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10 July 2025

The Commissioner
Australian Law Reform Commission
GPO Box 3708
Sydney NSW 2001
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Dear Commissioner,
Please accept our submission to your Review of Surrogacy Laws, Policies and Practices as referred to in the ALRCs Issues Paper 52, June 2025.

FINRRAGE (Australia) is part of an international feminist network commenting critically on reproductive technologies and genetic engineering since the 1980s. We regularly write submissions on these issues to Australian states and territories. We also sent a submission to the 2015/16 Federal Inquiry into surrogacy. Australian FINRRAGE members have contributed to books on surrogacy, such as *Surrogacy: A Human Rights Violation*; *Broken Bonds: Surrogate Mothers Speak Out*; *Towards the Abolition of Surrogate Motherhood* and regularly publish on these topics. We are in touch with a number of Australian women who were seriously harmed in so-called altruistic surrogacy arrangements in Australia. We are also a member of a growing global network of thousands of members of civil society who join forces to shine a spotlight on the human rights violations against women and children in all forms of surrogacy. Some of them are Stop Surrogacy Now in the United States and CIAMS (the Coalition for the Abolition of Surrogate Motherhood) in France, Stoppt Leihmutterschaft (Austria), Stop Surrogacy UK and Surrogacy Concerns (in the United Kingdom), Radicailin (Ireland), Not all Gays (Ireland), Stop Vientres de Alquiler (Spain) and The Declaration of Casablanca (France).

For all these reasons we believe we are *stakeholders* in the current ALRC review. We consent to our submission being treated as a public document.

Introductory remarks
When the 2015/2016 National Inquiry published its Report 'Surrogacy Matters', it stated clearly that *commercial surrogacy is to remain illegal* in all Australian states and territories. It also invited the ALRC to conduct a review of the current regulations of 'altruistic' surrogacy throughout Australia. After nine years, the current review by the ALRC has finally begun.

We are very concerned, however, that the ALRC Issues Paper published in June 2025 indicates clearly that the ALRC is interested in removing 'barriers' to currently legal so-called altruistic surrogacy which would possibly increase it, and also appears actively engaged in investigating whether so-called compensated and commercial surrogacy should be made legal in- and outside Australia.

When the previous Attorney General invited the ALRC to begin this review, the latter terms (compensated and commercial surrogacy) were *not* included in his Terms of Reference. We were therefore taken aback when in March 2025, Professor Ronli Sifris was appointed as Assistant Commissioner. She is well known for her long-term support for 'compensated' surrogacy. (Her submission to the 2015/2016 Federal Inquiry already included this recommendation.) Moreover, a look at the composition of the Advisory Committee confirms the undeniable interest of its members in a) increasing altruistic surrogacy in Australia, and b) even allowing compensated/commercial surrogacy. The Advisory Committee consists of industry representatives – surrogacy lawyers and IVF clinic specialists – who would of course increase their profits from a bigger surrogacy industry in Australia. (Another academic, Paula Gerber, from Monash who is on the Advisory Committee has for years advocated for compensated/commercial surrogacy.)

As an Australian Government agency – independent, but paid for by the taxpayer – which provides recommendations for law reform to government, we would have expected a more *objective* line of inquiry that would also allow for the possibility of *abolishing* currently legal so-called altruistic surrogacy, and focus on the harms done by *all* surrogacy to women and children. The fact that the Advisory Committee includes no donor conceived or adopted people who could contribute valuable insights from their own lives, is further proof of the one-sided approach this review takes. Where are the relinquishing mothers who know first-hand the unbearable pain of not seeing their baby again after s/he was taken?

Australia is obliged to uphold its international obligations. As a signatory to CEDAW, it is obliged to look at harms that might come to women and girls from surrogacy; as a signatory to the United Nations Convention on the Rights of the Child, it is obliged to look at potential violations of these rights from surrogacy.

In regard to focusing on women's and girls' rights as stipulated by CEDAW, it is profoundly disappointing to see the ALRC use 'politically correct' language. By defining surrogacy in the Issues paper as "the practice of a *person* (sic) carrying and giving birth to a child for another person or couple," *'woman' is erased*. And yet we all know that only female people with XX chromosomes – called women – can grow a baby from their own flesh and blood. [redacted]

The Harms for Women

Surrogacy can be likened to slavery, which Article 1 of the United Nations Slavery Convention (also signed by Australia) defines as "the status or condition of a person over whom any or all of the powers attaching to the right of ownership are exercised." This describes a 'surrogate mother' during her pregnancy when the intended parents control her

every move from her sex life to her choice of food as well as her movements. This can happen in both 'altruistic' and 'commercial' arrangements.

