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**Comparison of Intercountry Child Adoption in South Korea and China
Population, Welfare and Soft Power**

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Comparative Analysis of Intercountry Child Adoption Policies in South Korea and China

Abstract: By comparing the case of South Korea and China, the present article will try to understand if China's recent economic development will follow the path of South Korea in terms of intercountry adoption policies. In order to answer these questions, my hypothesis is that family planning and intercountry adoption were necessary to bolster economic development. After reaching a certain level of prosperity and gaining economic surplus, the state will be able to provide better living standards and social welfare for families. This should lead to a diminution of international adoption and a social recognition of adoptees. In order to answer these questions, I will first explain my theoretical framework and then provide a comparison between South Korea and China historical background, institutions and place of adoptees in their homeland.

Keywords : Intercountry Adoption, China, South Korea, Postcolonialism, Development

Introduction

In the field of international relations, the issue of intercountry adoption and overseas adoptees has little been discussed before. Traditionally, only social work, psychology and sociology would analyze the development of these children and their interactions in their adoptive society. However, the current article will examine the phenomena of intercountry adoption from the field of political science by using a postcolonial perspective. After years of colonisation by Western countries and Japan, resulting in an absence of national sovereignty and low living conditions, South Korea and China found population control a way to bolster economic growth. As a result, family planning and intercountry adoption constituted tools to enhance prosperous development. In the case of South Korea, after the achievement of its economic miracle, the government was able to provide high living standards for all citizens with the implementation of an efficient social welfare system and thus, progressively stopped intercountry adoption to Western nations. By comparing the case of South Korea and China, the present article will try to understand if China's recent economic development will follow the path of South Korea in terms of intercountry adoption policies: **Is economic development linked to the diminution of intercountry adoption and social recognition of adoptees? Will China's economic development lead to the establishment of a welfare state?** In order to answer these questions, my hypothesis is that

family planning and intercountry adoption were necessary to bolster economic development. After reaching an certain level of prosperity, the state will be able to provide better living standards and social welfare for families. This should lead to a diminution of international adoption and a social recognition of adoptees. In order to answer these questions, I will first explain my theoretical framework and then provide a comparison between South Korea and China historical background, institutions and place of adoptees in their homeland.

Theoretical Framework

As mentioned above, the current study will use post-colonial theories and a critical approach to understand international adoption. Indeed, the phenomena can be described as a transfer of unwanted babies from Southern or East Europe countries, largely developing states, to Northern countries, in majority industrialised states. Socio-economic inequalities between the «South» and «North» are the consequences of a long period of colonialism from Western powers and Japan. Nowadays, these colonial legacies are still present in form of socio-economic discrepancies within the process of globalisation. For instance, children are treated as material products for both the sending and receiving countries. With the emergence of a global economy over the last fifty years, adoption became a global market where children without parents may be seen as the commodity and adoptive applicants as the consumers (Brock & Hornnats 1990). In the adoption exchanges, when the supply of «Third World» children is low and the demand from «White» parents is strong, the value of orphans increases.

An example of how the political economy of international adoption reflects current geopolitical transformations can be found in the fact that Iran stopped sending children away for adoption after the Islamic revolution, South Africa after the fall of apartheid, Russia and other Eastern European countries started to give children up for adoption after the end of Soviet Union. Last but not least, China and Vietnam started to become involved with international adoption when they launched their reform policies and opened up to the world economy. These examples illustrate that economics, demographics, and politics influence child welfare policy (Montgomery 1994). In sum, historical legacy include how the exporting country has dealt with crises and relationships with foreign governments. Then, national laws govern the guardianship of children. Culture dictates what constitutes a socially acceptable family and which individuals are valued.

Political dynamics influence how and when children will be exported to other countries.

Applying post-colonial theories for South Korea and China seem logical due to their history and current international settings. Indeed, Korea was a former colony under Japan and for now, a subordinate of the American Empire. For China, the two Opium Wars during the 20th century and the invasion of Manchuria, and later other parts of China, by Japan are symbols of colonialism. After 1949, the persistent US threat against communist regimes can also be considered as another form of foreign power on China. Therefore, using a postcolonial perspective constitutes an useful approach to understand the Korean and Chinese adoption issue. Furthermore, the predominance of Asia as a supplying continent and that Asian children seem to be the most valued due to the orientalist imagery at work (Said 1978). In Western imaginary, Asians in are widely perceived as being docile and submissive, clever and hardworking, quiet and cute.

