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**Adoption "coûte que coûte"**  
**Korean adoption agencies, Dutch social workers,**  
**and (re)defining the best interests of the child,**  
**1953-1967**



*Mag ik naar Nederland komen?*

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**Adoption "coûte que coûte"**  
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**(re)defining the best interests of the child,**  
**1953-1967**

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Over the past year, a little group took shape that shared with me the same concerns – how do we ensure that this community can move progressively forward? I am grateful that I am together with so many others but especially Julayne Lee, Oh Myo Kim, Mary Bowers, and now Eva Suskind – all who have sacrificed so much to help find answers and bring them into fruition.

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## Abstract

As the first chapter in a history of transnational adoption from South Korea to the Netherlands, this thesis attempts to answer the question: Why did the Netherlands start adopting children from South Korea? This practice was made possible by two key developments, namely the systematic marketization of child relinquishment under the Park Chung-Hee regime in South Korea and the longer development of the principle of the best interest of the child as a regime of truth built upon the scientification of motherhood and population. By looking at internal government memos, private letters, and communication between stakeholders, it becomes clear that this matter was not only of importance to Dutch families but that the debate was unbeknownst to most, firmly situated in a larger global debate between adoption agencies and social workers on the nature of transnational adoption and its alignment with the principles of the best interests of the child.

Keywords: Korean Adoption, Transnational Adoption, Child Welfare, Best Interest of the Child, Motherhood, Family planning

## Abbreviations

CBP	Commissie Buitenlandse Pleegkinderen
CPS	Child Placement Services
ESWS	Eastern Social Welfare Society Inc.
HAP	Holt Adoption Program, now Holt Children's Services, Inc.
ICA	Inter-country Adoption
ISS	International Social Service
KSS	Korea Social Service, Inc.
PAPs	Prospective Adoptive Parents
SIA	Stichting Interlandelijke Adoptie

## Notes

- Translations of Dutch and Korean source texts to the English language are all by the author.
- The Korean terms have been romanised per the McCune–Reischauer (M–R) system of romanisation, excluding names and terms that have a well-known different spelling

# 1. Introduction

## 1.1 “My life started with the violation of my human rights”

On the 26th of March 2025, the South Korean Truth and Reconciliation Commission (TRC) held a press conference at their main office in Seoul on human rights violations in the intercountry adoption process.<sup>1</sup> Of the 376 adoption cases submitted to the TRC, 56 were recognised as victims that day, one of them being my very own father. This was the first time that an official South Korean governmental body had acknowledged that the fundamental rights of the children were violated within the process of intercountry adoption on a systemic basis; the adoption had not taken place with the best interest of the child in mind.<sup>2</sup> As my father does not speak Korean due to his adoption to the Netherlands, I had to deliver the news to him over the phone. After a few seconds of silence, he proclaimed: “I really thought I was prepared for the news but it’s a lot to hear that my life started with the violation of my human rights.”

With both of my parents being adopted from South Korea to the Netherlands, it is also necessary to look into the other side of the equation: if South Korea supplied infants for adoption, then that means there also was a demand side for adoptable children. The Dutch government has done an independent investigation into the process of intercountry adoption and possible violations of human rights by establishing a committee to look into the issue. After a three-year process, the committee published its final results in February 2021, making the Netherlands one of the first countries to critically reflect on intercountry adoption on a national level through an external committee.<sup>3</sup> This Joustra-report, named after commission chair Tjibbe Joustra, was cited by the TRC as one of the main motivators for accepting the cases of intercountry adoptees for investigation.<sup>4</sup>

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<sup>1</sup> “Press Conference on the Decision to Investigate Human Rights Violations in the Intercountry Adoption Process,” Truth and Reconciliation Commission, Republic of Korea, March 26, 2025.

<sup>2</sup> It was also only a partial acknowledgement as further investigation and recognition of the remaining 311 victims – one of which was my mother’s case – were suspended. TRC officials have cited a lack of documentary evidence as the reason for rejecting some cases as officially recognised victims. So while the TRCs does recognise how the intercountry adoption system as a process was ridden with human rights violations, its case-by-case judgement on status of victimhood is a rejection of the acknowledgement of the systemic nature of the violations and that all victims should be recognised as such by the Korean state.

<sup>3</sup> Commissie onderzoek interlandelijke adoptie, “Rapport Commissie Onderzoek Interlandelijke Adoptie” (the Hague, February 8, 2021), <https://open.overheid.nl/repository/ronl-8cc003fa-eadc-4d7a-8b49-9ea6e661bb94/1/pdf/tk-bijlage-coia-rapport.pdf>.

<sup>4</sup> Geontae, Park et al., *Decision on Truth Establishment on Human Rights Violations in the Intercountry Adoption Process* (Truth and Reconciliation Commission, Republic of Korea, 2025), 22-24, 115, 120-1.

Unfortunately, the Dutch report has clear limitations, especially in lifting the veil on the historic development of intercountry adoption from outside of Europe. Limited by the onset of the COVID-19 global pandemic and a limited legal mandate in terms of scope and time, the committee only shallowly touched base with most sending countries, except for the five main investigations into Bangladesh, Brazil, Colombia, Indonesia, and Sri Lanka. This meant adoptions from South Korea were not closely scrutinized, with only a passing mention in the appendix how South Korean children were the first non-European infants coming into the country on a large scale solely for the purpose of adoption, thereby setting the legal standard and precedent for all further intercountry adoptions.<sup>5</sup> This omission is problematic: how could one argue to be reflecting critically upon its past deeds without reflecting fully on the very origin of such deeds? It is for this very reason that, besides the obviously deeply personal motivations behind this research project, this unfinished investigation into the origins of South Korean adoption to the Netherlands remains of critical importance to further the debate in broader society on the practice of intercountry adoption as a measure of both child welfare and family formation. To achieve this, this research aims to be an introductory investigation into answering the question: ‘Why did the Netherlands start adopting children from South Korea?’

The argument in this thesis is two-fold. First, that the spread of the adoption of Korean children to the Netherlands necessitated the systematic marketization of child relinquishment under the Park Chung-Hee regime. Through specific legal and administrative policies, the Korean state transformed adoption into a routinized industry, creating the stable institutional conditions and supply of children necessary to meet burgeoning international demand. Secondly, this "legible" supply system could interface with this broad call for children as this legibility became detached from the specificities of each nation state by the perceived universality of the principle of the best interest of the child. I identify this principle as a transnational regime of truth built upon the scientification of motherhood and demography in both the sending and receiving country. Through the case of the Netherlands, it is revealed how the best interest of the child could be universally applied.

## **1.2 An Exceptional Form of Migration: Transnational Adoption**

Before introducing the specific relationship built up between Korea and the Netherlands, some definitions are in order: adoption, adoption as migration, adoption as industry, and

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<sup>5</sup> Commissie onderzoek interlandelijke adoptie, “Bijlagen Commissie Onderzoek Interlandelijke Adoptie” (the Hague, February 8, 2021), 42-44, <https://www.rijksoverheid.nl/documenten/rapporten/2021/02/08/tk-bijlage-coia-rapport>.

lastly the transnational form of adoption. To start, I borrow Margaret Homans' definition of adoption as a set of practices that revolve around the "move [of] infants and children from one social location to another."<sup>6</sup> This broadening of the definition of adoption complicates the normalised, untroublesome understanding of the concept that is still widely prevalent in the Global North, that is "adoption as an 'as if' family formation, in which relations between parents and children mimic biological ties."<sup>7</sup> The adoption of a child is regarded as a celebratory act for being a form of family formation that is in the best interests of the child. It simultaneously de-biologizes; many adoptees will grow up celebrating not only their birthday but "gotcha day" – a sort of 'second birthday' that opposes the bionormativity of parent-child relation. In the United States, many adoptees receive a U.S. birth certificate that lists their new adoptive name and their adoptive parents as their parents. This deemphasis of the biogenetic in adoption narratives rests on a foundational understanding of kinship as a sociocultural construction; human relations are deemed cultivable through human intervention into the natural. Yet, paradoxically, it simultaneously rests upon the reification of the nuclear family as the preeminent form of family life. To understand this puzzle, a quick glance at the historiography of adoption suffices.

For years, adoption has been researched mostly within the domain of social work, paediatrics, and psychology, where the act of adoption was framed as an intervention, a charitable deed, or an act of saviour – the saviour of a child that needed to be defined as being in dire need of that saving.<sup>8</sup> The circumstances of the child in the country of origin were naturally assumed to be so dire that saving was always warranted – a 'narrative of salvation' developed to substantiate these assumptions.<sup>9</sup> Since the early 2000s, this normative understanding has come under increasing scrutiny, accumulating into what could be defined as the field of Critical Adoption Studies.<sup>10</sup>

Tobias Hübinette, one of the founders of critical Korean adoption scholarship, pointed out in his 2005 dissertation how "international adoption is seldom perceived to be

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<sup>6</sup> Margaret Homans et al., "Critical Adoption Studies: Conversation in Progress," *Adoption & Culture* 6, no. 1 (2018): 1.

<sup>7</sup> Homans et al., "Critical Adoption Studies," 3.

<sup>8</sup> Jesús Palacios and David Brodzinsky, "Review: Adoption Research: Trends, Topics, Outcomes," *International Journal of Behavioral Development* 34, no. 3 (May 2010): 270-84, <https://doi.org/10.1177/0165025410362837>.

<sup>9</sup> Sandra Patton-Imani, "Orphan Sunday: Narratives of Salvation in Transnational Adoption," *Dialog* 51, no. 4 (2012): 294-304.