An argument often heard by pro-surrogacy supporters is that in 'altruistic' surrogacy it is unfair that the so-called surrogate mother who does all the work is not paid, whereas IVF-doctors, lawyers and middlemen/agencies are. However, this argument would only be relevant if being pregnant were 'a job like any other'. It clearly is not, as in no other 'jobs' lasting for nine months, is a human being is grown from a tiny embryo and then birthed. Moreover, no money changes hand in organ donation; and a pregnant woman using her womb (an organ) to gestate a child for others should not be paid either.

Hand in hand with the alleged justification for payment goes the claim that women 'choose' to become surrogates. This argument too is plainly wrong: in commercial surrogacy, it is poor and often less educated women who become surrogates, because they need money in order to survive. (Often the 'choice' is either becoming a surrogate or a prostituted woman.) To speak of 'choice' in 'altruistic' surrogacy, is misguided too: pushed by family and friends to be the kind angel who gives the greatest gift to her infertile family member or friend – a baby – is highly emotionally manipulative. We have called it succumbing to The Compassion Trap.

Another woman who frequently suffers after a surrogacy is the – rarely acknowledged – female partner in a heterosexual couple. The world expects her to be super happy once the new baby is put into her arms, but the child rejects her as s/he desperately looks for the only mother she knows and in whose body s/he spent the last nine months. So, there is crying and howling, rejection of milk, colic, sleepless nights – enough to drive the 'social' mother up the wall. But she is not allowed to complain. The resulting internalised bitterness can turn into resentment against this baby that ends up being reciprocal: a bad outcome for both.

(We will discuss further harms from surrogacy for women below including health and emotional risks and trafficking.)

The Harms for Children

As for upholding the rights of children, there can be no question that surrogacy profoundly violates the rights of the child. Article 2 of the United Nations Convention on the Rights of the Child prohibits any discrimination against children – such as being deprived of their birth parents – and Article 35 stipulates that "State Parties shall take all appropriate national, bilateral and multilateral measures to prevent the abduction of, *the sale of, or traffic in children for any purpose or in any form*" [our emphasis].

As soon as money changes hands after a contract is signed, we can talk about the *sale* of children; in fact, an embryo (made from a sperm and an egg cell) is only created *after* a contract is signed: unlike in cases of adoption, no previous child exists. Thus, surrogacy explicitly endorses the creation of human beings for sale. If this embryo is then forwarded to another country to be implanted in the womb of a woman, we can also talk of trafficking: a well-documented human rights violation of the child (e.g. embryos created in Israel are transported to Cyprus or Georgia).

Surrogacy also contravenes Article 1 of the Optional Protocol to the Convention on the Rights of the Child on the sale of children, which obligates governments to criminalise the sale of children. In commercial surrogacy, children are clearly both sold and trafficked: once the embryo has grown into a child in the womb of a woman who gives birth to her/him in, for example, Cyprus, the child is then taken back to the country of the so-called intended parents (i.e. Israel).

Children born from surrogacy are beginning to speak out. Not unlike children taken away in adoptions, they reveal their deep unhappiness, depression, suicidal ideation and search for something that is missing until, if they are lucky, one day a DNA test reveals their birth mother and other relatives. Olivia Maurel, the spokeswoman for the Casablanca Declaration can be heard here delivering a powerful speech to the Croatian Government on 29 February 2024 (<https://www.youtube.com/watch?app=desktop&v=fxFkUdeDb24&t=190s>).

There are many more breaches of UN Conventions that the ALRC should be aware of. Our question is whether the Australian Government would really want to endorse such harmful practices and breaches of international law that *all* surrogacy, but particular commercial surrogacy, entails.

Before we turn to answering the 27 questions in the Issues paper, we add some more general comments about surrogacy.

The Harm that is Surrogacy

In the last 10 years surrogacy has become normalised, not least because so many celebrities are using it. To believe that a woman is comparable to a suitcase, or a bus that will transport the passenger (the developing child) for nine months before s/he is given to the (paying) customers aka 'intended parents', is no longer seen as a travesty by many people. Nicole Kidman thanked her 'gestational carrier' – no name attached – when she collected 'her' child. Such behaviour due to surrogacy leads to the loss of dignity for mother and child.

