

Legal Narratives of the Effects of Surrogacy Agreements Under A Child's Rights Lens

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Abstract

The current legal landscape in the Philippines leaves surrogacy unregulated as there are neither laws nor jurisprudence on the validity of these agreements. As a consequence, it is unclear which rights and obligations arise from a surrogacy agreement. Using the Philippine legal system as a case, the study aimed at examining the validity of different surrogacy arrangements and provided contextual analysis on the status of children under surrogacy agreements and its legal effects, in light of the state obligation of the Philippines under the United Nations Convention on the Rights of the Child. It is supported by legal narratives pertaining to actual cases of surrogacy using the child's rights lens. Analyzing said agreements would aid not only legislators in filling policy gaps, but also those that are interested in entering such contracts in protecting the child that they have longed to have. It also examined critical perspectives on the possibility of surrogacy arrangements as potential illegal cases of human trafficking attached to circumvent Philippines laws. This study calls for a proper legal framework to recognize children, surrogate mothers and parents who enter such arrangements legitimizing their rights to be protected.

Keywords: Assisted Reproductive Technologies, Family Code, Filiation, Rights of the Child, Surrogacy Arrangement, Women's Right.

Introduction

In the Philippines, a cardinal part of the human experience is realizing a person's desire to reproduce and establish his or her own family unit (1). Recognizing that the family is the foundation of a nation, the State respects spouses wanting to establish a family unit based on their religious beliefs and requisites of conscientious parenthood (2). However, not everyone has the capacity to realize such a desire for a family – especially one that is tied in blood (3). A great number of people are still suffering from infertility. Nevertheless, advancements in technology have made it possible for those who were previously unable to conceive naturally to now have the opportunity for procreation (4).

Assisted Reproductive Technologies (ARTs), such as Artificial Insemination and Surrogacy, were developed to help people realize their dream of having a child (5). Article 164 of the Family Code of the Philippines already recognizes legitimate children born out of artificial insemination yet, children born out of surrogacy are still in the dark (5). There is currently a growing number of known

cases of surrogacy arrangements in the Philippines, however, these agreements have not been recognized by law. Moreover, there is also no jurisprudence on the validity of these agreements. As a consequence of the non-recognition of these arrangements in law, it is unclear which rights and obligations arise from a surrogacy agreement, and which may be recognized by laws. Without a law regulating or at least recognizing surrogacy agreements, parties may be left without legal or judicial remedy. More importantly, the impact on the child's right is apparent. The status of an unborn child would be undetermined, thereby, infringing on their rights to parentage and filiation, to citizenship, to be registered immediately after birth, to be cared for by his or her parents, to support, to be protected against discrimination of any kind, and his or her rights against all forms of exploitation.

The term "*human rights*" explicitly refers to rights inherent to all human beings which should be equally accessible to all (6). However, this is not entirely accurate for children, as certain rights are

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(Received 23rd May 2024; Accepted 22nd October 2024; Published 30th October 2024)

contingent when they have reached the age of majority in their respective states. Nevertheless, all children possess human rights and are entitled to these rights despite their age, including those whose status may be unknown due to the nature of their conception. The 1989 Convention on the Rights of the Child seeks to clarify the special status of children, including rights to special protections of children (6). The Philippines, in its capacity as a signatory to the United Nations Convention on the Rights of the Child (UNCRC), with its subsequent ratification on 21 August 1990, is legally obligated to ensure that children born from surrogacy agreements receive protections stipulated in its state responsibilities (7). Under Article 3(1) of the UNCRC, it is expressly emphasized that, in all instances involving children, be it initiated by governmental or non-governmental social welfare organizations, judicial institutions, administrative authorities, or legislative bodies, the utmost consideration should be the well-being of the child (7). Therefore, in order to determine whether surrogacy arrangements adhere to the imperative of acting in the best interest of a child, an examination of their legitimacy within the current legal framework of the Philippines is needed.

The Universal Declaration of Human Rights recognizes the right to life, liberty, and security of a person (8). Although not formally established, the right to life is inherent and cannot therefore be dependent upon a particular law, custom, or belief (9). The UNCRC has echoed this mandate in Article 6, where it recognized the inherent right to life of every child, mandating State parties to guarantee their protection to the maximum extent (7). The 1987 Philippine Constitution declared that it is the state policy to equally protect the life of the mother and the life of the unborn from conception (10). According to Philippine jurisprudence, life begins from the fertilization of the egg (9). It concluded that if the fertilized ovum is alive, then it can be asserted that there is human life from following the day of its fertilization (9).