<sup>10</sup> It is necessary to mention here the tireless efforts of non-scholar adoptees to reform the discourse on transnational adoption through film, poetry, literature, performative art, and visual art. See Eleana J. Kim, "Chapter 10. Producing Missing Persons: Korean Adoptee Artists Imagining (Im)Possible Lives," in *War Baby / Love Child* (University of Washington Press, 2013), 75–85.

a migration, and international adoptees are almost never discussed and treated as a diaspora or as an ethnic group.” Now, a lot has changed in the past two decades. Fuelled by an increasing number of adoptee scholars and activists, in attempting to make sense of the paradox underpinning their existence as transracial intercountry adoptees, the view that adoption is not only a form of humanitarian charity but an act that simultaneously fulfils a distinct *need* that went beyond doing something ‘good’ has become more prevalent. This complication centres around the question of what that need is, where it comes from, and most importantly, what its consequences have been, in the widest possible sense. As the impact of race on the adoption narrative and experience was brought up as a research question, the salvation narrative was identified and scrutinised in literary studies<sup>11</sup>, ethnic studies<sup>12</sup>, theology<sup>13</sup>, sociology<sup>14</sup>, as well as history<sup>15</sup> – all influenced heavily by gender studies – while anthropologists mapped out the lived experiences of the adoptees<sup>16</sup>; those in development studies<sup>17</sup>, social welfare<sup>18</sup>, and psychology<sup>19</sup> have worked hard to show the underlaying biases present in the existing scholarship on adoptees.

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<sup>11</sup> Kimberly D. McKee, *Adoption Fantasies: The Fetishization of Asian Adoptees from Girlhood to Womanhood*, Formations: Adoption, Kinship, and Culture (Columbus, Ohio: The Ohio State University Press, 2023).

<sup>12</sup> Catherine Ceniza Choy, *Global Families: A History of Asian International Adoption in America* (NYU Press, 2013); Kit W. Myers, *The Violence of Love: Race, Family, and Adoption in the United States* (University of California Press, 2025).

<sup>13</sup> Sandra Patton-Imani, “Orphan Sunday: Narratives of Salvation in Transnational Adoption,” *Dialog-a Journal of Theology* 51, no. 4 (December 2012): 294–304.

<sup>14</sup> Sara K. Dorow, *Transnational Adoption: A Cultural Economy of Race, Gender, and Kinship* (New York: New York University Press, 2006); Riitta Högbäck, *Global Families, Inequality and Transnational Adoption: The De-Kinning of First Mothers*, Palgrave Macmillan Studies in Family and Intimate Life (Palgrave Macmillan UK, 2016); Elizabeth Yoon Hwa Raleigh, *Selling Transracial Adoption: Families, Markets, and the Color Line* (Philadelphia: Temple University Press, 2018).

<sup>15</sup> Laura Briggs, *Somebody’s Children: The Politics of Transnational and Transracial Adoption* (Duke University Press, 2012).

<sup>16</sup> Signe Howell, *The Kinning of Foreigners: Transnational Adoption in a Global Perspective* (New York Oxford: Berghahn Books, 2006).

<sup>17</sup> Shila Khuki De Vries, Sara Kinsbergen, and Dirk-Jan Koch, “Towards a Critical Development Perspective on Intercountry Adoptions,” *Oxford Development Studies*, April 24, 2025, 1–15; Kristen Cheney, “‘Giving Children a Better Life?’ Reconsidering Social Reproduction, Humanitarianism and Development in Intercountry Adoption,” *The European Journal of Development Research* 26, no. 2 (April 2014): 247–63.

<sup>18</sup> Oh Myo Kim, JaeRan Kim, and Randy Tarnowski, “International Adoption: A Global Challenge,” in *The Routledge Handbook of Global Child Welfare* (Routledge, 2017).

<sup>19</sup> Jason D. Reynolds (Taewon Choi), Oh Myo Kim, and Joseph G. Ponterotto, “Authenticity Among Adult Transracial Korean Adoptees: The Influences of Identity, Thoughts About Birth Family, and Multicultural Personality Dispositions,” *Journal of Asia Pacific Counseling* 9, no. 1 (February 28, 2019): 21–37,

<https://doi.org/10.18401/2019.9.1.2>; Jade H. Wexler et al., “Understanding Adoption as a Reproductive Justice Issue,” *Psychology of Women Quarterly* 47, no. 4 (December 2023): 510–27, <https://doi.org/10.1177/03616843231166376>; Richard M. Lee, “The Transracial Adoption Paradox: History,

Hübinette was one of the first scholars to publish a historic overview of the development of Korean adoptions in 2004 with an article published in the community guide for adoptees, edited by Eleana Kim and published by the Overseas Korean Foundation.<sup>20</sup> His monograph *Comforting an Orphaned Nation: Representations of International Adoption and Adopted Koreans in Korean Popular Culture* was published in 2006; Eleana Kim's book, *Adopted Territory: Transnational Korean Adoptees and the Politics of Belonging*, was released in 2010.<sup>21</sup> Both devote a chapter to the history, laying the foundation for the flurry of productivity in the subsequent decade which saw the publication of six seminal works that cover parts of the history of Korean adoption.<sup>22</sup> Though I am indebted to the arguments presented in these works, a clear limitation is that the history of adoptions from Korea are always framed in the context of the US, US militarism and the Korean War, with most attention given to the first decade and the rapid decline in 1988. Notable exception to this is Hosu Kim's publication, *Birth Mothers and Transnational Adoption Practice in South Korea: Virtual Mothering*, which centres the Korean birth mother's experience.<sup>23</sup>

Intercountry adoption has also become more recognised as a form of migration, though as a form with a lot of asterisks. A way that migration scholars have viewed intercountry adoption is by defining it as a peculiar form of migration that deviates from established theories. It was apparent that the adoption of overseas born children is

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Research, and Counseling Implications of Cultural Socialization," *The Counseling Psychologist* 31, no. 6 (November 2003): 711–44, <https://doi.org/10.1177/0011000003258087>; Christine S. Wu et al., "Hidden among the Hidden: Transracially Adopted Korean American Adults Raising Multiracial Children," *Developmental Psychology* 56, no. 8 (August 2020): 1431–45, <https://doi.org/10.1037/dev0000881>; Xiang Zhou et al., "Korean Adoptees as Parents: Intergenerationality of Ethnic, Racial, and Adoption Socialization," *Family Relations* 70, no. 2 (April 2021): 637–52, <https://doi.org/10.1111/fare.12439>.

<sup>20</sup> Tobias Hübinette, "Korean Adoption History," in *Community 2004: Guide to Korea for Overseas Adopted Koreans*, ed. Eleana Kim (Seoul: Overseas Koreans Foundation, 2004), 12–27.

<sup>21</sup> Eleana Jean Kim, *Adopted Territory: Transnational Korean Adoptees and the Politics of Belonging* (Durham [NC]; London: Duke University Press, 2010); Tobias Hübinette, *Comforting an Orphaned Nation: Representations of International Adoption and Adopted Koreans in Korean Popular Culture*, Korean Studies Series 32 (Seoul: Jimoondang, 2006).

<sup>22</sup> Susie Woo, *Framed by War: Korean Children and Women at the Crossroads of US Empire* (New York: University Press, 2020); Kimberly D. McKee, *Disrupting Kinship: Transnational Politics of Korean Adoption in the United States*, *Disrupting Kinship* (University of Illinois Press, 2019); Arissa H. Oh, *To Save the Children of Korea: The Cold War Origins of International Adoption*, Asian America (Stanford, Calif: Stanford Univ. Press, 2015); Kim Park Nelson, *Invisible Asians: Korean American Adoptees, Asian American Experiences, and Racial Exceptionalism* (Rutgers University Press, 2016); SooJin Pate, *From Orphan to Adoptee: U.S. Empire and Genealogies of Korean Adoption*, Difference Incorporated (Minneapolis: University of Minnesota Press, 2014).

<sup>23</sup> Hosu Kim, *Birth Mothers and Transnational Adoption Practice in South Korea: Virtual Mothering*, Palgrave Macmillan's Critical Studies in Gender, Sexuality, and Culture (New York: Palgrave Macmillan US, 2016).

normally not included in the broader debate on migration issues; left outside of public recognition as a form of migration, it was termed a “quiet migration”.<sup>24</sup> Through the application of equilibrium theory, these scholars tend to look for the particular push and pull factors of intercountry adoption. Applying this angle of analysis, however, does not naturally lead to a deconstruction of the existing adoption narrative. The push is identified as driven by some form of crisis in the country of origin and the need to support the best interests of the child; pull is being driven by a demand for healthy children. Noticeable is often the normalisation of the logic backing the push factors, instead of critically dissecting the discourse and system that makes certain children ‘eligible’ for intercountry adoption.<sup>25</sup>

Within critical adoption studies, scholars have been able to apply the quiet migration framework to do exactly that. In an article from 2014, Jessaca B. Leinaweaver not only presents an overview of the quiet migration framework but is able to reveal the paradox in its logic. She points out that the push – the two-stage process of making children adoptable and selecting them for intercountry adoption by relevant authorities<sup>26</sup> – and the pull – the (complex) demand for a child – are both operating under the principle of the best interest of the child. However, embedded in this principle is an active push *against* intercountry adoption, exemplified by Article 4b of the Hague Adoption Convention: “An adoption within the scope of the Convention shall take place only if the competent authorities of the State of origin...have determined, *after possibilities for placement of the child within the State of origin have been given due consideration*, that an intercountry adoption is in the child's best interests.”<sup>27</sup> Leinaweaver thus aptly points out that intercountry adoption is thus defined as undesirable and only hesitantly tolerated as a measure of last resort.<sup>28</sup>

Such reading, enabled by applying the quiet migration framework, tells us something about an inherent tension in the adoption narrative. Unfortunately, the reading of the best interest of the child in the Hague Convention by Leinaweaver does not recognise that the due consideration mentioned Article 4b is by its very phrasing assumed

<sup>24</sup> Richard H. Weil, “International Adoptions: The Quiet Migration,” *International Migration Review* 18, no. 2 (June 1, 1984): 276–93, <https://doi.org/10.1177/019791838401800205>.

<sup>25</sup> See for example Gabriela Misca, “The Quiet Migration: Is Intercountry Adoption a Successful Intervention in the Lives of Vulnerable Children,” *Family Court Review* 52 (2014): 60.

<sup>26</sup> Within this migratory process, there is a distinct lack of agency of the child. See for example Jay Song and Ryan Gustafsson, “Korean Adoption to Australia as Quiet and Orderly Child Migration,” *Genealogy* 7, no. 2 (2023): 2, <https://doi.org/10.3390/genealogy7020040>.

