



## A better life in the Global North

---

*Understanding Dutch policies on international adoption through differing  
conceptualisations of childhood*

Mirte Oorebeek

Student number:

S3346447

Word count:

10.946 words

First assessor and supervisor:

dr. Brenda Bartelink

Second assessor:

Erica Kamphorst MSc.

Advisor:

dr. Marit Ursin

University of Groningen

Faculty of Behavioural and Social Sciences

Master Ethics of Education

June 2022

**Abstract.** In response to the documentation of serious and recurrent malpractices in a recent research report, the Dutch government decided to temporarily pause international adoption procedures. This decision constitutes a drastic change from the previous lack of substantial action against malpractices. In order to better understand this recent change in policy, this research will focus on recent Dutch debates and policies on international adoption as well as its underlying conceptualisations of childhood. The analysis is based on a literature study of the international academic literature and a document analysis on Dutch policy documents. The results show that the Dutch government decided to resume international adoption procedures a year after the initial pause with regard to the presumed need to provide vulnerable children with a better future and a chance to grow up in a family. Moreover, this decision would allow adoptive parents to form a family. However, this decision, as documented in academic literature, disregards local childcare options in the Global South and ignores the fact that international adoption contributes to the number of children growing up in institutional care. Additionally, international adoption rests on hegemonic narratives about the ‘ideal’ family that label birth families as unsuitable and tie the quality of parenting to ethnicity, class, and Western conceptualisations of a good childhood. This research concludes that while it is not possible to exclude the possibility of serious malpractices and it is unclear whether birth families gave informed consent, international adoption is not ethically responsible.

**Samenvatting.** Als reactie op de rapportage van een recent onderzoeksrapport over structurele ernstige misstanden, heeft de Nederlandse overheid besloten om interlandelijke adoptieprocedures tijdelijk te pauzeren. Deze beslissing behelst een drastische verandering ten opzichte van het eerdere gebrek aan substantiële maatregelen tegen misstanden. Om deze beleidsverandering beter te begrijpen, wordt in dit onderzoek gefocust op recente debatten en beleid omtrent interlandelijke adoptie en onderliggende conceptualisaties van de kindertijd. De analyse is gebaseerd op een literatuurstudie van de internationale academische literatuur en een document analyse van Nederlandse beleidsdocumenten. De resultaten laten zien dat de Nederlandse overheid heeft besloten om interlandelijke adoptieprocedures een jaar na de initiële pauze te hervatten met het oog op de veronderstelde noodzaak om kwetsbare kinderen een kans te bieden op een betere toekomst en een kans om op te groeien in een gezin. Bovendien zou deze beslissing adoptieouders te kans bieden om een gezin te vormen. Deze beslissing, zoals gerapporteerd in academisch onderzoek, ontkent echter lokale zorgopties in het Globale Zuiden en negeert het feit dat interlandelijke adoptie bijdraagt aan het aantal kinderen dat opgroeit in instituties. Daarnaast berust interlandelijke adoptie op hegemonische narratieven over het ‘ideale’ gezin die biologische families als ongeschikt beschouwen en de kwaliteit van het ouderschap verbinden aan etniciteit, klasse en Westerse conceptualisaties van een goede kindertijd. Dit onderzoek concludeert dat interlandelijke adoptie ethisch onverantwoord is zolang het niet mogelijk is om de kans op ernstige misstanden uit te sluiten en het onduidelijk is of biologische families informed consent hebben gegeven.

## Table of contents

1	Introduction.....	3
1.1	A humanitarian way of forming a family .....	3
1.2	Child wellbeing .....	5
1.3	Perspectives on childcare options .....	5
1.4	Children’s rights and the best interest of the child .....	6
1.5	Research questions .....	7
1.6	Reader’s guide .....	8
2	Method .....	8
2.1	Literature review .....	8
2.2	Document analysis .....	11
3	Results.....	13
3.1	Conceptualisations of childhood in international adoption.....	13
3.1.1	Humanitarian frame .....	14
3.1.2	Better life frame .....	15
3.1.3	Child wellbeing frame.....	16
3.1.4	The ideal family .....	17
3.2	Argumentation in recent debates on international adoption.....	18
3.2.1	The Hague Convention .....	18
3.2.2	Measures against malpractices.....	19
3.2.3	Recent developments .....	21
3.2.4	The best interest of the child.....	22
3.2.5	Interests of adoptive parents .....	23
3.2.6	Interests of the birth family .....	24
4	Conclusion .....	24
5	Discussion .....	26
5.1	Limitations .....	30
5.2	Recommendations .....	30
	References.....	31
	References literature study: included studies .....	34
	References document analysis: included documents .....	37
	Appendix 1 .....	40
	Appendix 2.....	41
	Appendix 3.....	47
	Appendix 4.....	51

## 1 Introduction

Recently, a research committee in the Netherlands, commissioned by the Dutch government, published a report on international adoption and the malpractices present in the appurtenant adoption procedures (Commission Joustra, 2021; Dekker, 2018). These malpractices include, for example, fraud, child trafficking, and child abduction. Despite the fact that the Dutch government and involved organisations have been aware of malpractices since the 1960s, no substantial action was taken to correct the existing procedures (Commission Joustra, 2021; Dekker, 2021). Additionally, Bangladesh, Indonesia and Sri Lanka, among other countries, have closed their borders for international adoption early on, in respectively 1981, 1983 and 1988 to protect their children against wrongful adoptions (Hoksbergen, 2012). Thereby emphasizing the need to review international adoption procedures.

As a result of the report by the Commission Joustra (2021), the Dutch government undertook to temporarily pause international adoption procedures in order to thoroughly review the current adoption system (Dekker, 2021). This decision constitutes a drastic change from the lack of substantial action against malpractices in the sixty years prior to this. In order to better understand this change, this research will focus on the perspectives and conceptualisations of childhood underlying this change in policy. First, several important concepts and debates concerning international adoption will be discussed.

### 1.1 A humanitarian way of forming a family

International adoption policies and the lack of substantial action against malpractices reflect an underlying belief that children are better off in the Global North (Commission Joustra, 2021; De Graeve & Bex, 2016). The Commission Joustra (2021) states that international adoption is seen as ‘doing the right thing’ and as a benevolent way of ‘saving’ children in need who are otherwise assumed to grow up in institutional care. In this way, international adoption is portrayed as a humanitarian and compassionate way of forming a family.

This humanitarian frame has been highly influential in shaping Western European conceptualisations of children in the Global South as innocent, vulnerable, and in need of protection (Ansell, 2005). The economic and political dominance of the Global North has led to the universalisation of the norms, values, and practices of these countries and the dismissal of the norms, values, and practices of the Global South (Twum-Danso Imoh et al., 2019). When we see childhood as a natural state, rather than a social construct, we tend to universalise the conceptualisations of childhood from the Global North (Ansell, 2005). This means that

conceptualisations from the Global North of a ‘good childhood’ are applied to the Global South, without a critical assessment of the varying understandings and conceptualisations in different contexts (Ansell, 2005; Tronto, 1993; Twum-Danso Imoh et al., 2019). However, childhood is particular to its social, cultural and historical context (Burr, 2002). The lack of a critical assessment of what is fitting within a particular context will then likely result in policies that are unresponsive to the lives and concerns of people in the Global South and that are unable to bring about positive change for the lives of the children involved (James & Prout, 1997; Tronto, 1993; Twum-Danso Imoh et al., 2019). Despite the good intentions behind these policies, they might increase the social and economic disadvantage of these children and isolate them from their families and communities (James & Prout, 1997).

This pattern of universalizing conceptualisations of the Global North is reflected in the terminology that has been utilized in the Global North to refer to the Global South, especially concerning the perceived development of different countries. The terms ‘developing’ and ‘developed’ countries are problematic as it establishes a hierarchy among countries based on an imperialistic history that portrays the notion of development from the Global North as superior (Ansell, 2005; Slater, 1995; Twum-Danso Imoh et al., 2019). All countries that differ from this particular notion of development are then perceived as being in need of guidance. The notion of a good life, and a good childhood, from the ‘developed’ countries is uncritically assumed as an ideal for the ‘developing’ countries to strive for (Ansell, 2005). An example of this is the statement in the United Nations Convention on the Rights of the Child (UNCRC) that ‘developed’ countries should take particular account of the needs of ‘developing’ countries regarding health care, ‘modern’ education, and the improvement of living conditions for children (United Nations, 1989). Statements like these are carried by the assumption that the necessary help for children in the Global South cannot be provided by their birth country, but needs to come from countries in the Global North who are assumed to be better equipped to offer adequate care (Ansell, 2005; Burr, 2002). This assumption infantilizes families and communities in the Global South and further casts the Global South in the role of recipient of help, whilst emphasizing the benevolent role of the Global North (Ansell, 2005).

The humanitarian relationship is defined by the unequal dynamic of those who need and those who provide care (Fassin & Gomme, 2012; Tronto, 1993). This unequal dynamic stems from deep-rooted patterns of inequality in power, wealth, and cultural influence that are historically based in imperialism and the imperialistic notion of ‘developing’ countries in need of education and guidance by the ‘developed’ countries of the Global North (Connel, 2007; Wekker, 2016). This power imbalance has shaped international adoption procedures (Briggs &

Marre, 2009; Leinaweaver & Seligmann, 2009). This is reflected in the fact that children are adopted from the Global South to the Global North, or in other words from ‘developing’ to ‘developed’ countries, and never the other way around (Briggs & Marre, 2009; Hoksbergen, 2012; Leinaweaver, 2007).

## **1.2 Child wellbeing**

Nonetheless, when considering wellbeing one could argue that, when comparing adopted children in the Netherlands to children who grow up in institutional care in their countries of origin, the wellbeing and the physical, cognitive, and emotional development of adopted children improve considerably (Juffer & Van IJzendoorn, 2008). However, this improvement for adopted children only holds when compared to children growing up in institutional care (Hoksbergen, 2012). In comparison with non-adopted children, serious concerns remain for the wellbeing of the adopted child. Especially when taking into consideration the disproportional amount of adoptive parents and adoptees who seek professional help (Lindblad et al., 2003). Compared to non-adopted children, adopted children more often experience externalizing problems, like hyperactivity and behavioural problems, and internalizing problems, like for example, depression, somatization, and withdrawal (Barcons et al., 2014). Additionally, adopted children in the Netherlands are admitted to residential care four to five times more often than non-adopted children (Hoksbergen, 2012). Of this group, 25 percent does not return to their adoptive family. These problems are often perceived as individual problems of the adopted child, rather than problems connected to the adoption (De Graeve, 2015).

Another obstacle many adopted children face is difficulty with positive identity development, particularly in relation to their ethnic identity (Stoddart, 2021). Knowledge about one’s origins and ethnic identity are crucial for healthy identity development (Cantwell, 2014; De Graeve & Bex, 2016). This is especially important in transracial adoptions, where the adopted child has a different ethnicity than their adoptive family (Cantwell, 2014; Stoddart, 2021). Furthermore, a perception in adoptive countries of whiteness as the norm and non-whiteness as foreign can further complicate healthy identity development, sense of belonging, and the assimilation of the adopted child (Hübinette & Tigervall, 2009).

## **1.3 Perspectives on childcare options**

It is often assumed that children would grow up in institutional care if they are not adopted by Dutch families (Commission Joustra, 2021). This assumption is not always correct, since

institutional care is not the primary alternative to parental care in many societies in the Global South (Ansell, 2005; James & Prout, 1997). These societies believe children to be the responsibility of the extended family and the community as a whole. An example of this is child circulation. Child circulation refers to the practice of the temporary placement of a child under the care of a family member or another member of the community (James & Prout, 1997). Child circulation and other informal childcare options contrast with contemporary childcare practices of middle-class families in the Global North and are therefore often perceived to be inadequate, deleterious, and as proof of abandonment (Cardarello, 2012; Chanyalew Kassa & Abebe, 2016; Fonseca, 2002; Leinaweaver, 2007). This perception fails to acknowledge caregiving practices and understandings of family that differ from those central to countries in the Global North and the upper-class of the Global South (Meintjes & Giese, 2006).

Informal childcare options, like child circulation, form a social support system for many families living in poverty that creates opportunities for them to, for example, go to work or ensure schooling for their children (Cardarello, 2012; Chanyalew Kassa & Abebe, 2016). These families are often unable to meet the standards of the ‘universal’ conceptualisations of a good childhood, especially when these conceptualisations conflict with local norms, values, and practices (James & Prout, 1997). The insufficient consideration of the circumstances of the poor and the portrayal of informal childcare options as moral and material abandonment normalizes the removal of children from poor families, while framing it as a moral act that is beneficial for the child (James & Prout, 1997; Leinaweaver, 2007).

Moreover, there are doubts about the extent to which the birth family gave informed consent for the adoption. To satisfy the demand for adoptable children, birth families are sometimes pressured or coerced to give up their children for adoption (Van Doore, 2016). Additionally, when birth families are used to informal childcare options they might place their children in institutional care believing it is a temporary arrangement similar to the temporary care of a family member or neighbour (Fonseca, 2002). As a result, birth families might not be aware of the permanent nature of the adoption.

