



THE COUNTESS



Coalition Internationale pour l'Abolition
de la Maternité de Substitution

Joint letter on the protection of children and women under the Health (Assisted Human Reproduction) Act 2024 and the forthcoming Amendment Bill

Dublin, Paris, 30 September 2026

To the Chairperson and Members of the Joint Committee on Health, Professor Deirdre Madden, Chairperson and the Members of the Board of the Assisted Human Reproduction Regulatory Authority

Dear Chairpersons, dear Members,

We write as Irish women, feminist and gay rights organisations, joined by Stop Surrogacy Now UK, and the International Coalition for the Abolition of Surrogate Motherhood (ICASM) to you to voice our concerns as the Health (Assisted Human Reproduction) Act 2024 contains no statutory bar preventing a person convicted of offences against children from obtaining a child through surrogacy.

When the then Minister for Health declined amendment No. 15 at Seanad Committee Stage on 20 June 2024, he entrusted that protection to the preconception approval and safety of the child assessment of an Authority whose procedures remain unpublished, under an Act which has not yet fully commenced.

The risks are well- documented:

In *Farnell & Anor and Chanbua* [2016] FCWA 17, the Family Court of Western Australia ruled that a child born to a surrogate mother in Thailand be taken from his mother by a commissioning father who was a convicted child sex offender. This is far from being a singular incident, a case will be before the UK criminal courts in January 2027 to try the UK's first same-sex attracted male father through surrogacy on charges of sexual abuse and human trafficking.

Other known cases include:

1. 2025 - In Spain, José María Hill Prados, a convicted child sex offender, was linked to the surrogacy company Gestlife..
2. 2024 - In America, Adam King, 39, was arrested and charged with distributing child sexual abuse material shortly before the birth of a child he had commissioned via surrogacy, with intent to harm.
3. 2025 - In Scotland, Cameron Shaw was exposed in online communications allegedly seeking to "buy a baby to abuse," including asking contacts whether they knew of a "desperate woman" who would "have one for me."

4. 2020 - In Germany, a man reportedly paid €60,000 to a Russian woman to carry a child. The man was convicted of child sexual abuse and possession of a large volume of child sexual abuse material (reported at over 175,000 images). The child was allegedly subjected to repeated abuse at an extremely young age.
5. 2018 - In Norway, a psychiatrist working in social services was found in possession of extensive child sexual abuse material involving violent content. He commissioned twins from India in 2011.
6. 2016 - In Israel, a convicted sex offender obtained custody of a child born via surrogacy in India.

We offer just a few examples, please note this is not a comprehensive list.

Additionally, in 2023 Greek police alleged that a single clinic in Chania exploited 169 foreign women. The Sunday Independent reported on the clinic which had [Irish people](#) as clients. The nature of the surrogacy industry is such that those commissioning babies abroad can have no real certainty as to the reality of what pressures or coercion are driving poor women into becoming surrogates only to be parted with their babies at birth. Equally those accepting clients as intending parents of these babies can have no certainty as to their motives and there is always a risk as we are learning of individuals, with or without a criminal record, who would seek a baby in order to abuse him or her.

We remind members that EU Directive 2024/1712, which Ireland remains a part of, names the exploitation of surrogacy as a form of trafficking and the UN Special Rapporteur on violence against women and girls, in report A/80/158, has called for a binding international instrument prohibiting surrogacy in all its forms.

We therefore ask the Committee whether the Amendment Bill will bar from surrogacy

- any person convicted, in Ireland or abroad, of a sexual offence,
- an offence against a child or trafficking on the basis of Garda vetting and foreign criminal record certificates;

Additionally we ask the Board what the assessment consists in relation to

- the safeguarding of children,
- how it will ensure that no woman abroad was recruited through coercion or the abuse of her vulnerability and
- whether it will publish its members' declarations of interests.

We ask you please to provide your responses by 14 October 2026 which we hope to publish, given the public interest in this issue which has very far reaching consequences for Irish society.

