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**Addressing global environmental concerns through trade:  
extraterritoriality under WTO law from a comparative perspective**

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**Citation**

Cooreman, B. E. E. M. (2016, June 14). *Addressing global environmental concerns through trade: extraterritoriality under WTO law from a comparative perspective*. Meijers Research Institute and Graduate School of the Leiden Law School of Leiden University, Leiden. Retrieved from <https://hdl.handle.net/1887/40164>

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Cover Page



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**Author:** Cooreman, B.E.E.M.

**Title:** Addressing global environmental concerns through trade measures : extraterritoriality under WTO law from a comparative perspective

**Issue Date:** 2016-06-14

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