What is forgotten are the potential physical harms that a pregnancy with a 'foreign' embryo presents for the woman (from suffering from placenta praevia and placental abruption to gestational diabetes, pre-eclampsia, excessive blood loss at birth and long-term cardiac damage). In 2024, a Canadian study by Veles *et al* was published in which they called the damage 'Severe Maternal and Neonatal Morbidity' (<https://www.acpjournals.org/doi/10.7326/M24-0417>).

And then there are the emotional harms: many of the women will never see their child again, they can't breastfeed them, they are not on the birth certificate. (And yet they keep cells from their child in their bodies for decades, and the reverse is true for the child: s/he too keeps cells from her mother in her body.)

The egg 'donor' too can suffer from long-term drug-damage or complications from egg 'harvesting' (e.g. sepsis, punctured bladder etc). In most cases, she will not even know whether her egg cell(s) have led to the creation of a child who has half her genes. She will never meet her child.

None of these serious harms to women appear in the Issues paper; they need to be discussed and accepted as reasons to push back against surrogacy, rather than to expand this practice that constitutes violence against women.

For the child, surrogacy means that she or he is abruptly ripped away for their mother (often after a caesarean section), meaning their only known familiar source of smell, movement and voice is no longer there. We know from adopted people that this loss at birth can cause life-long unease, sadness and sometimes despair. In Australia, children stolen from Aboriginal mothers and unmarried white mothers have received apologies from prime ministers Rudd and Gillard with the promise that this will never happen again, yet in surrogacy it *is* happening again and in an even worse way (as mentioned above): there is no existing child that is unlawfully stolen; there is a child that is *explicitly created because someone with money is rich enough to commission him/her – or has sufficient powers to make a woman grow a child 'for love' and then let her/him be taken away from her.*

We believe that this statement in itself is convincing enough to abolish all surrogacy. Furthermore – and crucially – ***there is no right to a child for anyone***, whether they are a couple, single, heterosexual, or gay. More recently, gay men, who have lots of money and (political) influence are claiming that they are 'socially infertile' and have a right to a child created through surrogacy. They argue this is to allow 'family formation' which they claim is sanctioned by the UN Convention on the Rights of the Child. However, this is a *misinterpretation*. The right to 'family formation' pertains to the rights of women and men of ethnic minorities or otherwise persecuted groups to be able to get married and have children. It never meant exploiting a woman as a breeder to produce a commodity for a buyer: a child.

Liberal/libertarian groups around the world such as CHIP, ISS and HCCH are creating legal frameworks such as the Verona Principles by stating that they want to ensure the rights of the child(ren) to parentage and statehood. But all they are doing with this is *ensconcing* surrogacy: if surrogacy were stopped today, we would only have to look after children that are born in the next year. After that, there will not be any new children. Hence no new questions about 'parentage' will be asked. In other words: this recent battle cry for allegedly wanting to do the right thing by children born from surrogacy is a furphy.

As the ALRC appears to be seriously considering legalising commercial surrogacy in- and outside Australia, its members absolutely have to look into the nightmare of what is global surrogacy.

Global Surrogacy

Poor countries with legalised commercial surrogacy such as India, Cambodia and Thailand have closed down their international surrogacy trade, but others, similarly poor, like Kenya, Nigeria, parts of Mexico and Colombia have opened their doors. War-torn Ukraine remains an important surrogacy destination, aided by middlemen [redacted] and surrogacy lawyers who connect so-called intended parents with clinics in Ukraine. Here too, the 'choice' for a poor woman is often surrogacy or prostitution. After a big surrogacy scandal in Greece in 2023 which involved illegally trafficking women

into Greece to become surrogate mothers, Greece too is now prohibiting international commercial surrogacy.

Most western countries make *all* surrogacy illegal (e.g. France, Spain, Switzerland, Germany, Sweden etc). Italy extended their long ban on domestic surrogacy to include international surrogacy in September 2024. Some countries like Canada, Australia and the UK allow 'altruistic' surrogacy (with proposed recommendations by the UK Law Commission for increased surrogacy services rejected by both the Conservative and now Labour government).

It is only in the USA, where most states offer legal commercial surrogacies, that the expansion of surrogacy is taking place, with the biggest trade happening in California and, since 2021, in New York. Surrogate and egg donation agencies flourish, IVF clinics compete with one another for the best deals, surrogate mothers get hurt or die, disabled children are rejected and end up in orphanages. The stories of 15 surrogate mothers in *Broken Bonds: Surrogate Mothers Speak Out* (2019, Spinifex Press) document some of the horrors these women have experienced.

