LUMEN ET VIRTUS
ISSN: 2177-2789

CRIMINAL LIABILITY OF THE LEGAL ENTITY IN ENVIRONMENTAL CRIMES[1]

https://doi.org/10.56238/levv16n47-094

Submitted on: 03/23/2025 **Publication date:** 04/23/2025

Irapoã de Jesus Mesquita[2] and Iara Barros Barbosa[3]

ABSTRACT

The criminal liability of legal entities in environmental crimes is a crucial mechanism for the protection of the environment, especially in the face of increasing degradation resulting from industrial activities and disorderly urbanization. The Environmental Crimes Law (Law No. 9,605/1998) allowed for the criminal liability of companies, recognizing their central role in generating environmental damage. However, its application faces challenges, such as harmonization with constitutional principles and the need to avoid excessive criminalization. Therefore, the objective is to analyze the application of the criminal liability of the legal entity in environmental crimes, exploring its legal and social aspects. Elements such as typicality, anti-legality, culpability and principles such as minimum intervention and insignificance were examined. The results indicate that the criminal liability of companies is effective to curb harmful conducts, but it must be applied with proportionality and reasonableness, balancing economic development and sustainability. It is concluded that the criminal liability of the legal entity is a necessary advance, but its effectiveness depends on the integration between the criminal system, environmental public policies and social awareness. The adoption of sustainable practices and environmental compliance mechanisms is essential to promote a culture of corporate responsibility, in line with the principles of sustainable development and the protection of the environment for present and future generations.

Keywords: Environmental crime. Responsibility. Legal Person.

[1] Article presented to the Bachelor's Degree in Law of the Institute of Higher Education of Southern Maranhão – IESMA/Unisulma.

[2]Graduated in Pedagogy – Faculty of Education of Vitória; Academic of the Bachelor of Laws course at the Institute of Higher Education of Southern Maranhão – IESMA/Unisulma.
Email: ij.mesquita2018@gmail.com

[3]Advisor Professor. Graduated in Law from the Institute of Higher Education of Southern Maranhão – IESMA/Unisulma, Specialist in Public Law – PUCRS; Professor of the Bachelor's Degree in Law at the Institute of Higher Education of Southern Maranhão – IESMA/Unisulma.
E-mail: iarabarrosadvocacia@gmail.com

INTRODUCTION

The imputation of criminal liability to collective entities has been a subject of intense doctrinal and jurisprudential divergence over the years. However, this issue has gained relevance because it configures a mechanism of extreme effectiveness in the protection of the environment, especially with regard to the performance of legal entities, recognized as the main agents of its degradation (Bittencourt, 1999).

It was after the Industrial Revolution that the damage to the ecosystem intensified significantly. The rural exodus and the disorderly growth of urban centers, added to the industrialization process, resulted in severe environmental impacts, compromising not only the integrity of the environment, but also the quality of life of the population (Freitas, 2006).

Hordienically, environmental degradation has reached critical levels, with the destruction of flora directly causing the extinction of several species and irreparable ecological imbalances. Among the most emblematic examples are the oil spill in Alaska in 1989, the oil spill off the coast of Galicia, Spain, the Bhopal disaster in India, which resulted in the death of twenty thousand people and left one hundred and fifty thousand with serious sequelae, and, more recently, the largest oil spill in history. occurred in the Gulf of Mexico, involving the British Petroleum company (Lauzid, 2002).

Given this scenario, the urgency of instituting robust and effective environmental protection mechanisms, capable of curbing the progressive deterioration of nature, is undeniable. This need is reflected in the adoption, by various legal systems around the world, of norms that elevate the environment to the status of a protected legal good. In Brazil, this global trend was embraced, consolidating itself as an indispensable response to the contemporary environmental crisis (Levorato, 2006).

The criminal liability of legal entities in environmental crimes is a complex issue that has significant implications from both a legal and social point of view. Understanding the legal mechanisms and practices applied in this context is critical to ensuring an effective and fair response to environmental damage (Séguin, 2002).

A detailed analysis of the criminal liability of legal entities in environmental crimes is essential to understand not only the legal aspects involved, but also the social and economic implications of these practices. The lack of effective enforcement of legislation in this context can result in impunity, encouraging conduct that is harmful to the environment and compromising long-term environmental and social sustainability (Milaré, 2009).

