Call for input to Australian Law Reform Commission's Review of surrogacy laws

Response by a Coalition of Australian feminist organisations 11 July 2025

Introduction
We are a coalition of independent feminist organisations representing groups from across Australia. Our members are women from diverse backgrounds and professions and we advocate for women and girls, especially in domains where we face discrimination or vulnerability because of our sex.

We thank the Australian Law Reform Commission (ALRC) for the opportunity to contribute to the call for input to its review of surrogacy laws. Our position is clear: all forms of surrogacy constitute sex-based violence against women and girls and perpetuate systemic exploitation. Only a universal ban – not regulation – can address the legal, policy, and ethical violations inherent in these practices. Prohibition is the necessary step to uphold human rights and prevent further harm.

This submission calls on the ALRC to recognise women as key stakeholders in surrogacy law reform, stressing that women – especially surrogates – bear the greatest burdens and we must be actively consulted to ensure genuine protection of human rights. We invite the ALRC to read a recent submission by the Affiliation of Australian Women's Action Alliances (AAWAA), attached below, to the UN Special Rapporteur on violence against women and girls for further details regarding the specific harms of surrogacy.

Women as essential stakeholders in the ALRC surrogacy review
Against this background, it is imperative that women, and by extension feminist organisations, are recognised as major stakeholders in the ALRC's surrogacy review. Women are not merely participants in surrogacy arrangements: we are the primary subjects upon whom the entire practice depends. The medical, psychological, and economic impacts of surrogacy fall overwhelmingly on women, particularly those who act as surrogates. As such, any reform to surrogacy laws, policies, or practices must be informed by the lived realities and rights of women, and not just by the interests of commissioning parents or industry bodies.

Feminist groups and women's advocacy organisations represent a broad cross-section of women's voices, including those who have been directly affected by surrogacy. Such groups have a long history of advocating for women's health, bodily autonomy, and protection from exploitation. Our expertise and experience are essential to ensuring that the ALRC's review is genuinely balanced and upholds Australia's obligations under international human rights law to consult women on matters that affect us.

The best interests of the child and the primacy of women's rights

The Terms of Reference (ToR)[1] direct the ALRC to ensure that the best interests of the child are paramount; however, this principle cannot be properly realised without first addressing the interests and rights of women. If surrogacy arrangements are found to be inherently exploitative or harmful to women, then the ethical foundation for the practice itself collapses. In such a scenario, the absence of children born through surrogacy is not a 'problem' – it is a reflection of a society that refuses in the first place to countenance the commodification and harm of women for the purpose of fulfilling the desires of others.

To put it plainly: if the only way to protect women from the violence, exploitation, and coercion inherent in surrogacy is to prohibit surrogacy altogether, then the question of children's best interests becomes immaterial in this context, as no child would be brought into existence through a process that violates the rights and dignity of another human being – and surrogacy is such a process. Upholding women's interests is not in opposition to the best interests of children; rather, it is a pre-condition for any ethical consideration of children's welfare as a vulnerable population.

The necessity of consulting feminist and women's groups

The ALRC's consultation process therefore must not sideline women's organisations in favour of those who advocate for the expansion or normalisation of surrogacy. There is a very real risk that, without any attempt to pursue balance, the voices of those most at risk of harm – women, especially those from marginalised backgrounds – are being drowned out by well-funded industry bodies or activists for surrogacy. We see concerning signs that the conditions for this to happen have been sown in the very list of stakeholders mentioned in the ToRs, none of whom represent the feminist perspective.

Feminist women's groups bring a critical perspective that is often absent from mainstream policy discussions: we foreground the material realities of women's lives, the risks of coercion and exploitation, and the broader social consequences of treating women's reproductive capacities as commodities. Excluding or minimising these voices would undermine the legitimacy and integrity of the review process, and risk perpetuating the very injustices the ALRC is tasked with addressing.

Finally, we note that Australia's obligations under CEDAW[2] require the government to meaningfully consult women on matters that affect our rights and interests, including law reform. In the context of the ALRC surrogacy review, this means actively seeking and incorporating the perspectives of women's groups and advocacy organisations. Meaningful consultation is both a legal obligation under international law and essential to ensuring that surrogacy policy genuinely reflects the realities and needs of women in Australia.