#### **1.4 Children’s rights and the best interest of the child**

The UNCRC states that “in all actions concerning children [...] the best interests of the child shall be a primary consideration” (United Nations, 1989, Art. 3). This means that the impact of policies on the children involved needs to be taken into account as well as what is in the best

interest of these children (Zermatten, 2010). The Hague Convention argues for “the necessity to take measures to ensure that intercountry adoptions are made in the best interests of the child and with respect for his or her fundamental rights” (Hague Conference on Private International Law, 1993, p. 1). When viewed as benevolence and ‘the right thing to do’, international adoption does indeed seem to serve the child’s best interests.

However, both Conventions also state that childcare options in the birth country of the child must be prioritized (Hague Conference on Private International Law, 1993; United Nations, 1989). Thus, international adoption is a last resort option for when a child “cannot in any suitable manner be cared for in the child’s country of origin” (United Nations, 1989, Art. 21). Additionally, the child has the right to know and be cared for by their parents, the right to not be unnecessarily separated from their parents, and the right to preserve their identity, including nationality, name, and family relations (United Nations, 1989). In case that it is not in the best interest of the child to be allowed to remain in their own family environment, possible solutions need to be weighed against “the desirability of continuity in a child’s upbringing and the child’s ethnic, religious, cultural, and linguistic background” (United Nations, 1989, Art. 20).

In reality, the interests of the child and the birth family often take a backseat to the interests of adoptive parents (Hoksbergen, 2012). Adoption organisations are under great pressure to find adoptable children for aspiring adoptive parents who are often willing to pay sizable sums to be able to adopt. As a result, these organisations tend to search for a child for a family that wishes to adopt, rather than for a family for a child in need. The combination of high pressure and sizable amounts of money has led to an adoption industry, which is ruled by the market principles of supply and demand. The danger of which is that, instead of the best interest of the child being the primary consideration, it becomes secondary to financial interest (Held, 2005; Van Doore, 2016).

## **1.5 Research questions**

In order to better understand the recent change in policy on international adoption in the Netherlands, the main question of this research will be ‘How can we understand the recent change in policies on international adoption in the Netherlands in light of differing conceptualisations of childhood in academic research on international adoption?’. To be able to answer this question, two sub-questions were formulated.



First, it is important to be aware of the conceptualisations underlying policies on international adoption, since policies tend to be based on these, often implicit, beliefs of what a good childhood entails (Ansell, 2005; Kehily, 2015). Because of this, the first sub-question is ‘How can we understand differing conceptualisations of childhood in academic research on international adoption?’. A literature study will be conducted to get a better understanding of the different conceptualisations of childhood present in academic literature on international adoption.

Second, if we wish to understand the recent shift in international adoption policies in the Netherlands, it is necessary to look at the debates on international adoption and the continuity and changes in these debates. Therefore, the second sub-question will be: ‘How can we understand the differing argumentation in recent debates on international adoption in the Netherlands?’ The answer to this second sub-question will be formulated using a document analysis on Dutch policy documents concerning international adoption.

## **1.6 Reader’s guide**

First, the method of this research will be described. The method consists out of two parts: a literature study to help answer the first sub-question and a document analysis to help answer the second sub-question. Next, the findings to the literature study and document analysis will be presented in the results section. Finally, the main findings of this research will be presented in a conclusion and discussion.

## **2 Method**

This research has a qualitative research design. Qualitative research allows for the study of differing perspectives and their subjective and social meaning (Flick, 2009). This is useful given the strong influence of the social, cultural, and historical context and the interests of those involved on international adoption.

### **2.1 Literature review**

In order to answer the first sub-question ‘How can we understand differing conceptualisations of childhood in academic research on international adoption?’, a systematic literature study has been conducted on the international academic literature on international adoption. A systematic literature study is a research method that aims to identify all relevant research studies for a specific research question in a thorough way (Petticrew & Roberts, 2008). The aim of the

literature study was to better understand the underlying conceptualisations of childhood present in current academic knowledge and debates on international adoption.

**Data collection.** In order to be able to identify relevant research studies, four categories of search terms were created: childhood, conceptualisations, policy, and international adoption. For the category childhood, different synonyms for the word child were used. Second, for the category conceptualisations of childhood, variations of the terms conceptualisations, assumptions, and perspectives were used. Third, for the category policy, terms like protocol, guideline, and practice have been included in the search terms. Lastly, different synonyms of the term ‘international adoption’ were used. The combination of these more general search terms generated the most relevant studies for this particular research. The databases Smartcat, ERIC, PsycINFO and Web of Science were used. An overview of the search terms and categories is presented in Table 1.

**Table 1**

*Search Strategy*

<b>Category</b>	<b>Search terms</b>
Childhood	child* OR childhood OR youth OR infant* OR kid* OR minor* AND
Conceptualisations	view* OR perspective* OR representation* OR construct* OR interpretation* OR belief* OR assumption* OR attitude* OR concept* OR conceptualisation AND
Policy	policy OR reform* OR organization OR organisation OR program* OR action* OR guideline* OR method* OR practice* OR protocol OR policymaker* OR approach* AND
International adoption	“international adoption” OR “intercountry adoption” OR “transnational adoption” OR “intercontinental adoption”

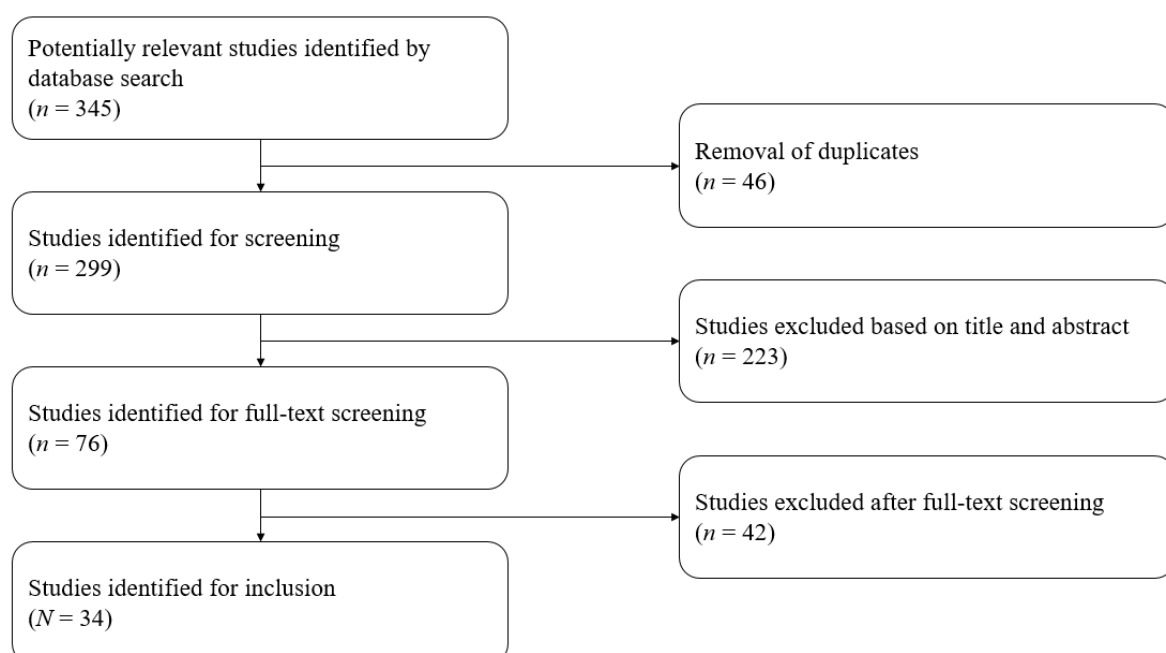
The quality of the found studies has been assessed using the quality indicators defined by the Committee quality indicators in the social sciences (2013). Other inclusion criteria were that studies needed to be peer-reviewed, published in an academic journal, written in English or Dutch, the topic was international adoption, and there needed to be an identifiable influence on policies on international adoption. Conceptualisations of childhood need not be explicitly

mentioned as these conceptualisations often consist of implicit beliefs and perspectives that can be identified from the used argumentation. Because this research focuses on policies on international adoption in the Netherlands, a time frame has been chosen that is relevant to Dutch policy developments. International adoptions that have taken place since the first adoption law of 1956 are comparable to current adoptions (Hoksbergen, 2012). Therefore, the literature study has included studies that focused on international adoptions from the 1960s onwards. Furthermore, the literature study focused on adoptions toward Western Europe. The policies of the United States and Australia are difficult to compare with Dutch policies due to the different social and historical context as well as the fact that the United States is both a sending and receiving country (Avitan, 2007). However, American or Australian studies that focused on global dynamics or the Global South have been considered for inclusion.

**Data selection.** By using beforementioned search terms in the different databases, a total of 345 possible relevant studies were found. 46 of these studies were duplicates. In all steps of the data selection, inclusion and exclusion criteria have been observed and the possibility for answering the research questions has been assessed. The screening based on titles and abstracts resulted in 76 possibly relevant studies. Next, the remaining studies have been screened based on full text analysis. This resulted in the inclusion of 34 studies. The data selection process is depicted in Figure 1. An overview of all included studies can be found in Appendix 2.

## Figure 1

### *Flow Chart of the Data Selection Process*



**Data analysis.** The included studies have been analysed through coding. The coding process created different categories for the analysis of data (Flick, 2018). This process made it easier to analyse and identify patterns in the data. The codes are: (historical) background and general information, debates on international adoption, conceptualisations of childhood, conceptual frame, and ethical frame. By structuring the coding in this way, the most important themes have been highlighted. The codes have been presented in a codebook. This codebook was added onto with relevant inductive codes when new information could not be placed under one of the deductive codes. The codebook is presented in Appendix 1.

The conceptualisations of childhood present in the international literature will be identified through a frame analysis. A frame refers to an “organising principle that is socially shared and persistent over time, that works symbolically to meaningfully structure the social world” (Reese, 2007, p. 150). Frame analysis allows for the analysis of underlying systems of knowledge and beliefs (Lowe, 2020). This method made it possible to study a concept through differing interpretations, without uncritically assuming dominant viewpoints (Reese, 2007).

## 2.2 Document analysis

In order to answer the second sub-question ‘How can we understand the differing argumentation in recent debates on international adoption in the Netherlands?’, a document analysis has been conducted. A document analysis is useful for the systematic qualitative analysis of different conceptualisations and perspectives (Olsen, 2012; Rapley, 2007). Documents reflect social meaning and can thus increase our understanding of social realities (Flick, 2009, 2014). A document analysis is, therefore, useful to better understand the argumentation in debates on international adoption.

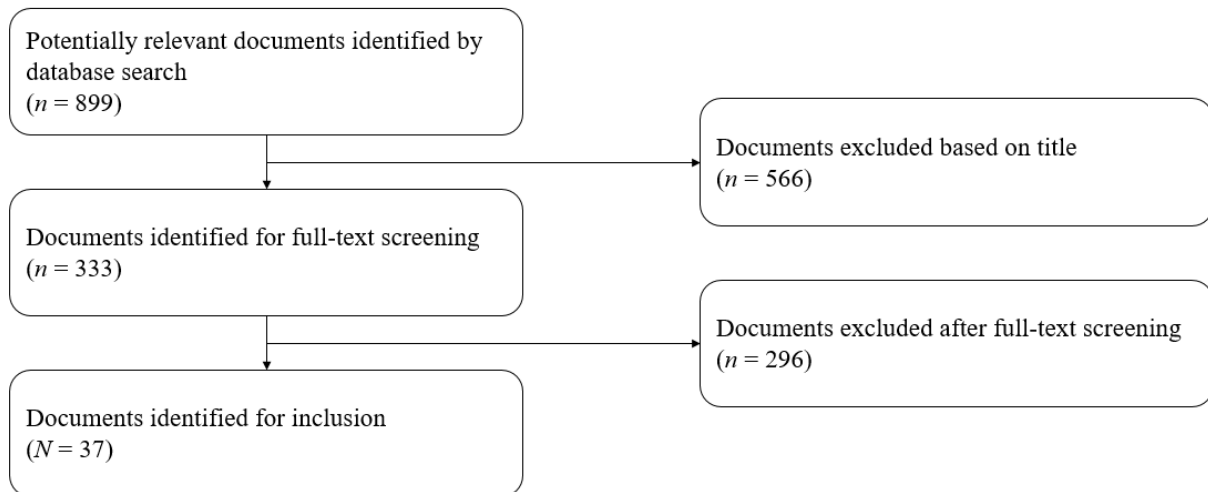
**Data collection.** Policy documents from the Dutch government have been included through the websites [tweedekamer.nl](https://www.tweedekamer.nl) and [officielebekendmakingen.nl](https://www.officielebekendmakingen.nl). As the mentioned websites are Dutch, Dutch search terms have been used. Additionally, the websites did not allow for the use of extensive search terms. Hence, different key terms were alternately used to identify the relevant documents. An overview of the search terms is presented in Table 2. In order to uphold continuity, the English translation of the terms has been added.