<sup>27</sup> Hague Conference on Private International Law (HCCH), “Hague Convention on Protection of Children and Co-Operation in Respect of Intercountry Adoption” (1993).

<sup>28</sup> Jessaca B. Leinaweaver, “The Quiet Migration Redux: International Adoption, Race, and Difference,” *Human Organization* 73, no. 1 (2014): 62–71, <https://doi.org/10.17730/humo.73.1.flx606xr745wnw4k>.

to have been given – the tension she reads is a false flag. For how and by whom could so many children, from so many different countries and backgrounds, be made adoptable and sent to so many countries, for such a long period of time, if the very principle that underpins the system actively pushes against it?

To answer part of these questions, a relevant framework through which I view the system that is transnational adoption is the concept of the transnational adoption industrial complex (TAIC). Coined by Kimberly D. McKee in 2016, it not only shows that it takes more than simply the traditional adoption triad (birth parents, adoptee, and adoptive parents) to have a continuous flow of children from the Global South to the North, but robustly brings to the fore the other nodes that make up that system: the nation-state, orphanages, adoption agencies, and immigration legislation. It is an active recognition that the bodies of children were commodified for the purpose of adoption and that adoption is not only a process or act of family formation but always necessitates a form of family separation.<sup>29</sup>

In the same vein, the export of Korean children only exists because there is an equal and opposite import of these children. The use of export to describe the transnational adoption flow is not new – already in 1959 did the media report that “South Korea ‘Exports’ Children.”<sup>30</sup> Covering the South Korea’s shift towards promoting domestic adoption, the Wall Street Journal reported in 1977 that “despite popularity, cute Korean babies aren’t for export.”<sup>31</sup> Fast forward thirty years and the 1988 Seoul Olympics brought not only fame but led to a shameful ‘investigation’ into “Babies for export” by Western media.<sup>32</sup> All these narratives conveniently omit the word ‘import’. It is necessary to recognise that this focus on the exporter indirectly turns the Global North into a passive actor, obscuring their role in the TAIC, while the hierarchy enables them to report and frame the narrative as such. Thus, in applying a deconstructive lens, I seek to bring back into the equation of commodity exchange the importer, the buyer, and the consumer of that what is exported.

As such, being in conversation with these frameworks, this thesis recognises that the personal motivations behind adoption, the system that enable the execution of such

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<sup>29</sup> Kimberly D. McKee, “Monetary Flows and the Movements of Children: The Transnational Adoption Industrial Complex,” *The Journal of Korean Studies* (1979-) 21, no. 1 (2016): 137–78; Riitta Högbäck, *Global Families, Inequality and Transnational Adoption: The De-Kinning of First Mothers*, Palgrave Macmillan Studies in Family and Intimate Life (Palgrave Macmillan UK, 2016).

<sup>30</sup> Kim, *Adopted Territory*, 44.

<sup>31</sup> Linda Matthews, “Despite Popularity, Cute Korean Babies Aren’t for Export: Overseas Shipment of Orphans Insults National Honor; Government Ends Flow Despite Popularity, Cute Korean Babies Aren’t for Export,” *Wall Street Journal*, January 7, 1977.

<sup>32</sup> Susan Chira, “Babies for Export: And Now the Painful Questions,” *New York Times*, April 21, 1988; for more media examples see Hübinette, *Comforting an Orphaned Nation*, 86-89.

motivations, and the discourse that surround adoption need to be disentangled. As such, to come to a more nuanced answer to the question of why intercountry adoption from Korea became a possibility in the Netherlands, this thesis focusses especially on this principle of the best interest of the child, how it was understood, defined, and reformulated, and by whom. In doing so, I recognise that the best interest of the child is not simply a children's rights principle but an essential *regime of truth* that needed to be discursively moulded to allow for transnational adoption to exist.<sup>33</sup> This complicates the saviour narrative by showing that it found justification through the scientification and legal codification of the principle of the best interest of the child, moving beyond the Christian and moral origins of the narrative.<sup>34</sup>

Before explaining more about the Korean and Dutch context, I would like to point out that, together with the historical terms overseas, international, and intercountry, I use transnational here to signal that the process of adoption does not end with the simple move between two countries or nations, but rather that the transcendence of the boundaries of the nation-state is foundational to the system itself.<sup>35</sup> Although it is outside the scope of this thesis to describe in detail the lived experiences of Korean adoptees in the Netherlands, when looking at transnational adoption, not only does a child move from one family to another, it crosses all sorts of borders. The obvious ones are the institutionalized borders of the nation-state, but critical adoption studies has shown over the years the layers of intersectionality that make up transnational adoption: class, race, age, gender, (dis)ability, and even religion. All reveal that it was about much more than stamping visas for children in need – something that will be addressed throughout this thesis by showing how the adoption process was possible due to the transnational scientification of motherhood and population.

### 1.3 70 years of Korean Export; 34 years of Dutch Import

With the first official case recorded in 1955, 2025 marks the 70<sup>th</sup> anniversary a continuous flow of Korean minors flying overseas on one-way visas with the explicit purpose of adoption, making it the longest-running international adoption program worldwide; South

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<sup>33</sup> Michel Foucault, *Power / Knowledge: Selected Interviews and Other Writings 1972 - 1977*, ed. Colin Gordon (Pantheon Books, 1981), 131.

<sup>34</sup> For a dedicated work on the intersection between Christianity and the saviour narrative see Kathryn Joyce, *The Child Catchers: Rescue, Trafficking, and the New Gospel of Adoption*, 1st ed (New York: PublicAffairs, 2013).

<sup>35</sup> Jessaca Leinaweaver, "Transnational Adoption," in *The Cambridge Handbook of Kinship*, ed. Sandra Bamford, 1st ed. (Cambridge University Press, 2019), 391–411, <https://doi.org/10.1017/9781139644938.017>; Kim, *Adopted Territory*, xiii.

Korea remains the only OECD member that is a sending country for adoption.<sup>36</sup> During this time, South Korea (hereafter Korea) has officially sent 169,767 children overseas for adoption to almost twenty countries in the Global North.<sup>37</sup> With international adoption beginning in the early 1950s in the fallout of the Korean War, adoption in South Korea remains a contemporary phenomenon directly linked to the very existence of the modern South Korean state.

Another reason why it is important to look at the history of South Korean international adoption is that it is an exceptional case – not only its long history but the absence of other adoption programmes from countries in ‘similar’ circumstances. North Korea, suffering from the same war as its southern counterpart, did not implement a policy supporting full-scale adoption, instead opting for international foster care; they repatriated their children from Eastern Europe by the early 1960s.<sup>38</sup> Vietnam opposed international adoption in any form, even though many Western parents wished to adopt a Vietnamese child in the wake of the Vietnam War; Trần Văn Hương, the president of South Vietnam told the West that “taking care of our children in our country is crucial for growing a sense of self-reliance.”<sup>39</sup>

As can be seen in Figure 1, the development of this flow has not been a linear one. As mentioned here above, a lot of research has focused on the first decade and recognises how the US and its militarism plays a key role in laying the foundation. South Korean research on adoption saw a somewhat different historiographic trajectory. Most studies also focussed on the adaptability of the adoptees, their circumstances growing up outside of Korea, and identity formation but already since the 1960s, researchers have looked at the governments transnational adoption policy and its effects.<sup>40</sup> From the 2000s, more research pivoted to critical questions like why South Korea had so many adoptable children and why transnational adoption persists till today.<sup>41</sup> In attempting to find

<sup>36</sup> ISS/IRC, “2019 Intercountry Adoption Statistics: Same Old Trends?” (International Social Service, December 2020), [https://www.iss-irc.org/wp-content/uploads/2021/07/Edito\\_247December\\_2020.pdf](https://www.iss-irc.org/wp-content/uploads/2021/07/Edito_247December_2020.pdf).

<sup>37</sup> Although there is some discussion among researchers that the number of unofficial adoptions could be as high as 200,000 to 250,000, there is no clear consensus or data on the magnitude of this unofficial count. See also Appendix 1.

<sup>38</sup> See Seok-jun Yoon, “Ich’yōjin aidūrūl kiōkhagi : tongyurōpūro kan pukhanūi chōnjaeng koadūl 잊혀진 아이들을 기억하기 : 동유럽으로 간 북한의 전쟁 고아들 [Forgotten Children: North Korean War Orphans sent to Eastern Europe],” *Naeirūl yōnūn yōksa* 74 (March 2019): 226–35; Hae sung Lee, “Retracing the footprints of the war: orphans from North Korea in Poland,” *The Central and East European Society of Koreanology* 15 (August 2014): 99–129.

<sup>39</sup> “Wōllamjōnjaenggoa—Haeoeipyang Malge 越南戰爭孤兒—海外入養말게 [Do Not Internationally Adopt Vietnamese War Orphans],” *Kyunghyang Shinmun*, March 26, 1969.

<sup>40</sup> Jin Kim, “Koaipyangt’ūngnyebōp 고아입양특례법 [Inter-Country Adoption Law with Regard to the Orphans],” *Seoul Law Journal* 4, no. 1/2 (1962): 124–39.