Thus, research in this field is relevant for strengthening the rule of law and promoting a culture of corporate responsibility. By analyzing concrete cases, identifying challenges

and proposing solutions, this research will contribute to the improvement of the legal system and to the construction of a fairer and more sustainable society.

Therefore, this research not only fills a gap in academic knowledge, but also has the potential to positively impact public policies and business practices, promoting greater environmental and social responsibility at the corporate level. Therefore, the general objective is to analyze the application of the criminal liability of the legal entity in environmental crimes, investigating its legal and social implications.

ENVIRONMENTAL PROTECTION IN THE BRAZILIAN LEGAL SYSTEM

Environmental protection in the Brazilian legal system is one of the central axes of the national normative structure, reflecting the conformation of a robust and multifaceted legal framework, based on constitutional and infra-constitutional principles (Sousa, 2007).

The Federal Constitution of 1988, by enshrining the environment as a legal good of a diffuse nature, established an innovative paradigm by attributing to it the condition of a fundamental right, under the terms of article 225, caput, which provides: "Everyone has the right to an ecologically balanced environment, a good for the common use of the people and essential to a healthy quality of life, imposing on the Government and the community the duty to defend and preserve it for present and future generations" (Brasil, 1988).

This constitutional provision, by elevating the environment to the category of transindividual right, enshrines the intergenerational dimension of environmental protection, recognizing that the protection of natural resources transcends immediate interests, projecting itself onto future generations (Branco, 2001). In this sense, the Magna Carta establishes a duty of environmental protection that is incumbent not only on the State, but also on the community, in line with the principle of popular participation and shared responsibility (Brasil, 1988).

At the infra-constitutional level, the National Environmental Policy (PNMA), instituted by Law No. 6,938/1981, is the main normative instrument for environmental regulation and management in Brazil. The PNMA establishes the foundations and objectives of environmental policy, highlighting the creation of the National Environmental System (SISNAMA) and the Federal Technical Registry of Potentially Polluting Activities. The PNMA enshrines basic principles of environmental protection, such as the principle of prevention, the precautionary principle and the polluter-pays principle, the latter embodied in the objective liability of the agent causing environmental damage, under the terms of article 14, § 1 (Brasil, 1985; Sousa, 2007).

Another important normative framework is the Environmental Crimes Law (Law No. 9,605/1998), which typifies conducts harmful to the environment and establishes criminal and administrative sanctions for offenders. This law, by criminalizing practices such as illegal deforestation, pollution of water resources and trafficking of wild animals, reinforces the idea that environmental protection is a legal duty imposed on all, under penalty of civil, administrative and criminal liability (Brasil, 1998).

Law No. 9,605/1998 introduces the figure of criminal liability of legal entities, innovating by recognizing that collective entities can also be active subjects of environmental infractions. At the international level, Brazil has ratified several treaties and conventions aimed at environmental protection, such as the Convention on Biological Diversity (CBD) and the Paris Agreement on Climate Change (Fiorillo, 2006).

These international instruments, when internalized in the national legal system, become part of the constitutionality block, influencing the elaboration of public policies and the interpretation of environmental standards. In this context, the principle of international cooperation stands out, which imposes on the Brazilian State the duty to adopt measures compatible with the commitments assumed at the global level (Freitas, 2006; Milaré, 2009).

Despite the normative advances, the effectiveness of environmental protection in Brazil faces practical challenges, such as the insufficiency of financial and human resources for environmental inspection, the slowness of the judicial system and the conflicts between economic development and environmental preservation. The recent relaxation of environmental standards, through provisional measures and bills, has raised debates about the compatibility of these changes with the constitutional principles of prevention and precaution (Oliveira et al., 2024).

Environmental protection in the Brazilian legal system is configured as a normative complex that articulates principles, norms and instruments of environmental management, aiming at the realization of the right to an ecologically balanced environment. However, the effectiveness of this protection depends not only on the existence of a robust legal framework, but also on the implementation of effective public policies, the coordinated action of federative entities, and the engagement of civil society. In this sense, environmental protection assumes the character of a legal and ethical imperative, imposing itself as an indispensable condition for sustainable development and the guarantee of the dignity of the human person.