Thus, I argue that if a developing country can get rid of colonialism and other forms of domination, it can be economically and politically sovereign on its territory. Mixed with reforms and major public policies, namely family planning, it is possible to create wealth and become industrialised. Then, after reaching a certain level of development, the country will be able to gather funds to create a proper welfare system. Only nations at a particular level of social and economic development can develop welfare programs (Quadagno 1987). This has been proven after the World War II, when public welfare expenditures in Western capitalist democracies showed a rapid growth, beginning immediately after World War II and slackening only in the 1970s after the Nixon Shock (Quadagno 1987). Welfare state expansion was closely associated with economic growth. Indeed, the welfare state relies on the availability of economic surplus. The high level of economic development between 1945 and 1973 provided the economic means, Keynesian economics provided the rationale, while the centralization of the federal government during national wartime mobilization expanded national bureaucratic capacity (Janowitz 1976). In brief, according to the logic of industrialism, social benefits became feasible because of the new wealth and expanded surplus created by the industrialization process and a massive state bureaucracy through which benefits could be delivered (Quadagno 1987). With the West, Japan and South Korea in the lead, it seemed only a matter of time before China would modernize

sufficiently to develop the economic surplus and bureaucratic capacity that would allow them to initiate similar programs. If China becomes as developed as South Korea, it will definitely stop to abandon children, decrease intercountry adoption and augment incountry adoption.

1. The History of Intercountry Adoption

Intercountry adoption is started as a global phenomenon in the years following the Second World War (Altstein & Simon 1991), even if the movement of children between countries has a longer history. According to Bean and Melville (1989), the child migrants from the United Kingdom to Australia and Canada are an example. In the following aftermath of the war, international adoption was a small movement of children from countries in Europe and Japan, that suffered from war, to the US. The story of intercountry adoption as a large scale exchange of children, involving multiple interracial placements, debuted formally in the 1950s and in particular in the after the Korean War. Between 1957 and 1969, around twenty thousand children born outside the United States were adopted by American families through adoption (Ruggeiro 2007), a third of these were from South Korea, and later between 1972 and 1987 for over half (Altstein & Simon 1991).

By the 1970s, intercountry adoption became commonly accepted in the US and Western Europe. Numbers grew rapidly, due to a demand for children from infertile couples coupled with a lack of infants available for domestic adoption within the country (Hoksbergen 2000). In the 1950s after the Korean War, when it largely targeted mixed-race or «GI» children, highest numbers peaked in 1985 when 8837 children were sent to foreign countries and most of them were girls. Criticism during the 1988 Seoul Olympic games led the Korean government to limit the amount of children sent abroad and to set a quota for the end of international adoption by 2000, which succeeded after falling below 2,000 only in 2006 (Selman 2007). The United Nations Committee on the Rights of the Child, local media and academics also raised concerns about the level of intercountry adoption in Korea (Lae 2007), especially during the 2007 Adoptee Gathering in Seoul, when adopted Koreans from several countries joined Korean birth mothers in calling for an end to international adoption (Trenka 2007).

Besides the year of 1991, when Romania sent most children overseas, Korea remained the major source of children in the US until 1995, when China and Russia began to dominate. Even today it is the fourth largest supplier of “orphans” to the United States, despite being have one of the strongest economies and having an extraordinary low birth rate. Before this year, intercountry adoption from China really started from 1980 to 1989 when less than 100 children sent abroad from mainland China, although three times that figure were sent from the island of Hong Kong to a range of countries including the United Kingdom (Bagley 1993). Mainland China began to allow foreigners to adopt their children in larger numbers in the late 1980s (Tessler, Gamache & Liu 1999), but formal regulations did not come until 1992, when China created a law that allowed foreign parents the right to adopt and followed meticulous protocols to do so (Evans 2000). Westerners were highly attracted by Chinese regulation because of its own criteria of appropriate parents. In comparison to the majority of other sending countries, there was a preference for mid-30s parents and a general acceptance of single women. Furthermore, most available children were female babies and in relatively good health. Another factor that triggered the rise of adoption from China in the US is the fact that these children were officially abandoned, without any possibility that birth parents could ever find again the adopted family. Indeed, at that time, children from domestic adoption in the US were increasingly aware, asking for open adoption, search and reunion with biological family. As a result, from 1992, the number of children going to the US began to rise and by 1995 China had become the main sender of children, replacing Korea. Similar to Romania, adoption in China was driven mostly by media coverage of the country’s poor orphanages. In 1996, the famous «Dying Rooms» came to attract the attention of Western film-makers and journalists shown on British media. Prospective future parents everywhere in the world saw international adoption as a way of saving these poor orphans and also contributing to the multicultural society of the receiving countries (Luo & Bergquist 2004). For instance, in 2003, over 6,000 children arrived, with a peak of 7,906 in 2005. China also ratified the Hague Convention in 2005. Although there has been some reduction in the number of children sent in 2006, it seems likely that China will continue to dominate international adoption throughout the first decade of the 21st century.