<sup>41</sup> Ki-hye Chōn Hong, Gyeong-eun Lee, and Jane Jeong Trenka, *Aidūl p’anūn Nara: Han’guk Ŭi Kukche*



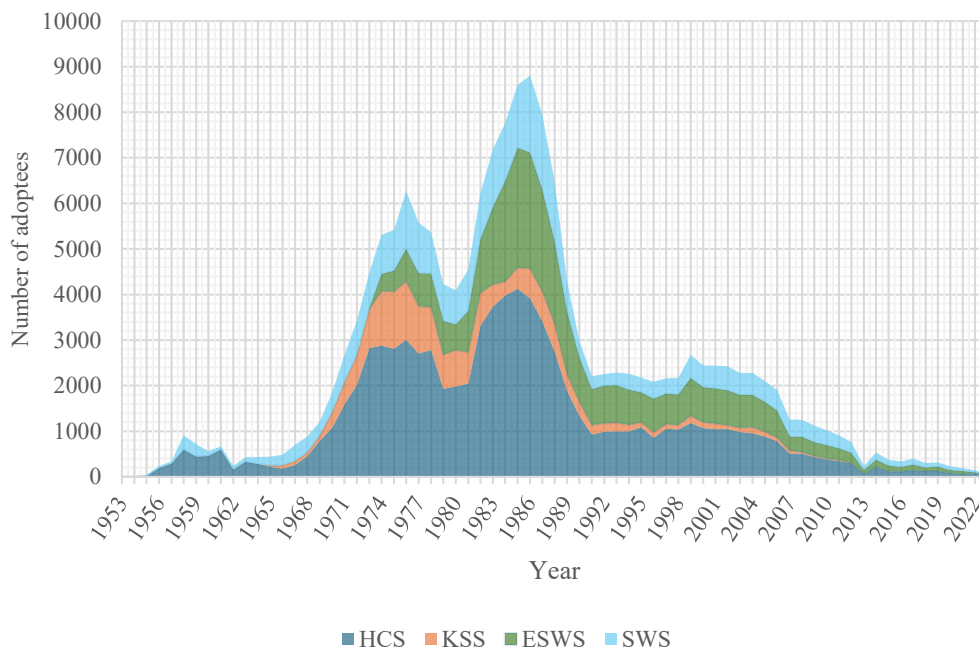


Figure 2 Number of Transnationally Adopted Children from Korea, per agency

Source: 보건복지부, “1958 년~ 2022 년까지 기관별, 국가별 해외입양 통계, ‘한국사회복지회,’” June 20, 2023; Holt’uadongpokchihoe 50nyönsa P’yöñch’anwiwöñhoe, Holt’uadongpokchihoe 50nyönsa 홀트아동복지회 50년사 : 1955-2005 [50-year History of Holt Children’s Services, Inc.: 1955-2005] (Seoul: Holt’uadongpokchihoe, 2005); Taehansahoebokchihoe 50nyönsa P’yöñch’anwiwöñhoe, Nanum, kü arümdaun sam – Taehansahoebokchihoe 50nyönsa 나눔, 그 아름다운 삶 – 대한사회복지회 50년사 [The 5 decades of SWS a love nest(since 1954-2003)] (Seoul: Taehansahoebokchihoe, 2004); Tongbangsahoebokchihoe 30nyönsa P’yöñch’anwiwöñhoe, 1972~2002 Tongbangsahoebokchihoe 30nyönsa 1972~2002 東方社會福祉會 30年史 [1972~2002 30-Year History of Eastern Social Welfare Society Inc.] (Seoul: Tongbangsahoebokchihoe, 2003).

historical angle, as well as a focus on the birth mothers.<sup>45</sup> Most recently, partially influenced by the decision of the TRC, papers on the human rights violations in adoption have started to come out.<sup>46</sup> Noticeable is also the publication of commemorative

<sup>45</sup> Yuri Lee, “Oesanghu söngjangüi aech’ak-inji mohyöng kömjüngr ibyang mihonmorül taesangüro 외상후 성장의 애착-인지 모형 검증: 입양 미혼모를 대상으로 [The attachment-cognitive model of posttraumatic growth : finding from the birthmothers sample]” (Dissertation, Korea University, 2011); Tae In Kang, “Haeoeibyangan saengmo(生母)üi mosöngjöngch’esöng kusöng kwanhan saengsaesa yön’gu 해외입양인 생모(生母)의 모성정체성 구성에 관한 생애사 연구 [A Life History of Birth Mother’s Construction of Maternal Identity for Overseas Adoption]” (Dissertation, Sungkyunkwan University, 2014).

<sup>46</sup> Philsik Shin et al., “Exploring Human Rights Violations in the Past Intercountry Adoption Process - Focusing on the Experiences of Adoptees, Birth Parents and Practitioners -,” *Korean Journal of Social Welfare* 76, no. 3 (2024): 201–30, <https://doi.org/10.20970/kasw.2024.76.3.008>; TaeIn Lee et al., “A Study of

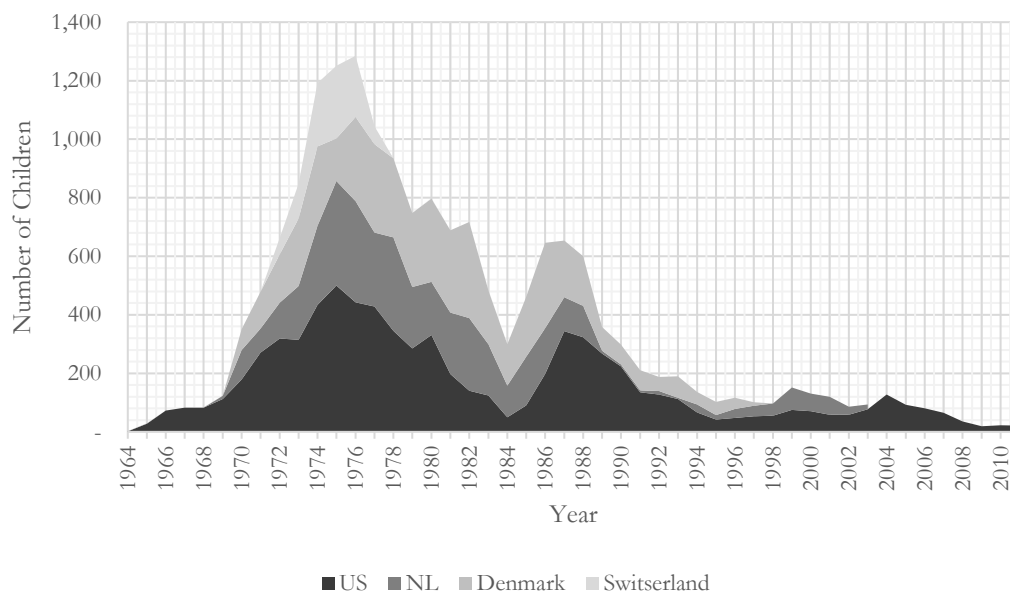


Figure 3 Number of Transnational Adoptees per Country, KSS  
 Source: See Appendix 2

anniversary histories by three out of the four major adoption agencies: Holt Children's Services, Inc. in 2005,<sup>47</sup> Korea Welfare Services in 2004,<sup>48</sup> and Eastern Social Welfare Society Inc. (ESWS) in 2003.<sup>49</sup>

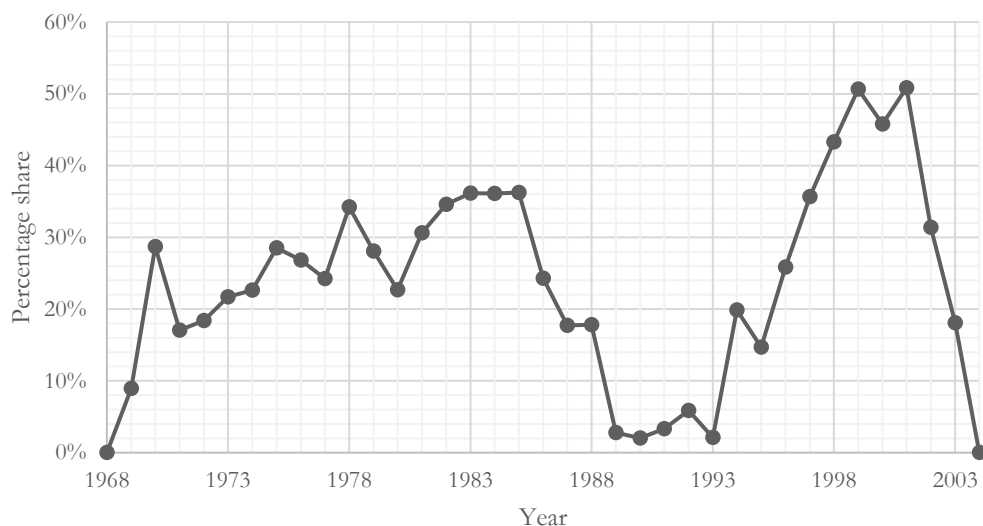
Unfortunately, the agency that mediated almost all adoptions to the Netherlands, Korea Social Service, Inc. (KSS), has not published their own history. What should be

Human Rights Violations in Intercountry Adoption Procedures: Investigations and Responses at the National Level in Foreign Countries,” *Journal of the Korean Society of Child Welfare* 73, no. 1 (March 31, 2024): 137–73, <https://doi.org/10.24300/jkscw.2024.3.73.1.137>; Helen Noh et al., “Haeoeipyangin in’gwönsanghwang silt’aejosarül t’onghan in’gwönbojang pangan yön’gu 해외입양인 인권상황 실태조사를 통한 인권보장 방안 연구 [Study on measures to protect human rights through a survey on human rights in the case of adoption process]” (Seoul: National Human Rights Commission of Korea, November 28, 2022), <https://www.humanrights.go.kr/base/board/read?boardManagementNo=17&boardNo=7608689&page=&searchCategory=&searchType=&searchWord=&displayType=&year=&month=&menuLevel=3&menuNo=115>.

<sup>47</sup> Holt’üadongpokchihoe 50nyönsa P’yönc’h’anwiwönhoe, *Holt’üadongpokchihoe 50nyönsa* *홀트아동복지회 50년사: 1955-2005 [50-year History of Holt Children’s Services, Inc.: 1955-2005]* (Seoul: Holt’üadongpokchihoe, 2005).

<sup>48</sup> Taehansahoebokchihoe 50nyönsa P’yönc’h’anwiwönhoe, *Nanum, kü arümdaun sam – Taehansahoebokchihoe 50nyönsa* *나눔, 그 아름다운 삶 – 대한사회복지회 50년사 [The 5 decades of SWS a love nest(since 1954-2003)]* (Seoul: Taehansahoebokchihoe, 2004).

<sup>49</sup> Tongbangsahoebokchihoe 30nyönsa P’yönc’h’anwiwönhoe, *1972~2002 Tongbangsahoebokchihoe 30nyönsa 1972~2002 東方社會福社會 30年史 [1972~2002 30-Year History of Eastern Social Welfare Society Inc.]* (Seoul: Tongbangsahoebokchihoe, 2003).



