack of evidence of the amount, while another chamber of the Curia ruled against the same facts on the grounds of state immunity. The application of the legal principle of liability for damages for breach of EU law by domestic courts is therefore not entirely clear, as the domestic legal context does not recognise the private law liability of the legislator. How can this possible contradiction be resolved?

## 2. Sources and methodology of the research

The choice of topic determined the research methodology. The sources used and found were primarily the judgments of the EU courts (CJEU, ECtHR and the CJEU as Arbitral Tribunal), international (permanent and ad hoc) courts and Hungarian courts. These were supplemented by an analysis of the relevant international and domestic literature.

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[6] In the first lawsuit, the court found that the Hungarian State was not entitled to terminate the contracts (Curia I. 33.305/1999.) but dismissed the action for damages in the second action, citing the impossibility of compliance (Curia I.32.777/2000)

[7] See the judgement of the Metropolitan Court P.20.810/2017/28. and the judgement of the Metropolitan Court of Appeal 5.Pf.20.894/2017/8/II.

[8] Judgements of the Curia Pfv.20.211/2017/13., the Metropolitan Court of Appeal Pf. 21.081/2016/6-II, and the Metropolitan Court P.22.701/2015/35.

In the course of the dogmatic approach, I also used legal-dogmatic methods: I examined how clear and unambiguous the ECtHR judgments are for a legal practitioner (judge). A particular point to highlight here is the legal-political controversy that has arisen around the obligation to interpret EU law. On the one hand, the national court is obliged to ensure the effective application of EU law (even contra legem), while on the other hand, the legislator cannot remedy the error by interpreting it contra legem.

In addition, there are chapters in which the relevant practice is presented using a comparative method. It is well known that there is still a debate around legal comparison as to whether legal comparison is a methodology or a discipline in its own right. Without entering into this debate, I have applied it as a method in this thesis. Based on the methodological principle of Zweigert's presumption of similarity (praesumptio similitudinis)[9], I compared the legal concepts of immunity and liability in some EU Member States. The comparison was primarily made in relation to the two main legal families present in Europe (common law and the Romano-Germanic family) (this mainly concerns international law instruments such as immunity), and I looked at French, Hungarian, German and Austrian legislation in relation to private law instruments (primarily liability, state as a legal person). I see the justification for the latter division in the fact that, historically, within the continental system, the development of these states (especially the German-Austrian-Hungarian) and their private law legislation show a high degree of similarity. The thesis has also included a statistical statement of the most recently published data from the Single Market Scoreboard, which is an expression of Member States' compliance with EU law.

## 3. Conclusions, brief summary of the scientific results

The European Union provides citizens of Member States with the possibility to claim damages against a Member State if it has adopted legislation in breach of EU law and has caused them damage. This finding is supported by the nearly 70 international and EU court decisions examined in my research. However, given the specific nature of EU law, this is not very often the case in practice in Hungary. Studying the Hungarian court practice, which also includes the relevant Constitutional Court practice, I came to the conclusion that the Hungarian judicial system has so far not been able to break through the problem of public law and private law, and that it does not really know what to do with the issue of fault and attributability. The main

[9] Konrad ZWEIGERT – Hein KÖTZ: Introduction to Comparative Law, Oxford Press (1992) p32.

question is therefore whether there is sui generis state liability under EU law, or whether the basis for state liability must be found in the domestic legal system. In the course of my research, I have come to the conclusion that there is one, which the Hungarian judiciary - on the basis of its practice - does not apply. I deduced this from the following:

When discussing the liability of a Member State for an EU infringement, national courts apply both EU and national law. However, EU law does not clearly indicate which parts of the procedure are to be governed by national law. The problem of the application of the law therefore arises from this. Another problem area in the case law is which of the national rules on damages should be applied to determine the liability of the Member State. The basis on which the national court enforces the principle of national liability for legislation is irrelevant. The fact remains, however, that this possibility must be guaranteed. It is crucial that the objectives of EU legislation are achieved.

According to the CJEU, the conditions for establishing national liability require that the individual has the possibility to seek a remedy. National liability for damages is therefore a sui generis form of liability based on EU law and developed by the practice of the CJEU. Given that the judgments of the CJEU are part of EU law, they do not require enforcement action, so that if they contain sufficiently precise and unconditional provisions, they can be directly invoked before the national court on the basis of the principle of direct effect.