LAW NO. 9,605/1998 AND ITS APPLICATION TO COMPANIES

Law No. 9,605/1998, known as the Environmental Crimes Law, represents a fundamental milestone in the Brazilian legal system by establishing a criminal liability regime for conduct harmful to the environment. One of the most innovative aspects of this legislation is the possibility of criminal liability of the legal entity, breaking with the traditional paradigm that restricted criminal imputation to individuals (Brasil, 1998). This expansion of the active subject of the criminal offense reflects the understanding that companies, as economic agents, play a central role in the generation of environmental impacts, whether by action or omission.

The application of Law No. 9,605/1998 to companies is provided for in its article 3, which provides: "Legal entities shall be held administratively, civilly and criminally liable in accordance with the provisions of this Law, in cases where the infraction is committed by decision of their legal or contractual representative, or of their collegiate body, in the interest or benefit of their entity" (Brasil, 1998). Thus, the liability of the legal entity occurs when the unlawful conduct is practiced in its name or for its benefit, even if through a decision of its legal or contractual representatives (Miliaré, 2009).

The Environmental Crimes Law establishes that the criminal liability of the legal entity is autonomous in relation to the individual liability of its directors or representatives. This means that the company can be sued and convicted regardless of the liability of the individuals who acted on its behalf (Fiorillo, 2006).

However, the conviction of the legal entity does not exclude the criminal liability of individuals who, by action or omission, contributed to the commission of the offense. The application of Law No. 9,605/1998 to companies requires the analysis of specific elements that characterize environmental criminal liability (Brasil, 1998).

Among these elements, the typical conduct, the causal link between the action or omission and the environmental damage, and the imputation of the conduct to the legal entity stand out. The legislation provides for the possibility of applying specific criminal sanctions to companies, such as fines, suspension of activities and dissolution of the legal entity (Lauzid, 2002).

The criminal liability of companies for environmental crimes aims not only to punish illegal conduct, but also to promote the prevention of damage to the environment. In this sense, Law No. 9,605/1998 reinforces the precautionary principle, which imposes the adoption of preventive measures to avoid the occurrence of environmental damage, even in the absence of scientific certainty about the risks involved (Séguin, 2002).

The application of Law No. 9,605/1998 to companies represents a significant advance in the fight against environmental crimes, by recognizing that the legal entity can be an active subject of conducts harmful to the environment. However, the effectiveness of this accountability depends on the coordinated action of inspection agencies, the Public Prosecutor's Office and the Judiciary, as well as the adoption of corporate policies aimed at preventing environmental damage.

RESPONSIBILITY FOR ENVIRONMENTAL CRIMES

The Federal Constitution of 1988 unequivocally established, in articles 173, § 5, and 225, § 3, the liability of collective entities (Brasil, 1988). However, although expressly provided for in the Magna Carta, the matter has raised intense controversy and heated debates among Brazilian scholars. On the one hand, a large part of the constitutionalists and penalists of renown in the country support the validity of the brocardo *societas delinquere non potest* – according to which society cannot delinquent. On the other hand, there are those who argue that the constitutional text effectively enshrined the criminal liability of legal entities.

In this context, Sívia Cappelli (1996) argues that the Major Law did, in fact, provide for the criminal liability of legal entities. For the author, to interpret article 225, § 3, as merely reaffirming the liability of individuals would be to reduce its usefulness, making it redundant in the constitutional sphere (Brasil, 1988).

On the other hand, Luiz Regis Prado (1992) takes a categorical position in denying that the 1988 Constitution attributed such responsibility. According to him, article 225, § 3, distinguishes between conducts attributed to individuals and activities linked to legal entities, showing that the legislator sought to establish a clear distinction between them (Brasil, 1988).

Walter Coelho (1998), in line with this understanding, goes on to state that the same legal provision associates criminal sanctions to individuals and administrative sanctions to legal entities, reinforcing the separation between the two liability regimes.

With regard to § 5 of article 173 of the Federal Constitution, Luiz Vicente Cernicchiaro (1995) argues that, if the Constituent Assembly had the intention of defining the criminal liability of legal entities, it would do so explicitly, especially in view of the relevance and controversy surrounding the subject, in the chapter dedicated to the principles of Criminal Law.

However, such positions are considered fallacious by Fernando Castelo Branco (2001), who states that there is no doubt that the intention of the constitutional provisions

was to establish that legal entities, regardless of the individual responsibility of their directors, are subject to civil, administrative or criminal liability.