Table 1

Seven major sending and receiving countries in 2004.

| Country of origin | Number of children sent |
|------------------------|-----------------------------|
| China | 13,408 |
| Russia | 9,440 |
| Guatemala | 3,420 |
| South Korea | 2,238 |
| Ukraine | 2,046 |
| Colombia | 1,741 |
| Ethiopia | 1,509 |
| Country of destination | Number of children received |
| USA | 22,884 |
| Spain | 5,541 |
| France | 4,079 |
| Italy | 3,403 |
| Canada | 1,955 |
| The Netherlands | 1,307 |
| Sweden | 1,109 |
| Finland | 289 |
| Total (22 countries) | 45,288 |

Source: Selman (2007)

Figure 1. Selman 2007

Causes of Intercountry Adoption

In Korea, the original goal of ICA was to export the children of Korean mothers and American fathers and, thus to maintain racial purity, a value developed through years of cultural isolation. The first time Koreans were faced with mixed-race children was following WW II and especially the Korean War, a harsh time of extreme poverty when no political or social mechanisms were established in order to raise these children. The most viable alternative on a long-term during that era was to expediate these children to their fathers' country (US), which alleviated the burden of the Korean government from having to deal with the problem internally. Furthermore, this solution fit in with patrilineal cultural and religious norms in which a child belongs to the paternal side of the family. The presence of Americans, namely missionaries, in Korea since the 1940s facilitated the development of the international adoption bilateral agreement as they were equipped to take the children to the US to fulfill the lack of babies back in their country (Adams & Kim 1971). At this period, Korea was not the only country to exporting children, but it was the first large-scale movement of children of a non-white race into Western countries. The number of children and the war circumstances made Korean adoptions appealing and forced adequate regulations. At first, it was established as an emergency measure in order to evacuate mixed-race "GI" children and later became a mechanism through which the Korean government exported its unwanted individuals from the competitive society: the poor, the disabled or those lacking Korean fathers.

In China, the exceptional rise of international adoption seems to be associated with the opening up to the West and the huge number of abandoned children resulting from the One-Child Policy since 1979. This had resulted in large numbers of babies being abandoned in public places without any information provided about the identity of their parents, as there was no legal channel by which birth parents could abandon and place their children for adoption. The second policy “one son/two child”, or also called the «one-and-half child», did not reduce the amount of child abandonment, but resulted that those abandoned were female babies, largely second daughters (Johnson 2004). That is why China is a unique case because most of the children were healthy girls. The Chinese officials actually define "abandoned" children not as unwanted babies, but as "surplus". In practice, these children tend to be girls and international adoption has become the most viable channel to dispose female offspring. In comparison to South Korea, China never experienced a large number of mixed-race babies and legitimized the export of children with family planning and population control, namely as a result of the "One Child Policy".

Comparison of Development Paths

Korea and China have both been involved in recent social, political and military conflicts. During the Cold war, China's role in Korean war resulted in North Korea siding with China and its socialist allies, while South Korea was strongly influenced by the US. These historical events and influences determined the two countries' methods and rates of modernization. While China has continued its isolation, Korea has pushed for modernization and has come to be known as one of the "new tigers" or "little dragons" of Asia due to its dynamic economic growth.

As a result of damage from wars and desperate needs of foreign assistance to rebuild, Korea initiated the move toward modernism in the 1950s when the US, and later other countries, offered foreign investments and aid. This massive assistance gave Korea a huge advantage over China which did not receive anything on this scale. China made the first tentative moves toward modernization by seeking foreign investors in the 1980s as a result of increasing internal pressures and, as well, from a weakening support from Soviet Union. Since then, economic liberalization has propelled China into fast economic growth. In response to poverty and demands from its citizens, China began its first socio-economic reforms in 1979, which posed a serious challenge to socialism by introducing western values and the privatization of industries (Cotton

1994).

