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Conception of the Path for Applying Portrait Right Protection Rules to Voice Rights by Reference—Taking China's First AI Voice Infringement Case as the Starting Point

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Abstract: With the rapid iteration of digital and intelligent technologies, human voice has evolved from a traditional communication medium into a digital personality identifier that embodies both personal dignity and economic value. Deepfake technology has given rise to new types of infringement such as digital reconstruction of voice. Taking China's first AI voice infringement case as an example, this paper analyzes the voice protection rule stipulated in Article 1023 of the Civil Code, and finds obvious regulatory deficiencies in respects including the interpretive boundary of mutatis mutandis application for voice protection, the identifiability standard, the allocation of the burden of proof, and the damages mechanism. Based on the existing referential protection rules and the dual jurisprudential attributes of voice concerning personal dignity and property value, this paper proposes improvement approaches: clarifying the interpretive boundary of mutatis mutandis application, establishing a unified identifiability standard, optimizing evidentiary rules, and perfecting the dual compensation mechanism. It aims to respond to the practical demands for personality right protection in the digital and intelligent era and provide beneficial reference for relevant theoretical and institutional construction.

1. Introduction

The core feature of the digital and intelligent era lies in the high circulation of data and the low cost of information reconstruction. The voice of natural persons, traditionally regarded merely as a medium of communication, has evolved into a high-value data asset that can be permanently stored, perfectly replicated, and deployed for commercial operation.

As the American jurist Edgar Bodenheimer pointed out, "Law is laggard and often falls behind changes in social life."[1]Implemented in 2021, the Civil Code of the People's Republic of China for the first time stipulates that the protection of a natural person's voice shall apply the provisions on the protection of portrait rights mutatis mutandis, reflecting legislative attention to emerging personality rights and interests at the normative level. Nevertheless, voice infringement presents complex and diversified forms in the digital and intelligent era. By adopting AI technology, infringers can highly simulate a specific individual's voice merely through a small number of voice

samples, enabling low-cost replication, dissemination and commercial exploitation of voice content. Some AI-generated voices are sufficiently realistic to confuse public perception, which not only infringes upon personal dignity but also undermines the economic interests that individuals derive from their voices. While such technological breakthroughs drive the development of the digital economy, they also pose new challenges to the traditional model of personality rights protection within the civil law system.

Different from static portraits, voice is characterized by dynamism, situational dependence and reproducibility. Traditional rules for portrait right protection cannot fully cover new infringement scenarios such as AI speech synthesis and deepfake forgery. Due to the essential differences between voice and portrait in object attributes and identification mechanisms, the application by mutatis mutandis encounters interpretive dilemmas at the doctrinal level, thereby giving rise to inconsistent application of such method in judicial adjudication.[2]

Against the backdrop where artificial intelligence continuously reshapes the form of personality interests, it has become an urgent theoretical and practical proposition for legal academia to explore how current law can balance the protection of personal dignity and the property value of voice, improve the normative system of voice rights within the framework of the Civil Code, and respond to emerging infringement problems arising in judicial practice.

2. Jurisprudential Interpretation of the Attributes and Protection Modes of Voice Rights

2.1. Personal Dignity Attribute of Voice

The core of the object of personality rights lies in its representational function. Through unique timbre, tone and frequency, voice conveys the identity information of a specific subject to the outside world. Physically, voice is a sound wave generated by vocal cord vibration; from a legal perspective, it refers to the sound signal that embodies the identity characteristics of a specific natural person. The structure of vocal organs, resonance cavity features and pronunciation habits of each individual are unique, thereby forming voiceprint characteristics. Such uniqueness enables voice, together with facial features, to serve as a core identifier for recognizing a natural person's identity.

In this sense, voice possesses not only identifiability in the biological sense but also bears the personal dignity and social evaluation of a natural person. The speaking manner, language rhythm and emotional expression formed by individuals in long-term social interactions often reflect their personality traits, professional identities and even emotional states.

For specific professional groups such as public figures, broadcasters and voice actors, voice has become an important part of personal image. The public can directly form cognition and trust toward a specific subject through voice. Therefore, voice is not merely technical data, but the external manifestation of personality interests at the auditory level, essentially constituting an extension of personal dignity.

2.2. Property Value Attribute of Voice

The economic value of voice is exploitable and sustainably utilizable. With the development of artificial intelligence speech synthesis technology, voice data can be repeatedly copied, stored and trained, and disseminated at low cost on digital platforms. This enables voice to go beyond traditional personality interests and evolve into digital resources capable of independent market circulation.

