

On the Public Morality Exception Rule Under the WTO: the Case of China-US Cultural Products Market Access as an Example

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Abstract: As the first of all exceptions in the GATT and GATS agreements, the public morals exception has been invoked by many countries in practice to justify their trade restrictive measures. The WTO rulings in the US Gaming case and the US-China Cultural Products Market Access case have made important contributions to the development of the public morality exception, but the concept of "public morality" and the extraterritorial effects of this rule have not been clarified. By considering these issues, the article proposes to adopt a "restricted domestic approach" to the definition and application of the public morality exception rule and to strictly limit the extraterritorial effects of the rule. This paper uses the research methods of comparative study and case study.

Keywords: WTO, Public morality, Extraterritoriality, US-China cultural products market access case

1. Introduction

The signing of the General Agreement on Tariffs and Trade (GATT) marked the dawn of the era of free multilateral trade. On the one hand, GATT/WTO members often cede some of their trade regulatory powers in pursuit of the enormous benefits of free trade in terms of civil rights, economic development and international peace; on the other hand, in order to protect their national interests, they have set up a number of exceptions as legal defences for breaches of their substantive obligations under GATT/WTO. Among the exceptions provided for in Article 20 of the General Agreement on Tariffs and Trade (GATT) and Article 14 of the General Agreement on Trade in Services (GATS), the public morals exception is the first element. The public morals exception within the WTO system is the ability of a member to temporarily depart from its WTO treaty obligations and impose import and export restrictions on the grounds of public morals protection, provided that the legal conditions are met. [1] This exception is not a loophole, but rather a "back door" left open by WTO members to reach the widest possible acceptance of the WTO agreement, in recognition of the vast differences in each other's values, historical traditions and social systems. "The case of *Antigua v. United States, Measures Affecting the Cross-Border Provision of Gambling and Gaming Services* (DS285, hereinafter referred to as the US Gaming case) first raised the issue of the WTO public morality exception. [2] For the first time, the United States, the respondent in that case, invoked the public morality exception, namely Article 14 of GATS, to defend

its measures prohibiting cross-border online gambling services. Subsequently, the case of *United States v. China, Enforcement of Trade Rights and Distribution Services Affecting Certain Publications and Audiovisual Entertainment Products* (DS363, hereinafter referred to as the "US-China Cultural Products Market Access Case") again involved the public morality exception defence, with the respondent China invoking China invoked Article 20(a) of GATT 1994 in an attempt to prove that restrictions on importers of cultural products such as books, periodicals, newspapers, audiovisual products (finished products) and electronic publications were necessary to protect public morals. [3] In view of the significant interests of WTO members in the public morality exception, this article attempts to explore the relevant exceptions within the WTO regime and, in particular, to analyse the controversy surrounding the US-China Cultural Products Market Access case.

2. Understanding of the Concept of "Public Morality" Under GATT

2.1. Treaty Law Interpretation of the Concept of "Public Morality"

The correct interpretation of any legal norm is essential for its proper application, and this is also the case with the public morality exception, which is of great interest but has an ambiguous connotation. However, no agreement or body has provided a sufficiently clear and authoritative interpretation of the public morality exception since its enactment in 1947 until the 2004 US gaming case.

Under Article 3.2 of the WTO Understanding on Rules and Procedures Governing the Settlement of Disputes (DSU), recommendations and rulings of the DSU, while not adding to or subtracting from the application of rights and obligations under the WTO Agreement, are entitled to be interpreted in accordance with the DSU. [4] However, the DSU is entitled to clarify existing provisions of the WTO Agreement in accordance with its practice of interpreting rules of international law, which naturally includes the interpretation of the meaning of "public morals" in Article 20 of the GATT Agreement. As regards the practice of interpretation of WTO agreements, the Appellate Body in *Venezuela, Brazil v. United States, Gasoline Standards in Violation of National Treatment*, made it clear that the provisions of Article 31 of the Vienna Convention on the Law of Treaties (VCLT) have acquired the status of customary or general international law of treaty interpretation. [5] According to this article, a treaty is to be interpreted in good faith in accordance with the ordinary meaning to be given to its terms in their context and in the light of the object and purpose of the treaty. However, as the text of the public morality clause itself does not further explain "public morality", it can only be generally understood as some norms that exist in a particular society and serve as value judgments and guidance for behaviour, and it remains unclear which norms should be included in the category of public morality.