In view of the above, it is understood that the criminal liability of legal entities was, in fact, enshrined in the text of the Federal Constitution. However, as it constitutes an exception to the general principle, such institute must be applied exclusively in the cases expressly authorized by the constitutional provisions, ensuring strict observance of the legal limits.

ELEMENTS OF THE CRIME

In the context of the criminal liability of the legal entity in environmental crimes, the elements of the crime assume specific particularities. The conduct, in this case, can be attributed to the legal entity through the actions or omissions of its representatives or employees, as long as there is a causal link between the company's activity and the environmental damage caused. Typicality, in turn, requires that the conduct fall within the criminal types provided for in environmental legislation, such as those described in the Environmental Crimes Law (Law No. 9,605/1998) (Freitas, 2006).

Anti-legality and culpability must also be analyzed from the perspective of the liability of the legal entity. Anti-legality is configured when the company's conduct violates environmental protection standards, without there being excluding causes of illegality. Culpability, on the other hand, although traditionally associated with the subjective capacity to understand and will, in the case of legal entities is analyzed objectively, considering the existence of violations of environmental standards and the lack of diligence in the prevention of damage (Nucci, 2008).

ANTI-LEGALITY

The anti-legality in environmental crimes committed by legal entities arises from the violation of environmental protection norms, constituting a conduct contrary to the legal system. The Environmental Crimes Law establishes that legal entities can be held administratively, civilly and criminally liable for damage to the environment, regardless of the individual liability of their directors. In this sense, anti-legality is ruled out only when the company's conduct is supported by excluding causes of illegality, such as strict compliance with legal duty or the regular exercise of a right (Milaré, 2009).

It is worth noting that the criminal liability of the legal entity does not depend on proof of intent or guilt, but on the verification that the company acted in non-compliance with

environmental standards. In this way, anti-legality is analyzed objectively, based on the violation of legal duties and the occurrence of environmental damage (Sousa, 2007).

CULPABILITY

Culpability, in the context of the criminal liability of the legal entity, is analyzed from an objective perspective, distinct from the subjective culpability applicable to individuals. For the companies, the reprehensibility of the conduct is verified based on the violation of environmental standards and the lack of preventive measures to avoid the damage. In this sense, the culpability of the legal entity is related to its ability to comply with legal obligations and adopt sustainable practices, and the subjective intention of its representatives is irrelevant (Nucci, 2008).

The Environmental Crimes Law adopted the theory of double imputation, allowing the legal entity to be held criminally liable independently of the liability of its directors. However, the company's culpability does not require proof of intent or fault, but rather the demonstration that the conduct harmful to the environment resulted from its activity or omission (Milaré, 2009).

IMPUTABILITY

The imputability of the legal entity in environmental crimes is recognized based on its ability to act in accordance with legal norms and to adopt measures to prevent damage to the environment. Unlike natural persons, the imputability of the legal entity is not linked to the psychological capacity to understand and will, but rather to its internal organization and the fulfillment of legal obligations (Séguin, 2002).

In this context, the imputability of the legal entity is ruled out only when the company proves that it has adopted all the necessary measures to avoid environmental damage, such as the implementation of environmental compliance policies and the regular inspection of its activities. Otherwise, the company may be held criminally liable, regardless of the imputability of its directors (Bitencourt, 2011).

EXTINCTION OF PUNISHABILITY

The extinction of the punishability of the legal entity in environmental crimes can occur for several reasons, such as the statute of limitations, the criminal settlement or the fulfillment of alternative measures provided for in the Environmental Crimes Law. The statute of limitations, for example, is calculated based on the maximum penalty imposed on

the crime, considering the seriousness of the environmental damage and the social repercussion of the fact (Freitas, 2006).

The Environmental Crimes Law provides for the possibility of criminal settlement, through the adoption of compensatory measures, such as the recovery of degraded areas or the implementation of environmental programs. Such measures aim to avoid unnecessary judicialization and to promote the repair of the damage caused to the environment (Sousa, 2007).

PRINCIPLE OF MINIMUM INTERVENTION AND PRINCIPLE OF INSIGNIFICANCE

The principle of minimum intervention is especially relevant in the context of the criminal liability of the legal entity, as it guides that the application of Criminal Law should be reserved for cases of greater gravity and social relevance. In environmental crimes, criminal intervention should occur only when the other control mechanisms, such as administrative and civil sanctions, prove insufficient to protect the environment (Séguin, 2002).