*Figure 4 Percentage share of adoptions to the Netherlands from KSS total per year*  
*Source: See Appendix 3*

noted is that the Netherlands was KSS' first European partner and would end up taking about 25% of their total caseload from 1969 till 2003 (see Figure 4). Noticeable is how it is only by 1970 that transnational adoptions start to surpass the number of domestic adoptions and that it would take another decade to surpass the peak in 1958 (930 adoptions). It is the 1960s laid the foundation for the peak to come in the 1970s, yet there has been little in-depth historic investigation of this shift, nor has there been any in-depth research on the history of KSS. This study on the spread of Korean adoption to the Netherlands then functions also as a precursor to a case study on this period of the history of KSS and Korean adoption in general.

To circle back to the other side, the history of transnational adoption in the Netherlands is fundamentally intertwined with the history of transnational adoption in South Korea: Korean children were the first non-European children regularly adopted into the Netherlands. From the first two babies arriving in 1969, by 2003, the last year of partnership between the Dutch and Korean adoption agency, this number had grown to a total of 4155 adoptions.<sup>50</sup> The Joustra-report tells us that public pressure calling upon the government to act swiftly fuelled by a television appearance of writer Jan de Hartog in which he famously proclaimed, "Al redden we er maar één! [let us save one at least!]," pressured the Dutch government to establish a commission to investigate the possibilities

<sup>50</sup> For more details regarding this number see Appendix 2.

for adoption: the Commissie Buitenlandse Pleegkinderen (CBP). This pressure was enabled by the increasing public attention to the plight of children in warzones, namely Vietnam. The government followed their positive advice, gave permission for the establishment of the first adoption agency – Stichting Interlandelijke Adoptie (SIA) – and allowed for the adoption of Korean children by 1969.<sup>51</sup>

This reading has remained prevalent ever since the 1970s, most notably present in the works of René Hoksbergen, who is regarded as the founder of Dutch adoption studies. It must be mentioned that, like the Joustra-report, his works are not at all clear chronological descriptions and instead are general descriptions from a kind-of temporal birds-eye view. Already in his first book about adoption in 1979 and in his 2011 magnum opus on the history of transnational adoptions to the Netherlands, describing the background of the foundation of SIA and the increase in intercountry adoptions, he paints a similar picture of bottoms-up pressure on an unwilling and unmotivated government.<sup>52</sup> Hoksbergen in 1979 explains this pressure in threefold: 1) PAPs first and foremost want their own child but are forced to adopt if they fail and do not let go of that wish; 2) first preference is a white child, though switch to adoption from afar, perforce, due to there being less domestic and European children available for adoption; 3) shift in the narrative of preference from the personal wish for a child and family planning to ‘the child in need,’ a shift actively encouraged by the adoption agencies as seen through their ties with other forms of development aid, empowered by the best interest of the child as defined by the 1959 Declaration of the Rights of the Child.<sup>53</sup>

In his work from 2011, he complicates this narrative by attempting to explain these motivations by placing them in the broader socio-cultural context –the counterculture of the 1960s. By pointing to the emergence of a PAPs who already have their own children and stressing “their dedication to the improvement of the quality of life of children in difficult circumstances,” enabled by the spread of television and increasing wealth, he again points to the spread of a narrative of saviourism.<sup>54</sup> Another factor he

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<sup>51</sup> Rapport, 3; Commissie onderzoek interlandelijke adoptie, “Bijlagen Commissie Onderzoek Interlandelijke Adoptie,” 42-44. <sup>51</sup> According to the footnotes, this reading is entire based upon Christine F. Swart-Babbé, “De Toelating van Buitenlandse Adoptiekinderen in Nederland,” in *De Toelating van Buitenlandse Adoptiekinderen in Nederland / Christine F. Swart-Babbé. Het Nederlands-Belgisch Exekutieverdrag (28-3-1925) / B.J.R.P. Verhoeven. Het Op de Internationale Verzekeringsovereenkomst Toepasselijke Recht / J.C. van Der Hooft*, ed. H.D. Tjeenk Willink and A.W. Sijthoff, Studentenscripties Internationaal Privaatrecht 4 4 (’s-Gravenhage: T.M.C Asser Instituut, 1974), 1–41. a thesis from 1974 by Christine F. Swart-Babbé: “De Toelating van Buitenlandse Adoptiekinderen in Nederland.”

<sup>52</sup> René Hoksbergen, *Adoptie van Kinderen Uit Verre Landen*, Sociale Bibliotheek (Deventer: Van Loghum Slaterus, 1979), 30-32.

<sup>53</sup> Ibid., 86-87.

<sup>54</sup> René Hoksbergen, *Kinderen Die Niet Konden Blijven: Zestig Jaar Adoptie in Beeld* (Uitgeverij Aspekt, 2011), 62 – 64, 69, 72 – 73.

mentions is that the taboo on adoption had melted away by a strong belief in the quality of family over institutional care, a narrative empowered by psychologists and psychiatrists in the US and the UK.<sup>55</sup> The third point he makes is demographic, pointing to the decline in the number of domestically available children in the 1970s but a consistent wish to family plan; interracial adoptions become the preferred alternative. The decline in domestically available children is explained by the lower birthrate and shift in attitudes towards child separation from unwed mothers.<sup>56</sup>

The Joustra-report homes in on the same socio-cultural context underlying the public pressure: reduction in public shame surrounding adoption coupled with a decline in the availability of domestically adoptable children due to a decrease in unwed motherhood because of the sexual revolution.<sup>57</sup> The only scholarly work that explicitly focusses on the shift in adoption policy in this time is a thesis from 2014 by Roeland Smeenk that specifically addresses the role of the government in the development of the Dutch intercountry adoption policy, though it unfortunately bases the motivations for overseas adoption on the reading of Hoksbergen's work.<sup>58</sup> The theoretical issues I find in this narrative are two-fold. First, it is anachronistic, as the decline in domestic adoptions and drop in domestically available children is described as occurring in the 1970s while the pressure to adopt from abroad emerges in the mid-1960s. Second, arguing that the spread of television and thereby the imagery of the Vietnam War leads to an increase in the demand for adoption is not a causal explanation – for what is the causal link between the concept of developmental aid and adoption? The almost natural assumption of the relation between these two concepts in the narrative shows nothing but how strongly embedded the entanglement of transnational adoption and developmental aid has become in our society; thus dully warranted is the question: Why is adoption seen as a form of developmental aid?

This thesis will attempt to shine light on this black box in the historic narrative of how Korean adoption to the Netherlands started. I define adoption as a critical formative site of negotiation on biopolitical governance where social workers, government officials, and pro-adoption lobbyists came together to – not only define adoption policy – but redefine how the best interest of the child should be interpreted. Through the connection of Dutch and Korean sources, I recognise how this was not simply a domestic institution

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<sup>55</sup> Ibid., 69-70.

<sup>56</sup> Ibid., 70-71.

<sup>57</sup> I use the term unwed mother throughout this thesis as a historic term, recognising that it is rooted in patriarchal norms and stigma surrounding normative expectations of motherhood and family life.

<sup>58</sup> Roeland Smeenk, "Migratie En Beleid: Een Paradox. Het Nederlandse Interlandelijke Adoptiebeleid 1956-1980" (Master Thesis, Leiden, Leiden University, 2014).

but became a temporary node in a transnational struggle between social workers and adoption agencies on what the best interest of the child should look like.

## 1.4 Methodology and Structure

I have conducted field work in different archives in South Korea and the Netherlands over the past two years. Archival material from South Korea includes documentation from the Ministry of Health and Welfare (MOHW: including its precursor the Ministry of Health and Social Affairs), National Assembly, newspaper articles, and the adoption agencies, including detailed statistics from KSS, giving us a rare sight into the inner workings of this agency. Archival material from the Netherlands includes documentation from the Parliament, Ministry of Justice, Ministry of Foreign Affairs, newspaper and magazine articles, several child protection agencies, and adoption agencies as well as private archives from relevant actors. This rich archival material gives us a rare glimpse into both the official discourse (what was said) and the private discourse (what was thought). Using discourse analysis, this contrast can reveal hidden tensions, informal decision-making, or external pressures. Employing strategies of reading against the grain, intertextuality, and assumptions, primary and secondary sources from various institutions will be combined for inference, using source criticism and intersectionality to reconstruct the past.

Chapter 2 of this thesis will describe the historical context in Korea, focusing on the transnational relation between family planning, adoption, and social work during the Park Chung-Hee regime. Moving on to the Netherlands, which introduced its first adoption law in 1956, crowning itself one of the last European countries to do so. Through an explanation in Chapter 3 of the background of this late legal introduction and the impact it had, a clearer picture emerges of the social landscape in which the call to action on a television show could be made and positively received by the public. Chapter 4 is an attempt to elongate the history behind the foundation of the CBP using new archival material. By separating cause and reason, I show how the overemphasis on the events in 1967 have muddled deeper analysis of the reasons behind the need to adopt. This chapter will frame the television appearance of Jan de Hartog as the match that lit the powder keg of public pressure that had been building up the years before. This chapter will also reveal what connections had been building up between Dutch and Korean agencies. Altogether, it becomes apparent that both states were not setting adoption policy in isolation but rather were doing so as part of a global push, empowered by the scientification of population, family, and motherhood. I will end with a conclusion to summarise my findings, discuss its limitations, and propose future directions for research in this area.

## 2. Cold War Developmentalism and Adoption in South Korea

### 2.1 The War for Orphans

It is undeniable that the large presence of US military since 1945 and the subsequent destruction of infrastructure, social upheaval, and death of millions during the Korean War lay at the foundation of transnational adoptions from Korea. Korea was the first flash point in the Cold War and became the first real ‘test’ for the United States as the undisputed hegemon of the World. Thus, Korea had to be a success story where the benevolence and superiority of the West had to be displayed. In the fight against global communism, the West donated wholeheartedly to support South Korea in the war, with military personnel and material but also social welfare programs.<sup>59</sup> The distance between American families and Korean children was bridged through the many images of Korean children taking centre stage in the narration of the Korean War to show that the fight against communism was a fight against an evil that had orphaned so many children.<sup>60</sup> In this early stage, international adoption began with US military personnel taking home orphans, ‘houseboys’, and ‘mascots’.