Since both countries had large labour forces and few natural resources, it was the timing and degree of openness that largely determined the pace of development. Korea effectively reformed the use of its limited land, developed an agricultural sector that fed its own people, and exported surplus food to Japan. This was developed into a wider range of exportable goods sent to a broader market. Even though China is a much larger country, it did not have surplus goods to export and did not look to develop any, since their political ideology did not support this kind of venture. Distinctive policies have emerged in China and Korea as political dynamics have been changing since the 1920s. The Korean legal system began to follow the western system in the early 1900s and South Korea eventually chose capitalism and a close relationship with Western countries, in particular the US. On the other side, China, along with North Korea, resisted capitalism and chose instead communism. South Korea maintained its traditionally authoritarian government and still enjoyed rapid economic growth. Communist regime in China maintained a sort of isolationism, but slowly destroyed feudal superstitions and patriarchal legacies (Chu & Carew 1990). Today, both countries are developing and competing for new markets to increase economic growth, improve their standards of living, and support large populations. Asian Tigers such as Japan, South Korea, Taiwan, Hong Kong and Singapore became socio-economic development models in Asia and for China. The latter appears to follow the trajectory of these developmental states by expanding its foreign investors.

Comparison of Culture

For centuries Confucianism, feudalism and isolationism forged the primary values of racial homogeneity, ethnic purity and cultural stability central to Chinese and Korean societies although they each had a different interpretation of Confucianism later. These values were not challenged due to the minimal contact with outside cultures. External contact was mainly with Japan with which both China and Korea had adversarial relationships.

Confucianism, which is shared by Korea and China, influenced what types of people are valued and how religion is to be practised, namely the definition of family. Confucianism grew out of feudalism and a harsh life and advocated patriarchy coupled with a strong, structured family unit

and society (Fong 1994). This belief system helps define a "surplus" child, and from these values and definitions grew the initial goals of intercountry adoption. Due to women preference, especially in rural areas, parents would prefer to raise a male in order to secure their future and perpetuate the lineage. In spite of women's oppression, boys were highly valued for producing sons and girls were chosen for characteristics believed to be good for child bearing. Nowadays, emphasis is now placed on small families in both China and Korea, and women no longer have several opportunities to produce a son. For some mothers, they will manipulate circumstances and use traditional medicine to insure their child is a male.

In sum, the two countries had different development trajectories, resulting in different causes for intercountry adoption. For South Korea, the Korean War created children of war, whom parents died in the conflict. The first wave of adopted children was also composed mainly of mixed-blood children between American soldiers and Korean women. Due to the importance of blood lineage and purity in Korean culture, these unwanted children were sent to US families. After, the next cohorts of children were abandoned due to poverty and hardship for Korean people. The majority of them were female babies in accordance to Confucian social and religious norms, where the son is responsible for the family's wealth and rituals. In terms of timing, the moment when international adoption started from Korea corresponds to the end of WWII and the Korean War. After years of authoritarianism, Korea started to embrace a capitalist democratic regime and reduced gradually intercountry adoption. Its openness to market economy and globalization made it easier for Korea to send children abroad earlier than in China.

For China, intercountry adoption started later in comparison to Korea for many reasons. China's major industrialisation phases started right after the Maoist period, namely during Deng Xiaoping's era. Its socio-economic reforms encompassed the goal to reach higher GDP by the end of 2000. Therefore, population and family planning were a way to alleviate the heavy population's burden on the state and become a «modern» nation. As a result, the one-child policy created thousands of children sent abroad as being born the second baby. These were mostly girls also due to similar Confucian beliefs, similar to the Korean case. As China undertook liberal reforms and connections to the world after a long period of socialism, its faster economic development started later and, thus, intercountry adoption.

2. Adoption Laws and Institutions

Korean adoption served as a kind of model as international adoption began in the late 1960s, for new sending and receiving countries. Although China and South Korea never explicitly collaborated to organize intercountry adoption institutions, based on an interview with a former official at Nanchang Welfare Institute, the manager went in the US to work for Holt Foundation which also organized children from Korea to the US since 1956. Chinese officials were also aware about the intercountry adoption practices in South Korea.

Comparison of Family Planning

As mentioned in the last section, international began after the Korean War. The first adopted children were the Amerasian offspring of American servicemen and, according to the culture, it made sense to send them to their fathers' country. After this supply was exhausted, Korea continued to export illegitimate and abandoned children as the demand from America and Europe continued to rise (Vitillo 1991). Adoption also came to be an informal initiative for population control and family planning when the Korean government introduced a non-coercive National Family Planning Program in 1962 (Hahm 1986). It promoted late marriage, smaller families and contraception education which have all contributed to the reduction of the birth rate.