In addition, referring to the public morality exceptions in the GATT and GATS agreements, it can be found that Article 14(a) of the GATS agreement specifies that members take measures "necessary for the protection of public morals or the maintenance of public order" and that "public morals" and "public order" should clearly be included in the scope of public morality. "public morals" and "public order" should clearly be two different concepts. [6] (although the measures to preserve them may well overlap).

2.2. Interpretation of "Public Morality" in Previous WTO Cases

In 2003, a dispute arose between the United States and Antigua over whether Antigua could provide online remote gambling and gaming services, and the dispute was referred to the WTO for resolution. It was in the US Gaming decision that the meaning of the public morals exception under the WTO was first interpreted by the panel as "standards of right and wrong conduct maintained by or on behalf of a society or the state". [7] In addition, the WTO panel and the Appellate Body in this case articulated three principles for the use of the public morality exception, which include the principles

of non-discrimination, necessity, and, to be described in particular below, the principle of dynamic interpretation to be followed in understanding "public morality." According to the panel, "the content of public morality can change over time and space, depending on a range of factors, including prevailing social, cultural, and racial morality". In other words, "public morality" should be interpreted dynamically rather than statically, not limited to what the drafters of the 1947 Treaty understood to be public morality, but responding to new situations and issues. [8] The panel in the US-China Cultural Products Market Access case followed this line of thought in the US Gaming case and held that the meaning of "public morality" in that case should be determined by China in the light of its own social, cultural, ethical, and religious circumstances [9].

In conclusion, whether based on the interpretation path provided by treaty law or by reference to the U.S. Gaming case, there is still no direct interpretation of the public morality exception, but only an acknowledgement that the principles of interpretation used for other exceptions to Article 20 of the GATT should be extended by analogy to the public morality provision. When a respondent invokes the public morals exception to justify its trade restriction, the Panel and the Appellate Body will still have to analyse whether this defence is valid in this case on a case-by-case basis.

3. Elements of the Application of the GATT Public Morality Exception

A careful analysis of the preamble and paragraph (a) of Article 20 of the GATT "Public Morality Exception" leads to the following summary of the elements of the application of the GATT Public Morality Exception.

3.1. Prerequisite Element: the Disputed Trade Measure Violates Other WTO Rules

The "public morality exception" clause of the GATT, as paragraph (a) under the "general exception" clause of Article 20 of the GATT, has "exceptions" as well as "conventions". "The premise of invoking the public morality exception as a ground for exemption is obviously that the respondent party considers that the trade measure at issue is inconsistent with the requirements of other GATT/WTO provisions (such as most-favoured-nation treatment, national treatment, etc.) and has caused substantial harm to the interests of other countries. [10] In the US-China Cultural Products Market Access case, the DSU first examined whether the Chinese trade measures at issue materially violated the relevant provisions of China's WTO Accession Agreement, GATT and GATS.

3.2. The Purposefulness Element: to Safeguard Public Morals

In Article 20(a) of the GATT, it is clearly stated that the purpose of the disputed trade measures shall be "to safeguard public morals", and that any trade restrictive measures contrary to WTO rules which are not for this purpose or which are used for trade protection in the name of safeguarding public morals cannot be exempted from this extra-regulatory rule.

As mentioned above, the DSU currently defines "public morality" as "the standards of right and wrong conduct maintained or represented by a society or a state". However, the exact meaning of this concept will vary according to time and place. Rather than accepting a static, fixed definition of "public morality", the panel took a dynamic approach to interpret the public morality at issue on a case-by-case basis, taking into account the vast differences in social, cultural, ethical, religious and other factors that exist in different countries. Thus, in both the US Gaming case and the US-China Cultural Products Market Access case, the panel held that WTO members have the right to define public morality and public order according to their own standards of right and wrong. This conclusion was somewhat in favour of China invoking the public morality exception.

3.3. Limiting Element 1: the Three Elements of Necessity Test

Article 20(a) of the GATT imposes an additional qualification on measures to preserve public morals, namely that the measure at issue must be "necessary" for the protection of public morals. In addition, Articles 20(b) and (d) contain similar requirements, which can be collectively referred to as the "necessity element" under the interpretation path of the Convention on the Law of Treaties. In the US Gaming case, the Appellate Body considered that the necessary element could be examined by reference to the relevant precedents invoking Article 20(b) and (d) of the GATT. In Korea Beef (DS161) and EC Asbestos (DS135), the Appellate Body created a three-factor test for the necessity to weigh the "indispensable" and "useful" elements of "necessity". essential" and "contributory" in "necessity".