The principle of insignificance, on the other hand, can be applied to remove the criminal liability of the legal entity in cases where the environmental damage is negligible or irrelevant. However, its application should be cautious, considering the diffuse nature of the protected legal interest and the potential for cumulative damage to the environment (Nucci, 2008).

BLANK CRIMINAL NORM AND OPEN CRIMINAL TYPE

Environmental legislation often uses blank criminal rules, which depend on complementation by administrative or regulatory rules for their application. This type of norm is essential to adapt the criminal protection of the environment to technological and scientific changes, allowing the constant updating of environmental control standards (Sousa, 2007).

On the other hand, open criminal types are common in environmental crimes, as they involve indeterminate legal concepts, such as "serious damage" or "significant pollution". In these cases, the application of the rule requires a case-by-case analysis, considering the circumstances of the fact and the environmental impact caused (Milaré, 2009).

SUBJECTIVE ELEMENT

The subjective element in environmental crimes committed by legal entities is analyzed objectively, dispensing with proof of intent or guilt. The liability of the company

arises from the violation of environmental standards and the occurrence of the damage, regardless of the subjective intention of its representatives (Freitas, 2006).

However, proof of intent or fault may be relevant to the individual liability of the company's directors, who may be punished cumulatively with the legal entity. In this sense, the analysis of the subjective element is essential to ensure the fair and proportional application of criminal sanctions (Bitencourt, 2011).

ADPF 747, 748 AND 749

The judgment of ADPFs 747, 748 and 749 by the STF represents a definition of the contours of corporate criminal liability in environmental matters. In ADPF 747, the legal debate focused on the requirement of specific intent for the configuration of criminal liability of the legal entity, as amended by the Economic Freedom Law (Supreme Federal Court, 2020a).

The STF, in a decision of high legal relevance, established that such a requirement does not apply absolutely to environmental crimes, maintaining the possibility of liability based on generic intent or even fault, provided that the causal link between the business activity and the ecological damage is demonstrated.

With regard to ADPF 748, the controversy was about the legal restrictions on the mechanisms for piercing the corporate veil. The Court, when considering the matter, maintained the applicability of both the inverse and the direct disregard, recognizing the need to preserve these instruments as a way to curb fraud or abuse in the use of the legal entity for the practice of environmental crimes (Supreme Federal Court, 2020b). Such a position reaffirmed the understanding that the corporate structure cannot be used as a protective veil for the practice of crimes against the environment.

As for ADPF 749, which dealt with the applicability of the criminal settlement to environmental crimes committed by legal entities, the STF adopted an equidistant position, admitting the aforementioned institute, but with significant restrictions (Supreme Federal Court, 2020c).

It was established that the criminal settlement will only be viable in crimes of lesser offensive potential, safeguarding the imposition of more severe penalties for environmental crimes of greater complexity and impact, in which a more energetic state response is imposed. These decisions of the STF reflect a balanced balance between environmental protection and the legal certainty of business activities. At the same time that they preserved the mechanisms of criminal liability of legal entities, the decisions avoided excesses that could make national economic development unfeasible (Vilani, 2022).

However, such a balance is not immune to criticism: doctrinal and practical sectors maintain that the flexibility resulting from the criminal settlement can attenuate the preventive and sanctioning nature of environmental legislation, while others point to operational difficulties in effecting the piercing of the corporate veil (Silva, 2022).

The jurisprudential evolution demonstrates that the STF has built a systematic hermeneutic of environmental legislation, harmonizing ecological protection with the constitutional principles of the economic order. This jurisprudential design gives companies greater predictability regarding the risks of criminal liability, without emptying the protective nature of Environmental Law.

FINAL CONSIDERATIONS

The criminal liability of legal entities in environmental crimes represents a significant advance in the Brazilian legal system, reflecting the need to address environmental degradation in an effective and proportional manner. The adoption of this mechanism, enshrined in the Environmental Crimes Law (Law No. 9,605/1998), demonstrates the recognition that companies, as the main agents of environmental impacts, must be held responsible for their conduct harmful to the environment.

However, the application of this institute still faces challenges, such as the need to harmonize the liability of the legal entity with the constitutional principles of Criminal Law, ensuring due proportionality and the observance of due process.

In view of the scenario of growing environmental degradation and the urgency to promote sustainability, the criminal liability of the legal entity is an essential instrument for the protection of the environment, while it is essential that its application is accompanied by public policies that encourage the adoption of sustainable corporate practices and the implementation of environmental compliance mechanisms.