Thanks to its uniqueness, identifiability and long-established social influence, a natural person's voice can be transformed into tangible economic benefits in commercial activities. For instance, the

voices of broadcasters, dubbers, singers and public figures already have market competitiveness and can be commercially utilized in various forms such as advertising endorsement, film and television dubbing, live-streaming sales, voice navigation and virtual digital humans. Once a specific voice gains stable public recognition, it generates market value similar to business goodwill and thus becomes intangible property with exchange value.

2.3. Jurisprudential Basis for Applying Portrait Right Protection to Voice Rights by Reference

Within China's civil law system, legislators incorporate voice into the normative structure of applying portrait right protection mutatis mutandis based on the isomorphism between voice and portrait in their personality identification function. Both undertake the legal function of externally identifying the identity of a specific natural person.[3]

Voice is not an abstract physiological output, but a stable identification symbol solidified through long-term socialization. Its identification mechanism relies on a composite structure including voiceprint features, expression habits and semantic style, which is functionally similar to portraits that adopt a combination of facial features for identity recognition.[4] Accordingly, the personality identification characteristic of voice not only serves as the factual basis for its inclusion in the civil law protection system, but also constitutes the normative premise for the establishment of the mutatis mutandis rule.

On this premise, voice right is not an entirely new type of right independent of the existing right system; instead, it is a compound right form formed through functional expansion and interpretive supplementation within the established personality rights framework. From the perspective of normative interpretation, mutatis mutandis application is not a simple analogy, but an expansive interpretation method aiming at systematic coordination. The premise of expansive interpretation lies in the consistency of value and similarity of function between the referenced rules and the regulated objects.[5]

The portrait right system protects natural persons' right of disposition and control over their external image, and its core legal interests lie in the autonomy of personality identification and the exclusivity of commercial utilization. Although voice takes the form of auditory information as its carrier, it also features identifiability and commercial exploitability. Hence, voice is highly comparable to portrait rights in terms of right structure.

3. Judicial Dilemmas in the Protection of Voice Rights by Reference to Portrait Rights

3.1. Infringement via Digital Reconstruction of Voice

With the rapid advancement of artificial intelligence technology, voice infringement is no longer limited to traditional on-the-spot recording. Instead, infringers extract audio clips of infringed persons from social media, short-video applications and other platforms, and adopt software to synthesize forged voice content. Such digital forgery is highly likely to cause severe public confusion regarding the identity of the aggrieved party.[6]

Compared with traditional infringement means, voice infringement through digital reconstruction features stronger concealment and wider dissemination. Infringers do not need long-term physical contact with the right holder; they can replicate voiceprints merely by using a small number of voice samples available on public networks and generate highly simulated voice content via AI models. This technological approach breaks the original physical attachment between voice and natural persons, enabling voice to exist independently of the subject and to be infinitely reproduced. Especially amid the rapid development of short-video platforms and the

intelligent voice industry, forged voices may be utilized not only for commercial marketing but also for false propaganda, telecom fraud and public opinion manipulation, thereby causing dual damages to both the personality interests and property interests of right holders.

In China's first AI voice infringement case,[7] the plaintiff, a professional dubber, had her voice extracted without authorization by the infringer and imported into a specific software platform to generate text-to-speech products for commercial sale. The court of first instance held that the digitization and illegal exploitation of a specific natural person's voice constitutes an infringement upon the victim's voice rights. This case indicates that voice infringement has evolved from unauthorized recording and dissemination in the traditional sense toward the in-depth development and algorithmic utilization of voice data.

3.2. Ambiguous Identification Criteria for Voice Identifiability

Identifiability serves as a core judicial criterion for determining the establishment of voice infringement. Unlike portraits and names with intuitive recognizability, voice identification carries strong subjectivity and situational dependence, resulting in the absence of unified judicial rules for the determination of individualized voice in judicial practice. At present, most judicial authorities take "whether the relevant public can recognize the voice" as the core judgment basis, yet there are no clear and fixed norms concerning the degree, scope and method of identification. This leads to markedly divergent judgments in analogous cases.

In the first AI voice infringement case, the court held that although the AI-generated voice in dispute was not an exact copy of the plaintiff's original voice, its timbre, intonation and vocal style could enable the relevant public to associate the voice with the plaintiff's identity, thus satisfying the requirement of identifiability and deserving legal protection. For the first time, the case clarified that the protection of voice rights does not require complete consistency with the original voice, but emphasizes the overall recognition effect of the relevant public.

By contrast, in another dubbing APP voice infringement case,[8] the trial court ruled that a voice shall be protected as a personality interest only when the general public can associate it with a specific natural person merely through auditory perception without relying on auxiliary information.