**Table 2***Search Strategy*

<b>Category</b>	<b>Dutch key terms used</b>	<b>English translation of key terms</b>
International adoption	Buitenlandse adoptie Intercontinentale adoptie Interlandelijke adoptie Internationale adoptie Transnationale adoptie	Foreign adoption Intercontinental adoption Intercountry adoption International adoption Transnational adoption

According to Scott (1990), there are four quality criteria that need to be considered when assessing the quality and relevancy of a document: authenticity, credibility, meaning, and representativeness. First, authenticity refers to the necessity of documents to originate from a reliable source. In this case the Dutch government. Second, credibility refers to the validity of the content of the documents. Third, meaning refers to the need for the documents to be clear, comprehensive, and relevant for the research questions. Finally, representativeness refers to the extent to which the selected sample is representative for a larger body of documents. Other inclusion criteria were that documents needed to be written in Dutch or English, the topic was international adoption, and documents were dated from 1998 onward. The beforementioned report by the Commission Joustra (2021) studied international adoption procedures till 1998. This research picks up from there. Documents that focused primarily on the preparation of adoptive parents and the matching of adoptive parents and adoptable children have been excluded.

**Data selection.** The beforementioned search terms produced a total of 899 possible relevant policy documents. In all steps of the data selection, policy documents have been screened based on the inclusion and exclusion criteria as well as the possibility for answering the research question. The screening based on title resulted in 333 remaining policy documents. Next, full text analysis led to the inclusion of 37 policy documents. The data selection process is depicted in Figure 2. An overview of all included policy documents can be found in Appendix 3.

**Figure 2***Flow Chart of the Data Selection Process*

**Data analysis.** This research followed the steps for document analysis as identified by Rapley (2007). As a result, the documents have been coded using the Constant Comparison Method. This means that a comprehensive and systematic coding scheme was developed which focused on continuity and variation in the data. The codebook that has been used for the literature study has also been used for the document analysis (see Appendix 1). This allows for a clearer analysis of patterns, similarities, and differences between the academic literature and Dutch policy documents (Flick, 2014). The codebook was added onto with inductive codes when necessary.

The findings for the literature study and the document analysis will be discussed separately. The conclusion and discussion compare the findings from the literature study and document analysis to get a better understanding of the underlying perspectives that have influenced Dutch policies on international adoption.

### 3 Results

#### 3.1 Conceptualisations of childhood in international adoption

In section 3.1 the results of the literature study will be discussed as well as the different frames that could be identified from the included studies. Section 3.2 discusses the results of the document analysis.

Based on the included studies four frames could be identified: the humanitarian frame, better life frame, child wellbeing frame, and ideal family frame. It is important to note that these frames are not clear-cut and might overlap each other.

### 3.1.1 *Humanitarian frame*

A first important frame in the academic literature on international adoption is the humanitarian frame. The humanitarian frame comprises the portrayal of international adoption as a humanitarian and benevolent practice that ‘saves’ vulnerable children in need and as the best chance for these children to grow up in a family (Agoglia & Monsalve, 2019; Ali, 2014; Breuning, 2013a; Candaele, 2020; Cardarello, 2009; Cheney, 2014; Dowling & Brown, 2009; Fonseca, 2006; Fronek, 2006; Kim, 2012; Koo, 2021; Leinaweaver, 2009; Ma, 2017; Salvo Agoglia & Marre, 2020). The practice can be seen as a humanitarian response for children growing up in dire circumstances, poverty, conflict, famine, natural disasters or war (Agoglia & Monsalve, 2019; Ali, 2014; Candaele, 2020; Dowling & Brown, 2009; Ma, 2017; Schachter, 2017). The conceptualisations of childhood inherent to the humanitarian frame are the conceptualisations of the child as vulnerable, abandoned, and in need of care and protection (Ali, 2014; Candaele, 2020; Cuthbert et al., 2010). These conceptualisations support the political, social, and moral legitimization for international adoption and frame it as ‘the right thing to do’ (Agoglia & Monsalve, 2019; Cuthbert et al., 2010).

However, if the reason for international adoption is ‘saving’ children in need, offering economic support could prove an easier way of achieving this goal. International adoption is more expensive than the help needed for birth families to keep their children (Cheney, 2014). This means that if the money currently spend on international adoption would be spend on local childcare options, a larger number of children could be provided with the care they need (Cheney, 2014; Dowling & Brown, 2009; Schrover, 2021).

Moreover, the portrayal of international adoption as a charitable and humanitarian act masks the unequal dynamics that enable this practice (Ali, 2014; Cheney, 2014; Fronek & Cuthbert, 2012). Despite the fact that international adoption can be of help to some children, the fact remains that the practice rests on the social, political, and economic dominance of the Global North, which benefits adoptive families as it allows them to adopt (Fonseca, 2006; Fronek, 2006; Hollingsworth, 2003). Conceptualisations of the child as vulnerable and abandoned add to the conditions under which international adoption could be justified, while focusing on generalizing stereotypes of ‘developing’ countries, rather than on the root causes of, for example, famine, poverty or social norms opposing unwed motherhood (Breuning, 2013b; Candaele, 2020; Cheney, 2014; Hollingsworth, 2003; Leifsen, 2008; Kim, 2015; Kim et al., 2015; Poveda et al., 2013).

This inequality is also reflected in the fact that international adoption moves children from poorer countries in the Global South towards wealthy countries in the Global North, while

the norms, values, and practices of the Global North regulate the practice (Ali, 2014; Breuning, 2013a, 2013b; Cheney, 2014; Poveda et al., 2013; Schachter, 2017; Schrover, 2021). As a result, global social, economic, and political inequalities are increased (Dowling & Brown, 2009; Poveda et al., 2013; Schachter, 2017). These dynamics, in addition to infantilized portrayals of sending countries as economically and socially ‘underdeveloped’, lead some academic studies to refer to international adoption as a neo-imperialistic practice with roots in ethnocentric and colonial policies and practices (Ali, 2014; Candaele, 2020; Dowling & Brown, 2009; Koo, 2021).

### ***3.1.2 Better life frame***

A second important frame is the better life frame. Within this frame international adoption is seen as a form of social mobility for the adopted child that provides them with the chance at a better life (Cardarello, 2009; Cheney, 2014; Kim, 2012; Van Wichelen, 2015). The assumption being that sending countries are unable to provide suitable care for vulnerable children in terms of both material resources and a loving family environment (Cheney, 2014). Instead, these countries are believed to be in need of intervention from countries in the Global North (Cheney, 2014; Van Wichelen, 2015). Consequently, international adoption gets priority over the preservation of the birth family.

This frame is also present in the discourse on international adoption in sending countries as reflected in portrayals of the practice as a solution for institutionalisation, poverty, and poverty-related societal problems, like criminality (Cardarello, 2009; Hollingsworth, 2003). The richer countries in the Global North are then perceived to be able to provide greater opportunities, wealth, education, and health care (Cardarello, 2009; Dowling & Brown, 2009; Koo, 2021; Leinaweaver, 2009). Some members of the Brazilian elite and legal system have expressed the opinion that these advantages are more important than the occurrence of illegal adoptions (Cardarello, 2009).

Another argument within the better life frame concerns the presumption that institutional care is the only alternative childcare option (Fronek & Cuthbert, 2012). However, institutional care is meant as a last resort option and a temporary measure when no other appropriate local childcare options are available (Roby & Shaw, 2006). In countries in Sub-Saharan Africa, for example, most orphaned children are taken care of by their extended family (Breuning & Ishiyama, 2009; Roby & Shaw, 2006). In these countries many poor families rely



on informal childcare options, like child circulation, that allow the responsibilities of childcare to be shared among family members and the community (Roby & Shaw, 2006).

The extent to which these local childcare options are recognized has implications for the meaning of adoptability and consent to adoption (Cheney, 2014). The plenary and permanent nature of international adoptions conflict with longstanding traditions of informal childcare (Roby & Shaw, 2006; Schachter, 2017). Due to the familiarity with informal childcare options, birth families might not be aware of the consequences of giving up their children for adoption (Breuning, 2013a). Without a proper understanding of the consequences, informed consent from the birth family cannot be obtained (Breuning, 2013a; Candaele, 2020; Cheney, 2014; Schachter, 2017).

### ***3.1.3 Child wellbeing frame***

A third frame in the academic literature is the child wellbeing frame. The child wellbeing frame consists of two different lines of argument. The first line of argument concerns the wellbeing of the individual child. It is argued that growing up in institutional care can have harmful effects on the development of the child (Chou & Browne, 2016). These harmful effects might, as recorded in Romania and Lithuania, include physical underdevelopment, delays in motor skill development, health problems, physical and learning disabilities, attachment problems, and a damaging psychological effect on child development and wellbeing (Chou & Browne, 2016; Iusmen, 2013). International adoption is then perceived as a solution that can prevent these harmful effects by providing the child with a loving and caring home (Chou & Browne, 2016; Dowling & Brown, 2009). This argument rests on the assumption that international adoption results in a decreased number of children in institutional care. Instead, international adoption is associated with a higher number of children in institutional care (Chou & Browne, 2016). The ban on international adoption in Romania led to a decrease, rather than an increase, in the number of children growing up in institutional care.

The second line of argument concerns the connection between the wellbeing of the child and their cultural and ethnic heritage. Adopted children often do not share their racial, ethnic, and cultural background with their adoptive family, which might have a negative impact on the identity development of the adopted child and may result in low self-esteem and negative adjustment outcomes (Dowling & Brown, 2009; Yngvesson, 2013). Several academic studies have therefore emphasized the importance of cultural continuity (Fronek, 2006; Fronek & Cuthbert, 2012; Kim, 2012; Kim et al., 2015; Roby and Shaw, 2006).

Adopted children are often expected to be grateful to be removed from difficult circumstances, which results in unrealistic expectations for the ability of the adopted child to adjust to their new situation (Cheney, 2014; Roman et al., 2015). As a result, problems are attributed to the individual child and pre-adoption experiences, such as early deprivation, instead of the trauma of the adoption or social, cultural, and contextual factors of the adoptive country and family (Roman et al., 2015).

### ***3.1.4 The ideal family***

A fourth frame is the ideal family frame. The ideal family frame is based on the normative family model of the middle-class, heteronormative, and nuclear family with exclusive and permanent parent-child relationships (Ali, 2014; Poveda et al., 2013; Schachter, 2017). This norm is reflected in international conventions on children's rights and extended to the ideal for adoptive parents (Ali, 2014; Lind & Lindgren, 2017). International adoption practices continuously frame certain families as appropriate and others as unsuitable, strongly influenced by hegemonic narratives about the 'ideal' family (Kim, 2015; Kim et al., 2015; Leinaweaver, 2009, 2015; Lind & Lindgren, 2017; Roman et al., 2015; Schrover, 2021). These 'unsuitable' homes are mostly those of the poor and indigenous, thus legitimizing poor families losing their parental rights and tying the quality of parenting to ethnicity, class, and Western conceptualisations of a good childhood (Cardarello, 2009; Leinaweaver, 2009, 2015; Leinaweaver et al., 2017; Schrover, 2021). International adoption can then be concluded to be strongly influenced by global inequalities and racial hierarchies (Leinaweaver, 2015).

International adoption is justified by labelling birth families as unsuitable and emphasizing the responsibility of the receiving country to 'save' children in need (Kim, 2015; Leinaweaver, 2015; Schrover, 2021). Children in these 'unsuitable' families can be deemed abandoned (Cardarello, 2009; Cuthbert et al., 2010; Kim et al., 2015; Salvo Agoglia & Marre, 2020). "Seemingly old or outdated adoption narratives of the 'salvation' and 'redemption' of children in need by worthy and deserving adoptive parents can be rehearsed, largely unchallenged by the counter-claims of birth families whose 'abandonment' of their children disqualify them to speak or whose geographical distance renders their voices inaudible" (Cuthbert et al., 2010, p. 436).

Contrarily, when a child is removed from their birth family in the Global North, childcare alternatives tend to complement rather than replace the birth family (Fonseca, 2006). The wishes of the birth family continue to be respected through open adoption arrangements or visitation rights. Yet, the wishes and interests of the birth family in the Global South tend

not to be considered. Instead, clean-break adoptions, that sever all ties between the child and their birth family, are portrayed as the best option for the child (Cantwell, 2014; Cuthbert et al., 2010; Fonseca, 2006). These clean-break adoptions and the possibility to adopt very young children contribute to the idea of international adoption as mimicking a more ‘natural’ way of forming a family. Moreover, it strengthens the feeling of adoptive parents that the child is exclusively their own with a low chance of interference from the birth family, thereby offering a sense of security to the adoptive parents (Hollingsworth, 2003). Notwithstanding that it deprives adopted children and their birth families of a similar protection.

### **3.2 Argumentation in recent debates on international adoption**

In the next section the results from the document analysis will be presented. The frames that could be identified from the included policy documents will be discussed. Six main frames could be identified: the Hague Convention, measures against malpractices, recent developments, the best interest of the child, the interests of adoptive parents, and the interests of the birth family. An overview of the countries that have been discussed after the occurrence of malpractices is presented in Appendix 4.

The Dutch government believes international adoption to be a valuable practice that is in the best interest of the child when the practice is approached as a child protection measure for vulnerable children (Commission for Justice and Safety [CJS], 2021; House of Representatives of the Netherlands [HRNL], 2018). Nonetheless, the practice is by definition a vulnerable process with inherent risks for malpractices (CJS, 2021; HRNL, 2009a, 2009b, 2012, 2013a). These malpractices can change international adoption from a charitable practice to a serious crime (HRNL, 2009b, 2013a). It is therefore of great importance to ensure that international adoption procedures are comprehensive and meticulous (HRNL, 2009a, 2009b, 2012, 2013b, 2018; Ministry of Safety and Justice [MSJ], 2012; Teeven, 2012a). To that end, it is necessary that procedures are in accordance with the Hague Convention. This also applies for sending countries that have not ratified the Convention (Hirsch Ballin, 2006, 2008b, 2010a; HRNL, 2013a).