The three-factor test weighs 1) the importance of the public morality that the trade restriction is intended to protect; 2) the extent to which the measure contributes to the objective pursued, and 3) the restrictive effect of the measure on trade and whether there is a more reasonable WTO-compatible alternative.

And in the US-China cultural products market access case, the importance of public morality for 1. China argued that the regulations in its cultural product review mechanism were designed to protect public morals and that it had established an effective and efficient content review mechanism. The US did not object to this, and the panel therefore only recognised the importance of the disputed "public morals" through China's argument, which was more favourable to China; about 2. the contribution of the disputed measures and 3. the restrictive impact of the disputed measures on trade, China argued in its response that only wholly state-owned enterprises met the content review requirements at the time. [11]In its response, China argued that only wholly state-owned enterprises met the necessary financial, technical and organisational requirements for content review, that domestic private enterprises could not afford the cost of content review, and that foreign enterprises may have lacked an understanding of the public morality that China values, could not communicate well with the relevant administrative authorities, and were not suitable to operate as importers of cultural products. In this regard, the expert group divided China's relevant controversial measures into standard provisions (mainly concerning the entry conditions for importers and exporters of publications), discretionary provisions (mainly concerning China's implementation of a designation system for publication importers) and exclusionary provisions (China's exclusion of entities other than wholly state-owned enterprises from participating in the import of publications). Concerning the standard provisions, the Group agreed with China's assertion that "importers of publications need to have the right organisational structure and the right personnel". [12]Concerning the discretionary provisions, the Group acknowledged that the Chinese authorities authorise specific enterprises to import cultural products through designation. However, on the one hand, China acknowledges that if an application-approval system is adopted, the criteria for vetting cultural products by import operators are essentially the same as under the designation system; on the other hand, the lack of an application procedure under the designation system limits the trade rights of foreign and private enterprises. The expert group, therefore, considered that the discretionary provisions were not "necessary" as they neither made an independent contribution to the protection of public morals nor restricted the trade rights of foreign and private enterprises. [13] To the exclusionary provision, the Panel estimated, based on evidence submitted by China, that the additional cost of content review for China National Book Import and Export Corporation in 2006 was RMB 4 million, but that the company's imports in that year were US\$127 million, so the cost of the content review was small relative to the value of imports. The fact that China only allows wholly state-owned enterprises to import publications restricts the trading rights of potential import operators and is not "necessary".

In the US Gaming case, the Appellate Body supplemented the third prong of the above test by shifting the burden of proof from the Respondent to the Complainant as to whether a reasonable alternative measure existed, thereby significantly reducing the Respondent's burden of proof, a principle that was followed in the US-China cultural products market access case. According to the above analysis, the Chinese side only has "standard provisions" that meet the three elements of the necessity test and to argue that these measures are not necessary, it is up to the US side to propose "reasonably available alternative measures that are consistent with WTO regulations". [14]

In this regard, the alternative measures proposed by the US include: replicating the "domestic" content review mechanism applied by Chinese domestic producers of cultural products, shifting to having foreign investors and private enterprises train and hire professionals to review the content of imported cultural products; or having the Chinese government train and hire professionals to review the content; or allowing foreign investors and private enterprises to hire qualified reviewers to review the content of imported cultural products. The Group of Experts considered that the above-mentioned alternative measures should be adopted by the Chinese government. Of the above alternative measures, the Panel found that having the Chinese government conduct its censorship of all imported publications would contribute more to the maintenance of public morality on the Chinese side and would not impose unreasonable additional costs. Although China argued in its defence that this alternative measure designed by the US would have forced the Chinese government to undertake extensive staff restructuring and upgrading of technical equipment, resulting in an unreasonable increase in the cost of content review, the Panel found that the Chinese government at the time would also have provided financial support to the wholly state-owned enterprises responsible for reviewing imported cultural products, and therefore did not accept China's arguments.