A comparison of the two cases reveals that China has not yet established a unified judicial identification standard for voice identifiability. The first AI voice infringement case stresses the overall association of ordinary audiences within the relevant field, while the dubbing APP case emphasizes direct correspondence between the voice and a specific subject by the general public. Substantial applicable differences exist between the two cases in terms of identification scope, recognition degree and judging subjects. Furthermore, current laws and regulations in China have not formulated clear judicial review provisions or interpretations concerning concepts such as the relevant public, ordinary audiences and direct recognition. Highly similar voices generated by AI technology often lie between imitation and exact replication, which cannot be precisely defined by traditional personality rights theories. If the applicable criteria for reference application remain ambiguous, analogous cases are highly likely to yield completely opposite judicial outcomes.

3.3. Imbalance of the Burden of Proof in Voice Infringement Cases

With the widespread application of generative artificial intelligence, voice infringement has exhibited the characteristic of a technical black box.[9] There exists a conspicuous gap in information and technological capability between right holders, online platforms and technology companies, resulting in a structural imbalance of the burden of proof in judicial practice. Traditional personality right infringement cases generally follow the basic rule of he who asserts shall prove. Nevertheless, in AI voice infringement disputes, infringing conduct is embedded within technical

processes such as algorithms and data operation. Aggrieved parties are usually unable to obtain complete evidence chains, which substantially increases the cost of rights protection.

The Provisions of the Supreme People's Court on Evidence in Civil Procedures clearly stipulate that parties shall bear the burden of proof for their claims.[10] In cases where AI infringes upon voice rights, the aggrieved party can usually only prove the objective facts of voice similarity or unauthorized voice use, but struggles to further prove how the infringer acquired voice samples, whether model training was conducted, and the source of training data. Relevant data, model parameters and technical records are exclusively controlled by platforms and technology companies, placing right holders in an objectively disadvantaged information position. Some infringing platforms train deep learning models with publicly available voice samples, and can complete high-fidelity voice replication merely with several seconds of audio material. At present, applications that use AI to replicate natural persons' voices are becoming increasingly prevalent with lowering technical thresholds and high concealment of infringement conduct, which objectively increases the difficulty of judicial evidence collection.[11]

Specialized legislation governing AIGC in China is still in the developmental stage. Although the Provisions on the Administration of Deep Synthesis Services for Internet Information requires deep synthesis service providers to implement algorithm filing, safety assessment and data management systems, it does not explicitly allocate the burden of proof in infringement litigation.[12] Article 4 of the Interim Measures for the Administration of Generative Artificial Intelligence Services only lays down a principled obligation for service providers to use data lawfully and protect intellectual property rights and personality rights, yet lacks specific procedural linkage mechanisms for litigation. Under the current institutional framework, the burden of proof in voice infringement cases presents a state of formal equality but substantive imbalance. On the one hand, right holders are imposed with a heavy evidentiary burden; on the other hand, platforms that possess key technical evidence are not subject to adequate obligations of information disclosure. Solely applying the traditional rules of tort liability proof is insufficient to meet the demands of personality right protection under the background of AI technology.

3.4. Imbalanced Criteria for Damages Assessment

With the rapid expansion of the short-video industry, virtual digital human industry and intelligent voice industry, voice has gradually formed stable market transaction value. Relevant statistics show that the scale of users of AI speech synthesis services in China has reached 230 million. In particular, for professional voice actors, live streamers and public figures, their voices possess prominent commercial identification functions and can directly generate economic benefits.[13]

As stipulated in Article 1182 of the Civil Code,[14] voice bears dual attributes of personality interests and property interests, so both moral damage and commercial utilization value should be taken into account in damages awarding. However, current judicial adjudication remains markedly conservative in recognizing the commercial value of voice, leading to generally low compensation amounts. Taking the first AI voice infringement case as an example, although the Beijing Internet Court confirmed that the defendant had infringed upon voice rights, the final compensation was discretionally determined mainly based on platform profits, duration of infringement and market impact, without establishing an independent evaluation system for the commercial value of voice. This case reflects that judicial authorities still regard voice as a common object incidental to personality interests, and fail to fully recognize its independent property value in the digital economy era. Consequently, judicial compensation confined to the traditional compensation logic for personality damage cannot match the actual market value of voice.

In addition, substantial discrepancies exist among different courts in the application of compensation standards for voice infringement. Article 1182 of the Civil Code establishes the principle of loss compensation. Even so, the compensation amount determined by the Beijing Internet Court is still discretionally evaluated by comprehensively considering factors such as infringement impact, duration and mental harm. A quantitative calculation model centered on market licensing fees or commercial utilization value has not yet taken shape, and adjudication is still dominated by the logic of personality interest protection.