Surrogacy applies when there is a third-party reproductive practice wherein the prospective parent(s) solicit a surrogate mother for the purpose of childbirth (8). By practice, a woman, through an agreement with the prospective parent(s), intentionally bears and gives birth to a child, whom she does not intend to parent (11). In fact, it is not a novel matter. In the 1950s, there was

a social stigma against infertile couples in the United States, which led to couples adopting children to strive to have the perfect American family. There was then a demand for adopted children to look like biological children, which led to baby shortages. The supply of the coveted “white babies” was not enough to realize the demand, which led to a move towards medical advances to treat infertility and other methods of ART (12).

With the growing number of demands for surrogacy comes different development in regulation among different states. Some states prohibit all kinds of surrogacy for being contrary to its policy to protect human dignity. In several European states, surrogacy is strictly regulated. These states include Germany, Austria, France, Switzerland, Sweden, Norway, Italy, and Bulgaria (13). In some of these states, entering a surrogacy arrangement is punishable, either for the parties involved or for any intermediaries and/or medical institutions facilitating the arrangement for public policy considerations (14). According to a preliminary report from the Permanent Bureau at the Hague Conference on Private International Law, this approach is generally based on a policy perspective which views such agreements as a “violation of the child’s and the surrogate mother’s human dignity” (14).

In France, its Civil Code was amended to specifically prohibit all forms of surrogacy (15). In Switzerland, surrogacy is not recognized by their constitution. In Italy, the Italian Parliament enacted Law 40/2004 to regulate medically assisted reproduction techniques and surrogacy also is prohibited. There are some states which regulate surrogacy but allow altruistic ones or payment for reasonable expenses and they are Denmark, the United Kingdom, and Canada (11). The National Legislative Assembly of Thailand also enacted the Protection for Children Born through Assisted Reproductive Technologies Act (ART Act). It allows altruistic surrogacy, or surrogacy without compensation, but completely bans and criminalizes commercial surrogacy (16).

In the United Kingdom, alterations to the right of filiation were instituted via the Human Fertilization and Embryology Act of 2008. This law allows couples desiring to produce a child through surrogacy to enable them to acquire parental order. The same act also allows payment for

“reasonable expenses” to the surrogate mother (14).

There are some states which allow both commercial and altruistic surrogacy such as India, Russia, Ukraine, and different states in the United States (17). In Ukraine and Russia, gestational surrogacy has been incorporated in its respective Family Codes (18). Both states have recognized the intended parent(s) as the legal parent of the child but at least one of the intended parents must have a genetic relationship with the child and the surrogate mother may have none.

In the Philippines, the definition of the family is strongly associated with blood and marital relationships, which makes biological ties important, even extending up to distant relatives (19). For Filipino parents that long for a child but could not do it naturally, child adoption is the normal practice. Gamete donation and surrogacy arrangements are options but are controlled mainly by religious beliefs and morally questionable procedures (20). Medical procedures such as in vitro fertilization (IVF) regulate the process which is an expensive option for Filipino partners. There is also limited government support for partners availing of such arrangements thus broadening the alternatives for child adoption as a viable choice (21). There is a lack of legal parameters in the Philippines for those who opt for such arrangements thereby raising both a question of potential illegal practices that abuse the absence of such laws and a question of legal support for such arrangements due to its culture and religious beliefs (22).

Surrogacy regulations vary significantly across state jurisdictions crafted by their legal, cultural, economic, and social strata. States, like France and Switzerland, outrightly prohibit all forms of surrogacy, while other states are permissible under strict regulation (13). Permissibility on the type of surrogacy also varies and how it was adopted into their legal jurisdiction. The Philippines is among the numerous countries that has not addressed these issues into their legal system which leaves the status of the parties involved in the gray area, especially the children.

In surrogacy agreements, the parties are the surrogate mothers, intended parents, gamete donors (if donor is different from that of the intended parent/s), and the resultant children who are born out of surrogacy agreements. The

Warnock Report states that the conduct of entering in surrogacy agreements, can be considered detrimental to the child who will be the result of this transaction, as it essentially implies that the child is purchased for monetary gain (23). The welfare of a child must be the utmost consideration under the best interest of the child principle (23). However, the UNCRC neither suggests a precise definition, nor plainly outlines common factors of the best interests of the child.