Conclusion

For the ALRC's review to meet its stated objectives as well as international obligations, it must:

- Recognise women as central stakeholders whose rights and interests are at the heart of surrogacy policy,
- Ensure that feminist and women's advocacy groups are actively consulted and our expertise and lived experience given due weight,

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[1] Terms of Reference, ALRC Review of Surrogacy Laws

[2] Convention on the Elimination of All Forms of Discrimination against Women, UN General Assembly, December 1979.

- Understand that the best interests of the child cannot be separated from the rights and welfare of women, and
- Guard against the further marginalisation of women's voices in favour of those with vested interests in the continuation or expansion of surrogacy.

Surrogacy, though often framed as a personal path to parenthood, systematically exploits women and girls – both individually and collectively – inflicting harm that extends beyond individual infertility or the longing for a child. While some experience real sorrow at not being able to give birth to a child, this cannot override Australia's – and therefore, also, this Commission's – obligation to protect women and girls from exploitation, commodification, and violence. Only by centering women's experiences and expertise can the ALRC deliver recommendations that truly uphold women's rights.

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ATTACHMENT

Submission to the Call for input to the thematic report of the Special Rapporteur on violence against women and girls to the General Assembly 80th session on surrogacy and violence against women and girls, 18 April 2025, Affiliation of Australian Women's Action Alliances (AAWAA).

AFFILIATION OF AUSTRALIAN WOMEN'S ACTION ALLIANCES

Call for input to the thematic report of the Special Rapporteur on violence against women and girls to the General Assembly 80th session on surrogacy and violence against women and girls

18 April 2025

INTRODUCTION

The Affiliation of Australian Women's Action Alliances (AAWAA) is a secular, non-partisan, independent women's rights peak body representing groups from each state and territory in Australia. Our members are women from diverse backgrounds and professions and we advocate for women and girls, especially in domains where we face discrimination or vulnerability because of our sex.

We thank the Special Rapporteur for the opportunity to contribute to the call for input on surrogacy and violence against women and girls for the General Assembly's 80th session. Surrogacy, though often framed as a personal path to parenthood, systematically exploits women and girls—both individually and collectively—inflicting harm that extends beyond infertility or the longing for a child. While that sorrow is real, it cannot override the global obligation to protect women and girls from exploitation, commodification, and violence.

Our position is clear: all forms of surrogacy constitute sex-based violence against women and girls and perpetuate systemic exploitation. Only a universal ban—not regulation—can address the legal, policy, and ethical violations inherent in these practices. Prohibition is the necessary step to uphold human rights and prevent further harm.

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A. SURROGACY AS STATE-SANCTIONED VIOLENCE AGAINST WOMEN AND GIRLS

Surrogacy constitutes systemic violence against women and girls through medical, economic, and psychological harm, and state policies that permit or regulate surrogacy sanction this violence.[1]

Medical violence

Surrogacy subjects women to invasive medical procedures that violate bodily autonomy and endanger health, often with inadequate safeguards. States that permit or regulate surrogacy tacitly endorse these harms through:

- Forced interventions: Surrogates undergo hormone treatments, embryo transfers, and caesarean sections without full informed consent. Contracts often grant commissioning parents control over medical decisions, including forced abortions or fetal reductions.[2]
- Health risks: IVF pregnancies carry heightened risks of ovarian hyperstimulation syndrome, gestational diabetes, and long-term complications such as hysterectomies.[3] States fail to mandate post-pregnancy care, leaving surrogates to bear lifelong health consequences.[4]
- Obstetric violence: Medical procedures are performed for the convenience of commissioning parties.[5] This aligns with the UN's definition of obstetric violence: harm inflicted through coercive or non-consensual reproductive interventions.

States legitimise the commodification of women's bodies when surrogacy is legalised or decriminalised. We need look no further than Greece's Mediterranean Fertility Institute scandal, which revealed surrogates confined to clinics and subjected to non-consensual procedures under state sanction.[6]

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[1] See State-sanctioned structural violence: Women migrant domestic workers in the Philippines and Sri Lanka, via PubMed (2019) and Commercial surrogacy: Landscapes of empowerment or oppression explored through integrative review, *Health Care for Women International* (2023).