Yours sincerely,

Annaïg Birdy, *Not All Gays*

Laoise de Brún BL, *The Countess*

Jill Nesbitt, *Women's Space Ireland*

Jana Lunden, *Natural Women's Council*

Co-signed for *Stop Surrogacy Now UK*: **Lexi Ellingsworth**

Co-signed for *The International Coalition for the Abolition of Surrogate Motherhood*: **Marie-Josèphe Devillers**,

Ana-Luana Stoicea-Deram and **Berta O. García**, Co-Presidents

Sources

1. Seanad Éireann, Health (Assisted Human Reproduction) Bill 2022, Committee Stage, 20 June 2024: <https://www.oireachtas.ie/en/debates/debate/seanad/2024-06-20/11/>
International Coalition for the Abolition of Surrogate Motherhood (ICASM)
c/o at Cité audacieuse 9 Rue de Vaugirard, 75006 Paris - +33 686 42 5944
RNA W931017751 - SIRET 84082258900031

2. Department of Health, establishment of the AHRRA, 13 October 2025:
<https://www.gov.ie/en/department-of-health/press-releases/minister-for-health-establishes-assisted-human-reproduction-regulatory-authority/>
3. Oireachtas Library & Research Service, briefing paper on the Amendment Bill, April 2026:
https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2026/2026-04-20_briefing-paper-health-assisted-human-reproduction-amendment-bill_en.pdf
4. Family Court of Western Australia, Farnell & Anor and Chanbua [2016] FCWA 17, 14 April 2016:
http://www.familycourt.wa.gov.au/_files/Publications/2016FCWA17anon.pdf
5. Article from CBC Network, The Dark Side of Surrogacy: Legal Loopholes, Predators, Fraud and Systemic Failure, May 2026 <https://cbc-network.org/2026/05/dark-side-surrogacy/>
6. Neos Kosmos, reporting AMNA, on the Chania investigation: <https://neoskosmos.com/en/?p=264889>
7. Greek Herald, on the allegations concerning 169 women: <https://greekherald.com.au/?p=103181>
8. Directive (EU) 2024/1712, Official Journal L, 24 June 2024 (recital 36, Art. 1):
<https://eur-lex.europa.eu/eli/dir/2024/1712/oj/eng>
9. United Nations General Assembly, A/80/158, 14 July 2025: <https://docs.un.org/en/A/80/158>

About Not All Gays

Not All Gays is a grassroots gay rights organisation that advocates for the rights of same-sex attracted people, with a particular focus on ensuring that sexual orientation remains clearly understood as attraction to the same sex. NAG has been a leading voice opposing the portrayal of surrogacy as a "gay right", arguing that surrogacy raises complex ethical, legal and human rights issues that should not be conflated with gay rights advocacy. The organisation has raised concerns about reproductive exploitation and the commodification of women's bodies and children, and has taken these arguments to international human rights forums, including the United Nations, advocating for greater scrutiny of the human rights implications of the surrogacy industry.

About The Countess

The Countess is a non-profit, volunteer-led organisation formed to promote the rights and interests of women and children in Ireland. The Countess believes that there was no way to mitigate the harm of the separation for both the baby and the surrogate mother and there was no way to stop babies being trafficked and surrogate mothers being exploited.

About Natural Women's Council

The Natural Women's Council, a grassroots non-profit in Ireland, is dedicated to protecting the well-being of children, women, and families. We work tirelessly to champion for their rights and ensure their voices are heard in communities across the country. Through our efforts, we aim to create a safer and more supportive environment for all.

About Women's Space Ireland

Women in Ireland are concerned for the risks posed by the adoption of gender identity ideology in law, policy making and society. As the sex which gives birth we have an innate instinct to protect the rights of babies and their mothers not to be separated from each other at birth through the exploitative human rights abuse of both that is surrogacy.

About Stop Surrogacy Now UK

In direct response to the UK Law Commission's 2019 public consultation on surrogacy law reform, Lexi Ellingsworth founded Stop Surrogacy Now UK, a campaign dedicated to raising public awareness about the realities of surrogacy, including concerns about the exploitation of women and the commodification of children.

About ICASM

The International Coalition for the Abolition of Surrogate Motherhood, CIAMS in French, brings together more than sixty organisations in twenty countries on four continents and works for the abolition of surrogacy and of all forms of reproductive exploitation, on the basis of the inalienability of the human body, the prohibition of the sale of children and the universality of women's rights, including the right to abortion and access to contraception. abolition-ms.org · abolition.surrogacy@gmail.com