This principle has not been uniformly accepted. Some challenges emerge when, despite a consensus on the utmost interest of a child, divided opinions arise on the optimal means to pursue those best interests (24). Due to the lack of defined criteria to determine custody disputes, judges must rely on their own intuitions or the intuitions of those whom they choose to rely on, to make decisions that prioritize the well-being of children (24). Under typical conditions, biases and prejudices tend to favor the commissioning mother, particularly when higher courts prioritize the financial capability to safeguard the child's well-being. This is because surrogates often belong to a lower socioeconomic class (22).

The UNCRC, which the Philippines ratified, places rights that children must be afforded with. These rights include the rights to legal parentage and citizenship, the right to be legally registered, to be supported, to acquire nationality, to be cared for by their parents, and the corresponding responsibility of parents to make sure that children actually enjoy their rights, and the rights against discrimination based on their status. Due to the complexities of these contracts, the absence of any regulation poses a problem for it raises questions on whether State Parties are violating the Convention for these children are being discriminated against because of how they were born.

The current legal landscape in the Philippines leaves surrogacy unregulated (2). Neither the Congress, nor the Supreme Court has acknowledged the legality of surrogacy agreements. When entered into agreements, the intended parent(s) and the surrogate mother agree for the latter to carry the child of the former. Leaving the agreement to the wide discretion of the parties will ultimately affect the child's rights and status from the moment of his or her conception, as this discretion is subject to abuse by

either party. Considering that the Philippines have no law on surrogacy and taking into consideration its impact on children's rights, there is a need to lay down regulations that would balance these interests.

Methodology

Using the Philippine legal system as a case, the study is built on the core research question of what the legal mechanisms are in safeguarding the welfare of children and parents under surrogacy arrangements. To answer this, it required document review of the Philippine laws that have been enacted to serve as the legal framework of the study. Review of existing laws complemented the surrogacy cases available on Philippine news reports retrieved between 2019 and 2022.

It followed a three-phased approach in developing the legal narratives. First, the research gap was established from the surrogacy cases available in the Philippines with focus on famous Filipino personalities who were capable of entering into such arrangements. Secondly, existing laws that served as a legal framework of the cases and some legal initiatives made by the Philippine government were tracked. Lastly, the study highlighted the effects of unregulated arrangements with focus on the state obligation of the Philippines under the United Nations Convention on the Rights of the Child.

Results and Discussion

Family Cases under Surrogacy Arrangements in the Philippines

The Philippines is obligated to safeguard anyone who wishes to establish a family in accordance with religious beliefs and requisites of parenthood. Artificial insemination is the only ART recognized and regulated by Philippine law. The Family Code of the Philippines states that children conceived through the method of artificial insemination, involving the impregnation of the wife with either the husband's sperm, a donor's sperm, or a combination thereof, are considered as legitimate children of the husband and wife. This is contingent upon the condition that both individuals have given their explicit consent or approval for such insemination, as evidenced by a written document executed and signed by them prior to the child's birth. Other than the provision, there is no other existing legislation in the Philippines that specifically regulates ART.

The first known Philippines case engaged in surrogacy occurred in October 2009 when a male gay couple from Malaysia and Denmark contracted a Filipino married woman to conceive the said couple's child via intrauterine insemination (IUI), after which the baby was brought to Thailand (25). The owner of Asian Surrogates argued that the biological father, or the sperm donor, is considered the legal father and consequently holds the authority to remove the child from the country. This viewpoint stands in contrast to the legal framework in the Philippines, where the birth mother is typically recognized as the legitimate parent, particularly when she is validly married to another individual, according to local legislation. This case was undetected in the Philippines.

Another prominent case of surrogacy was of Joel Cruz, a Filipino perfume mogul, who revealed in the past that he has fathered eight children all through surrogacy (26). All his children were born and conceived through IVF by the same Russian surrogate mother. Another surrogacy case was in 2014 when infamous Filipino medical doctors, Vicky Belo and Hayden Kho employed the help of a surrogate mother in the United States in conceiving their daughter, Scarlet Snow Belo (27). There were speculations that the egg used was a donor's egg, but Dr. Belo has since stated that the egg used was hers (27).