# 4. Proposals to solve the problem

## 4.1 Proposals for a possible codification

In Hungary, there is no completely unambiguous legislation stating the liability of the State for damage caused by legislation. There is no clear legal basis for a clear declaration of liability for infringements of EU or national law. However, national law enforcement bodies have an obligation to apply national law in their proceedings in conformity with EU law. The conditions for the application of EU law by national courts have been established by Hungarian case law (in particular the practice and principle of the Kúria). The courts appear to apply the principles of primacy, direct applicability and direct applicability of EU law. Hungarian courts are particularly well placed at EU level in the initiation of preliminary ruling procedures. However, in practice, a number of questions have already arisen in relation to the interpretation of the Charter of Fundamental Rights (Repcevirág case, Kásler case, Érsekcsanád case, etc.).

There have also been some recent negative examples in administrative litigation concerning the lack of application of EU law (e.g. the application of the Meranini principle in the UMTS case). Furthermore, we cannot be satisfied with the reception of the EU principle on the liability of Member States for breach of EU law (e.g. the Baradics case, the Gambling Act case, etc.). Without wishing to exonerate the courts, it should be noted that this criticisable practice has developed in a legal context which excludes the legislator's responsibility for legislation and its reception is also made difficult by the domestic doctrinal environment. Under current legislation, liability for the State's legislative activity on the basis of attribution cannot be established by an ordinary court.[10] It can only be qualified by a Constitutional Court on the basis of the provisions of the Constitution. [11]

What is becoming clear from practice is that national courts will find the state liable for damages if the norms created by the state are in breach of EU law or the Constitution and this has been declared by the designated forum, i.e. the CJEU or the Constitutional Court. In such cases, the infringement must be assessed according to the general rules of tort liability. In principle, the Code provides for liability for damage caused by the exercise of public authority (§§ 6:548-549) among the rules of tort liability, which, however, cannot be extended to the legislative activity of the Member States. I emphasise that, in my view, the current practice (application of the general rules of tort liability) is not an appropriate case-law either. A codification in a separate instrument could have been a possible solution. The need for the State to be held liable for its legislation is a constant feature of society. This is illustrated by a number of legal cases (in addition to the large number of publications on the subject), one or two of which I have highlighted. Of course, such accountability for possible abuses cannot be without its consequences. It can have neither the purpose nor the effect of making the legislative activity of Parliament impossible. We have already seen proposals for an attempt at codification in the course of the codification of the Civil Code, but these have, as we know, remained attempts.

A dogmatic analysis of the liability issue was essential in order to fully explore the codification issue. For this very reason, I have also included in my examination the scope of what a public act (i.e. legislation) would seek to find in private law as an element of fact. In a place where the legislation describes the civil liability of civil law entities. Legislation which has neither substantive nor substantive scope, therefore, does not cover the legal relationship

[10] Ádám FUGLISZKY: *Kártérítési jog,* HVG-ORAC (2015) p579-587.
[11] Attila MENYHÁRD: *The state's liability and the state's immunity* In: Ünnepi tanulmányok Kecskés László professzor 60. születésnapja tiszteletére szerk.: Nochta Tibor, Fabó Tibor, Márton Mária, Pécs (2013) p389-404.

described. The idea naturally arises that the legislation could be located elsewhere (perhaps in the area of public law)? In my view, this is not entirely unacceptable either, although I would argue that the place of regulation is in the sphere of private law. I see the main reason for this in the fact that liability for damages as a concept is linked to civil law. Compensation as a sanction is so inherently a subject of private law that any regulation would have to be placed within the rules of private law. I note that the vast majority of domestic lawyers share this view. I share Attila Menyhárd's view[12] that, if the issue were to be regulated within the scope of private law, it should be removed from the system of tort law and the legal consequence should not be so much punitive as compensatory (such as compensation or equitable satisfaction, as known from the ECtHR case-law).

For a possible regulation, I propose the following:

- it is necessary to regulate, under the rules of private law, also the liability for damages caused by legislation as a private law liability, taking into account that the legal relationship is not classically private law (since it also contains elements of public law, it should be included in a separate set of facts),

- a liability-based system should not be developed, but one based on an obligation to make reparation, similar to expropriation (as reflected in the CJEU judgments in the 'sufficiently serious breach' criterion),

- compensation is not the appropriate remedy, but rather "compensation" or "reparation" (as the system is not liability-based)

- the decision should be taken before the civil courts, taking into account the rules of civil procedure (in this respect, one can also think of foreign examples - see, inter alia, Austria).