In comparison, Chinese policies concerning family and adoption stem from a need to control the huge population. The famous "One Child Policy" is part of several policies and laws developed since the 1950s to address overpopulation which have slowed the growth rate. The family planning policies are especially designed to increase per capita production to triple that of 1980 by the year 2000 (Jing et al. 1987). The establishment of the State Family Planning Commission in 1971 was an early policy specifically targeting the birth rate. An expanded Marriage Law of 1980 further legislated family planning and now there are 185,000 family planning committees in China (Zhangling 1990). Assuming that later marriage means fewer children, the new law raised the minimum marriage age to 20 for females and 22 for males. Late marriage, 23 for women and 25 for men, and late birth, mother over 24, earn financial awards. On the other hand, births outside of marriage are illegal and these babies will not possess hukou. A compulsory one child pledge is signed by all couples upon marriage. Non-coercive methods such as financial and

social incentives -priority for schools, "good" jobs for the parents, health funds and a monthly allowance for only children- encourage this pledge to be honoured (Jing et al. 1987). There are some exceptions to the one child policy with the creation of the one-and-half policy, which allowed parents to have a second child : if the first has a non-inherited disability, if both parents were singleton children, if the parents live in certain remote rural regions, if couples are over a minimum income level and pay an "excess birth fee", if after many years of childless marriage a couple adopts and then conceives, or if a widowed or divorced person marries a childless person.

Comparison of Social Welfare

The evolution of adoption development follows the sequence of modernization and development of social welfare in these two countries. In 1954, religious organizations began to arrange inter-country adoptions (Miller 1971). The Korean Central Child Welfare Committee was created in 1961 under the Ministry of Social Affairs. This organization expanded services to include other countries and other areas of child welfare. International Social Service (Korea) was established in 1964 and in 1965 became a private agency and partly sponsored by the government (Miller 1971). Korea's Extraordinary Adoption Law requires agencies to operate both group care institutions and foster homes (Kim & Carroll 1975). Foster homes, established in 1965, are also for children about to be adopted. The Korean government pays for part of institutional care, but not foster care which is financed through fees paid by adoptive parents. In South Korea, all adoptions must be arranged by government and approved agencies (Selman & White 1994). Four agencies, mandated for ICA by the South Korean Ministry of Health and Services, work with licensed agencies in the countries with which Korea has adoption agreements (Alstein & Simon 1991). Initially, the Korean government also saw adoption as a way to alleviate population but as well, as an alternative to costly institutional care. As incountry adoption was not culturally acceptable, exporting children seemed an appropriate way to reduce the care of orphans and mixed-race children.

Modernization and democracy were promoted by mostly students and politicians seeking reform in the 1970s and 1980s. These events set the tone and direction for the major economic, industrial and social changes that followed. A five-year development program to expand economic growth potential and improve social conditions was launched in July 1993 by President Kim Young Sam

five months following his inauguration (Lee & Sohn 1994). This meant rapid prosperity and independence for many Koreans who, until recently, knew only poverty. As a consequence, social welfare spendings also increased and targeted everyone including children, the elderly, handicapped persons and the poor. Domestic political pressures, strong economic growth and national pride, all these factors contributed to the idea that children's needs must be provided by the state internally. With this economic boom, Korean child welfare improved in terms of health, education and infant mortality since the 1960s (Bowen 1992). In addition to help more children, the Korean government is increasing subsidies and aid to families so they will not be tempted to abandon children due to poverty (Tahk 1986).

For China, the first orphanages for domestic purpose were also established by religious organisations such as Christian leaders from the Kuomintang during the civil war. For example, the Soong sisters, Ai-ling, Ching-ling and Mei-ling, along with their husbands (H.H. Kung, Sun Yat-tsen and Chiang Kai-shek), founded several orphanages and foster houses for war children (Scott 2005). From 1949, the Chinese Communist Party established new governmental institutions, based on those set up by the Kuomintang previously, to take care of abandoned children. According to data by the Ministry of Civil Affairs, during 1949-1954, there were 666 welfare institutions caring for the elderly and orphans, with 25,960 orphans living in them (Bai and Wu 1996). Due to food shortages and natural disasters, this number increased and institutions rose. However, a large number of homes closed down and a lot of homeless children became street kids. The care services were more focused on accommodation and political education (Liu and Kai 2009). For example, these children were helping to establish a socialist society and had to participate to the planned economy. These children were not given to international adoption yet, but simply remained in foster care institutions until they would reach the adult age. In the era of the one-child-policy since the 1980s, child welfare reforms occurred and national orphanages began to make exchanges with foreign countries. There were now multiple funding sources for orphanages in addition to state funds, such as Western foundations, religious missionaries and individual donors (Wang 2007). For example, foreign adoptive parents pay a CAN \$3,600 to \$6,000 "donation" to the orphanage plus a notary fee for, that are suppose to serve the orphanage facilities (Bowen 1992). However, conditions in these facilities have been reported as filthy, crowded and unhealthy (Driedger 1996).