In February 2019, Filipino TV host and news anchor, Korina Sanchez announced that she and her husband, former Philippine Senator Manuel Roxas II, welcomed their twins in the United States (where surrogacy is regulated) through gestational surrogacy (28). These known cases of successful surrogacies manifest the rising popularity of such practice in the Philippines.

In 2006, a former Philippine senator sponsored Senate Bill 2344 entitled, An Act Prohibiting Surrogate Motherhood Including Infant Selling and Providing Penalties. Therefore that seeks to regulate surrogacy by making it unlawful for any woman capable of motherhood to agree to become a surrogate mother as cited in the said bill. The same bill also establishes the practice as unlawful especially for any person in the medical profession to engage in surrogacy agreements. In 2013, the late Philippine Senator Miriam Santiago introduced an Act Requiring Coverage for the Treatment of Infertility in Any Group Health Plan of Health Insurance or Senate S. No. 1616. Aside

from including Surrogacy in its definition of ART, the bill also sought to require the coverage of infertility treatment in any health plan and insurance, citing Section 15, Article 11 of the Philippine Constitution, or the duty of the State to protect and promote the right to health of the people. These two bills, however, were not passed into law. Therefore, there remains to be no regulation for surrogacy practices in the Philippines.

Legal Mechanisms of Potential Surrogacy Agreements Under Philippine laws

Article 1306 of the New Civil Code of the Philippines stipulates that contracting parties entering a contract must have the authority to institute stipulations, clauses, terms, and conditions that they may deem convenient, subject to the condition that such provisions are not contrary to any laws or morals. However, morals and customs frequently overlap as the former deals with the good and right conduct in the community and these norms may differ at varying places and times with different groups. Customs, on the other hand, are those practices which have been followed through long usage and are enforced by society or some part of it must be recognized as a binding rule of conduct (29). The high court will not recognize agreements which could be detrimental to the civic welfare or to affect civic honesty. Jurisprudence establishes criteria to determine whether or not the stipulation of the parties is against public policy or lies in the legal principle that “all agreements to the purpose of which is to create a situation which tends to operate to the detriment of the public interest are against public policy and void, whether in the particular case the purpose of the agreement is or is not effectuated. For a particular undertaking to be against public policy actual injury need not be shown; it is enough if the potentialities for harm are present” (30). It is clear from the above pronouncement by the Philippine high court that a potential for harm present in an agreement violates public interest and public policy because actual injury is of no moment. In the current legal landscape of the Philippines, the potential harm that surrogacy poses not only to the parties therein but especially to the child, would make these agreements void because it is against public interest and public policy.

Surrogacy commonly involves two major parties: the intended parent(s) and the surrogate mother. The intended parents are those who wish another to carry a child for them, with the intention that they will take custody of the child following the birth and raise the child as theirs (22). The surrogate mother assumes the responsibility of carrying the child to full term on behalf of the intended parent(s), under the mutual agreement that she will subsequently renounce her parental rights towards the child at delivery (22). In the Philippines, due to the lack of clarity on the definition of children born out of surrogacy agreements, the person who gives birth to the child is normally the legitimate mother while in surrogacy agreements, the legitimate mother would be the surrogate mother, not the intended mother.

The Act Establishing Rules and Policies on the Domestic Adoption of Filipino Children and for Other Purposes or the Domestic Adoption Act of 1998 (known as Republic Act No. 8552) enumerates who may be adopted in the Philippines. However, there is no mention of a situation where the ovum of the intended mother and sperm from a donor was used to develop the child in the aforementioned law. In such a case, the legitimate mother would be the surrogate mother and since there is no genetic connection with the supposed father, adoption would be difficult because it would render the child incapable of adoption by his or her intended parents. There is also no mention of an instance where the ovum and the sperm were not that of the intended parents because it came from donors (31). If this circumstance arises, the child born to the surrogate would not fall within the category of persons eligible for adoption, unless the child be administratively or judicially declared available for adoption. In this case, the child is not the legitimate child of the individual or couple who will adopt, neither would this child be qualified under the said law.

The UNCRC protects the child against all forms of exploitation. Considering the prevailing state policies in the Philippines and harmonizing surrogacy agreements with criminal law, for surrogacy agreements to be enforceable in the Philippines, these agreements should not be for commercial purposes. Enforcing commercial surrogacies in the state may open Pandora’s box

since these agreements are a vessel for committing crimes such as human trafficking, particularly the sale of children, exploitation of women (or the surrogates), and circumvention of adoption laws. For as long as the surrogacy is for altruistic purposes and there being no compensation stipulated for the gestational services of the surrogate, the agreement may be enforceable. Altruistic surrogacy may be likened to blood or living-related organ donation. If blood may be donated legally, surrogacy is possible under Philippine laws so long as it is not for the sale of a commodity but for altruistic reasons.