Gay men, in particular, are responsible for the recent steep increase in the demand for children from surrogacy. Many western countries legalised gay marriage 10-20 years ago (in Australia this happened in 2017) and so, after the big wedding comes the demand for a child of their own [redacted] This continues the heterosexualisation of gay male culture. While some gay men undoubtedly very much long for a child of their own, for others, it might be likened to a fad, a bit of a 'me too' reaction. Just as with heterosexuals, some gay men's marriages will end in divorce: what then will be the fate of the expensive motherless child who may not be so desirable now?

But IVF clinics welcome the monetary power of gay men, and special organisations like Men Having Babies (<https://menhavingbabies.org/>) organise conferences even in countries where surrogacy remains illegal (e.g. Germany). They provide financial and educational assistance for surrogacy to gay men. They are especially active in the USA.

But the real 'wild west' of surrogacy happens on social media from Facebook to TikTok and Instagram. Here, individual baby buyers advertise for a 'bargain' surrogacy: hoping to avoid unnecessary legal expenses, they go shopping for a woman who is desperate for money and may sign on to a deal without any legal protections which, should she face medical complications in her pregnancy, might end with her having the foot the bill.

Again, in its deliberations about extending surrogacy to include international commercial surrogacy, the ALRC – and after July 2026, the Australian government – has a overriding duty of care to ban arrangements that might lead to serious harm for women overseas which is not in their power to prevent.

Instead of suggesting to delete the current laws in QLD, NSW and the ACT, it should become a criminal act *in the whole of Australia* to go overseas for the purpose of engaging in commercial surrogacy. Third parties – lawyers, business people, immigration agents,

advertising services, supporting or in any way assisting a person to breach these laws in relation to surrogacy – should receive heavy non-negotiable fines.

And to those pro-surrogacy people who say this can never be enforced, here is an example how it can be done: On 1 May 2025, Spain stopped accepting children born overseas from surrogacy as Spanish nationals after a DNA paternity test from a sperm donor is submitted to a Spanish Consulate or Embassy abroad <https://www.politico.eu/article/spain-bans-embassies-registering-babies-born-through-surrogacy-foreign-countries/>.

Australia could easily do the same as a first step. Together with a large government-driven education campaign that points out that surrogacy is a serious human rights violation of women and children and that people who break the law and go overseas for surrogacy will be served with a large fine. When people still try and break the law by arriving in Australia with a newborn baby from overseas (and cannot prove they gave birth to the child), they must be instantly served at customs with a large non-negotiable fine.

Next, see our *brief* responses to the 27 questions in the ALRC's Issues paper:

1. Personal experiences
A number of FINRRAGE members have supported so-called surrogate mothers in their domestic surrogacies. All 5 of them (who wish to remain anonymous) have experienced a deteriorating relationship with the family member who was the so-called Intended mother. This resulted in unpaid legal and medical bills and many heartaches. After the birth, the 'intended parents' withheld the child from his/her mother. The surrogacy also split their families to the extent that years later, they are still not talking to each other. In sum, what started out as a goodhearted attempt to provide babies for infertile relatives or close friends, ended in persisting regret, depression and ongoing health issues. The surrogate mothers we know all wish for surrogacy in Australia to be abolished, and definitely not to become 'compensated/commercial'.

2. Reform Principles (Questions 2-4)

In response to the comment that the ALRCs role is to only look into improving existing regulation, we thoroughly disagree:
We contend that **pragmatism** (p. 7) demands that the ALRC must also look into banning all forms of surrogacy. Brave people banned slavery two hundred years ago. More recently, Australia banned smoking in most public places (leading to greatly reduced smoking rates). It was said in both cases that it could not be done.
Domestic surrogacy is very small in Australia: 100-150 children per year (this includes twins and triplets). Few women in Australia can be manipulated into committing physical and emotional violence against themselves. Known harms from the past – taking babies from mothers – must not be repeated. A year after surrogacy has been prohibited, no new children's rights will need to be considered, because no new 'surrogate' children will be born.
Practically all of Europe bans surrogacy. There is no reason why Australia can't join them. A surrogacy-free Australia is possible.