3.4. Limiting Element 2: Non-discrimination Requirement

In the 1998 Shrimps and Turtles case, the Appellate Body made it clear that since the ten circumstances under Article 20 of the GATT are limited and conditional exceptions to other substantive provisions of the GATT, any measures invoking the exceptions must achieve a balance between the rights and obligations of Members in the GATT. The requirements of the introductory part of Article 20 of the GATT must also be met.

The preamble consists of two parts: firstly, that "measures applied to countries in the same situation shall not constitute arbitrary or unjustifiable discrimination"; and secondly, that "they shall constitute a disguised restriction on international trade". Concerning "disguised", the Appellate Body considered that the term could be understood as "hidden" or "undeclared", similar to "disguising an unlawful purpose in a lawful form" in the field of civil law. "disguise an unlawful purpose" in civil law. In the case of "non-discrimination", Article 20 was invoked by the Member States for the very purpose of providing an exemption from liability for their trade restrictive measures, i.e. necessarily discriminating between the sanctioned State and other States. The Panel, therefore, considered that the introductory phrase "non-discrimination" emphasised the prohibition of selective discrimination, which could occur between the complaining State and a third State, as well as between the complaining State and the respondent State. In the US Gaming case, the Panel found that while the US prohibited remote gaming services in Antigua, it did not prohibit. [15]

4. The Unclear Issues of the Public Morality Exception

The US Gaming case and the US-China Cultural Products Market Access case have significantly developed the public morals exception. However, these cases have been decided with great restraint, revolving around whether the trade restriction measures of the respondent country make a substantial contribution to the protection of public morals and whether they are "necessary", leaving open the

question of the connotation and extension of the concept of public morals. At a time when "counter-globalisation" is becoming more and more prevalent and trade protectionism is on the rise, this suspension inevitably casts a shadow over the WTO's invocation of the public morality exception.

4.1. Connotation: National or International Public Morality

While the US Gaming case establishes the principle of dynamic interpretation to be followed when interpreting the concept of "public morality", it fails to address a fundamental question: who has the authority to define "public morality"? What morals are "public" and not those possessed by a minority of the population? One view of this question is that, in the field of international law, "public morality should be understood as morality universally shared and followed by all mankind- the international view-while another, equally extreme, asserts that each sovereign state is a representative of the public-the domestic view" [16]. The other, equally extreme view is that each sovereign state is a representative of the public, i.e. the "domestic view".

Although, as mentioned above, the panel in the US gaming case stated that WTO members "should be given the right to determine for themselves the scope of 'public morality'", in the US-China cultural products market access case, the meaning of public morality was also determined by China according to its specific circumstances. In the US-China cultural goods market access case, the content of public morality was also determined by China according to its circumstances. However, the Panel did not support an exclusively 'domestic argument' either, as they carefully reviewed the practice of other WTO member states when considering whether the US gambling restrictions constituted the maintenance of public morals, noting that Israel and the Philippines have banned or restricted gambling-related services and products to maintain public morals. Another 16 member states have banned or restricted international gambling, and online gambling, or are preparing to do so. Based on this comparative law evidence, the Panel believes that the US ban on online gambling can be classified under the public morality exception. The outcome might be different if the US were the only country in the world to restrict gambling by defining it as conduct detrimental to public morals.

4.2. Jurisdiction: Upholding National Morality or the Morality of Another Country

Depending on the geographical location of the public morality to be safeguarded, trade restrictive measures can be divided into intraterritorially oriented and extraterritorially oriented measures. Extraterritorially oriented measures refer to trade-restrictive measures imposed by a member party to protect public morals outside its territory [17].

Generally speaking, when a country upholds traditional notions of public morality, such as the prohibition of alcohol, drugs and gambling, its trade restriction measures protect its people (citizens of the country imposing the sanctions). For example, in the US-China cultural products market access case, China banned and restricted the entry of cultural products holding different values and ethics into China by restricting the import and distribution of cultural products, thereby upholding public morality within China. However, when some Western countries invoke exceptions to public morality, they uphold some broader emerging public morality, such as human rights, gender equality and the prohibition of forced labour. These concepts have often emerged in the last half-century or even a decade or so, and often have the extraterritorial effect of 'long-arm jurisdiction', i.e. they govern and 'protect' foreigners (citizens of the sanctioned state). For example, in November 2007 the EU increased its sanctions against the Burmese military government, enacting trade bans on a range of products such as textiles, timber and gemstones exported from Burma. On 23 December 2021, US President Joe Biden signed the Uyghur Forced Labor Prevention Act, the core concept of which is the "rebuttable presumption" rule, which prohibits the importation of Uyghur goods. presumption rule, which prohibits the importation of products originating in Xinjiang, China, unless the importer

can provide "clear and convincing evidence" that the products were not manufactured by so-called "forced labour". Neither the US Gaming case nor the US-China Cultural Products Market Access decision can provide a referable recommendation on this issue.