In 2010, the Health Ministry of the Philippines issued Administrative Order No. 2008-2004 on the policy of living non-related organ donation and transplantation. It covers the precondition on organ donation and its sale and purchase by vendors or commercial donors highlighting its strict prohibition. Furthermore, it also states that non-directed or non-directed donors are only permitted only when they are voluntary donors, which means that they are allowed by law to donate.

Surrogacy agreements must be altruistic for it to be considered consistent with law, morals, good customs, public order, or public policy. It must not be for a consideration and must be for an altruistic purpose. These arrangements, however, are not merely a transfer of parental rights for it needs to undergo the adoption process. In cases where surrogacy arrangements happen, these agreements are not recognized as legal processes and contracts that were defined by existing laws.

Effects of Unregulated Surrogacy Agreements in Light of the UNCRC

Article 7 of the UNCRC mandates State Parties to ensure the right of a child to acquire nationality and to safeguard the enactment of these rights in accordance with their national law and their obligations under the relevant international instruments in this field, particularly where the child would otherwise be stateless.

On Citizenship: Citizenship is a personal and permanent membership in a political community (32). It denotes not only a person's possession of his or her full civil and political rights but also the duty of allegiance to the political community (32). There are three ways generally recognized as a way of acquiring nationality namely, *jus soli*, *jus sanguinis*, and naturalization. *Jus soli* is the

acquisition of citizenship on the basis of a person's place of birth as this would determine a person's nationality (32). *Jus sanguinis* is the acquisition of citizenship on the basis of blood relationship (32). In other words, citizenship in the Philippines is determined by blood ties.

On Parentage: Parentage is generally defined as a descent from parents or ancestors. It is also known as lineage. Article 7 of UNCRC further states that a child is entitled to registration following birth, the right to be bestowed with a name, the right to obtain a nationality, and, to the greatest extent, the right of awareness and care from their parents. In the Rules on DNA Evidence, parentage is measured through the "probability of parentage." "Probability of Parentage" refers to the numerical assessment of the probability of parentage for a putative parent compared to the probability of a random match between two unrelated individuals within a specified population. In the Philippines, parentage can be proven through DNA testing. In surrogacy agreements, the woman who gives birth does not necessarily mean that she is the mother of the child, leaving her unprotected by Philippine laws. Since in gestational surrogacy, the surrogate mother or the birth mother has no genetic connection to the child; she is genetically a stranger to the child.

On Parental Authority: Article 3 of the UNCRC mandates that States Parties commit to ensuring children the right to protection and care that is essential for their well-being. This commitment involves due consideration of the rights and duties of their parents, legal guardians, or other individuals with legal responsibility for them. To fulfill this obligation, States Parties implement appropriate legislative and administrative measures and laws to mandate parent/s on their obligations to their child. Article 209 of the Family Code of the Philippines also affirms this stating that parental authority and responsibility include the caring for and rearing children for civic consciousness and the development of their moral, mental, and physical character and well-being. An important aspect of surrogacy arrangements is the transfer of parental rights over the child. The nature of surrogacy agreements makes the enforcement of a child's right to be cared for by his or her parent(s) unclear. Without first establishing who the parents are, a question on who is legally responsible to take care of the child ensuring its

holistic development remains unanswered because in surrogacy agreements, there are two sets of “parents”: the intended parent(s) and the surrogate mother.

Although the parties may agree that the surrogate mother must transfer parental rights over to the intended parents, such provision would not be possible without complying with the Philippines’ adoption laws. There must be a genetic connection between the intended parent or at least one of the intended parents and the child to ensure that adoption laws are not circumvented by surrogacy agreements. Citizenship and parentage are determined by blood. Through the genetic connection of the parent(s) to his or her child, the child inherits his or her citizenship and parentage therefrom. By requiring that there be a genetic connection between the intended parent(s) and the child, the citizenship and filiation of the child will be properly established. Ultimately, given the law, there must be a blood connection between the intended parent(s) and the child.