At the same time, a new group of adoptable children was being born: ‘GI babies’, with American fathers and Korean mothers. The Korean government was convinced that these children had no future in Korea; adoption was defined as being in the best interest of the child by Syngman Rhee and his American wife Francesca Donner Rhee themselves as reflected in their invested their personal correspondence with PAPs between 1956 and 1960.<sup>61</sup> Their efforts were in line with the state ideology established by president dictator Rhee: *Ilminjuui* (onepeople-ism), which characterises the Korean people as a homogenous race with a single shared bloodline. This was the discourse of Koreanness that was developed to ideologically underpin the South Korean state.<sup>62</sup> In 1954, by

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<sup>59</sup> SooJin Pate, *From Orphan to Adoptee: U.S. Empire and Genealogies of Korean Adoption*, Difference Incorporated (Minneapolis: University of Minnesota Press, 2014), 31-5.

<sup>60</sup> Oh, *To Save the Children of Korea*, 45-6, 76-7.

<sup>61</sup> Ministry of Foreign Affairs, “Koagugoeipyang [Orphan Inter-country Adoption],” 1956 ~ 1960, CA0004545, National Archives of Korea; A Lam Kim, “People’s perception of hybrids (mixed bloods) in the 1950s, and their adoption to foreign countries,” *Critical Studies on Modern Korean History* 13, no. 2 (2009): 33–71.

<sup>62</sup> Gi-Wook Shin, *Ethnic Nationalism in Korea: Genealogy, Politics, And Legacy*, 1 edition (Stanford, CA: Stanford University Press, 2006), 166; Pyeoung-jeon Lee, “‘Ilminjuui’ p’ashijūmgwa chōngch’ijōng sōsasōng yōn’gu — 1950nyōndae munhakul chungshimūro — [A Study on the Fascism of ‘Uni-Nationalism’ and Political Narrativeness -on the Basis of Literature of 1950s-],” *The Studies in Korean Literature* 28 (2005):

presidential order, the Child Placement Service (CPS, *Adongyanghohoe*)<sup>63</sup> was established as a solution to this ‘issue’ of mixed-race children for the sole purpose of sending these mixed-race children to their ‘fatherland’ in collaboration with International Social Service (ISS).<sup>64</sup> Korean social worker were convinced that it was in the child’s best interest to send the children to the “hundreds of families in the US wanting to adopt a Korean orphan.”<sup>65</sup>

Parallel to this, zealous missionaries expanded their aid work into adoption with the Catholic Relief Service and the Seventh-day Adventist Adoption Services stated operating in 1955, followed by the establishment of the Holt Adoption Program (HAP) in 1956, Pearl S. Buck’s Welcome House joined the effort in 1958 and ISS started its own programme in 1957 (though stopping in 1966).<sup>66</sup> Different aid-providers also had started to facilitate financial adoptions. This form of aid created an imagined emotional bond between the ‘parents’ and the ‘adoptive’ child and fostered the wish to fly ‘their child’ over to the US in many parents.<sup>67</sup> The rapid expansion of the number of adoption agencies resulted in an explosive rise in numbers of transnational adoptees, who were largely of ‘mixed-race’.<sup>68</sup> Most notable of these five is HAP, founded by Harry Holt. Driven by a strong fundamentalist Christian ideology, it was this farmer from Oregon that successfully lobbied for a continuous flow of children to the US.<sup>69</sup> Regarded as the saviour of the Korean orphans, Syngman Rhee himself even called him an “apostle of international understanding and good will.”<sup>70</sup>

In this early stage, when most adoptees were sent to the US, the system was influenced heavily by the institutional and legal changes in the US. In the 1950s, Immigration to the US was curated by a national origin-based quota system. Thus, the adoption of Korean children had to rely on specific immigration quotas for refugees and orphans.<sup>71</sup> Adoptions were made possible under the banner of refugee assistance, a humanitarian effort, instead of an issue of immigration. Children who were “eligible

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<sup>63</sup> Still in operation as of 2025 under the name Korea Welfare Services.

<sup>64</sup> Hübinette, “Comforting an Orphaned Nation,” 60; Shin, “Han’gung haeoeibyanggwa ch’insaengmo mosöng, 1966~1992,” 49.

<sup>65</sup> Oksun Hong, “honhyörawa ipyangmunje 混血兒와 入養問題 [Children of mixed-race and the issue of adoption],” *Saegajöng*, July 1955, 40–42.

<sup>66</sup> Hübinette, “Korean Adoption History,” 15.

<sup>67</sup> Oh, *To Save the Children of Korea*, 53 – 55.

<sup>68</sup> For the detailed statistics, see Appendix 1.

<sup>69</sup> Hübinette, “Comforting an Orphaned Nation,” 52- 63

<sup>70</sup> For more about Holt’s fundamentalism see Chapter 3 in Oh, *To Save the Children of Korea*.

<sup>71</sup> Kyung-un Lee, *The Global Orphan Adoption System: South Korea’s Impact on Its Origin and Development* (Seoul: KoRoot, 2021), 72-73.

orphans” were categorised without nationality, showing the exceptional nature of the orphan and the possibility of its inclusion as kin. The temporary nature of the legislation and the quota allocations led to panic on both sides of the equation – in Korea, social workers attempted to find eligible children as quickly as possible<sup>72</sup> while in the US, Harry Holt continuously lobbied for both extensions of the temporary refugee legislation as well as more permanent easing of restrictions that hampered the inflow of children.<sup>73</sup>

Officially, around 3500 children were sent abroad during the 1950s, of which about 2300 were defined as ‘mixed-race’.<sup>74</sup> To fill up the visa quotas, a practice dubbed “baby hunting” was employed to convince mothers to give up their children if they had not done so already for practical reasons such as inaccessibility to public resources due to the child not being registered.<sup>75</sup> The war had also led to many families being torn apart, either due to loss of life or income, and many children were placed in childcare facilities as separated children or orphans.<sup>76</sup> In the belief that providing families as an alternative to the institutional care in Korea was in the best interest of the many war orphans, an ever increasing number of children from orphanages were rushed to fill up these quotas.<sup>77</sup> This was also made possible by the lack of a proper legal system that defined who was eligible for adoption and who was not.

It is in this space of legal ambiguity that proxy adoption as an institutional technology emerges. In essence, adoption by proxy allowed PAPs to get an entry visa for a child that was adopted through a foreign court by appointing a legal representative.<sup>78</sup> Because proxy adoption was much quicker as the child was legally adopted before they emigrated, this method was preferred by HAP and the South Korean government.<sup>79</sup> In 1956, the Ministry of Health and Social Affairs proposed to the State Council (South Korea’s national cabinet) a plan for proxy adoption of mixed-children: prioritise placing them with domestic adoptive families first, finalise the adoption in Korea on behalf of the PAPs located abroad, and then sent them overseas. Here we can see the narrative of the

<sup>72</sup> Ministry of Foreign Affairs, “Koagugoeipyang,” 1957, 27-28.

<sup>73</sup> Oh, *To Save the Children of Korea*, 103.

<sup>74</sup> Yukyung Kim and Sung Un Lim, “Haeoeibyang churigi chonghaptaeche’aeng yŏn’gu [A Study on Comprehensive Measures to Reduce Overseas Adoption],” Policy Report (Seoul: Ministry of Health and Welfare, Korean Adoption Services, Korean Institute for Health and Social Affairs, 2011), 60-3; Shin, “Han’gung haeoeibyanggwa ch’insaengmo mosŏng, 1966-1992,” 70-4.

<sup>75</sup> Holt’ŭadongpokchihoe 50nyŏnsa P’yŏnch’anwiwŏnhoe, *Holt’ŭadongpokchihoe 50nyŏnsa*, 150, 158.

<sup>76</sup> Shin, “Han’gung haeoeibyanggwa ch’insaengmo mosŏng, 1966-1992,” 47-51.

<sup>77</sup> Rosemary C. Sarri, Yenoak Baik, and Marti Bombyk, “Goal Displacement and Dependency in South Korean-United States Intercountry Adoption,” *Children and Youth Services Review* 20, no. 1 (January 1, 1998): 87-114.

<sup>78</sup> Kelly M. Rich, “Sight Unseen: Proxy War, Proxy Adoption,” *Representations* 163, no. 1 (August 1, 2023): 52.

<sup>79</sup> Ministry of Foreign Affairs, “Koagugoeipyang,” 1959, 20.

best interest of the child in action – they regarded proxy adoption “the best course of action...to create opportunities for as many children as possible to receive proper care through the adoption by good families abroad.”<sup>80</sup>

This type of adoption came under heavy fire by social workers, especially those of ISS, who looked at these practices of HAP with much scrutiny; the practice was dubbed “mail-order baby business” as the parents never had any contact with the child before the adoption and from the point of view of the sending country, it was impossible to screen or examine the qualifications of any PAPs before the adoption and the best interests of the child could therefore not be guaranteed.<sup>81</sup> As such, US Congress banned the practice through the amendment of the Immigration and Nationality Act in 1961 by removing the possibility for an entry visa on the basis of proxy adoption; necessitating that the PAPs “personally saw and observed the child prior to or during the adoption proceedings”; and requiring the mediation of a licensed adoption agency to complete the adoptive placement after arrival.<sup>82</sup> Yet, this act simultaneously supported the adoption lobby: from that point on, there would be no more quotas on visas for foreign-born children who were adopted as they would enter the country as “immediate relatives” instead of “eligible orphans”.<sup>83</sup> This was the recognition of adoption as a measure in the best interest of the child, so long proper procedures were followed. With adoptees no longer recognised as refugees but instead as family members to be, transnational adoption was there to stay.