For China, orphanages operate foster homes to make unwanted children, the strongest and the healthiest, ready for adoption. Nowadays, these are the clean, bright facilities foreigners see (Driedger, 1996). Applicant parents from outside the country apply to China Center for Children's Welfare and Adoption (CCWA), under the Ministry of Civil Affairs and then visit China and enter into a written contact with a designated adoption organization in their country of residence. After a short wait of a few months or less, the Civil Affairs Department approves and finalizes the adoption. Despite criticism, today's orphanages incorporated better environment and health care services for the children, especially for the disabled ones. Today in China, we can find three types of orphanages: foreign non-governmental organizations, religious foundations and state-led ones (Wang 2016).

Comparison of Adoption Regulations

The two countries also present variances in terms of adoption laws. Korean legislation in the 1960s followed the normally accepted procedures of intercountry adoption, in contrary to China which legislated first, and then pushed its citizens to comply. In China, modern civil adoption was legislated in 1980 and intercountry adoption was officialy formalized in the early 1992.

In Korea, before a child can be adopted, the biological parents or the child's relatives must give their consentment (Bogard 1991). It is legal to surrender a child in a proper orphanage. If the child is abandoned in an anonymous way, police systematically search for the parents by giving notice twice in two weeks through newspaper's and court bulletin boards. If the parents are not found to give their consentment, guardianship goes to the official responsible of the local child care agency. Korea has vey severe standards for Western adoptive parents and agencies (Vitillo 1991). The receiving agency must provide a home study and post-placement services by a social worker who is Korean or familiar with Korean culture and traditions (Chun 1989). Korea has a guardianship provision in their adoption laws. The child may leave Korea before finalization, but the foreign agency director must accept guardianship until procedures are cornpleted (Hale 1981). Then, the receiving agency must send a progress report to the Korean agency every six months until the child becomes a citizen in the new country. To provide support services, the Korean agency employs a social worker who processes requests from overseas Korean adoptees or their

parents regarding post-legal services, visits to Korea or cultural information (Tahk 1986).

Concerning the case of China, it was not until the new Marriage Law in 1980 that civil adoption was recognized and promoted. There are now two types of legal adoption in modern China. In a Civil Adoption an individual adopts a child and takes on all parental responsibilities for that child. In a State Adoption, a child welfare organization adopts a "young unfortunate", or a child who has been orphaned or abandoned and is disabled, ill, or part of a sibling group (Palmer 1989). China's first law on child protection, the Protection of Minors and the Adoption Laws, became effective in 1992. During the same year, explicit legislation to facilitate the export of Chinese girls, the Adoption Law of the People's Republic of China, was passed as part of a larger series of policies designed to control population. This was partly due to the fact that China stopped ICA for two years in response to negative allegations about trafficking in babies. The two basic principles of this law are that adoption must be voluntary and must be in the best interests of the child.

In China, abandoning a child is illegal and punishable by a fine, yet only abandoned children can be adopted although the word "abandoned" is broadly interpreted (Melina 1996). While South Korean laws require an investigation and approval to confirm an abandonment, Chinese law assume any child in an orphanage is abandoned. This is the reason why most of Chinese parents left their child in a market, a bus station or in front of an orphanage without providing informations on their identity. If so, they would have been accused of a crime and officials would have brought back the foundling baby to the place of residence. Also, there is no Chinese agency or social worker who that is in charge to send a report about the health status of the child after the adoption.

As mentioned previously, while adoption processes of Korea and China are highly comparable due to cultural and historic similarities, the rate and timing of international in Korea and China are different due to political priorities and contact with the outside, especially Western cultures. As a result, their practices and policies also differ. In Korea, intercountry adoptions procedures are highly structured, regulated, and include written bilateral agreements with the countries involved. These agreements follow the Leysin guidelines and include a guardianship provision,

transparent protocol for follow up services (Bagley 1993). In China adoptions are independent, direct, quick, open to anyone and procedurally simple. However, China is demanding more criterias the last years and prioritized domestic adoption within Mainland China and extended to Taiwan, Hong Kong and Macao (Cote 2013). In both, countries orphanages and adoptions are financed through fees paid by adopters.

3. Place of Adoptees in their Homeland

Since the Korean adoptees were adopted earlier than China, the first generation already came back to South Korea. Therefore, China has not developed as much official infrastructures to receive them and the society is not aware of the issue.