Securing the Child’s Best Interest

Due to the absence of regulation, surrogacy agreements usually involve simulation of birth, which is in contravention of adoption laws. It should be noted however, that children born out of surrogacy are different from children up for adoption. The main objective of surrogacy is to provide a child for the intended parents, intentionally removing the right of the biological mother on her right to the child. Adoption, on the other hand, seeks to remedy a situation of existing abandonment by providing a child with a new family. Adoption is rooted in addressing the needs of an already existing child while surrogacy is focused on fulfilling the desires of adults regarding a prospective offspring. It is suggested that the child should not get his or her parentage from adoption laws. A law must be passed to establish and clarify the parentage of such a child.

Furthermore, according to Article 36 of the UNCRC, “States Parties that recognize and/or permit the system of adoption shall ensure that the best interests of the child shall be the paramount consideration.” The UNRC requires the best interest not only to be “a primary consideration” but “the paramount consideration.” The Philippines, being a state party to the UNCRC, protection of the child should be of utmost importance. There is no prohibition for parties to

enter into surrogacy agreements however, in cases of breach of obligation or infringement of rights by any of the parties, the injured party, especially the child, cannot go to court for redress. This means that anyone can partake and enter into surrogacy agreements, leaving the child unprotected.

When the child is born, the intended parents would be the ones that should have parental rights over the child. However, since the law penalizes simulation of birth, this would not be possible, thus, problems such as the legal parentage, the nationality, citizenship, and parental authority of the child arise. Through a regulation that would recognize the existence of surrogacy agreements, children born out of surrogacy would be protected because they will be under the ambit of the law. By recognizing surrogacy agreements in law as a source of rights and obligations of the parties, such law will become a contract between the parties and the state. The rights of children born out of surrogacy agreements will be further protected in relation to his or her right regarding parental authority, parentage, citizenship, filiation, support, discrimination, and most especially his or her inherent right to life.

Conclusion

In the Philippines, surrogacy arrangements already exist especially for intended parents who opted for ARTs to conceive a child. The legal system generally establishes the status of a child conceived in the conventional sense; however, this is not the case for children born through surrogacy. The only existing law that recognizes similar arrangement is the Family Code of the Philippines. It establishes the status of children born out of artificial insemination and proclaims them as legitimate children as long as both authorized the artificial insemination in a form of a written document recorded in the civil registry. However, children born out of artificial insemination are different from those born out of surrogacy. Recognition of the latter must also be established for children born out of these arrangements to enjoy the same rights. It is only right that surrogate children be afforded protection to prevent them from falling under the cracks of the law for there are substantial distinctions between children born out of surrogacy and those children born in the traditional sense.

Finally, surrogacy arrangements are agreements, and not contracts. Agreements are those, which are

not enforceable in the courts of justice as they are not a source of obligation. However, agreements being unenforceable in courts is the reason why there is a need for legal framework. The rights of the child embodied under the UNCRC that surrogacy agreements are potentially infringing upon such as: legal registration immediately after birth and their right to a nationality; that the parents' parental responsibility to the child must also be fulfilled together with their rights to be holistically cared for by their parents; and that they are protected against discrimination based on their status is unprotected due to the absence of regulation in the state, all of which are not inherent for children out of surrogacy under the legal frameworks of the Philippines.

This paper acknowledges certain limitations. Although the study captured repercussion on the absence of a legal framework that will fully support the rights of a child and surrogate mothers engaged in surrogacy, we emphasize the need for an open discourse using different lenses to fully understand how legislation can safeguard their rights without undermining the role of intended parents to engage in the role of alternative modes of reproduction through Assisted Reproductive Technology. Future studies should explore documentation of how different states treat surrogacy arrangements so as to explore the extent of how each country addresses and delineates between rights of those involved in a traditional conception and parties under surrogacy.

Abbreviation

Nil.

Acknowledgment

The authors wished to express their gratitude to the support of friends and colleagues extended to them during the completion of this research.

Author Contributions

Dustine Marlee C. Serpa Juan: conceptualization, data collection, document analysis, paper writing, paper revision, and paper presentation.

Jessa Frida T. Festijo: document analysis, synthesis, paper writing, reformatting, and paper revision.

Conflict of Interest

The Authors declare that there is no conflict of interest among them.

Ethics Approval

The document review underwent validation clearance to proceed with the journal paper format by the Research and Innovation Center of the Lyceum of the Philippines University, Manila, Philippines.

Funding

Nil.

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