Not everyone shared this interpretation of the best interest; Immigration and Naturalization Service commissioner Joseph Swing had created a loophole for Holt by interpreting the law as such that PAPs were allowed to adopt from overseas without fulfilling the new requirement of seeing the child beforehand, so long as they were able to prove that they planned to readopt the child through a licensed adoption agency in the US.<sup>84</sup> PAPs from this point on would have to contact a US licensed agency and after a screening, would contact their licenced partner agency in Korea, who would find a child for the PAPs and finish the paperwork in Korea. After arrival in the US, the adoption

<sup>80</sup> Ministry of Government Administration, “Honhyöradong Haeoeyangjarül Wihan Taeriyangja Ch’okchinüi Kōn [Promotion of Proxy Adoption for Mixed-Race Children Seeking Overseas Adoption],” March 23, 1956, BA0084205, National Archives of Korea.

<sup>81</sup> “PROXY ADOPTIONS OF ALIENS SCORED; Loophole in U.S. Law Said to Lead to ‘Mail-Order Baby Business’ Abroad,” *The New York Times*, August 1, 1958, sec. Archives, <https://www.nytimes.com/1958/08/01/archives/proxy-adoptions-of-aliens-scored-loophole-in-us-law-said-to-lead-to.html>; Lee, *The Global Orphan Adoption System*, 77.

<sup>82</sup> An act to amend the Immigration and Nationality Act, and for other purposes; Pub. L. No. 87–301, 75 Stat. (1961).

<sup>83</sup> Lee, *The Global Orphan Adoption System*, 76.

<sup>84</sup> Oh, *To Save the Children of Korea*, 150.

would be finalised through the US adoption agency and a US court. This measure thus effectively was a laundering of the proxy adoption practice: under the banner of best interest, proxy adoption had transformed from a temporary and legally dubious measure into a fully legalised pathway to adoption under the supervision of the social workers who had protested its development – the future expansion of transnational adoptions was secured.

## 2.2 The Law of Exception

When adoption emerged as an emergency measure, the legal foundations in Korea remained slim. By 1955, the need for control had become clear and the Special Law on the Adoption of Orphans (*Koaibyangt'ŭngnyeobŏp*) was introduced, only for it to strand in parliament six times. To be more specific, the government put up the law for review on the agenda of the parliament on July 23<sup>rd</sup>, 1955; June 17<sup>th</sup>, 1957; June 26<sup>th</sup>, 1958; January 30<sup>th</sup>, 1959; February 23<sup>rd</sup>, 1959; December 1<sup>st</sup>, 1960; and December 31<sup>st</sup>, 1960.<sup>85</sup> Though it might sound ironic, 'all' it took for the Special Law to pass was a military coup. After Park Chung-Hee had replaced the civil government in May of 1961 with the Supreme Council for National Reconstruction, the law came to pass on September 31<sup>st</sup> of that year.

The first major accomplishment of this law was that it retroactively legalised the existing practices surrounding adoption. It indirectly legalised the already established adoption agencies and formulated a rough procedure with minimum requirements for transnational adoption. The idea of the best interest of the child appears immediately in Article 1, which states the purpose of the Act as “the facilitation of the improvement of the welfare of orphans by simplifying the procedures for foreigners to adopt Korean orphans.”<sup>86</sup>

This law was “special” because it overruled the ‘normal’ law. Customary family law only allowed for consanguineous adoption and did not allow for the adoption of a child that was supposed to inherit the family line into another family.<sup>87</sup> Article 875 of the Civil Law, enacted in 1958, states that “The eldest son of the patriarch of the family is not allowed to be adopted except in cases where it is to inherit the lineage of his own family.”<sup>88</sup> Contradictory to this, an Article 2 of the Special Law, orphans were defined as either “1) A person under 18 whose legal guardian is unknown; or 2) A person under 18

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<sup>85</sup> Kiwŏn Chŏng and Manchi Kim, *Urinara ipyangŭi silt'ae punsŏk* [Analysis of the Current State of Adoption in Korea], 14 (Korea Institute for Health and Social Affairs, 1993), 75.

<sup>86</sup> Republic of Korea Parliament, “Koaibyangt'ŭngnyeobŏp [Orphan Adoption Special Law ],” Pub. L. No. 731 (1961).

<sup>87</sup> Chŏng and Kim, *Urinara ipyangŭi silt'ae punsŏk*, 76.

<sup>88</sup> Republic of Korea Parliament, “Minbŏp [Civil Law ],” Pub. L. No. 471 (1958).

with legal consent from their legal guardian.”<sup>89</sup> This meant that there was virtually no difference anymore between a lost child, an abandoned child, and an actual orphan. Soojin Pate points out that this legal definition of an orphan was a misnomer, conflating three distinct types of non-orphan populations: children with one parent deceased due to the war; children separated from both parents still alive; and mixed-race orphans with both of their parents still alive.<sup>90</sup>

A key institutional means of control for this was the the *Hojök* registration system that was organised around the male patriarch.<sup>91</sup> Introduced in 1909 by the Japanese during the colonial rule over the Korean peninsula, they differ in multiple ways from modern birth certificates. Instead of having individual registrations, one is always put under a patriarch, either as spouse or child.<sup>92</sup> For orphans, however, an exceptional registration existed that would come to be known as the *Koa Hojök* or the Orphan Registry. Instead of being linked to a previous patriarch, orphans were pronounced patriarchs of their own lineage with the sole member being themselves. Any other information on the form was left blank (see Image 2)

The mechanism then through which these children become adoptable still has been described using insights from the works of Giorgio Agamben. Eleana Kim argued that the figure of “bare life” was overlayed over the imagined orphans “in order to be included in the political life guaranteed by the adoptive family and the nation-state.”<sup>93</sup> The imagined orphans are rescued from imagined death – namely, the orphanages. Jodi Kim pointed out that this condition is only made possible with the social death of the

<sup>89</sup> Republic of Korea Parliament, “Koaibyangt’üngnyeoböp [Orphan Adoption Special Law ],” Pub. L. No. 731 (1961).

<sup>90</sup> Pate, *From Orphan to Adoptee*, 77.

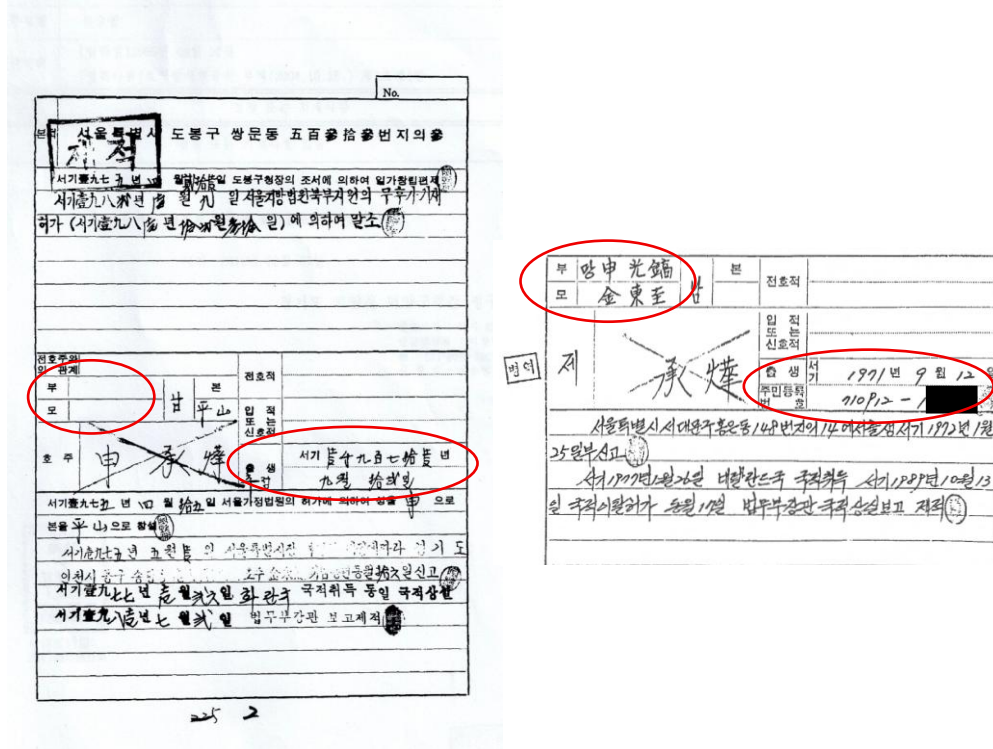
<sup>91</sup> “Transnational Adoptees: Global Biopolitical Orphans or an Activist Community? – Natalie Cherot,” *Culture Machine* (blog), January 15, 2006, <https://culturemachine.net/community/transnational-adoptees/>; <https://press.uchicago.edu/ucp/books/book/chicago/B/bo8540253.html>; Hosu Kim and Grace Cho, “The Kinship of Violence,” in *Mothering in East Asian Communities*, ed. Patti Duncan and Gina Wong, Politics and Practices (Demeter Press, 2014), 31–52, <http://www.jstor.org/stable/j.ctt1rrd8cn.6>; Jodi Kim, “An ‘Orphan’ with Two Mothers: Transnational and Transracial Adoption, the Cold War, and Contemporary Asian American Cultural Politics,” *American Quarterly* 61, no. 4 (2009): 855–80; Eleana Kim, “The Origins of Korean Adoption: Cold War Geopolitics and Intimate Diplomacy,” *UC Irvine, U.S.-Korea Institute Working Paper Series*, December 10, 2023, <https://escholarship.org/uc/item/78q9q34d>; Hosu Kim, “The Biopolitics of Transnational Adoption in South Korea: Preemption and the Governance of Single Birthmothers,” *Body & Society* 21, no. 1 (March 1, 2015): 58–89, <https://doi.org/10.1177/1357034X14533596>;

<sup>92</sup> Youngeun Koo, “The Paradoxical Development of Liberal Governance: International Adoption Policy and Professional Social Work in Authoritarian South Korea, 1953–1976,” *Journal of Social History*, November 12, 2024, 2.