[2] See Fact sheet: Surrogacy and violence against women, Coalition for the Abolition of Surrogate Motherhood (2024); Caring for delivery: Healthcare professionals' ethical conflicts in surrogate pregnancy, *Hypatia* (202); Obstetric violence, mistreatment, and violence against women In Reproductive Health Services, International Confederation of Midwives (2024); Obstetric violence, Pregnancy birth and baby (2023); and The shocking reality of surrogacy, Filia (2020).

[3] See Obstetric outcomes following ovarian hyperstimulation syndrome in IVF – A comparison with uncomplicated fresh and frozen transfer cycles, via PubMed (2022); Risks IVF, NHS; Hysterectomy in the second trimester of pregnancy after in vitro fertilization-embryo transfer, via PubMed (2017); The association between ovarian hyperstimulation syndrome and pregnancy complications following fertility treatments, via PubMed (2021); and Possible health effects of IVF and ICSI, VARTA (2021).

[4] See "Ain't I a woman?": A historical and contemporary analysis of state-sanctioned violence against black women in the United States, *Journal of Gender Studies* (2023); and Commercial surrogacy: Landscapes of empowerment or oppression explored through integrative review, Health Care for Women International (2024).

[5] See Surrogacy and violence against women, Coalition Internationale pour l'Abolition de la Maternité de Substitution (2024); Obstetric violence violates human rights, Human Rights Watch (2023); Women's and provider's moral reasoning about the permissibility of coercion in birth, via PubMed (2024); Obstetric violence: hidden in silence, EVN Report (2022); and Obstetric violence, mistreatment, and violence against women in reproductive Health services, International Confederation of Midwives (2024).

[6] See Crete: Another international surrogacy disaster (2023) and Surrogacy scandals continue, The Center for Bioethics and Culture Network (2023).

Economic violence

Surrogacy exploits economically disadvantaged women, perpetuating systemic inequality. State policies enable this through lax regulation and enforcement:

- Targeted recruitment: Poor women, including military spouses in the U.S. and marginalised groups in India, are coerced into surrogacy due to financial desperation. Payments (often $20,000–$25,000 in the U.S.) rarely compensate for risks, and surrogates face wage theft or contract breaches.[7]
- Global exploitation: Cross-border surrogacy in unregulated markets (e.g., Cambodia, Ukraine) traps women in cycles of poverty. States such as Australia criminalise domestic commercial surrogacy but permit overseas arrangements, outsourcing exploitation.[8]
- Structural inequity: Surrogacy laws prioritise commissioning parents' rights over surrogates' welfare. For example, New York's *Child-Parent Security Act 2020* allows intended parents to be listed on birth certificates while denying surrogates custody rights.[9]

By failing to ban surrogacy outright, states treat women's reproductive labor as a market commodity. The Australian government acknowledged this in 2014 when DNA tests revealed children born via Indian surrogacy had no biological link to commissioning parents, exposing trafficking risks.[10]

Psychological violence

Surrogacy inflicts profound psychological harm, exacerbated by state policies that erase women's agency and legitimise reproductive exploitation:

- Coercion and trauma: Surrogates report emotional detachment, grief, and depression after relinquishing children. Contracts often forbid bonding with the child, compounding trauma.[11]
- Emotional isolation and lack of support: Surrogates often experience significant emotional isolation, particularly when separated from their families during pregnancy or when housed in surrogate hostels. The absence of adequate psychological support or counselling exacerbates feelings of loneliness, anxiety, and distress increasing the risk of postnatal depression and long-term emotional harm.[12]
- Pressure to suppress natural attachment: Surrogacy contracts and social expectations frequently require women to suppress or deny natural feelings of

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[7] See America's overlooked surrogate mothers, *Richmond Journal of Law and Technology* (2018); Fact sheet: Surrogacy and violence against women, Coalition for the Abolition of Surrogate Motherhood (2024); Predicament of commercial surrogacy in India (2015); and Trading on the female body: Surrogacy, exploitation, and collusion by the US Government, *Public Discourse* (2017).

[8] See Sleepwalking through the minefield, Law Society of the Australian Capital Territory (2018); Surrogacy overseas, Australian Government; and Surrogacy in Australia: The 'failed experiment'? Precedent AULA 6; (2023) 174 Precedent 22 (2023).

[9] The Child-Parent Security Act: Gestational surrogacy agreements, acknowledgment of parentage and orders of parentage (2021); Parentage proceedings under the Child - Parent Security Act in conjunction with the New York State budget for fiscal year 2020-2021 (2021); and Can a surrogate mother seek custody of the child in New York? (2021).