Comparison of Popular Culture

In Korea, the adoptees situation is quite famous. It is no longer a taboo since the presidency of Kim Dae Jung. During the Asian financial crisis in 1997, the country's social welfare budget had few support to offer victims and thousands of "IMF orphans" who were sent abroad for international adoption. After the crisis, the Kim Dae Jung government created a productive welfare system, symbolising a shift from the status of a Third World state to a social democratic welfare one. President Kim had asked himself how it is possible to morally defend international adoption in spite of a fast developing economy. In his prison letters to his wife, he wrote :

«I read in the newspapers published in prison last month about people who were adopted abroad when young and returned as adults to the motherland to visit, either alone or with stepparents. I could not but feel touched and shamed as well when I thought about the fact that although their homeland abandoned them, they came to this land again». (Kim Dae Jung, 1986: 238)

Later, he also publically apologized and felt ashamed about the bad reputation of Korea abroad in Asia Week on April 6, 1990.

«It's a shame that Americans call Korea the largest exporter of toys and textiles and babies. We should be ashamed of ourselves and put a stop to this immediately...In Europe, in the United States, wherever I've been, I've seen our children. I am ashamed».

This was the first time international adoption appeared in the political sphere : the adoption issue involved the pro-North, the pro-South factions both in Korea, Korean diaspora groups and political sympathisers in the adopting countries from the West (Hübinette 2005). From the mid-

1970s, the Korean Government increasingly began to recognise the existence of the adopted Koreans at an official level, and individual adoptees began to appear in the Korean media. As a result of this social recognition, the number of adoption agencies was also reduced from seven to four wholly run by Korean nationals. According to Hübinette (2005), the adoptees became a product on the consumption market, part of Korean entertainment industry. Besides newspapers or news media, they are often portrayed in popular culture such as songs, movies, and TV shows as victims and thus, attract thousands of Korean customers' pity. Based on benevolence, but mostly on profits quest, we assist to the marketization of the adoption issue, without the consentment of them. They also asked biological parents to participate in order to make it more dramatic and sensational. For example, a famous TV show is filming biological moms are bringing homemade food in America to their daughters. Last August 2015, the MBC entertainment program 'Infinite Challenge' member Yoo Jae Suk went on an international food delivery service to the United States, and met with Korean adoptees.

In China, the number of adoptees back in China is pretty low comparing to South Korea. Indeed, most of adoptees are relatively young and not enough well equipped to come back. Most who came back to their homeland are searching for their biological parents, studying Chinese or traveling in the country with an agency. Although, there is not much initiatives from private companies to publicize adoptees, journalists are eager to find crunchy and touchful stories to publish. Many written articles, blog posts and documentaries have been made online. Also, some news channels advertised adoptees case in order to help them to find their biological parents. The data bank Huijia baobei 回家宝贝 and the TV show Deng zhe wo 等着我 are helping Chinese parents to find lost children exclusively within Mainland China, not specifically for adoptees. Is it true because I, myself, used social media to find my own parents and since I am a Peking University student, it was easy for me to receive mediatic attention. However, my friends in Canada were unable to appear in the newspapers because their story is too banal. No Chinese movie has been done explicitly about the case of Chinese adoptees overseas. In traditional culture, the only reference was The Orphan of Zhao 赵民孤儿 created in the 13th century by Ji Junxiang, which depicts the theme of familial revenge, in the context of Confucian morality and social hierarchical structure. Recently, only the movie Qingaide 亲爱的, depicting a kidnapped orphan in China, tackles the issue of adoption. As a result, few Chinese people, none of my

professors at Peking University, know about the issue of international adoption, unless mothers and families who abandon themselves children.

Comparison of Soft Power

As many scholars described US as a missionary power (Bertelsen 2014), transnational actors beyond the control of the state, such as missionaries establishing orphanages, play an important, if not always acknowledged, role in the soft power of states. As a result, intercountry adoption enhanced US-Korea and US-China relationships. Indeed, according to Nye (2004), this type of human exchanges can be called soft power. Criticism from North Korea and international community of mistreatment of children serve as leverage and bargaining tools about human rights. The open reporting of North Korean criticism in the left-leaning Scandinavian press and the adoption issue vividly involved the pros and cons of the two Koreas (Hübinette 2005). The Korean government is proud of its accomplishments and its new, modern image. To save face, it suspended all international adoption during the Olympics to avoid negative publicity and international embarrassment that could come from reports of not being able to care for its children (Alstein & Simon 1991). Korea is often seen as a model because it created TV shows to lessen the taboo of adoption in Korea. With the new nationality law, the government recently gave citizenship to adoptees and recognize them as part of the Korean diaspora, part of the Adoptee Rights Campaign's efforts to pass the Adoptee Citizenship Act in the US. A revised nationality law passed on 21 April 2010, by the National Assembly of South Korea and in effect since 1 January 2011, granted a limited number of persons dual citizenship. It wants to be perceived as modern and able to care for its citizens internally. Instead, Korea is encouraging internal adoptions. Korea is phasing out ICA largely because fewer mixed race children are available but also from concern about its international reputation. Many of the countries which have reduced the number of children sent for intercountry adoption have done so because they felt it inappropriate as they become richer and often from a deep sense of shame or because of a series of scandals.