This could possibly lead to a solution that is preventive towards the state and delivers justice to the citizen, does not undermine sovereignty, but at the same time would provide a framework for accountability.

## 4.2 Changing practice

[12] Attila MENYHÁRD: *Lehet-e a jogalkotónak polgári jogi felelőssége*? Budapest Dialog Campus (2018) p33-42.

In fact, the liability of EU Member States has become an integral part of national liability law, based on the case law of the CJEU. National courts apply both EU and national law in determining the liability of Member States. The cases already presented show that these are of great economic importance .[13] The case law of the CJEU has opened the way for the establishment of national liability, but it has also been based on national liability law, influencing and modifying it. This is what Danwitz called the "European form of liability in the hands of the judiciary" in 1997[14]. In practice, this means that Member States must allow citizens to make such claims under EU law.[15] Indeed, since the Francovich-judgment, there is another form of liability under which individuals can bring a claim alongside national law (on the basis of EU law).[16] However, it is not clear from practice whether these claims are coexistent or subsidiary (where national liability law is not sufficient).[17]

It is not disputed - and this is also supported by Hungarian case-law - that under EU law, primarily infringements of the fundamental treaties (TEU, TFEU, Charter of Fundamental Rights) and international treaties (e.g. ECHR) and of regulations and directives can be enforced, and that the Member State can be held liable for damages caused by incorrect or delayed - or even omitted - transposition of EU directives (Schöppenstedt formula). It should be pointed out here that the scope of the Charter of Fundamental Rights differs from that of the TEU and the TFEU. Article 51(1) of the Charter narrows the scope of the Charter: it only applies where the Member State is implementing EU law. This limitation raises a number of practical problems as regards the applicability of the Charter of Fundamental Rights.[18]

More recently, the misapplication of directives has also become a ground for liability under EU law (British Telecomm-case, Haim II-case). The legal basis is Article 4(3) TEU (Member States must take all appropriate measures to ensure fulfilment of their obligations under EU law), which includes remedying damage caused by a breach of EU law (Francovich-case), and Article 340(2) TFEU.

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[13] E.g. due to the insolvency of MP Travel Line, Germany had to process thousands of claims for delay in implementing Directive 90/314 / EEC on package travel.

[14] See: DANWITZ, Thomas von: *Die gemeinschaftsrechtliche Staatshaftung der Mitgliedstaaten – Entwicklung, Stand und Perspektiven der Europäischen Haftung aus Richterhand*, DVBl 1997, p1–10

[15] See: TOBLER, Christa: *Staatshaftung für fehlerhafte höchstrichterliche Rechtsprechung*, Rs C-224/01, in JUS&news Lichtenstein 2003, p339.

[16] OSSENBÜHL, Fritz –CORNILS, Matthias: *Staatshaftogsrecht*, C.H. Beck (2013) p628.

[17] BECK, Andreas: *Unionsrechtliche Staatshaftung der EU-Mitgliedstaaten für judikatives Unrecht,* Potsdam (2015) p52. https://publishup.uni-potsdam.de/files/8021/beck_diss.pdf

[18] See details: BLUTMAN László: *Az Alapjogi Charta és az uniós jog határai* In: Acta Universitatis Szegediensis: acta juridica et politica (2016) p103-109. http://acta.bibl.u-szeged.hu/53895/

It is worth emphasising the principle of the protective purpose of a rule: every rule has a legal object which it protects. The scope of the protection is defined by the CJEU and should be applied to limit further liability in a case for damages against a Member State (Rechberger-case) The application of national procedural rules on the purpose of the protection of a norm may be subject to discretion in a Member State liability case, but only within the limits of the EU principles of equality and effectiveness.

The argument that the State, when making law, is acting in its public function and therefore cannot be held liable under private law cannot be accepted in these circumstances since the basis of the action in these cases must therefore be sought directly in EU law and the function of the State is therefore irrelevant. The cause of action therefore does not derive from national law, so there is no need to seek a specific finding in this respect. The fact that the infringement is attributable to the national legislator does not call into question the liability of the State under EU law. (Factortame III) The fact is that the EU is thus interfering with national law - in this case Hungarian law - from which the establishment of State liability in relation to legislative bodies is a fundamentally foreign element.

Furthermore, the CJEU's case-law also leads to the conclusion that EU legal liability does not depend on which public body committed the infringement. If we talk about "injustice" - by which I mean infringement - we can talk about infringement injustice, administrative and judicial "injustice". Liability for damages in the exercise of public authority is regulated by the Code, so its applicability should not be a problem for the judiciary. This paper focuses specifically on infringements caused by legislation, where there is no longer such a clear codified rule.