#### **3.2.1 *The Hague Convention***

An important principle of the Hague Convention is the subsidiarity principle. The subsidiarity principle states that international adoption can only be considered when the child cannot remain with their birth parents and there is no suitable childcare option available in the birth country

of the child (Hirsch Ballin, 2008a; HRNL, 2004, 2009a, 2012, 2013a, 2013b, 2018). Nevertheless, the Dutch government argues that international adoption should not be perceived as a last resort measure (HRNL, 2009a). A permanent placement abroad is to be preferred over a temporary placement or institutional care in the country of origin. They state that the subsidiarity principle is not respected when children are placed in institutional care whilst there are families who wish to take care of them (HRNL, 2018). A risk factor for the proper implementation of the subsidiarity principle is the discrepancy between the pressing demand for and the limited availability of adoptable children (Hirsch Ballin, 2007, 2009b; MSJ, 2012; HRNL, 2004, 2009b). This discrepancy results in a risk for malpractices and the establishment of an adoption market (HRNL, 2004, 2009b). Additionally, it leads to receiving countries pressuring sending countries to produce adoptable children (MSJ, 2012; HRNL, 2013a).

Another important principle is the principle of trust. The principle of trust refers to the need to be able to rely on other countries that have ratified the Hague Convention to act in accordance with the Convention (Hirsch Ballin, 2007; HRNL, 2008; Teeven, 2011a; Van der Steur, 2015a). Sending countries are responsible for the assessment of the adoptability of the child, adherence to the subsidiarity principle, the arrangement of meticulous adoption procedures, and thorough and accurate adoption documentation (Dekker, 2018a, 2018b; HRNL, 2009b; Teeven, 2011a, 2013). The principle of trust makes international adoption more cost- and time-effective (Hirsch Ballin, 2007). Be that as it may, the principle is at odds with the responsibility of adoption organisations to monitor adoption procedures and assess the reliability of partner organisations in sending countries (Hirsch Ballin, 2009b; Teeven, 2012b). The limited possibilities to monitor adoption procedures in sending countries contributes to the risk for malpractices (Hirsch Ballin, 2007; HRNL, 2008, 2012). The Dutch government states that it is not possible to guarantee that malpractices do not occur and sending countries have followed all necessary procedures (CJS, 2021; HRNL, 2001, 2008, 2009a, 2009b; Van der Steur, 2015b).

### ***3.2.2 Measures against malpractices***

Over the years, multiple measures have been taken to reduce the risk for malpractices. These measures include increased monitoring, the implementation of more stringent procedures and quality requirements, the promotion of comprehensive and meticulous procedures, intensified international relations, and adequate action against malpractices (CJS, 2021; Dekker, 2021c; Hirsch Ballin, 2007, 2009a; HRNL, 2001, 2008, 2009b, 2018). Nevertheless, children continue

to be removed from their families and taken abroad without necessity, without following the correct procedures, and without proper assessment of what is in the best interest of the child (MSJ, 2012; HRNL, 2012). Moreover, there are serious concerns about insufficient monitoring of procedures, adoptability, and the process of relinquishment in sending countries (HRNL, 2012, 2013a). This raises the question whether it is responsible to continue to adopt from poor countries that have weak legal systems and are vulnerable to financial incentives (HRNL, 2009b).

Despite these serious concerns and the statement that the Dutch government does not wish to be responsible for the continuance of malpractices, indications of malpractices are often not thoroughly investigated (HRNL, 2001). The need to rely on the principle of trust is emphasized as further investigation could have negative consequences for relations with sending countries (CJS, 2021; Hirsch Ballin, 2009b; HRNL, 2009b). Furthermore, it is argued that further investigation is not necessary, nor in the interests of the child and the adoptive parents, since it could disrupt the established family life (Teeven, 2012c, 2013; HRNL, 2009b, 2013a). When further investigation does take place, it is often through a request for clarification or the reassessment of adoption documentation (Dekker, 2020; Hirsch Ballin, 2010b; Teeven, 2013; Van der Steur, 2015a). These methods are questionable given that there are doubts about the effectiveness of asking foreign authorities for clarification and given the concerns about the possible lack of complete and correct documents in addition to the frequent discovery of fraudulent documentation (Dekker, 2021a; HRNL, 2001, 2009a, 2009b; Teeven, 2012a). The lack of thorough investigations on (indications of) malpractices and the acceptance of risks stands in stark contrast to the statement that every illegal adoption is one too many (CJS, 2021; HRNL, 2009a, 2012).

When a country cannot be urged to take action against malpractices and the Dutch government cannot vouch for the reliability of adoptions, this may result in an adoption ban for that country (Teeven, 2011a, 2011b; HRNL, 2009b). Despite the inability to guarantee safe procedures and the absence of illegal practices, the Dutch government deems a ban on international adoption a disproportionate measure as the practice is presumed to be too valuable for children in need (Hirsch Ballin, 2007; HRNL, 2008, 2009a, 2009b, 2012, 2018). An adoption ban would deprive these children of the chance to grow up in a family and adoptive parents of the possibility to form a family. Besides, an adoption ban is argued to benefit other receiving countries and to not offer enough incentive for sending countries to improve their adoption procedures (HRNL, 2001, 2009b). Moreover, an adoption ban might result in people pushing the boundaries of what is legally allowed and might even cause them to illegally take

children from abroad (Hirsch Ballin, 2007; HRNL, 2008, 2013a). Therefore, international adoption is continued, even though things occur that are not in the best interest of the child (Hirsch Ballin, 2007; HRNL, 2009b).

### **3.2.3 *Recent developments***

In recent years a steady decline can be observed in the number of adoptions (HRNL, 2013b; Teeven, 2012b). A possible explanation for this decline is the increased number of older children with special needs (HRNL, 2012, 2018; Teeven, 2012b). Alongside this trend, a new argument is brought forward. The argument that upcoming economies, like Bulgaria and China, should be able to take care of their own children with special needs and not ship them off abroad (HRNL, 2018). Especially since there seem to be childcare options for healthy children in these countries. It is argued that international adoption can be no excuse to not arrange suitable local childcare options.

At the same time, doubts arise about whether the current adoption system is in the best interest of the child (Dekker, 2018a; HRNL, 2018). An investigation on international adoption procedures pointed to the insufficient investigation of malpractices, monitoring of adoption procedures, and law and legislation (CJS, 2021). The Dutch government has sometimes actively contributed to malpractices and has requested for this involvement to be disregarded in case of a criminal investigation (Dekker, 2018a, 2018b; CJS, 2021). These findings coupled with the previously existing doubts led to the temporary ban on international adoption in the Netherlands (Dekker, 2021b). Some members of the Dutch government are unconvinced that the adoption system is corrupted to such an extent that necessitates an immediate pause (CJS, 2021).

In the spring of 2022, the decision is made to continue international adoption for children for who there are no suitable childcare options available in their birth country (Weerwind, 2022a). The reasoning is that international adoption provides children in need with a family and these children cannot be deprived of this chance. The resumption of international adoption procedures is accompanied by additional quality measurements such as more stringent requirements, further monitoring of adoption procedures, intensified international collaboration, the establishment of a single adoption organisation, and periodical assessments whether countries are able to provide suitable care themselves (Weerwind, 2022a). The goal is that sending countries will be able to provide local childcare options in the future. As every child has the right to know and be raised by their birth parents in their birth country (CJS, 2021;

Hirsch Ballin, 2010a; HRNL, 2004, 2009a, 2012; Weerwind, 2022b). The number of sending countries will be limited to those who can meet these more stringent requirements (CJS, 2021; Weerwind, 2022b). Malpractices can only be prevented in countries that have a governmental and legal system that have integrated safety measures and conform with Dutch standards (CJS, 2021). This might result in adoptions from countries who are capable of providing suitable local childcare options and, additionally, children who need protection the most might no longer be eligible for adoption (CJS, 2021; Dekker, 2021c; Weerwind, 2022b). Moreover, the additional quality measurements do not eliminate the risk for malpractices, which leaves the question whether this risk is acceptable (CJS, 2021; Dekker, 2021c; MSJ, 2012; Weerwind, 2022a).

#### ***3.2.4 The best interest of the child***

The Dutch government states that the best interest of the child needs to be central (CJS, 2021; HRNL, 2004, 2009b, 2012, 2013a, 2013b, 2018; MSJ, 2012; Teeven, 2012a; Weerwind, 2022a, 2022b). This is especially important in light of the vulnerability of children who cannot be raised by their birth parents in their birth country (Hirsch Ballin, 2007; HRNL, 2009, 2009a, 2011, 2012, 2013b). These children deserve a chance to grow up in a loving family (CJS, 2021; HRNL, 2001, 2004, 2008, 2009a, 2018). International adoption can be a beautiful thing for both adoptive parents and the adopted child (HRNL, 2012, 2018).

The Dutch government assumes that children are better off in the Netherlands (Commission Joustra, 2021). This is reflected in the statement that international adoption provides children with a better future than they could have had, and allows them to grow up happier than they would have been, in their birth country (CJS, 2021; Hirsch Ballin, 2007; HRNL, 2008, 2009a, 2011, 2012, 2013b, 2018; Weerwind, 2022b). International adoption is portrayed as a possible lifesaving solution for children in hopeless situations that, at the same time, fulfils the wish of adoptive parents to become a family (CJS, 2021; HRNL, 2009b, 2011, 2012, 2013b). Strict measures and a ban on international adoption would deprive children and adoptive parents of this chance (CJS, 2021; Hirsch Ballin, 2007; HRNL, 2009a, 2013a). Moreover, the government believes a ban would leave children in inadequate institutions without prospects and the trust, opportunities, love, and warmth that a family could provide (CJS, 2021). According to the Dutch government, preventing malpractices ought not to be achieved by stopping to protect children.

These statements are at odds with the increased risk on behavioural and other problems and the higher percentage of adoptees who are in need of professional help in comparison to their non-adopted peers (HRNL, 1999). Furthermore, the Dutch government seems to focus on how adoptive parents could provide children with a better future, whilst the focus should be on the possible occurrence of malpractices and the insecurity about whether birth parents have given informed consent for the adoption (CJS, 2021).

### ***3.2.5 Interests of adoptive parents***

As mentioned above, the Dutch government argues that international adoption provides children with a better future and fulfils the wish of adoptive parents to become a family (Hirsch Ballin, 2007; HRNL, 2008, 2009a, 2009b, 2011, 2012, 2013b). An adoption ban would deprive both children and adoptive parents of the chance to a family (CJS, 2021; Hirsch Ballin, 2007; HRNL, 2009a, 2013a). This combination of the interests of children and adoptive parents is common in the included policy documents.

This combination of interests, in addition to the statement that the government needs to actively support the legitimate wishes of aspiring adoptive parents, stand in stark contrast to the statement that the assessment of the appropriateness of international adoption should be focused on the best interest of the child and not on the interests of adoptive parents (HRNL, 2009a, 2009b, 2012). In reality, the possibility of a ban on international adoption is often discussed in terms of the negative impact on adoptive parents (CJS, 2021; HRNL, 2001; Teeven, 2012c). This measure is claimed to do an injustice to the wish of adoptive parents to ‘provide children in distressing situations with a future’ (HRNL, 2012). Members of the Dutch government state that the recent pause on international adoption has hurt adoptive parents, who were convinced they were doing the right thing (CJS, 2021). The temporary adoption ban has made adoptive parents and adoption organisations feel that they have been placed on the wrong side of history.

The focus of the Dutch government on the interests of adoptive parents is also reflected in the statement that adoptive parents deserve praise, appreciation, gratefulness, and respect for their investment in time, money, and emotional resilience as well as the loving way they offer a safe place and a good future for children from different places and circumstances (HRNL, 2008, 2009b, 2011, 2012, 2018). Adoptive parents want to make a difference in the life of a vulnerable child and act with good intentions and noble motives (CJS, 2021; Commission Joustra, 2021; HRNL, 2011, 2018). Despite these good intentions, international adoption has



not always had good consequences for the adopted child, and especially not for birth parents (CJS, 2021). However understandable the wish for a family can be, the starting point needs to be that a family is found for a child in need, and not the other way around (HRNL, 2009a, 2009b).

### ***3.2.6 Interests of the birth family***

Contrarily to the interests of adoptive parents, the interests of the birth parents are rarely mentioned. One of the few times the interests of birth parents were discussed, is after the ban on adoptions from Uganda due to recurrent malpractices. The Dutch government stated that this ban was in the interests of children and birth parents and deemed the hurt of the involved birth parents unimaginable (CJS, 2021; HRNL, 2013a). It was not deemed in the interests of the child and adoptive parents to reverse the adoptions, but birth parents would be informed about the wellbeing of the children they gave up for adoption (HRNL, 2009b, 2013a; Teeven, 2012c, 2013).