REFERENCES

1. Bitencourt, C. R. (1999). Reflexos sobre a responsabilidade penal da pessoa jurídica. Revista dos Tribunais.

2. Bitencourt, C. R. (2011). Tratado de direito penal: Parte geral. Saraiva.

3. Branco, F. C. (2001). A pessoa jurídica no processo penal. Saraiva.

4. Brasil. (1981). Lei nº 6.938, de 31 de agosto de 1981: Dispõe sobre a Política Nacional do Meio Ambiente, seus fins e mecanismos de formulação e aplicação, e dá outras providências. https://www.planalto.gov.br/ccivil_03/leis/l6938.htm

5. Brasil. (1988). Constituição da República Federativa do Brasil de 1988. http://www.planalto.gov.br/ccivil_03/constituicao/constitui%C3%A7ao.htm

6. Brasil. (1998). Lei nº 9.605, de 12 de fevereiro de 1998: Dispõe sobre as sanções penais e administrativas derivadas de condutas e atividades lesivas ao meio ambiente, e dá outras providências. http://www.planalto.gov.br/ccivil_03/Leis/L9605.htm

7. Cappelli, S. (1996). Responsabilidade penal da pessoa jurídica em matéria ambiental: Uma necessária reflexão sobre o disposto no art. 225, parágrafo 3°, da Constituição Federal. Revista de Direito Ambiental, (1), 1–XX.

8. Cernicchiaro, L. V. (1995). Direito penal na constituição (3rd ed.). Revista dos Tribunais.

9. Coelho, W. (1998). Teoria geral do crime (2nd ed.). Sergio Antônio Fabris Editor.

10. Fiorillo, C. A. P. (2006). Curso de direito ambiental brasileiro (7th ed.). Saraiva.

11. Freitas, G. P. (2006). Crimes ambientais: Jurisprudência organizada. Millennium.

12. Lauzid, F. A. S. (2002). Responsabilidade penal da pessoa jurídica nos crimes ambientais. Paka-Tatu.

13. Levorato, D. M. (2006). Responsabilidade penal da pessoa jurídica nos crimes ambientais. Revista dos Tribunais.

14. Milaré, É. (2009). Direito do ambiente: A gestão ambiental em foco: Doutrina, jurisprudência, glossário (6th ed.). Revista dos Tribunais.

15. Nucci, G. S. (2008). Manual de direito penal (4th ed.). Revista dos Tribunais.

16. Oliveira, M. M., Lago, A., Nogueira, C. M., Dal'Magro, G. P., & Weber, C. (2024). Análise das modificações decorrentes da reformulação do Código Florestal. Caderno Pedagógico, 21(9), e7611.

17. Prado, L. R. (1992). Direito penal ambiental: Problemas fundamentais. Revista dos Tribunais.

18. Séguin, E. (2002). Direito ambiental: Nossa casa planetária. Forense.

19. Silva, R. C. (2022). Licenciamento ambiental: Seu histórico, aplicações, definições, limitações e eventuais conflitos com a gestão urbanística municipal [Undergraduate thesis, Universidade Federal do Rio de Janeiro]. Repositório da UFRJ.

20. Sousa, G. A. M. (2007). Crimes ambientais: Responsabilidade penal das pessoas jurídicas (2nd ed.). AB.

21. Supremo Tribunal Federal. (2020a). Arguição de Descumprimento de Preceito Fundamental 747 (Relatora: Min. Rosa Weber). https://portal.stf.jus.br/processos/detalhe.asp?incidente=6016616

22. Supremo Tribunal Federal. (2020b). Arguição de Descumprimento de Preceito Fundamental 748 (Relatora: Min. Rosa Weber). https://portal.stf.jus.br/processos/detalhe.asp?incidente=6018018

23. Supremo Tribunal Federal. (2020c). Arguição de Descumprimento de Preceito Fundamental 749 (Relatora: Min. Rosa Weber). https://www.stf.jus.br/arquivo/cms/noticiaNoticiaStf/anexo/adpf749.pdf

24. Vilani, R. M. (2022). Avanço técnico-científico na jurisprudência do STF: Reflexões a partir das ADPFs 747, 748 e 749. Sequência (Florianópolis), 43(90), e80705. https://doi.org/10.5007/2177-7055.2022.e80705