In FINRRAGE's view, the most important rights to consider in *all* surrogacies are the human rights of the woman: the so-called surrogate mother (a misnomer). Without her, surrogacy would not exist: there would not be a single child born.
We concur with the UN Rapporteur on Violence against Women and Girls, Reem Alsalem, that surrogacy is *violence* against women. Her ongoing inquiry into surrogacy will be concluded by October/November 2025. We encourage the ALRC to seriously consider her findings.
The harms of surrogacy cannot be minimised: a motherless child is produced; physiological and psychological damage to the mother happens in most cases.

And the rights of the child are compromised from its first breath. While infertility can be painful, no right exists to obtain a child for love or money from anyone else. There are many ways of having children in one's life including Permanent Care Orders (Victoria). Surrogacy is a human rights violation of mother and child.
For children born from surrogacy arrangements, their right to find out about their birthmother, egg 'donor' and sperm donor, must be paramount. It cannot be left to their 'social' parents. The birth certificate must include the details about the birthmother, egg 'donor' and sperm donor. It must not be falsified by including the names of the commissioning parents but should be a statement of the truth of a child's origins.

5. Barriers
We need **more** barriers to surrogacy in Australia, not fewer.
There should be a government-led education campaign that informs people of the harms in surrogacy to women and children. It should make clear that no one has a right to a child. The heartbreaking stories of surrogate mothers who have no access to their child(ren) must be shared. Surrogacy is a version of baby stealing.
There should not be any incentives or benefits offered, e.g. Medicare payments, insurance contributions. The campaign should mention pressures on women to be kind and compassionate givers of new life. The campaign should mention that there are many ways of having children in one's life, and that a child-free life is also a good option for many people.

6. In case the Australian government continues to allow so-called altruistic surrogacy, we oppose any broadening of eligibility.

7. Single men should *not* gain access to surrogacy.

8. If 'altruistic' surrogacy continues to be legal in Australia, the medical, psychological and legal expenses of surrogate mothers should be enforceable requirements during the pregnancy and up to five years after the birth. This includes expenses for the mother as well as pre-term babies, including ICU and surgery costs.

9. If 'altruistic' surrogacy continues to be legal in Australia, only the birthmother should be able to enforce or cancel the contract during the pregnancy and up to five years after the birth.

10. If ‘altruistic’ surrogacy continues to be legal in Australia, if the birthmother desires counselling at any time during the pregnancy and up to five years after the birth, the so-called intended/social parents should pay for its provision.
Parentage should always remain with the birthmother. And the sperm donor.

11. There are no gaps in professional services in Australia.
There are too many services already.

12. Changes in professional services?
If ‘altruistic’ surrogacy continues to be legal in Australia, groups such as [redacted] who seek to increase the number of surrogacies in- and outside Australia by holding seminars and inviting Australian and overseas surrogacy providers, should be closed down and threatened with big fines should they continue operating. The same should apply to surrogacy lawyers who help ‘clients’ to find a ‘surrogate’ or egg ’donor’ and provide them with legal information (e.g. draft contracts, or information about the legality of surrogacy in overseas countries). If they continue to engage in such work (in- and outside Australia), this should be considered serious professional misconduct. This prohibition should apply to LGBTQI+ groups who are trying to organise ‘rainbow’ surrogacies. All of these groups should be declared illegal and prosecuted with substantial fines if they continue; fines large enough to act as a deterrent. So-called ‘Rainbow Apps’ should also be prohibited.

13. Advertising
On- and offline advertising for surrogacy should remain strictly forbidden; advertising aids and abets a practice – surrogacy – FINRRAGE members would like to see prohibited.

14. Special services, i.e. Medicare
As FINRRAGE members would like to see numbers of ‘altruistic’ surrogacies reduced as much as possible, we do not believe that special Medicare rebates should be available to birthmothers. However, they should of course keep access to any medical assistance offered to other women.
Enterprise bargaining terms should *not* include paid or unpaid leave for birthmothers and egg ‘donors’ as this might entice more women to fall into the Compassion Trap.

15. Reimbursements for surrogate mothers/egg ‘donors’
If ‘altruistic’ surrogacy continues to be legal in Australia, the so-called intended parents need to pay for all legal and medical costs incurred by the pregnancy and birth including childcare for the birthmother’s children. They should include counselling for the pregnant woman and her children (and partner) if desired. This should also include egg ‘donors’. But there has to be a strict cap on these expenses, so as to not act as financial incentives.