The emphasis on ‘the children they gave up for adoption’ implies a voluntary relinquishment of the child. However, there are doubts about the extent to which adoptions have occurred with the informed consent of the birth parents (HRNL, 2008, 2018). Birth parents are often insufficiently informed about the consequences of adoption and possible childcare alternatives (Hirsch Ballin, 2010a; HRNL, 2008, 2013a; Teeven, 2012c). They are often unaware of the fact that the adoption means the complete and permanent severing of all ties with their child. It is important to ensure that birth parents have relinquished their children with informed consent and without being pressured or coerced (Hirsch Ballin, 2010a; HRNL, 2013a).

## **4 Conclusion**

The main question of this research was ‘How can we understand the recent change in policies on international adoption in the Netherlands in light of differing conceptualisations of childhood in academic research on international adoption?’ In order to answer the main question, two sub-questions were formulated: ‘How can we understand differing conceptualisations of childhood in academic research on international adoption?’ and ‘How can we understand the differing argumentation in recent debates on international adoption in the Netherlands?’

In response to the documentation of serious and recurrent malpractices, the Dutch government decided to temporarily pause international adoption procedures. A year later, the procedures are resumed with regard to the presumed need to provide vulnerable children with a chance to grow up in a loving family. The Dutch government depicts international adoption as a chance for children at a better future when they cannot grow up with their birth parents in their birth country. A ban on international adoption would deprive these children of that chance and would deprive aspiring adoptive parents of the chance to form a family. Consequently, the Dutch government does not deem it justifiable to ban international adoption. This reasoning comprises the same arguments that have previously been used to argue for the continuance of international adoption. The recent pause does therefore not constitute a lasting change in Dutch policies on international adoption, nor its underlying conceptualisations of childhood.

The Dutch government claims to reduce the risk for malpractices by promoting comprehensive and meticulous procedures, implementing more stringent quality requirements, limiting the number of sending countries, intensifying international collaboration, establishing one single adoption organisation, and upholding the best interest of the child. However, the acceptance of the risk for serious malpractices and the lack of thorough investigations lead one to wonder whether the best interest of the child is indeed central. Instead, international adoption seems to be driven by the interests of (aspiring) adoptive parents. This is reflected in the fact that adoption organisations search for adoptable children for aspiring adoptive parents, rather than for a family for a child in need. It is assumed that international adoption is a solution for vulnerable children growing up in institutional care. Academic research points out that this assumption does not only fail to acknowledge local childcare options in the Global South, it ignores the fact that international adoption contributes significantly to the number of children in institutional care and tends to undermine local childcare options.

Another important argument in the academic literature is that international adoption rests on unequal dynamics and hegemonic narratives that benefit adoptive families in the Global North as it allows them to adopt. This power imbalance is especially visible in infantilized portrayals of sending countries as economically and socially ‘underdeveloped’ and the justification of international adoption by labelling birth families as unsuitable. These ‘unsuitable’ homes are mostly those of the poor and indigenous, thus legitimizing poor families losing their parental rights and tying the quality of parenting to ethnicity, class, and Western conceptualisations of a good childhood. In line with this argumentation is the assumption of the Dutch government that the Netherlands is better equipped than countries in the Global

South to ensure a suitable family environment for children in need and the emphasis on their responsibility to help these children.

The focus of the Dutch government on international adoption as a chance for vulnerable children at a better future and a chance to grow up in a family is misdirected. There is no doubt that adoptive parents act with the best intentions and have a lot of love to offer. However, international adoption allows for children to be illegally taken from their birth families through a commercialized and corrupted system that does not always have the best interest of the child at heart. As long as it is not possible to exclude the risk for serious malpractices and there are doubts about whether birth families gave informed consent, international adoption is not ethically responsible. A ban on international adoption might deprive aspiring adoptive parents of the possibility to form a family, its continuance could deprive birth families of the chance to remain a family.

## 5 Discussion

The beforementioned report by the Commission Joustra (2021) is not the first report to call into question whether international adoption is in the best interest of the child. A few years earlier, a different report concluded that while the practice can offer an individual child the chance to grow up in a family, the separation of the child from their birth country, language, culture, and the complete severing of all ties with their birth family is a drastic measure with far-reaching consequences (Cantwell, 2014; Counsel for Criminal law enforcement and Child protection [CCC], 2016; HRNL, 2011; Westra, 2017). The CCC (2016) states that the focus of the Dutch government on providing adequate care in the Netherlands neglects both local childcare options and the importance of continuity in the upbringing and stability in life circumstance of the child. Additionally, this focus tends to disregard malpractices and the fact that international adoption procedures undermine local childcare options.

After a year-long pause, the Dutch government decided to resume international adoption procedures (Weerwind, 2022a). Notwithstanding the conclusion of both reports that the risk for malpractices is too great in every imaginable adoption system and the statement of the Dutch government that no risks ought to be taken when it comes to removing children from their parents (CCC, 2016; CJS, 2021; Commission Joustra, 2021). The government emphasizes the harmful effects of institutional care and claims that the Netherlands can offer these children a better future (Weerwind, 2022a). It is argued that international adoption should be maintained for children who cannot be provided with suitable care in their birth country and who are thus

believed to benefit from adoption (HRNL, 2018; Weerwind, 2022a, 2022b). However, the limited possibilities to monitor adoption procedures in sending countries make it impossible to determine which children would benefit from international adoption (Westra, 2017). Nor is it possible to ensure the adoption is in the best interest of the child as there are serious concerns about the insufficient monitoring of procedures, adoptability, the process of relinquishment, and the occurrence of malpractices (CJS, 2021; HRNL, 2012, 2013a, 2018; Inspection Childcare, 2007; MSJ, 2012).

There are several differences between the argumentation of the Dutch government and the academic literature. First, the assumption of the Dutch government that children would grow up in institutional care if they are not adopted by Dutch families neglects local childcare options (Roby & Shaw, 2006). The number of domestic adoptions in sending countries has increased in recent years due to policies that promote the practice (United Nations, 2009). Furthermore, academic research shows that many families in the Global South make use of informal childcare practices to ensure the wellbeing of their children (Ansell, 2005; Cardarello, 2012; Chanyalew Kassa & Abebe, 2016; Fonseca, 2006; James & Prout, 1997). These local childcare options contrast with contemporary childcare practices of middle-class families in the Global North and are therefore often perceived as inadequate, deleterious, and as proof of abandonment (Cardarello, 2012; Chanyalew Kassa & Abebe, 2016; Fonseca, 2002; Leinaweaver, 2007). Even though local childcare options do not cause a breach in language, culture or religion and might even allow the child to remain with their birth family. The ignorance of the Dutch government of local childcare options is reflected in the use of the term birth parents, rather than the term birth family that is used in academic research to refer to kinship networks. The disregard of local childcare options fails to acknowledge conceptualisations of childhood and an understanding of family that are different from those central to countries in the Global North and the upper-class of the Global South (Fronck & Cuthbert, 2012; Meintjes & Giese, 2006; Stanziani, 2018). In short, the academic literature does not support the argument of the Dutch government that there is a lack of local childcare options in sending countries.

Second, the aim of the Dutch government to make international adoption unnecessary can only be achieved when international adoption does not undermine local childcare options and when sending countries are supported in their task to improve local childcare options (Commission Kalsbeek, 2008). Yet, research points out that international adoption does undermine local childcare options and contributes to the number of children in institutional

care (Chou & Browne, 2016; Westra, 2017). As producing adoptable children means supporting international adoption and hindering other alternatives (Fonseca, 2006).

Third, whilst both the Dutch government and the academic literature focus on the best interest of the child, the Dutch government tends to accentuate the interests of adoptive parents. This is reflected in the praise for the good intentions and noble motives of adoptive parents who are said to provide vulnerable children with a better future (Commission Joustra, 2021; Hirsch Ballin, 2007; HRNL, 2008, 2009a, 2009b, 2011, 2012, 2013b, 2018). Moreover, the focus tends to be on finding adoptable children for aspiring adoptive parents, rather than finding a family for a child in need (HRNL, 2009a, 2009b). This is reflected in the use of terms like the 'shortage' and 'lack' of adoptable children (HRNL, 2004). Consequently, the child is transformed into a product of the global market and the wish of aspiring adoptive parents to form a family becomes the driving force behind international adoption (Hoksbergen, 2012; Westra, 2017). Malpractices in international adoption procedures can continue because of the tension between the demand for and the availability of adoptable children (Hirsch Ballin, 2007, 2009b; Hoksbergen, 2012; HRNL, 2004, 2009b; MSJ, 2012). The existence of a demand-driven adoption market makes that the interests of children and birth families become secondary to financial interests and the interests of aspiring adoptive parents (Held, 2005; Hoksbergen, 2012; Leifsen, 2008; Mostafanezhad, 2014b; Van Doore, 2016; Westra, 2017).

Contrarily, the academic literature emphasizes the child's right to grow up with their birth family in their birth country. International adoption might violate the child's right to grow up with their birth family and the right of the birth family to raise their own child, whilst supporting the continuance of malpractices (Agoglia & Monsalve, 2019; Cuthbert et al., 2010; Fronck & Cuthbert, 2012; Hollingsworth, 2003). The UNCRC (1989) agrees with the Dutch government that institutional care should be a last resort measure, but does not agree with the statement that international adoption is to be preferred over childcare solutions in the country of origin. The Convention values the ethnic and cultural identity of the child and therefore prioritizes local childcare options (Leinaweaver & Seligmann, 2009; United Nations, 1989).

Fourth, the prioritization of international adoption interprets the best interest of the child through conceptualisations of childhood from the Global North and rests on the underlying assumption that the Global North is able to provide the child with a better home and a better future (Fonseca, 2002; Roman et al., 2015; Salvo Agoglia & Marre, 2020; Van Wichelen, 2015; Westra, 2017). This assumption can result in the dismissal of birth families (Westra, 2017). In the Netherlands, there have been multiple court cases where birth families tried to get their (abducted) children back (Van Wichelen, 2015). Without exception, adoptive parents and the

Dutch authorities refused to cooperate and the children were never returned to their birth families (Koo, 2021; Van Wichelen, 2015). This author highly doubts that the Dutch government and Dutch families would accept a similar course of action if the roles were reversed.

Fifth, it is remarkable that the dominant argument in academic literature of the power imbalance between sending and receiving countries has not been mentioned in Dutch policy documents. The debate tends to focus on vulnerable children in need and the harmful effects of institutional care, while social, historical, and political causes are largely ignored (Fassin & Gomme, 2012). The power imbalance between the Global North and Global South, related to an imperialistic past and racial factors, is reflected in narratives of ‘helping’ struggling countries, ‘saving’ children in need, and the labelling of birth families as unsuitable (Mostafanezhad, 2014a; Mostafanezhad, 2014b; Ramirez-Faria, 2011; Schrover, 2021). Examples of this are the statements of the Dutch government that the aim to make international adoption unnecessary can only be achieved when sending countries are supported in their task to improve local childcare options and that malpractices can only be prevented in countries with governmental and legal systems that conform with Dutch standards (CJS, 2021; Commission Kalsbeek, 2008).

Lastly, the Dutch government stated that a ban on international adoption might result in people illegally taking children from abroad (Commission Kalsbeek, 2008; Hirsch Ballin, 2007; HRNL, 2008). However, children are already illegally taken from their birth families. The difference is that international adoption procedures legitimize and legalize adoptions that are the result of illegal practices (Cardarello, 2009; Smolin, 2006; Van Wichelen, 2015). These adoptions cannot be reversed and there are often no legal consequences for people who engage in these illegal practices (Andersson Elffers Felix, 2016; Van Wichelen, 2015).

On the whole, it remains of vital importance to question the underlying assumptions that justify the practice of international adoption (Cheney, 2014). These assumptions need to be scrutinized in both sending and receiving countries. Local childcare options ought to be thoroughly assessed and the main reason for continuing international adoption procedures should never be the interests of (aspiring) adoptive parents. When international adoption becomes an instrument to serve the interests of adoptive parents, the practice loses its usability as an instrument for serving the best interest of the child (Van Nijnatten & De Graaf, 2002).

## **5.1 Limitations**

This research has a few limitations. First, the coding process was completed by one person. As a consequence, inter-rater reliability could not be assessed. Inter-rater reliability refers to the level of consensus between different coders (Maruyama & Ryan, 2014). This measure enables researchers to ensure that the different coding categories were used and interpreted in a consistent manner. This allows an independent researcher to replicate the coding process and findings of the research.

Second, the document analysis focuses on Dutch policy documents from 1998 onwards. A more complete picture could be obtained through an analysis of all policy documents since the start of international adoption procedures similar to current procedures in the 1960s. Given the limited time frame of this research, this more extensive document analysis was not feasible.

Third, there are multiple research reports on international adoption by commissioned or authorized professionals. This research discusses a limited sample of these research reports. The inclusion of the different research reports might have helped paint a clearer picture of the debate on international adoption in the Netherlands. The additional analysis that this required did, however, not fit the scope of this research.

## **5.2 Recommendations**

Oftentimes, the position of birth families remains overlooked. It is important that more attention is paid to the, often vulnerable, position of birth families (MSJ, 2012). Birth families might have been pressured, coerced, and did not always understand the consequences of adoption. Future research could pay further attention to birth families, the factors that influence the relinquishment of their child for adoption, and the consequences of international adoption on their lives. Without a proper assessment of the position of birth families, recommendations on policies on international adoption fall short.