[10] Surrogacy Matters Report, Parliament of Australia (2016).

[11] Emotional experiences in surrogate mothers: A qualitative study, via PubMed (2014); and The psychological well-being and prenatal bonding of gestational surrogates, via PubMed (2018).

[12] See Navigating emotional bonds: A comprehensive study of surrogate mothers attachment and psychological experiences in surrogacy, *International Journal for Multidisciplinary Research* (2024); Surrogacy and its effects on the mental health of the gestational carrier, CSUSB (2024) The psychological well-being and prenatal bonding of gestational surrogates, via PubMed (2018).

> attachment to the baby they carry. This enforced emotional detachment is a coping mechanism that can lead to internal conflict, guilt, and psychological turmoil especially at the point of relinquishment.[13]

Courts prioritise commissioning parents' interests over surrogates' rights. In Australia, parentage orders are granted automatically for overseas-born children, legitimising exploitative practices post hoc.[14]

B. THE AUSTRALIAN REGULATORY AND LEGAL CONTEXT

Australia's surrogacy laws are governed at the state and territory level, resulting in a fragmented legal landscape. While all jurisdictions prohibit commercial surrogacy,[15] and altruistic surrogacy is permitted under strict conditions, significant loopholes exist for those who wish to purchase a child in an overseas surrogacy arrangement. The regulatory focus on altruistic arrangements raises significant ethical questions – questions that are not resolved by commercial surrogacy.

Numbers of surrogacy births

More Australian children are born each year through overseas commercial surrogacy than domestic altruistic arrangements. Domestically, around 130–150 children are born annually via altruistic surrogacy, including 131 gestational births recorded in fertility clinics in 2022 (ANZARD)[16] and an estimated 10–15 'traditional' surrogacy births occurring outside clinics.[17] By contrast, overseas commercial surrogacy consistently accounts for higher numbers. In the year ending June 2024, a record 376 children were commissioned overseas by Australians via overseas surrogacy—nearly triple the number of domestic 'altruistic' births.[18] The trend is ongoing: in 2021–2022, 213 Australian passports were issued to children born through such arrangements.[19]

'Altruistic' surrogacy

Australian states and territories generally imagine that consent to an altruistic surrogacy arrangement can be "freely and voluntarily" given by each of the affected parties.[20] Surrogacy as an inherently coercive, violent, and exploitative practice does not align with 'consent.' Of growing concern, and now recognised at law, are the many different forms of social control of women that find expression in individual situations as well as in everyday socio-cultural practices. Neither social nor individual coercion can ever be discounted in altruistic surrogacy: in fact, all States and Territories in Australia recognise that exploitation

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[13] See Fact sheet: Surrogacy and violence against women, Coalition for the Abolition of Surrogate Motherhood (2024); "The miracle mothers and marvelous babies": Psychosocial aspects of surrogacy – A narrative review, via PubMed (2020).
[14] Reforming Australia's surrogacy landscape, *Law Society Journal* (2025); and Overseas compensated surrogacy arrangements and the Family Court of Australia, AUSTLII (2020)
[15] Except in the Northern Territory, which has no specific laws in this relation.
[16] Australian and New Zealand Assisted Reproduction Database (ANZARD).
[17] Surrogacy births in Australia and Australian surrogacy statistics.
[18] Record number of Australian children born overseas through surrogacy (2024).
[19] Surrogacy births in Australia (2023).
[20] See, for example, the NSW Surrogacy Act 2010 No 102, Section 31.

of women is possible and must be prevented in surrogacy arrangements, even in 'altruistic' arrangements—which is why altruistic surrogacy is regulated.[21]

In Australia, serious attention is needed where birth mothers in altruistic surrogacy receive 'rewards,' 'gifts,' or other benefits—such as holidays, beauty treatments, or entertainment. These fall within the definition of a commercial arrangement, involving a fee, reward, or material advantage.[22] Commodification doesn't require payment—only exchange—and such transactions effectively render altruistic surrogacy commercial by another name.

In any kind of reproductive contract to relinquish a child, exploitation is baked-in to the arrangement—and this includes contracts for 'altruistic' surrogacy. Commercial surrogacy suffers these same moral complications, but in Australia it is nowhere near as regulated as is altruistic surrogacy.