5. Reflections on the Public Morality Exception

The above questions can be summarised in two ways: (1) Is public morality "domestic" or "international" in meaning? (2) Can trade restrictions based on the preservation of public morals in a country (or part of a country or region) have extraterritorial effects?

With question (1), this article argues that there are obvious problems with both the "domestic" and "international" approaches and that the "restricted domestic" approach should be adopted as a compromise. The "international theory" asserts that morality must be recognised by the international community as a whole before it can be elevated to "public morality", which in effect leaves no room for the application of the public morality exception. At present, only a few moral principles are universally recognised by the international community, such as anti-genocide, anti-slavery and anti-psychological torture. The "publicness" of a myriad of other public moralities, such as anti-gambling, anti-drugs and anti-obscenity, is not strictly speaking solid. Secondly, if a norm is already widely recognised by the international community, it is often unnecessary for states to invoke the public morality exception to justify their actions. The "domestic argument", while fully respecting the vast social, cultural, ethical and religious differences between regions and countries, also allows a country to protect trade in the name of a public morality exception, thus increasing the uncertainty of international trade.

In the "restricted domestic approach", this paper agrees that WTO members "should be given the right to determine the scope of 'public morality' on their own", as recognised in the US gaming case. [18] Secondly, when a country intends to introduce discriminatory trade restrictions on the grounds of public morality, it is not enough to adopt domestic legislation or executive orders, but additional notification and certification obligations should be fulfilled, such as: (a) determining that the morality to be protected does not violate the norms contained in international conventions to which the country is a signatory, the customary and conventional principles and jurisprudence at the time of application (b) the State should demonstrate *prima facie*, through various means such as the collection of historical documents, the organisation of social research, public opinion polls, etc., that this moral concept is widely accepted by the citizens of the State; (c) the State should demonstrate, through similar measures, that the current importation of particular goods or services undermines this moral concept and that this undermining poses a "clear and immediate danger" to this public morality. clear and present danger", i.e. some imminent, clear and present risk such that the country must take immediate measures to protect this public morality; and (d) after the above has been completed, inform the WTO Director General and other member states in writing within a certain period of the trade-restrictive measures it intends to take, and allow a buffer period for the enterprises concerned. [19]

Concerning question (2), whether "extraterritorial jurisdiction" can be established depends firstly on whether the scope of application of the provisions is agreed in the GATT agreement; if not, then the "context" of the provisions and the "object and purpose" of the treaty, by the Convention on the Law of Treaties and other norms. [20] If there is no such agreement, then a "good faith" interpretation will be made based on the "context" of the provision and the "object and purpose" of the treaty, by the Convention on the Law of Treaties.

Secondly, it is difficult to generalise the jurisdictional scope of these ten exceptions, which varies from one context to another: for example, article 20(e), "measures relating to the products of prison labour", clearly has extraterritorial effect, while paragraph (b) The scope of the effect of "measures necessary to safeguard the life or health of people, animals and plants" is not necessarily the same. In

the Tuna/Dolphin case, the panel reviewed the drafting history of Article 20(b) of the GATT and found that it had been drafted to focus protection on the use of sanitary measures to safeguard "the life or health of animals or plants under the jurisdiction of the importing State", thus ultimately concluding that paragraph (b) had only an extraterritorial effect. [21] Finally, Article 31(3) of the Convention on the Law of Treaties provides that a treaty must be interpreted by taking into account the relevant provisions of the international conventions applicable to the parties. Article 53 provides that a treaty cannot be contrary to jus cogens in the international legal system. Thus, unless the public morality asserted by the State against which the trade restriction measure is imposed contradicts the principles and provisions of an international convention to which that State is a signatory, or violates some fundamental human rights protected by international jus cogens. In other cases, this article argues that the extraterritorial effect of the public morality exception should be strictly limited to prevent some member states from imposing their moral standards on other countries, or from using the defence of morality as a justification for trade protection.