Another interesting angle for future research might be an analysis of international adoption through the ethics of care. The ethics of care focuses on relations, particulars, and the importance of context (Held, 2005). This seems particularly important in the context of international adoption as such a reflection respects differing contexts, rather than being led by a supposed 'universal' interpretation of what is in the best interest of the child. Furthermore, the ethics of care perceives care as unequal by definition as it happens between those who need and those who provide care (Tronto, 1993). This might make the power dynamics in international adoption more clear.

## References

- Andersson Elffers Felix. (2016). *De toekomst van de keten voor interlandelijke adoptie [The future of the chain of international adoption]*. Ministry of Safety and Justice. [https://www.eerstekamer.nl/overig/20160622/rapport\\_de\\_toekomst\\_van\\_de\\_keten/meta](https://www.eerstekamer.nl/overig/20160622/rapport_de_toekomst_van_de_keten/meta).
- Ansell, N. (2005). *Children, youth and development*. Routledge.
- Avitan, G. (2007). Protecting our children or our pride: regulating the intercountry adoption of American children. *Cornell International Law Journal*, 40(2), 489-519.
- Barcons, N., Abrines, N., Brun, C., Sartini, C., Fumadó Victoria, & Marre, D. (2014). Attachment and adaptive skills in children of international adoption. *Child & Family Social Work*, 19(1), 89–98.
- Briggs, L., & Marre, D. (2009). *Global Inequalities and the Circulation of Children*. New York University Press.
- Burr, R. (2002). Global and Local Approaches to Children’s Rights in Vietnam. *Childhood*, 9(1), 49–61.
- Cantwell, N. (2014). *The best interest of the child in Intercountry Adoption*. UNICEF Innocenti Research Centre.
- Cardarello, A. (2012). The right to have a family: ‘legal trafficking of children’, adoption and birth control in Brazil. *Anthropology & Medicine*, 19(2), 225-240.
- Chanyalew Kassa, S., & Abebe, T. (2016). Qenja: child fostering and relocation practices in the Amhara region, Ethiopia. *Children’s Geographies*, 14(1), 46-62.
- Connel, R. (2007). *Southern theory: the global dynamics of knowledge in social science*. Routledge.
- Commission Joustra. (2021). *Rapport commissie onderzoek interlandelijke adoptie [Report commission research international adoption]*. <https://www.rijksoverheid.nl/documenten/rapporten/2021/02/08/tk-bijlage-coia-rapport>.
- Commission Kalsbeek. (2008). *Rapport interlandelijke adoptie: “Alles van waarde is weerloos” [Report international adoption: “Everything of value is defenseless”]*. <https://zoek.officielebekendmakingen.nl/kst-31265-6-b1>
- Committee Quality Indicators in the Social Sciences (2013). *Towards a framework for the quality assessment of social science research*. Royal Netherlands Academy of Arts and Sciences. <https://www.knaw.nl/en/news/publications/towards-a-framework-for-the-quality-assessment-of-social-science-research#>



- Counsel for Criminal law enforcement and Child protection. (2016). *Bezinning op Interlandelijke Adoptie [Reflection on International Adoption]*. <https://www.tweede kamer.nl/kamerstukken/detail?id=2016D41457&did=2016D41457>
- De Graeve, K. (2015). 'They have our culture': negotiating migration in Belgian-Ethiopian transnational adoption. *Ethnos*, 80(1), 71-90.
- De Graeve, K., & Bex, C. (2016). Imageries of family and nation: a comparative analysis of transnational adoption and care for unaccompanied minors in Belgium. *Childhood*, 23(4), 492-505.
- Dekker, S. (2018, December 6). *Onderzoek naar interlandelijke adoptie in het verleden [Research on international adoption in the past]*. Rijksoverheid. <https://zoek.officielebekendmakingen.nl/kst-31265-66.html>
- Dekker, S. (2021, February 8). *Beleidsreactie rapport Commissie Onderzoek naar Interlandelijke Adoptie in het verleden [Policy response report Commission Research on International Adoption in the past]*. Rijksoverheid. <https://www.rijksoverheid.nl/documenten/kamerstukken/2021/02/08/tk-beleidsreactie-rapport-commissie-onderzoek-naar-interlandelijke-adoptie-in-het-verleden>.
- Fassin, D., & Gomme, R. (2012). *Humanitarian reason: a moral history of the present times*. University of California Press.
- Flick, U. (2009). *An introduction to qualitative research* (Fourth Edition). SAGE Publications.
- Flick, U. (2014). *The SAGE Handbook of Qualitative Data Analysis*. SAGE Publications.
- Flick, U. (2018). *The SAGE Handbook of Qualitative Data Collection*. SAGE Publications.
- Fonseca, C. (2002). Inequality Near and far: Adoption as seen from the Brazilian Favelas. *Law & Society*, 36(2), 397-432.
- Hague Conference on Private International Law (1993). Convention on protection of children and co-operation in respect of intercountry adoption. <https://www.hcch.net/en/instruments/conventions/full-text/?cid=69>
- Held, V. (2005). *The ethics of care: personal, political and global*. Oxford Scholarship Online.
- Hoksbergen, R.A.C. (2012). *Kinderen die niet konden blijven*. Uitgeverij ASPEKT.
- Hübinette, T., & Tigervall, C. (2009). To be Non-White in a Colour-Blind Society: Conversations with Adoptees and Adoptive Parents in Sweden on Everyday Racism. *Journal of Intercultural Studies*, 30(4), 335-353.
- Inspection Childcare. (2007). *Meiling en adoptie uit India [Meiling and adoption from India]*. <https://zoek.officielebekendmakingen.nl/dossier/kst-31265-1-b2>.

- James, A., & Prout, A. (1997). *Constructing and Reconstructing Childhood: Contemporary Issues in the Sociological Study of Childhood* (Second Edition). Falmer Press.
- Juffer, F.J., & Van IJzendoorn, M.H. (2008). Adoptie als interventie II. *Kind En Adolescent*, 29(1), 31–49.
- Kehily, M.J. (2015) *An Introduction to Childhood Studies* (Third Edition). McGraw Hill Education.
- Leinaweaver, J.B. (2007). On moving children: The social implications of Andean child circulation. *American Ethnologist*, 34(1), 163-180.
- Leinaweaver, J.B., & Seligmann, L.J. (2009). Cultural and Political Economies of adoption in Latin America. *The Journal of Latin America and Caribbean Anthropology*, 14(1), 1-19.
- Lindblad, F., Hjern, A., & Vinnerljung, B. (2003). Intercountry adopted children as young adults: a Swedish cohort study. *American Journal of Orthopsychiatry*, 73(2), 190–202.
- Lowe, R.J. (2020). *Uncovering ideology in English language teaching: identifying the 'native speaker' frame*. Springer.
- Maruyama, G., & Ryan, C.S. (2014). *Research methods in social relations*. John Wiley & Sons Incorporated.
- Meintjes, H., & Giese, S. (2006). Spinning the epidemic: The making of mythologies of orphanhood in the context of AIDS. *Childhood*, 13(3), 407-430.
- Mostafanezhad, M. (2014a). Volunteer tourism and the popular humanitarian gaze. *Geoforum*, 54, 111-118.
- Mostafanezhad, M. (2014b). *Volunteer tourism: Popular Humanitarianism in Neoliberal Times*. Ashgate Publishing.
- Olsen, W.K. (2012). *Data collection: key debates and methods in social research*. Sage Publications.
- Petticrew, M., & Roberts, H. (2008). *Systematic reviews in the social sciences: A practical guide*. Malden, MA: Wiley Interscience.
- Ramírez-Faria, C. (2011). *The origins of economic inequality between nations: a critique of western theories on development and underdevelopment*. Routledge/Taylor & Francis Group.
- Rapley, T. (2007). *Doing conversation, discourse and document analysis*. Sage Publications.
- Reese, S.D. (2007). The framing project: a bridging model for media research revisited. *Journal of Communication*, 57(1), 148–154.
- Scott, J. (1990). *A Matter of Record: Documentary Sources in Social Research*. Polity Press

- Slater, D. (1995). Challenging western visions of the global: the geopolitics of theory and north-south relations. *The European Journal of Development Research*, 7(2), 366–388.
- Stanziani, A. (2018). *Eurocentrism and the politics of global history*. Palgrave Macmillan.
- Stoddart, J., Wright, A.C., Spencer, M., van Wichelen, S. (2021). 'I'm the centre part of a Venn diagram': belonging and identity for Taiwanese-Australian intercountry adoptees. *Adoption and fostering*, 45(1), 71-89.
- Tronto, J.C. (1993). *Moral boundaries: a political argument for an ethic of care*. Routledge.
- Twum-Danso Imoh, A., Bourdillon, M., & Meichsner, S. (2019). *Global childhoods beyond the north-south divide*. Palgrave Macmillan.
- United Nations. (1989). Convention on the Rights of the Child. <https://www.unicef.org/child-rights-convention>
- United Nations. (2009). *Child Adoption: Trends and Policies*. <https://www.un.org/development/desa/pd/content/publications>
- Van Doore, K.E. (2016). Paper orphans: exploring child trafficking for the purpose of orphanages. *International Journal of Children's Rights*, 24(2), 378-407.
- Van Nijnatten, C., & de Graaf, W. (2002). The legal management of (social) parenthood: adoption and Dutch family policy. *The Journal of Social Welfare & Family Law*, 24(3), 263–277
- Wekker, G. (2016). *White Innocence: Paradoxes of Colonialism and Race*. Duke University Press.
- Westra, H. (2017, Mei 15). *Gespreksnotitie: Rondetafelgesprek naar aanleiding van het advies 'Bezinning op Interlandelijke adoptie' [Conversation note: Discussion in response to the advisory report 'Reflection on International adoption']*. Tweede Kamer der Staten-Generaal. <https://www.tweedekamer.nl/kamerstukken/detail?id=2017Z06343&did=2017D13394>
- Zermatten, J. (2010). The best interests of the child principle: literal analysis and function. *The International Journal of Children's Rights*, 18(4), 483–499.

### References literature study: included studies

- Agoglia, I.S., & Monsalve, K.A. (2019). 'Irregular Adoptions' in Chile: New Political Narratives About The Right To Know One's Origins. *Children & society*, 33(3), 201-212.

- Ali, S. (2014). Governing multicultural populations and family life. *The British Journal of Sociology*, 65(1), 82–106.
- Breuning, M., & Ishiyama, J. (2009). The politics of intercountry adoption: explaining variation in the legal requirements of Sub-Saharan African countries. *Perspectives on politics*, 7(1), 89-101.
- Breuning, M. (2013a). Samaritans, family builders, and the politics of intercountry adoption. *International studies perspective*, 14(4), 417-435.
- Breuning, M. (2013b). What explains openness to intercountry adoption? *Social Science Quarterly*, 94(1), 113–130.
- Candaele, C. (2020). Mother Metropole Adoptions of Rwandan Minors in Postcolonial Belgium (1970-1994). *BMGN – The low countries historical review*, 135(3-4), 209-233.
- Cardarello, A. (2009). The movement of the mothers of the courthouse square: “legal child trafficking,” adoption and poverty in brazil. *The Journal of Latin American and Caribbean Anthropology*, 14(1), 140–161.
- Cheney, K. (2014). ‘Giving Children a Better Life?’ Reconsidering Social Reproduction, Humanitarianism and Development in Intercountry Adoption. *European Journal of Development Research*, 26, 247-263.
- Chou, S., & Browne, K. D. (2016). The relationship over time between international adoption and institutional care in Romania and Lithuania. *Child Abuse Review*, 25(6), 444–453.
- Cuthbert, D., Spark, C., & Murphy, K. (2010). “That was then, but this is now”: historical perspectives on intercountry adoption and domestic child adoption in Australian public policy. *Journal of historical sociology*, 23(3), 427-452.
- Dowling, M., & Brown, G. (2009). Globalization and international adoption from China. *Child & family social work*, 14(3), 352-361.
- Fonseca, C. (2006). Transnational influences in the social production of adoptable children: the case of brazil. *International Journal of Sociology and Social Policy*, 26(3-4), 154–171.
- Fronek, P. (2006). Global perspectives in Korean intercountry adoption. *Asia Pacific Journal of social work and development*, 16(1), 21-31.
- Fronek, P., & Cuthbert, D. (2012). The future of inter-country adoption: a paradigm shift for this century. *International Journal of Social Welfare*, 21(2), 215–224.
- Hollingsworth, L. D. (2003). International Adoption among Families in the United States: Considerations of Social Justice. *Social Work*, 48(2), 209–217.