Commercial and overseas surrogacy

Commercial surrogacy is illegal in all Australian states and territories, but laws on overseas surrogacy vary widely—from explicit bans in NSW, Qld, and WA, to discouragement (Vic), to no clear prohibition (SA, Tas, NT), and no criminalisation at all (ACT). This legal patchwork, combined with weak enforcement, creates loopholes that allow Australians to commission commercial surrogacies abroad with little consequence.

Since 2010, over 3,000 children have been born via overseas surrogacy to Australian parents—yet not a single prosecution has occurred under state laws criminalising the practice.[23] In effect, Australia's enforcement is symbolic, rendering these laws ineffective as real deterrents. This has implications for trafficking, and makes the legal application of citizenship and parentage by the Australian Courts often a post-hoc approval of exploitation of women being used in surrogacy arrangements.

Australians' exploitation of women and girls through surrogacy arrangements/trafficking

This effective decriminalisation in Australia of overseas surrogacy—either through lack of enforcement, lack of regulation, or straight-out non-criminalisation (as in the ACT)—has implications for human rights abuses and human trafficking.[24]

In truth, the evidence of surrogacy in commercial arrangements overwhelmingly shows that women and girls in overseas jurisdictions—particularly in poorer countries—are being coerced into commercial surrogacy for the benefit of wealthy buyers in the West. We are informed in this view by various international reports that detail baby trading and human trafficking[25] and by the fact that many of those poorer countries have recognised the

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[21] See Discussion Paper, Review of Surrogacy Act 2010 and Status of Children Act 1996, 'Background to the Surrogacy Act' (2024).
[22] See Discussion Paper, Review of Surrogacy Act 2010 and Status of Children Act 1996, (2024).
[23] Medallist launches surrogacy case book (2024) and Surrogacy overseas.
[24] Women's bodies, international relations, and surrogacy: Private lives made public, Australian Institute of International Affairs (2023); Key considerations: children's rights and surrogacy – briefing note, UNICEF (2022); Fight against human trafficking: Council and European Parliament strike deal to strengthen rules, Council of the EU (2023); Surrogacy and the sale of children, Special Rapporteur on the sale and sexual exploitation of children (2018).
[25] Women's bodies, international relations, and surrogacy: Private lives made public, Australian Institute of International Affairs (2023); Key considerations: children's rights and surrogacy – briefing note, UNICEF (2022);

exploitation that occurs in commercial surrogacy and have responded by banning the practice.[26]

Indeed, the NSW 2018 Statutory Review of the Surrogacy Act,[27] the 2016 Surrogacy Matters Report[28] published by the Commonwealth Parliament, and the UN Special Rapporteur on the sale and sexual exploitation of children[29] all speak with one voice when it comes to preventing the commercialisation of women's reproductive function:[30] there are power imbalances between wealthy customers and poor women which commodify women's reproductive capacities.

While Australia has ratified the Palermo Protocol, which defines trafficking as exploitation through recruitment by coercion or deception (Art 3(a)), enforcement against surrogacy-related trafficking remains inadequate in this country. Moreover, third-party exploitation, in which Australian-based brokers promote surrogacy in countries with lax regulations, profits from arrangements that exploit women as surrogate mothers.[31]

C. HUMAN RIGHTS VIOLATIONS

International obligations and violations of international instruments

AAWAA recognises that legislative change in Australia—especially around human dignity and rights—reinforces our international human rights obligations. Surrogacy is a form of state-sanctioned violence against women and girls and therefore violates multiple international human rights instruments. While acknowledging the personal desire for family formation, these aspirations cannot outweigh the global imperative to prevent the commodification of women and girls in surrogacy. Surrogacy violates the following international human rights instruments.

Convention on the elimination of all forms of discrimination against women (CEDAW)[32]

- Article 6: Requires states to suppress all forms of trafficking and the exploitation of women. Surrogacy arrangements involving women's reproductive capacity fall within this definition.
- Article 5: Calls for eliminating stereotypes that portray women as reproductive vessels. Surrogacy reinforces this harmful stereotype.

Fight against human trafficking: Council and European Parliament strike deal to strengthen rules, Council of the EU (2023); Surrogacy and the sale of children, Special Rapporteur on the sale and sexual exploitation of children (2018).

[26] See, for example, Cambodia, India, Nepal, and Thailand.