6. Conclusion

As the first of all exceptions in the GATT and GATS agreements, the public morality exception has been invoked by many countries in practice to justify their trade restriction measures. However, from the above analysis, it can be seen that the concept of "public morality" itself is ambiguous and there is no universally accepted definition or interpretation; trade restriction measures created based on "public morality" recognized by a country will be fiercely opposed by the counterparty whose interests are damaged. By considering these issues, the article proposes to adopt a "restricted domestic doctrine" to define and apply the public morality exception rule, and strictly limit the extraterritorial effects of the rule.

References

- [1] Gonzalez, M. A. (2006). *Trade and Morality: Preserving Public Morals without Sacrificing the Global Economy*. *Vand. J. Transnat'l L.* 39, 939-972.
- [2] Marwell, J. C. (2006). *Trade and morality: The WTO public morals exception after gambling*. *NYUL Rev.* 81, 802-842.
- [3] Wu, M. (2008). *Free trade and the protection of public morals: An analysis of the newly emerging public morals clause doctrine*. *Yale J. Int'l L.* 33, 215-251.
- [4] Fitzgerald I, P. L. (2011). "Morality" may not be enough to justify the eu seal products ban: animal welfare meets international trade law. *Journal of International Wildlife Law & Policy*, 14(2), 85-136.
- [5] He, Li ya. (2018) *Study on the legality of animal welfare import ban under GATT 1994*. Shanghai Jiaotong University.
- [6] Liu Yilin. (2018) *WTO Brazil tariff measures case - the application of the public morality exception to Article 20(a) of GATT*. *Business Economics*, 6, 121-124.
- [7] Du M. (2017) *The generalized interpretation of the public morality exception clause under the WTO framework and its systemic implications*. *Tsinghua Jurisprudence*, 6, 171-188.
- [8] Zhang J. (2017) *Review of the application of the "public morality exception clause" under the WTO framework*. *Law Graduate*, 1, 165-180.
- [9] Guo Guihuan. (2015) *Animal welfare and public morality exceptions under the WTO framework*. *Hebei Jurisprudence*, 2, 138-145.
- [10] Huang Anping. (2014) *Study on the WTO public morality exception clause from the perspective of human rights protection*. Shanghai Jiaotong University.
- [11] Yang X. (2014) *Study on the public morality exception clause under the WTO framework*. Liaoning University.
- [12] Zhao Yuyi. (2012) *On the WTO Public Morality Exception: A Review of the U.S. Remote Gaming Case and the China Publications and Audiovisual Products Case*. *Business Times*, 32, 51-53.
- [13] Zhan Tao. (2012) *Analysis of the public morality exception clause in WTO*. *Hebei jurisprudence*, 8, 63-69.
- [14] Xu Li. (2012) *Rumination on the "public morality exception" clause of WTO rules*. *Yue Lu Law Review*, 7, 214-221.
- [15] Xu Li. (2012) *Study on the "public morality exception" clause of WTO*. Hunan Normal University.

- [16] Xu Li.(2012) On "extraterritorial jurisdiction" under the "public morality exception" clause of WTO. *Law Science Magazine*, 33(01):165-169.
- [17] Liu Ying. (2010) On the application of the GATT public morality exception: a review and insights from the case of U.S. v. China Affecting Trade in Publication and Audiovisual Products. *Journal of Guangdong Administrative College*, 4, 68-74.
- [18] Liu Y. (2010)On the public morality exception rule in the WTO system: a review of the controversies related to the Sino-US cultural products market access case. *Journal of International Trade*, 5, 68-74.
- [19] Gong Bohua. (2009) "Legal analysis of the "public morality exception" of Article 20 of GATT in the WTO case of China-US publications market access. *World Trade Organization Developments and Studies*, 10, 30-37+44.
- [20] Liu Yong. (2010) On the public morality exception in the WTO system: A review of the controversy in the China-Guangzhou cultural products market access case. *International Trade Issues*, 5, 9.
- [21] Li Xianbo, Xu Li. (2010) An analysis of the "public morality exception clause" in GATT. *Journal of Social Sciences of Hunan Normal University*, 1, 53-57.