16. FINRRAGE absolutely rejects the introduction of ‘any forms of compensated’ or ‘commercial’ surrogacy into Australia. This would mean legalising the selling and buying of women as well as the sale and trafficking of children: it would legalise the selling and buying of a woman’s womb – and in fact her whole life – for nine months (or longer depending on numbers of IVF attempts). This is akin to slavery. As we already said earlier, pregnancy is not a ‘job’ like any other. Surrogacy is a violation of women’s and children’s human rights.

If the Australian government were to introduce 'compensated/commercial' surrogacy, we would become pariahs in most of European countries' eyes.

17. Compensated or commercial surrogacy
See Question 16. **FINRRAGE members disagree 100 per cent with the introduction of compensated and commercial surrogacy in Australia.** Commercial surrogacy should remain criminalised in- and out Australia and extended from Qld, NSW and the ACT to *all* Australian states and territories.

18. Problems with obtaining parentage documents for children
The birth certificates for children born from surrogacy arrangements must bever be falsified. They must list the birthmother, egg 'donor' and sperm donor. No one else. **Pre-birth parentage orders (e.g. from the USA) must be outlawed.**

19. Improvements for intended parents to obtain parentage documents
There should be no improvements; this would serve as an incentive to increase all types of surrogacy.

20. Problems with obtaining citizenship
As FINRRAGE members hope that surrogacy will decrease or be abolished very soon, we see this problem as very temporary.
We do not wish for children born from surrogacy to remain stateless. If possible, s/he should retain the citizenship of the birthmother.
However, if that is not possible, then the country of the sperm donor should provide citizenship, BUT this must be decided on a case-by-case basis, so it is not seen as legitimising commercial international surrogacy.

21. Obtaining citizenship documents must become harder.
As stated earlier, following the Spanish government, DNA tests by Australian sperm donors should no longer lead to a passport and citizenship provided by consulates/embassies overseas.

For people already in Australia with a child born from a surrogacy agreement, obtaining legal papers should be made as expensive as possible, to deter other people from entering illegal surrogacy agreements overseas.

22. Different surrogacy regulations
In Australia, all states and territories should make it a criminal act to engage in compensated or commercial surrogacy in- and outside Australia. Big fines must be handed out *and* collected. If commissioning parents refuse to pay these fine, mandatory jail terms must be the answer. It has to be a criminal offence under federal law which the government commits to enforce. (Not like today in QLD, NSW and the ACT, where breaking these laws does not lead to enforced jail terms or even fines.)

23. A new oversight body for surrogacy?
FINRRAGE members reject a national body to have oversight of surrogacies. This would be akin to legalising compensated/commercial surrogacy.

If any overseeing body is to be established, it must be to enforce fines and jail terms.
Also, if 'altruistic' surrogacy continues to be legal in Australia, this would be a good time to start research projects funded by the federal government into the physiological and psychological health of surrogate mothers and egg 'donors' and of the children born of surrogacy.

24. Should the law play a role in discouraging or prohibiting surrogacy?
Absolutely, and it should be criminal law so that people who break surrogacy laws can be prosecuted with the full force of the law (see Question 22).

25. Improving awareness about surrogacy in Australia
Indeed. As we wrote in response to Question 5 (Barriers): **There should be a government-led education campaign that informs people of the harms in surrogacy to women and children. It should make clear that no one has a right to a child. The heartbreaking stories of surrogate mothers who have no access to their child(ren) must be shared. Surrogacy is a version of baby stealing.**
All types of surrogacy, but particularly compensated and commercial surrogacy, are serious human rights violations and should be criminalised in all states and territories.

26. Issues to be out of scope
We do not agree with the ALRC that issues of prohibiting/banning/abolishing surrogacy should not be part of this review which is why we have included them.

If a survey were conducted today asking 'ordinary' people on the streets of cities as well as in regional areas of Australia about their views on surrogacy, there is no question that a majority would be critical of surrogacy. This is the reason we believe the ALRC has a duty to review the whole gamut of the surrogacy story rather than believing that the views of the Assistant Commissioner and the members of the Advisory Committee are more important that the views of ordinary Australians, especially women: it is after all our bodies that are discussed as if we were raw material that can be turned into baby machines.

27. Other Insights
FINRRAGE members urge the ALRC and the Attorney General, Michelle Rowland, to give serious consideration to the fact that regulation might be the wrong way to approach surrogacy, and that Australia should look to the dominant European countries that prohibit all forms of surrogacy.
We look forward to the next Issues paper from the ALRC at the end of 2025 which hopefully will be more nuanced.

10 July 2025