[27] Report on the Statutory Review of the Surrogacy Act 2010, Parliament of New South Wales (2018).

[28] Surrogacy Matters Report, Parliament of Australia (2016).

[29] Surrogacy and the sale of children, Special Rapporteur on the sale and sexual exploitation of children (2018).

[30] See Discussion Paper, Review of Surrogacy Act 2010 and Status of Children Act 1996, 'Commercial surrogacy arrangements' (2024).

[31] See, for instance, the Mediterranean Fertility Institute (Crete) scandal, which involved Australian agencies marketing surrogacy services linked to trafficking allegations. The scandal involved allegations of surrogates being trafficked across borders, unpaid, and exploited under fraudulent surrogacy arrangements marketed to international clients, including Australians. Australian brokers were implicated in promoting these services despite ethical concerns. The clinic allegedly exploited 169 women from countries like Ukraine and Georgia, forcing them to act as surrogates or egg donors while keeping them under surveillance. Australian couples were among the primary clients due to Greece's previously liberal surrogacy laws.

[32] Convention on the Elimination of All Forms of Discrimination against Women, UN General Assembly, December 1979.

Protocol to prevent, suppress and punish trafficking in persons, especially women and children[33]

- Defines trafficking as involving recruitment, transfer, or harbouring of persons for exploitation.
- Commercial surrogacy involving international travel often meets this definition. Payments exploit vulnerable women, commodifying the surrogate.

D. MEASURES REQUIRED

To address surrogacy's human rights violations, legal reforms must be enacted across national, regional, and international levels.

Legal measures required

National level

- Prohibit all forms of surrogacy—commercial and so-called 'altruistic'.
- Criminalise the facilitation, brokerage, and advertising of surrogacy.
- Apply surrogacy prohibitions extraterritorially to prevent cross-border circumvention.
- Integrate prohibitions into broader anti-trafficking and human rights frameworks.

*Regional leve*l

- Harmonise surrogacy laws to ban surrogacy world wide.
- Develop conventions and protocols that explicitly define surrogacy as exploitation.
- Establish cooperative frameworks to address cross-border surrogacy cases.

International level

- Develop a binding international convention prohibiting all forms of surrogacy as exploitation of women and children.
- Strengthen existing human rights instruments to explicitly prohibit surrogacy.
- Expand UN special procedures' mandates to monitor and report on surrogacy violations.
- Establish universal standards recognising surrogacy as a form of violence against women and girls.

Policy measures required

National level

- Develop ethical infertility frameworks that reject exploitation of women's reproductive capacity.
- Strengthen domestic adoption systems as an ethical alternative to surrogacy.
- Launch public education campaigns on the harms of surrogacy.
- Establish support services (healthcare, legal aid) for exploited women.
- Fund research into long-term physical and psychological impacts on women and girls exploited in surrogacy.

[33] Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, OHCHR.

Regional level

- Address structural drivers of surrogacy such as poverty and gender inequality.
- Develop coordinated strategies to counter reproductive tourism.
- Monitor surrogacy trends and share best practices for ethical responses to infertility.

International level

- Integrate prohibition of surrogacy into international development policy.
- Create best practice guidelines for ethical infertility care.
- Promote global recognition of surrogacy as exploitation.

Institutional measures required

Monitoring

- Establish national observatories to track surrogacy practices and harms.
- Require medical facilities to report on assisted reproductive technologies.
- Empower independent monitoring bodies with civil society participation.

Enforcement

- Create specialised law enforcement units to detect and prosecute surrogacy crimes.
- Provide adequate resources, whistleblower protections, and sanctions for complicit professionals.
- Coordinate immigration, child welfare, and justice systems for comprehensive enforcement.

Cross-border cooperation

- Establish mutual legal assistance treaties specific to surrogacy.
- Implement data-sharing protocols across agencies and jurisdictions.
- Enable joint investigations, extradition agreements, and coordinated training for relevant officials.

CONCLUSION

While acknowledging the profound grief of infertility, individual aspirations for parenthood cannot justify the systemic violence embedded in surrogacy. True progress lies not in regulating exploitation but in eradicating it. We urge the Special Rapporteur to recommend a prohibitionist approach, ensuring that the rights of women and girls prevail over commercial and contractual interests. Only through such decisive action can societies uphold the principles of dignity, equality, and justice enshrined in international law.