- Iusmen, I. (2013). The EU and international adoption from Romania. *International journal of law policy and the family*, 27(1), 1-27.
- Kim, E. (2012). Human Capital: Transnational Korean Adoptees and the Neoliberal Logic of Return. *Journal of Korean studies*, 17(2), 299-327.
- Kim, H. (2015). The biopolitics of transnational adoption in South Korea: pre-emption and the governance of single birthmothers. *Body and Society*, 21(1), 58-89.
- Kim, J.W., McPherson, L., & Sung, K.T. (2015). Alternatives to international adoption: emotional issues in the Korean cultural context. *Children and youth services review*, 52, 167-173.
- Koo, Y. (2021). The question of adoption: “divided” Korea, “neutral” Sweden, and Cold War Geopolitics, 1964-75. *Journal of Asian studies*, 80(3), 563-585.
- Leifsen, E. (2008). Child trafficking and formalisation: the case of international adoption from Ecuador. *Children & Society*, 22(3), 212–222.
- Leinaweaver, J. B. (2009). Kinship into the Peruvian adoption office: reproducing families, producing the state. *The Journal of Latin American and Caribbean Anthropology*, 14(1), 44–67.
- Leinaweaver, J. (2015). Geographies of generation: age restrictions in international adoption. *Social & cultural geography*, 16(5), 508-521.
- Leinaweaver, J. B., Marre, D., & Frekko, S. E. (2017). ‘homework’ and transnational adoption screening in Spain: the co-production of home and family. *Journal of the Royal Anthropological Institute*, 23(3), 562–579.
- Lind, J., & Lindgren, C. (2017). Displays of parent suitability in adoption assessment reports. *Child & Family Social Work*, 22, 53–63.
- Ma, K. (2017). Korean intercountry adoption history: culture, practice, and implications. *Families in society- the journal of contemporary social services*, 98(3), 243-251.
- Poveda, D., Jociles, M.I., & Rivas, A.M. (2013). Professional Discourses on Single Parenthood in International Adoptions in Spain. *Polar-political and legal anthropology review*, 36(1), 35-55.
- Roby, J. L., & Shaw, S. A. (2006). The African Orphan Crisis and International Adoption. *Social Work*, 51(3), 199–210.
- Roman, B., Gaggiotti, H., & Marre, D. (2015). “you don't take anything for granted”: the role of anthropology in improving services, policies, and parenting practices for adoptive families. *Annals of Anthropological Practice*, 39(2), 205–220.

- Salvo Agoglia, I., & Marre, D. (2020). Children forever: the search for origins among Chilean adults who were adopted. *Child & Family Social Work*, 25(1), 127–134.
- Schachter, J. (2017). Intercountry adoption/global migration: a pacific perspective. *Asia Pacific Journal of Anthropology*, 18(4), 305-322.
- Schrover, M. (2021). Parenting, citizenship and belonging in Dutch adoption debates 1900-1995. *Identities*, 28(1), 93-110.
- Van Wichelen, S. (2015). Scales of grievability: on moving children and the geopolitics of precariousness. *Social & cultural geography*, 16(5), 552-566.
- Yngvesson, B. (2013). The child who was left behind: ‘Dynamic temporality’ and interpretations of history in transnational adoption. *Childhood- a global journal of child research*, 20(3), 354-367.

### References document analysis: included documents

- Commission for Justice and Safety. (2021). *Kamerstukken [Parliamentary papers] II 2020/21*, 31265, nr. 95.
- Dekker, S. (2018a). *Aanhangsel Handelingen [Proceedings] II 2018/19*, nr. 1272.
- Dekker, S. (2018b). *Kamerstukken [Parliamentary papers] II 2018/19*, 31265, nr. 66.
- Dekker, S. (2020). *Aanhangsel Handelingen [Proceedings] II 2019/20*, nr. 4016.
- Dekker, S. (2021a). *Aanhangsel Handelingen [Proceedings] II 2021/22*, nr. 868.
- Dekker, S. (2021b). *Kamerstukken [Parliamentary papers] II 2020/21*, 31265, nr. 79.
- Dekker, S. (2021c). *Kamerstukken [Parliamentary papers] II 2020/21*, 31265, nr. 93.
- Hirsch Ballin, E.M.H. (2006). *Aanhangsel Handelingen [Proceedings] II 2006/07*, nr. 404.
- Hirsch Ballin, E.M.H. (2007). *Kamerstukken [Parliamentary papers] II 2007/08*, 31265, nr. 1.
- Hirsch Ballin, E.M.H. (2008a). *Aanhangsel Handelingen [Proceedings] II 2007/08*, nr. 1130.
- Hirsch Ballin, E.M.H. (2008b). *Aanhangsel Handelingen [Proceedings] II 2007/08*, nr. 2797.
- Hirsch Ballin, E.M.H. (2009a). *Aanhangsel Handelingen [Proceedings] II 2008/09*, nr. 3116.
- Hirsch Ballin, E.M.H. (2009b). *Aanhangsel Handelingen [Proceedings] II 2008/09*, nr. 3693.
- Hirsch Ballin, E.M.H. (2010a). *Kamerstukken [Parliamentary papers] II 2009/10*, 31265, nr. 32.
- Hirsch Ballin, E.M.H. (2010b). *Kamerstukken [Parliamentary papers] II 2009/10*, 31265, nr. 35.
- House of Representatives of the Netherlands. (1999). *Kamerstukken [Parliamentary papers] II 1998/99*, 26211, nr. 8.

- House of Representatives of the Netherlands. (2001). *Kamerstukken [Parliamentary papers]* II 2000/01, 27256, nr. 8.
- House of Representatives of the Netherlands. (2004). *Kamerstukken [Parliamentary papers]* II 2003/04, 28457, nr. 13.
- House of Representatives of the Netherlands. (2008). *Kamerstukken [Parliamentary papers]* II 2007/08, 31265 en 30551, nr. 2.
- House of Representatives of the Netherlands. (2009a). *Kamerstukken [Parliamentary papers]* II 2008/09, 31265, nr. 26.
- House of Representatives of the Netherlands. (2009b). *Kamerstukken [Parliamentary papers]* II 2009/10, 31265, nr. 28.
- House of Representatives of the Netherlands. (2011). *Kamerstukken [Parliamentary papers]* II 2010/11, 32446, nr. 85.
- House of Representatives of the Netherlands. (2012). *Kamerstukken [Parliamentary papers]* II 2011/12, 31265, nr. 42.
- House of Representatives of the Netherlands. (2013a). *Kamerstukken [Parliamentary papers]* II 2012/13, 31265, nr. 45.
- House of Representatives of the Netherlands. (2013b). *Kamerstukken [Parliamentary papers]* II 2013/14, 31265, nr. 50.
- House of Representatives of the Netherlands. (2018). *Kamerstukken [Parliamentary papers]* II 2017/18, 31265, nr. 64.
- Ministry of Safety and Justice. (2012). *Beleidsdoorlichting interlandelijke adoptie [Policy review international adoption]*. [https://www.tweedekamer.nl/kamerstukken/brieven\\_regering/detail?id=2012\\_Z04967 &did=2012D10709](https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2012_Z04967&did=2012D10709)
- Teeven, F. (2011a). *Aanhangsel Handelingen [Proceedings]* II 2010/11, nr. 3038.
- Teeven, F. (2011b). *Kamerstukken [Parliamentary papers]* II 2011/12, 31265, nr. 39.
- Teeven, F. (2012a). *Aanhangsel Handelingen [Proceedings]* II 2012/13, nr. 722.
- Teeven, F. (2012b). *Kamerstukken [Parliamentary papers]* II 2011/12, 33199, nr. 1.
- Teeven, F. (2012c). *Kamerstukken [Parliamentary papers]* II 2012/13, 31265, nr. 44.
- Teeven, F. (2013). *Aanhangsel Handelingen [Proceedings]* II 2012/13, nr. 1931.
- Van der Steur, G.A. (2015a). *Aanhangsel Handelingen [Proceedings]* II 2015/16, nr. 603.
- Van der Steur, G.A. (2015b). *Aanhangsel Handelingen [Proceedings]* II 2015/16, nr. 964.
- Weerwind, F.M. (2022a, Maart 31). *Beslisnota: Kamerbrief standpunt interlandelijke adoptie [Note: Parliamentary letter standpoint international adoption]*. Tweede Kamer der

Staten-Generaal. <https://www.rijksoverheid.nl/documenten/kamerstukken/2022/04/11/tk-standpunt-toekomst-interlandelijke-adoptie>

Weerwind, F.M. (2022b). *Kamerstukken [Parliamentary papers] II 2021/22*, 31265, nr. 103.



## Appendix 1

### Codebook

Category	Code	Sub-code
<b>(Historical) background and general information</b>	Definition	
	Policy	
	Trends	
<b>Debate on international adoption</b>	Child wellbeing frame	Attachment problems Child development Child wellbeing Developmental delays Institutional care Post-adoption problems
	Humanitarian frame	A better life Constructed abandonment 'Saving' children in need Poverty
	Malpractices	Adoption industry Assumption of birth Child abduction Child recruiting Child trafficking Coercion * Consent Fraud Illegal adoptions Improper financial gain
<b>Conceptualisations of childhood</b>	A 'good' childhood Child at risk/in need Helpless and dependent Innocent and vulnerable The 'ideal' family The sacred child	'Suitable' parents
	Global North/Global South divide	'Development' Global North Global South
<b>Conceptual frame</b>	Power imbalance	Humanitarian help Postcolonial thought Poverty
	<b>Ethical frame</b>	* Comprehensive and meticulous procedures
	Human rights	Best interest of the child Children's rights * Interests adoptive parents * Principles conventions * Principle of trust * Subsidiarity principle

\* Inductive codes based on document analysis

## Appendix 2

*Overview included studies (N = 34)*

<b>Author(s)</b>	<b>Year</b>	<b>Country</b>	<b>Methodology</b>	<b>Themes</b>	<b>Main points</b>
Agoglia & Monsalve	2019	Chile	Document analysis	Humanitarian frame Human rights Malpractices	International adoption justified as saving children in need. Recruitment of children from vulnerable families/mothers. Violation of the right of the child to grow up in their own family.
Ali	2014	Great Britain	Discourse analysis	Global North/Global South divide Power imbalance The 'ideal' family The vulnerable child in need	Children from the Global South move to the Global North, values and concepts from the Global North move to the Global South. Finding children for families, rather than finding families for children. Parents considered suitable for international adoption, but not for domestic adoption.
Breuning & Ishiyama	2009	Sub-Saharan Africa	Explanatory model	The 'ideal' family	Traditionally, orphaned children in Sub-Saharan African countries are cared for within the family network.
Breuning	2013	United States	Literature study and theoretical research	Best interest of the child Global North/Global South divide	International adoption as a demand-driven market vs. international adoption as the best chance for children to grow up in a family. No consensus on what serves the best interest of the child.
Breuning	2013	112 included countries	Cross-sectional	Global North/Global South divide	More restrictive adoption laws protect vulnerable (and often poor) women against being pressured into giving up their child for adoption.
Candaele	2020	Belgium	Historical research	Conceptualisations childhood Postcolonial thought	Adoptions were seen as an act of altruism. African children portrayed as starving, abandoned, helpless, and dependent on the benevolence of the Global North, even though the majority was living with family.

<b>Author(s)</b>	<b>Year</b>	<b>Country</b>	<b>Methodology</b>	<b>Themes</b>	<b>Main points</b>
Cardarello	2009	Brazil	Theoretical research	A better life Malpractices	Illegal adoption allowed by judges and other members of the legal system. International adoption as a solution for poor children who are sometimes seen as a societal threat. International adoption as an act of generosity.
Cheney	2014	The Netherlands	Theoretical research	A better life Global North/Global South divide Humanitarian frame Malpractices Poverty The sacred child	International adoption is framed as charitable and a modern way of forming a family, which masks the inequalities that make international adoptions possible. International adoption is more expensive than offering families the necessary assistance so they might keep their children. Within a better life discourse, international adoption is prioritized over preservation of the family and the rights of the child and the birth parents.
Chou & Browne	2016	Romania and Lithuania	Correlational study	Child wellbeing Institutional care	After the ban on international adoption in Romania, there was a decrease in the amount of children in need for institutional care. The continued international adoptions in Lithuania did not lead to a similar decrease.
Cuthbert et al.	2010	Australia	Historical research	Child in need Constructed abandonment Malpractices Policy trends	Tension between views of international adoption as a social policy for the placement of children in need, and as a way to meet the needs of aspiring adoptive parents. The wish to adopt internationally instead of domestic stems from the wish to avoid open adoptions that are common in domestic adoptions.
Dowling & Brown	2009	China	Theoretical research	Child in need Humanitarian frame Malpractices Power imbalance	Humanitarian response from people in the Global North to offer homes for these children in need. Resources used to support international adoptions, when used for local childcare options, could improve the lives of a large number of children domestically.

<b>Author(s)</b>	<b>Year</b>	<b>Country</b>	<b>Methodology</b>	<b>Themes</b>	<b>Main points</b>
Fonseca	2006	Brazil	Document analysis	Best interest of the child Constructed abandonment Power imbalance 'Saving' children in need	In the Global North, children can be removed from homes that are considered to be inadequate, but instead of adoption across borders, child welfare arrangements complement rather than replace the birth parents. Families in Brazil, when necessary, make use of family networks and informal foster parents to ensure the welfare of their children.
Fronek & Cuthbert	2012	Australia	Theoretical research	Children's rights Global North/Global South divide Humanitarian frame Power imbalance	International conventions tend to reflect Western values. Simplification of a complex problem through a privileged, Western view on childhood and family positioned against institutionalisation.
Fronek	2006	South Korea	Theoretical research	Global North/Global South divide Humanitarian frame 'Saving' children in need	The discourse of 'saving' children in need supported international adoptions from Korea.
Hollingsworth	2003	United States	Theoretical research	Children's rights Global North/Global South divide Malpractices	Despite helping some children, international adoption relies on unequal social dynamics. Alternatively, others believe international adoption helps children in need, solves the problem of poverty and institutionalisation, and offers children the opportunity to grow up in a nurturing family environment.
Iusmen	2013	Romania	Document analysis and interviews	Best interest of the child Children's rights Malpractices	The view of international adoption as a last resort measure and the view of international adoption as having the preference over the potential harm of institutionalisation regardless of possible malpractices.