4. Conception of Paths for Applying Portrait Right Protection Rules to Voice Rights by Reference

4.1. Clarifying the Hermeneutic Boundary of Mutatis Mutandis Application to Portrait Right Protection

Paragraph 2 of Article 1023 of the Civil Code explicitly stipulates that the relevant provisions on the protection of portrait rights shall apply mutatis mutandis to the voice of natural persons. This embodies the legislators' open institutional design within the personality right system, and meanwhile indicates that voice rights are not completely equated with portrait rights but remain in a state of functional embedding. Therefore, the core issue lies in how to delineate the boundary of such referenced application so as to avoid disorderly over-expansion in judicial application.

From the perspective of systematic interpretation, mutatis mutandis application is not simple analogy, but a limited expansive application model premised on functional similarity and value consistency.[15] Portrait rights protect natural persons' interest in controlling their external visual image, with the core legal interests resting on the controllability of personality identification and the exclusivity of commercial utilization. Although voice rights belong to auditory expression, they likewise possess the functions of personality identification and the attribute of commercial exploitability. Hence, the two are highly isomorphic in jurisprudential structure, which, however, does not allow completely identical application. To curb the generalized application existing in current judicial practice, categorized application rules shall be established from the following three aspects:

First, uphold the principle of priority of personality identification function. A voice shall be eligible for protection under the personality right system only when it can sufficiently point to a specific natural person in the perception of the general public.

Second, distinguish between natural voice infringement and AI-generated voice infringement. The former is typically manifested in unauthorized recording and dissemination, while the latter involves model training and algorithmic generation. For AI-generated voices, even if they fail to reach an identical degree of recognizability, they may still be evaluated as infringing acts as long as associative identifiability exists, making up for the lag of traditional identification standards in the technological context.

Third, introduce the enhanced protection rule for commercial utilization. For commercial conducts such as advertising endorsement, virtual digital human application and voice product development, the evidentiary threshold for identifiability shall be lowered, and the right holder's right of control shall be strengthened.

As a crucial remedy mechanism for personality rights, the openness of the scope of personality right claims provides normative room for the protection of emerging personality interests. The categorized rules for applying portrait right protection to voice rights by reference refine such openness in the protection of specific personality identifiers, and conform to the legislative spirit of Article 995 of the Civil Code concerning the continuous expansion of the protective scope of

personality right claims. This ensures a balance between right protection and systematic coordination within limited institutional expansion.

4.2. Formulating a Unified Standard for Voice Identifiability

Identifiability constitutes the core criterion for judging voice infringement. Against the rapid development of AI voice cloning technology, reliance merely on subjective auditory judgment can no longer meet practical needs. Current judicial practice adopts two dominant approaches: the relevant public association standard and the general public direct recognition standard, which differ markedly in identification intensity and applicable scope. To eliminate such divergence, it is necessary first to set differentiated identification standards for public figures and ordinary natural persons. Thanks to long-term public exposure, the voice features of public figures have gained high social recognition, justifying an appropriately lowered identification threshold. For ordinary natural persons, comprehensive consideration shall be given to factors such as usage scenario, dissemination scope and vocal uniqueness.

Furthermore, legislative clarification shall be made on the constitutive elements of voice identifiability, establishing a dual-path framework consisting of the natural recognition standard and the technical recognition standard. Drawing on the judgment mode of substantial similarity in copyright law, a composite identification mechanism of lay public perception supplemented by technical appraisal shall be constructed. Based on the general discernment capacity of the public, professional voiceprint appraisal institutions shall be introduced to conduct auxiliary technical verification, so as to reduce the uncertainty arising from judicial discretion.

Finally, unified forensic appraisal rules and technical standards shall be formulated. At present, China lacks nationally unified voiceprint appraisal norms for voice infringement cases, and forensic appraisal institutions in different regions adopt divergent sampling criteria and comparison methods, resulting in unstable appraisal conclusions. In this regard, the Supreme People's Court may collaborate with the Ministry of Public Security and the Cyberspace Administration of China to promote the formulation of unified national technical specifications for AI voice identification.

In reference to the regulatory requirements for voice generation services such as synthetic human voice and simulated voice stipulated in the Provisions on the Administration of Deep Synthesis Services for Internet Information,[16] a traceable identification system shall be established for AI-generated voices. Platforms shall be obligated to retain voice generation logs, model invocation records and training data sources, so as to provide evidential support for subsequent infringement determination.