Nowadays, adoptees from both countries act as cultural ambassadors in their homeland and adoptive land. South Korea and China are actively organizing subsidised root-seeking tours through embassies and adoption agencies. South Korea possesses a formal website called

Korean Adoption Services for fully supporting adoptees, families and organized a comprehensive report of all adoptees. China also has a website called China Center for Children's Welfare and Adoption, but is mainly focused on administrative purpose between China and adoptive countries. It is not yet giving the same resources as the Korean website, but is offering indirect scholarships to certain adoptee students such as certain of my friends, including myself. Most of support comes from adoptee's organizations in their adoptive country or social online groups. Even from orphanages, officials seem not very welcoming and happy to see us again, like if we were dissatisfied by our new parents, an unwanted product after the purchase. Treating us like a child, they avoid talking about the socio-economic reasons of our abandonment and don't try to help us to find our biological parents. They want to show their own version of narratives on Chinese culture. There is no governmental mechanism to find them but only via media channel, which is very emotionally tiring and dangerous. Last January 2018, China's Ministry of Public Security launched a campaign to attract ethnically Chinese or overseas people to participate in China's economic development and get 5-years residence permit. However, it never mentioned any special procedures for Chinese adoptees. Less initiative are state-led comparing to South Korea. This is certainly due to the fact that China is still a developing country with a big population and extremely busy on the international sphere.

Conclusion : Future Status of Intercountry Adoption

As mentioned previously, Korea and China identified different welfare and population at varying times, but both countries introduced intercountry adoptions to accomplish these goals. In the case of ICA, policy differences were influenced by the fact that Korea moved towards modernization and capitalism five decades before China. Regarding adoptions, Korea and China are at different stages of policy development and practices. In many ways, China seems to follow Korea after opening up to the world and building international trade.

From the comparison of South Korea and China, it is possible to conclude that a diminution of intercountry adoption, an increase in domestic adoption and a higher quality of children welfare will occur, as an emerging state become more developed. Recent years have seen a fall in the number of children sent from China to most countries (fewer than 4,000 in 2006), but it remains unclear whether this is the ending to adoption from China and what this would mean for

the overall future of intercountry adoption. Indeed, China has concrete benefits from a continuation of adoption in the short term, as a solution to the continuing abandonment of children, through savings on the cost of institutional care, and the substantial amount of revenue adoption brings in per child. However, China, like South Korea did, has other incentives to stop sending children abroad or, at least reduce the amount of adoption. The government seems to follow South Korea's path by prioritizing the amount of incountry adoption (Mainland, Hong Kong, Macau and Taiwan). According to Wang (2016), only disabled children remain in orphanages in China. Infant adoption is now largely incountry, but older and special needs children, including sibling groups, are sent for intercountry adoption (Cote 2013). Due to the One-Child policy, development by reducing domestic demands on women and freeing them to work outside the home, thus resulted in a higher standard of living for the smaller families. With the rise of contraception means, access to abortion and reproductive technologies, fewer families are likely to abandon a child. The two-children policy, emitted in 2015, also wants to counter the low fertility rate, which is now under the replacement rate. In sum, if China continues to industrialize and modernize its welfare system, it may provide better living conditions and parents will have more reasons to raise more children. If this is the case, as Korea did, China will eliminate the export of children and seek ways to integrate them into society.

In order to pursue further studies, it would be interesting to explore these research questions concerning the case of Chinese adoptees: What will this large cohort of adoptees feel when they reach adulthood? How will these young women feel about their early history of "abandonment" because of their gender? Indeed, the cohort is still young and much of the writing has come from adoptive parents or focused on adoptive parents' experiences. For China, will adoptees compose a new type of overseas diaspora? Is it the emergence of another type of citizenship based on ethnicity? If a generation of adoptees is returning to South Korea (New York Times 2015), I believe the same will happen in China.

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