<b>Author(s)</b>	<b>Year</b>	<b>Country</b>	<b>Methodology</b>	<b>Themes</b>	<b>Main points</b>
E. Kim	2012	South Korea	Ethnographic research	Conceptualisations childhood Return birth country	International adoption is justified via ideologies of mobility and opportunity.
H. Kim	2015	South Korea	Theoretical research	A 'good' childhood Malpractices Power imbalance 'Suitable' parents	Some people are perceived to have the right to raise children, while others are discouraged, or even prohibited, from doing so. The inequality underlying international adoption makes to question whether or not birth parents had a choice in relinquishing their child.
J. Kim et al.	2015	South Korea	Theoretical research	Child wellbeing Conceptualisations childhood	Many local childcare alternatives for vulnerable children in South Korea.
Koo	2021	South Korea, Sweden and Denmark	Historical research	Best interest of the child Humanitarian frame Malpractices Policy trends	The imaging of 'poor orphans' led to a strong motivation to 'save' these children. Even after the occurrence of malpractices, the credibility of these malpractices was questioned and it was supposed to be in the best interest of the child to remain with their adoptive family.
Leifsen	2008	Ecuador	Theoretical research	Malpractices	Child trafficking has increased with international adoption. The practice can be linked to an adoption market.
Leinaweaver	2009	Peru	Ethnographic research	Constructed abandonment Humanitarian frame The 'ideal' family	Through removing children from 'unsuitable' homes, an ideal is produced of 'appropriate homes' that are allowed to adopt. The perceived 'unsuitable' homes are mostly those of the poor and indigenous.
Leinaweaver	2015	Peru	Document analysis	Helpless and dependent Malpractices The 'ideal' family	Adoption practices continuously frame certain families as appropriate and others as inadequate, strongly influenced by hegemonic narratives about the 'ideal' family.

<b>Author(s)</b>	<b>Year</b>	<b>Country</b>	<b>Methodology</b>	<b>Themes</b>	<b>Main points</b>
Leinaweaver et al.	2017	Spain	Ethnographic and theoretical research	The 'ideal' family	There are no clear guidelines for what a 'suitable home' actually is.
Lind & Lindgren	2017	Sweden	Document analysis	The 'ideal' family	Norms of parenthood are reflected in the assessment process for international adoption.
Ma	2017	South Korea	Historical research	Humanitarian frame Malpractices	Competition between adoption agencies and the lack of governmental social services led to unethical practices.
Poveda et al.	2013	Spain	Interviews and observations	The best interest of the child The 'ideal' family	Conceptualisations of children are absorbed into the ambiguous 'best interest of the child' standard.
Roby & Shaw	2006	Sub-Saharan Africa	Ethnographic research	Child wellbeing Poverty	Most orphans in Sub-Saharan Africa are taken care of by their extended family. International adoption should only be considered after efforts to find a home for the child through the extended family, community, or domestic adoption have failed.
Roman et al.	2015	Spain	Ethnographic research	Child wellbeing Conceptualisations childhood Malpractices	There seem to be unrealistic expectations for adoptees and their ability for 'normalization'. Problems are located in the child, resulting in a search for biomedical solution, instead of looking into social, cultural, and contextual factors of the receiving country and family.
Salvo Agoglia & Marre	2020	Chile	Interviews	Best interest of the child Constructed abandonment Humanitarian frame	The clean break principle refers to the full separation of ties with the birth family of the adopted child. 'Universal' definition of the best interest of the child, which is, however, based on ideals of childhood and family from the Global North.

<b>Author(s)</b>	<b>Year</b>	<b>Country</b>	<b>Methodology</b>	<b>Themes</b>	<b>Main points</b>
Schachter	2017	Pacific Islands	Literature study	Humanitarian frame Malpractices The 'ideal' family	The normative family model of The Hague Convention conflicts with the longstanding emphasis on the movement of children within kin or community networks in Pacific Island societies.
Schrover	2021	The Netherlands	Historical research	Child wellbeing Humanitarian frame Malpractices Policy The 'ideal' family	Children are made adoptable by emphasising that their birth family, community, and country have failed them. Additionally, by creating a construction of the 'bad' parent and the 'good' parent.
Van Wichelen	2015	The Netherlands	Case study	Best interest of the child Conceptualisations childhood Malpractices	In the Netherlands, there have been multiple cases where birth parents claimed back their children, who have been denied this claim based on the 'family life' principle and the underlying assumption that families in the Global North can provide better homes for these children.
Yngvesson	2013	Ethiopia, India, South Korea, Sweden, and the United States	Interviews	Return and reunion	A racial, ethnic or cultural difference between the child and their adoptive family might form an obstacle for healthy identity development.

### Appendix 3

Overview included documents ( $N = 37$ )

Reference	Year	Document type	Title document	Themes
Dekker, S.	2018	Kamerbrief	Onderzoek naar interlandelijke adoptie in het verleden	Comprehensive and meticulous procedures; Malpractices
Dekker, S.	2019	Policy document	Aanhangsel Handelingen	Comprehensive and meticulous procedures; Malpractices
Dekker, S.	2020	Policy document	Aanhangsel Handelingen	Malpractices
Dekker, S.	2021a	Policy document	Aanhangsel Handelingen	Fraud; Malpractices
Dekker, S.	2021b	Kamerbrief	Adoptie	Malpractices
Dekker, S.	2021c	Kamerbrief	Adoptie	Best interest of the child; Comprehensive and meticulous procedures; Malpractices
Hirsch Ballin, E.M.H.	2006	Policy document	Aanhangsel Handelingen	Adoption industry; Illegal adoptions; Malpractices
Hirsch Ballin, E.M.H.	2007	Kamerbrief	Adoptie	A better life; Interests adoptive parents; Malpractices; Principle of trust
Hirsch Ballin, E.M.H.	2008a	Policy document	Aanhangsel Handelingen	Best interest of the child; Consent; Improper financial gain
Hirsch Ballin, E.M.H.	2008b	Policy document	Aanhangsel Handelingen	Principles conventions
Hirsch Ballin, E.M.H.	2009a	Policy document	Aanhangsel Handelingen	Child trafficking
Hirsch Ballin, E.M.H.	2009b	Policy document	Aanhangsel Handelingen	Malpractices; Principle of trust
Hirsch Ballin, E.M.H.	2010a	Kamerbrief	Adoptie	Best interest of the child; Consent; Fraud; Malpractices
Hirsch Ballin, E.M.H.	2010b	Kamerbrief	Adoptie	Malpractices



<b>Reference</b>	<b>Year</b>	<b>Document type</b>	<b>Title document</b>	<b>Themes</b>
House of Representatives of the Netherlands	1999	Verslag algemeen overleg	Jeugdzorg 1999-2002	Child wellbeing
House of Representatives of the Netherlands	2001	Verslag algemeen overleg	Aanpassing van wetgeving in verband met de openstelling van het huwelijk en de invoering van adoptie door personen van hetzelfde geslacht	Comprehensive and meticulous procedures; Interests adoptive parent; Malpractices; 'Saving' children in need
House of Representatives of the Netherlands	2004	Verslag algemeen overleg	Regeling van het conflictenrecht inzake adoptie en de erkenning van buitenlandse adopties	Best interest of the child; Child trafficking Interests adoptive parent; 'Saving' children in need; Subsidiarity principle
House of Representatives of the Netherlands	2008	Verslag algemeen overleg	Wijziging van Boek 1 van het Burgerlijk Wetboek in verband met verkorting van de adoptieprocedure en wijziging van de Wet opnemng buitenlandse kinderen ter adoptie in verband met adoptie door echtgenoten van gelijk geslacht tezamen	A 'good' childhood; Best interest of the child; Child in need; Illegal adoptions Interests adoptive parent; Malpractices Principle of trust
House of Representatives of the Netherlands	2009a	Verslag algemeen overleg	Adoptie	A better life; A 'good' childhood; Best interest of the child; Child in need; Comprehensive and meticulous procedures; 'Development'; Malpractices; Subsidiarity principle; 'Suitable' parents
House of Representatives of the Netherlands	2009b	Verslag algemeen overleg	Adoptie	Best interest of the child; Comprehensive and meticulous procedures; Consent; Humanitarian frame; Malpractices; Principle of trust; 'Saving' children in need

<b>Reference</b>	<b>Year</b>	<b>Document type</b>	<b>Title document</b>	<b>Themes</b>
House of Representatives of the Netherlands	2011	Verslag algemeen overleg	Interlandelijke adoptie	A better life; Humanitarian frame
House of Representatives of the Netherlands	2012	Verslag algemeen overleg	Adoptie	A better life; Best interest of the child; Child in need; Child wellbeing; Comprehensive and meticulous procedures; Humanitarian frame; Interests adoptive parents; Malpractices
House of Representatives of the Netherlands	2013a	Verslag algemeen overleg	Adoptie	Best interest of the child; Child in need; Child wellbeing; Comprehensive and meticulous procedures; Consent; Humanitarian frame; Malpractices; Subsidiarity principle
House of Representatives of the Netherlands	2013b	Verslag algemeen overleg	Adoptie	A better life; Child in need; Comprehensive and meticulous procedures; Interests adoptive parents; Subsidiarity principle
House of Representatives of the Netherlands	2018	Verslag algemeen overleg	Adoptie	A better life; Best interest of the child; Child wellbeing; Humanitarian frame; Interests adoptive parents; Malpractices Principle of trust; ‘Saving’ children in need; Subsidiarity principle
House of Representatives of the Netherlands	2021	Verslag commissiedebat	Adoptie	A better life; Best interest of the child; Humanitarian frame; Interests adoptive parents; Malpractices; ‘Saving’ children in need; Subsidiarity principle
Teeven, F.	2011a	Policy document	Aanhangsel Handelingen	Malpractices; Principle of trust; Subsidiarity principle

<b>Reference</b>	<b>Year</b>	<b>Document type</b>	<b>Title document</b>	<b>Themes</b>
Teeven, F.	2011b	Kamerbrief	Adoptie	Comprehensive and meticulous procedures
Teeven, F.	2012a	Policy document	Aanhangsel Handelingen	Best interest of the child; Comprehensive and meticulous procedures; Malpractices
Teeven, F.	2012b	Kamerbrief	Beleidsdoorlichting Veiligheid en Justitie	Comprehensive and meticulous procedures; Malpractices; Principle of trust
Teeven, F.	2012c	Kamerbrief	Adoptie	Best interest of the child; Consent; Interests adoptive parents
Teeven, F.	2013	Policy document	Aanhangsel Handelingen	Best interest of the child; Comprehensive and meticulous procedures; Principles conventions
Van der Steur, G.A.	2015a	Policy document	Aanhangsel Handelingen	Malpractices; Principles conventions; Principle of trust
Van der Steur, G.A.	2015b	Policy document	Aanhangsel Handelingen	Illegal adoptions; Malpractices
Weerwind, F.M.	2022a	Beslisnota	Kamerbrief standpunt interlandelijke adoptie	A better life; Best interest of the child; Comprehensive and meticulous procedures; Subsidiarity principle
Weerwind, F.M.	2022b	Kamerbrief	Adoptie	A better life; Best interest of the child; Child wellbeing; Interests adoptive parents; Malpractices; Subsidiarity principle

## Appendix 4

### *Discussed countries after occurrence malpractices*

<b>Country</b>	<b>References</b>
Bangladesh	Dekker, 2018b
Bulgaria	Van der Steur, 2015a
Brazil	Dekker, 2018a, 2018b, 2020
Cambodia	HRNL*, 2021
China	Hirsch Ballin, 2009b, 2010b; HRNL, 2009a, 2009b, 2018, 2021; Teeven, 2011a, 2012c
Colombia	Dekker, 2018b; HRNL, 2012, 2013a, 2021; Teeven, 2012c;
Congo	HRNL, 2018, 2021
Ethiopia	Hirsch Ballin, 2010a; HRNL, 2009b; Teeven, 2013
Guatemala	Hirsch Ballin, 2006; HRNL, 2001, 2021
Haiti	Hirsch Ballin, 2008b; HRNL, 2012; Teeven, 2011b
India	Hirsch Ballin, 2007, 2008a; HRNL, 2008, 2009a, 2021; Teeven, 2012c
Indonesia	Dekker, 2018b
Malawi	Hirsch Ballin, 2009a; HRNL, 2009a
Nepal	Van der Steur, 2015b
Nigeria	Hirsch Ballin, 2009a; HRNL, 2009a
Sri Lanka	Dekker, 2018b; HRNL, 2018
The Netherlands	Dekker, 2018a, 2021a, 2021b; HRNL, 2021
Uganda	HRNL, 2012, 2013a, 2021; Teeven, 2012c

\* *HRNL = House of Representatives of the Netherlands.*