It is also clear from practice that no prior procedure is necessary to bring a claim. Thus, any practice that requires a prior procedure or procedures (e.g. constitutional court proceedings, preliminary ruling procedure, etc.) for enforcement is contrary to EU law. This imposes an additional burden on the injured party to pursue his claim.

Overall, on the basis of the more than 70 judgments of the Court of Justice of the European Union that have been examined and analysed, it can be concluded that there should be no question of the inclusion of primary law sources in the Treaties and directly applicable primary law sources, since these sources automatically become part of the national legal system - they do not need to be implemented. The area of law in question relates to directives, where EU case-law links the establishment of liability to a set of conditions. Since the Francovich -

judgment, and subsequently the Factorteam-judgment, the criteria have been clear: where the individual protective character of the Directive is demonstrated, the content of the rights conferred on individuals by the Directive can be determined by its terms, the infringement is sufficiently serious and there is a causal link between the damage and the breach of the State's obligations. This is echoed and further refined in subsequent judgments of the Court of Justice.

EU rules of an individual protection nature were initially understood to be primary sources of law (TEU, TFEU, Charter of Fundamental Rights), while later secondary sources of law included regulations and directives which had an individual protection character. A directive can be said to confer rights on individuals if the economic or other interests or rights of the individual arising from the directive fall within a sector regulated by an EU standard. This is the case, for example, of the Dillenkofer- case mentioned in the case-law, i.e. where the Directive aims to give the consumer who has taken a package holiday the right to claim the amount paid by the organiser and the return journey in the event of insolvency, or the Directive concerned in the Francovich- case, which protects the employee in the event of the insolvency of the employer. The Directive on the financial supervision of investment service companies is not considered as such in practice. There are also areas where such individual protection is difficult to define, such as environmental directives.

It may be inferred from the case-law that an infringement is sufficiently serious where a Member State, in the exercise of its legislative powers, manifestly and seriously disregards the limits of those powers. In making this assessment, the national court must take into account the precision and clarity of the provision infringed, as explained in British-Telecomm-judgement. It is therefore important to stress that, in practice, the test of imputability must be abandoned and the criterion of a sufficiently serious breach must be applied. The scope of the legislator's discretion and the degree of latitude available to it are the decisive factors in this assessment. The problems in this respect were highlighted by the Court of Justice in the Dillekofer- case, when it held that failure to transpose within the time-limit for transposition is in itself a sufficiently serious breach to give rise to liability for damages, and in the Hedley Lomas- case, when it held that where the Member State concerned had no or very limited legislative discretion at the time when the infringement was committed, the mere infringement of Community law is sufficient to establish a sufficiently serious breach. The consequence of late and incorrect transposition is clearly the possibility of a claim for damages under the Rechberger judgment. It can be seen, therefore, that the criterion of a 'sufficiently serious' infringement is met by the failure to transpose the Directive or by late transposition. As regards

'incorrect' transposition, it is necessary to consider whether the State has a margin of appreciation in relation to the transposition and, if so, whether the transposition has achieved the objective of the Directive. The Court of Justice stated in Angelidaki and Others that the principle of interpretation in conformity with Community law requires national courts (within the limits of their jurisdiction) to ensure that the Directive in question is fully implemented and to do their utmost to achieve a result consistent with its objective. In my view, it may be difficult for the national court to assess this.

In relation to the adequacy of the transposition, there may also be a problem as to the achievement of the objective of the directive. All Member States must also take the necessary measures to transpose the directive correctly. That is to say, they must adopt 'all the measures necessary to ensure that the provisions of the Directive are fully effective in securing the result prescribed by the Directive.

Liability is objective where the infringement consists of a failure to achieve the result required by the EU provision. This implies a clear liability of the Member State and a sufficiently serious breach can be established without further investigation. Examples of such cases are: where legislation is in conflict with previous court judgments, or where the Member State fails to transpose EU law or transposes it late, or does so with content contrary to EU law (Dillenkofer- case, Hedley Lomas- case).