4.3. Construction and Perfection of the Inversion of Burden of Proof in Voice Infringement Cases

In the digital and intelligent era, the technical black box feature prevalent in voice infringement cases has led to a serious imbalance in the burden of proof. The traditional evidentiary rule of the burden of proof lies with the claimant can no longer adequately protect the voice rights of natural persons. It is therefore necessary to establish a mitigation mechanism for the burden of proof to appropriately reduce the evidentiary burden borne by right holders.

In AI voice infringement disputes, aggrieved parties can generally only prove that their voices have been highly imitated or utilized by online platforms, whereas evidentiary materials such as algorithm training processes and model parameters are exclusively controlled and stored within platform systems. If right holders are still required to prove the complete chain of infringement, most cases will be hindered from entering the substantive trial stage. Drawing on evidentiary rules adopted in environmental pollution infringement, network tort and other fields, a preliminary

burden of proof system may be introduced into voice infringement litigation. Specifically, once the right holder proves a high degree of similarity between his or her original voice and AI-generated content, and establishes that the platform has engaged in acts of voice generation, dissemination or commercial utilization, the platform shall be presumed to be suspected of infringement. Thereafter, the burden shifts to the platform to prove the legality of voice sources, the authorized nature of training data, or explicit permission obtained from the right holder.

At present, most AI voice platforms possess complete records of model training procedures, data access logs and user generation records. However, existing laws do not clearly impose an obligation of comprehensive data assistance on platforms in infringement disputes. In this context, in accordance with the Provisions on the Administration of Deep Synthesis Services for Internet Information and the Interim Measures for the Administration of Generative Artificial Intelligence Services, it is necessary to further establish an algorithm log retention system and a traceability system for training data. Platforms shall be obligated to retain traces regarding the source of voice samples, the time of model training, data processing routes and commercial application conditions, and submit such records to the people's court in accordance with legal procedures.

If a platform refuses to disclose relevant data, the court may apply the rule on obstruction of proof stipulated in Article 95 of the Provisions of the Supreme People's Court on Evidence in Civil Procedures and presume the existence of adverse factual findings. This approach prevents technical platforms from evading legal liability by taking advantage of their information superiority.

4.4. Establishment of a Dual Standard for Damages Assessment

At present, significant divergences exist among courts in the determination of compensation for voice infringement cases, and the fundamental reason lies in the absence of unified judicial application criteria. Traditional theories of personality right protection emphasize predominantly the connection between voice and personal dignity. Nevertheless, with the rapid development of the virtual digital economy, voice is no longer merely an accessory symbol of personality, but has evolved into a digital personality identifier with independent transaction value.[17]

Judicial adjudication should not be confined merely to the logic of moral damage compensation, but shall also take into account the profit-making capacity of voice in the market. For voices with commercial recognition held by professional dubbers, live streamers, public figures and other groups, right holders should be permitted to claim economic losses by reference to the licensing fees of portrait rights, advertising endorsement remuneration and dubbing authorization charges, so as to align compensation standards with actual market value. Drawing on the licensing fee calculation model adopted in intellectual property infringement cases, a value evaluation system for voice rights can be gradually established by comprehensively weighing factors such as voice popularity, commercial purpose, scope of dissemination, platform traffic gains and duration of infringement.

In areas including commercial advertisements, AI voice packs, digital customer service and virtual anchors, the income derived from infringement may be reasonably calculated by referring to industry market quotations, historical authorization contracts and remuneration for similar dubbing services, so as to enhance the objectivity and predictability of compensation criteria.

Furthermore, the Supreme People's Court may unify adjudicative standards through judicial interpretations based on typical cases. It shall clarify the application order and calculation methods of economic loss, infringer's profit, moral damage and commercial licensing fees in voice infringement cases, so as to form relatively stable adjudicative rules. Only by establishing a compensation system that balances personality interests and property interests can substantive fairness in the protection of voice rights be truly realized in the digital and intelligent era.

5. Conclusion

Against the background of the digital and intelligent era, voice is no longer merely a communication medium between natural persons, but an important personality identifier with both personal dignity attributes and property value attributes. Paragraph 2 of Article 1023 of the Civil Code incorporates voice into the framework of personality right protection by stipulating that portrait right protection shall apply mutatis mutandis. However, confronted with emerging infringements such as voice forgery triggered by AI technology, the current legal system still exhibits prominent deficiencies in identifiability determination, allocation of the burden of proof, and damages assessment criteria.

In the future, based on the personality identification function of voice, it is necessary to further clarify the hermeneutic boundary of applying portrait right protection to voice rights mutatis mutandis, formulate unified voice identification standards and technical appraisal rules, and give equal weight to the protection of both personality interests and property interests. This will fully embody the people-oriented connotation of the rule of law in China.

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