As regards the causal link, in the Rechberger judgment cited above, the Court of Justice found that there was a causal link between the harm to passengers and the incorrect transposition of the Directive. It explained that it would not have existed only if the same damage had been suffered by the correct transposition. However, in the Brinkmann case it was found that there was no causal link. It reasoned that the specificity of the Directive as a source of law was that it did not contain appropriate dynstinctions as to the method of transplantation in a given case. Therefore, if transplantation takes place, the Member State concerned cannot be held liable for damages. The interpretation of EU law is also a difficult and unclear task for the Hungarian court. The Kücükdevici judgment and the Angelidaki and Others judgment impose an obstacle to the application of the law by national courts: they must not apply a national rule which makes it practically impossible or substantially difficult to fulfil obligations under EU law. This has been laid down by the CJEU in the area of interpretation of Community law. It is still rare for a Hungarian judge to set aside a Hungarian law in force when giving judgment, which makes it very difficult to enforce EU law.

It can therefore be argued that, since EU law clearly provides for liability, the causal link test must also be based on EU law. If the legislator cannot excuse itself - i.e. if it has not acted with due diligence - then its conduct is imputable (it commits a sufficiently serious infringement) and it can be held liable. It is a different question whether national law applies at this stage of the procedure. The judge can choose between the doctrines of causation in this area.

The form of damages is clearly monetary. There is no known case where the injured party has requested compensation in kind. At the same time, there is no prohibition to do so. In theory, therefore, compensation in kind is not excluded. There is also a well-established practice as regards the amount of compensation (quantification). The uncertainty is therefore to be found in the question of whether the conditions for enforcement are met.

Overall, therefore, in my view, the practice of the CJEU is completely closed and clear, precise and unconditional, also in relation to the directives. In my view, in these cases, it is possible to clearly define the criteria to be applied when assessing a breach by the State, the legislature, by referring the State to its own national rules as regards the legal consequences. There are also cases in which a national legislator enacts domestic legislation that is contrary to EU law (the Treaty). In these cases the conditions are also very clear. However, the "bridge" may be missing here too for some practitioners. I do not consider it absolutely necessary to state this expressis verbis, but if the Fundamental Law were to name the state - even as the underlying responsible party - (Article XXIV of the Fundamental Law) and assign to it the applicability of the Civil Code, then there would in fact be no obstacle to liability being established on the basis of general (tortuous) liability. The German Fundamental Law is a good example of this.

## 5. My publications on the subject:

Member State Liability of the infringement of EU Law – first Decision of the Curia In: Európai Jog, XVIII. évfolyam/ 4. sz. (July 2018.) p. 21-26.

Jurisdiction in American style – the history of the Herzog-estate, In: Magyar Jog 65. évfolyam/6.sz. (June 2018) p. 342-346.o.

Member State liability for reinterpretation of the "acte claire" doctrine In: Európai Jog XXI. évfolyam/4. szám (September 2021.) p. 8-15.

State immunity in the event of damage caused by legislation In: XII. Jogász Doktoranduszok Országos Szakmai Találkozója 2017, Jog és Állam 22. szám, szerk.: Miskolczi-Bodnár Péter, Patrocínium Kiadó, Budapest (2018) p. 302-312.

A little different about infringement proceedings In: XIII. Jogász Doktoranduszok Országos Szakmai Találkozója 2018, Jog és Állam 23. szám, szerk.: Miskolczi-Bodnár Péter, Patrocínium Kiadó, Budapest (2018) p. 187-205.

Immunity and determination of the Member State 's liability for damages in the international arena and in Hungary In: XIV. Jogász Doktoranduszok Országos Szakmai Találkozója 2018., Jog és Állam 24. szám, szerk.: Miskolczi-Bodnár Péter, Patrocínium Kiadó, Budapest (2019) p. 279-295.

Difficulties in applying EU law in Member States' liability for damages In: Doktoranduszok Fóruma Miskolc, 2018. november 22., Állam és Jogtudományi Kar szekciókiadvány, szerk.: Prof. Dr. Szabó Miklós, Miskolc (2019) p. 134-141.

State responsibility for the COVID-19 epidemic In: XVIII. Jogász Doktoranduszok Országos Szakmai Találkozója 2020, Jog és Állam 32. szám, szerk.: Miskolczi-Bodnár Péter, Patrocínium Kiadó, Budapest (2021) p. 169-180.

Legislative liability from a public law perspective - in the light of Constitutional Court practice In: XIX. Jogász Doktoranduszok Országos Szakmai Találkozója 2021, Jog és Állam 34. szám, szerk.: Miskolczi-Bodnár Péter, Patrocínium Kiadó, Budapest (2021) p. 163-177.