<sup>93</sup> Kim, *Adopted Territory*, 255.

adoptee who is rendered as such by the legal system that places them outside of normal family registration.<sup>94</sup>

The dual definition of ‘orphan’ opened the door for adoption agencies to send away children whose parents were present but had given up their guardianship, or were forced to do so, such as children of unwed mothers and poor families. Article 6 of the



The image shows two handwritten Korean family registration forms (Hojöks). The left form is a 'Koa Hojök' (family registration for an orphan) and the right form is a 'normal Hojök' (family registration for a child with parents). Red circles highlight differences: the left form lacks a parentage box and a registration number box, while the right form has them.

Image 1 Shin Seung-yup's two Hojöks  
 Left is the Koa Hojök of my adopted father; on the right is my father's entry in the Hojök of my grandfather.  
 Notice in the Koa Hojök the information about parentage is absent and that there is no box for a registration number in contrast to the normal Hojök entry.

new law also vested the adoption agencies with the power to represent the PAPs in Korea, in line with what was necessary to continue the kind-of proxy adoption practice allowed by the new American legislation passed only five days before.<sup>95</sup>

This granting of the power of attorney in combination with the lack of actual oversight over the agencies led to scandals such as asking for too much money and not

<sup>94</sup> Jodi Kim, “An ‘Orphan’ with Two Mothers: Transnational and Transracial Adoption, the Cold War, and Contemporary Asian American Cultural Politics,” *American Quarterly* 61, no. 4 (2009): 867.

<sup>95</sup> Lee, *The Global Orphan Adoption System*, 76.

actually delivering any child.<sup>96</sup> So by 1966, the Special Law was revised to more explicitly specify the procedures and roles of the adoption agency – only government-sanctioned adoption agencies were from then on allowed to mediate an adoption, reducing the number of agencies to the big three: CPS, HAP, and KSS, which was founded in 1964.<sup>97</sup> Adoptions from Korea had to be clean and organised and this required more mechanisms for governance. The trust within it needed to be restored by strengthening, at least superficially, the regulations through sanctioning by a trustworthy authority, that being the state. However, in the three debates covering this law in the Health and Social Affairs Committee of the National Assembly, this ‘cleaning’ process also revealed the inherent contradictions of the system.

As an example, the revisions reduced the obligated search period for the biological family of orphans from twenty to fifteen days, deemed necessary by the Ministry for the explicit purpose of “speeding up the adoption procedure.”<sup>98</sup> This reduction directly harms the best interest of the child. But the majority of the discussion surrounded the potential addition of a new article about the collection of a fee: “The necessary expenses for the adoption procedure may be collected from the foreigner who will become the adoptive parent.”<sup>99</sup> The Minister explained that the existing law did not stipulate anything regarding receiving expenses for the costs incurred during the adoption process, despite the “orphan adoption *saōp*” being a “win-win situation” – about US\$130 to US\$350 was earned per child, while reducing the pressure on domestic child welfare institutions.<sup>100</sup>

*Saōp* here is most often translated to business, enterprise, or service. The use of this term to refer to social welfare policy or projects originates from 1920s colonial government in Korea.<sup>101</sup> The colonial government, with a severe lack of budget to address the social welfare needs of the Korean population, outsourced a lot of this work to private entities, notably missionary foundations.<sup>102</sup> The strong missionary presence in Korea and

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<sup>96</sup> National Assembly Secretariat, “Minutes of the 1st Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” March 3, 1965, National Assembly Archives, <https://likms.assembly.go.kr/record/mhs-10-040-0040.do?conferNum=010828&fileType=PDF>, 4.

<sup>97</sup> ESWS gained its certification in 1972, completing what is now known as the “big four.”; National Assembly Secretariat, “Minutes of the 1st Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 1.

<sup>98</sup> Republic of Korea Parliament, “Koaibyangt’ŭngnyebōp [Orphan Adoption Special Law ],” Pub. L. No. 1745 (1966).

<sup>99</sup> National Assembly Secretariat, “Minutes of the 1st Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 2.

<sup>100</sup> Ibid., 2, 6.

<sup>101</sup> Ji-sook Ye, “Trends and challenges in the study of social policy history during the Japanese colonial period,” *Youngham Studies*, no. 86 (September 2023): 365.

<sup>102</sup> Ibid., 370; see also Michael Kim, “The Politics of Officially Recognizing Religions and the Expansion of

their connection to social work during the colonial-era and the parallel with the missionary nature of the adoption agencies and their pivotal role in the child welfare system is therefore not a coincidence but the result of path-dependency.

Within the Health and Social Welfare Committee, the Members of the National Assembly pointed out that this was “an embarrassment” as it gave the impression that Korea “is a country that sells<sup>103</sup> its own children.”<sup>104</sup> The law was seen as an attempt by the Korean state to legalize “organizations that sell Korean citizens” instead of providing a service in the best interests of the child, let alone caring for them to be raised as Koreans.<sup>105</sup> They pointed out the corruption in the social welfare industry and that the Ministry seemed uninterested in taking action against the agencies trying to take in an ever increasing number of children who were not orphans to reap the fees for their own benefit.<sup>106</sup> The Minister responded that such acts would “fall under the laws related to human trafficking” and refused to add a specific penalty for such in the adoption law.<sup>107</sup> In a plea, Assembly Member Shin Gwan-u said: “This *saōp* is unacceptable. It is shameful to call it a *saōp*, but I consider the law to be extremely problematic, and it will be judged by history in the future. It is a law that sells out the citizens of our own country.”<sup>108</sup> As the revisions to the law were scrutinised by the National Assembly, that what was being attempted to obscure became clear: transnational adoption of children, despite all its good intentions, had become a practice akin to child trafficking as children became exchangeable for money to supply a demand.<sup>109</sup> It must be mentioned that the proposal for this Article 7 was scrapped, not because it violated the best interests of the

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Urban ““Social Work” in Colonial Korea,” *Journal of Korean Religions* 7, no. 2 (2016): 69–98.

<sup>103</sup> The National Assembly member quoted here uses the word 팔아먹다, which could be translated to both ‘to betray’ and ‘to sell.’

<sup>104</sup> National Assembly Secretariat, “Minutes of the 1st Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 8; National Assembly Secretariat, “Minutes of the 5th Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” March 15, 1965, National Assembly Archives, 9

<sup>105</sup> National Assembly Secretariat, “Minutes of the 1st Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 8

<sup>106</sup> National Assembly Secretariat, “Minutes of the 1st Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 7; National Assembly Secretariat, “Minutes of the 5th Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 10; National Assembly Secretariat, “Minutes of the 15th Meeting of the Health and Social Affairs Committee of the 53th Session of the National Assembly,” December 6, 1965, National Assembly Archives, 10.

<sup>107</sup> National Assembly Secretariat, “Minutes of the 15th Meeting of the Health and Social Affairs Committee of the 53th Session of the National Assembly,” 11–12.

<sup>108</sup> National Assembly Secretariat, “Minutes of the 5th Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 12

<sup>109</sup> National Assembly Secretariat, “Minutes of the 1st Meeting of the Health and Social Affairs Committee of the 48th Session of the National Assembly,” 8.



prove that South Korea was the true representation of the Korean people.<sup>113</sup> By securing economic independence and a strong military, South Korea had to become a truly ‘modern’ nation.<sup>114</sup> In his first New Year Presidential Address to the National Assembly, he stated that “the whole nation must tighten their belts and put in the hard work, blood, sweat and tears” to overcome the lack of national resources.<sup>115</sup> This was achieved through investments in public infrastructure, an export-led industrialization strategy, and the outsourcing of social welfare to private entities.

Chang Kyung-sup in his structuralist description of Korean modernization as a compressed form of modernization, explains how the family was controlled and mobilized by the state for the development of industry, to shift the responsibility of raising children to families and women so that social welfare costs could be privatized and invested in economic development.<sup>116</sup> This led to the dissolution of extended family households throughout the 1960s and 70s. In its place emerged the nuclear family, encouraged by the state as the ideal ‘modern’ family form.<sup>117</sup> Moon Seungsook explains that the process of establishing modern norms and values was rooted in militarism, which came to define the people and society, a militarised modernity that was essentially gendered. The state established family planning for women, and women's citizenship took on a reproductive character.<sup>118</sup> The ‘National Modernisation’ required all ‘kungmin’, which can be translated as nation, people, citizens, or subjects, to toil for the future prosperity of the Korean nation; women were no exception to this new definition of Koreanness. The existing discourses regarding ‘proper’ motherhood were reformulated to align with this nationalist rhetoric of ‘proper’ citizenship. Young unmarried women were expected to work in factories and the city's service industry, only to become dutiful wives. The most important duty of a good patriotic wife was the delivery of fewer children who could be better educated; the creation of a harmonious family; and a frugal lifestyle.<sup>119</sup>

To achieve this transformation of the family into a modern economically efficient unit, extensive family planning policy was established by the Park-government. Modern

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<sup>113</sup> Jongtae Kim, “The Rise of the Seonjungkuk Discourse and the Formation of Developmental National Identity during the Park Chung-Hee Era : Analyzing Presidential Addresses and the Chosun Ilbo,” *Korean Journal of Sociology* 47, no. 1 (2013): 75.

<sup>114</sup> Park Chung-Hee, “Inaugural Address of the Inauguration of the 5th President,” Ministry of the Interior and Safety, December 17, 1963, Presidential Archives.

<sup>115</sup> Park Chung-Hee, “1964 State of the Union Address,” Ministry of the Interior and Safety, January 10, 1964, Presidential Archives.

<sup>116</sup> Kyung-sup Chang, *The Logic of Compressed Modernity* (Cambridge Medford (Mass.): Polity, 2022).

<sup>117</sup> Hye Kyung Kim, “The ‘Nuclear’ Family Discourse during the Park Chung Hee Regime Period: The Discursive Change and Its Dualism,” *Sahoewayōksa [Society and History]*, no. 82 (2009): 169–212.

<sup>118</sup> Seungsook Moon, *Militarized Modernity and Gendered Citizenship in South Korea*, Politics, History, and Culture (Durham, NC: Duke University Press, 2005).

<sup>119</sup> Ibid., 68-94.

motherhood in South Korea thus also became redefined through these measures. Family planning policy was seen as an important pillar of the capitalist development of South Korea by the new regime. Thinking in such terms was not new – calls for a healthy and large population were made during the colonial occupation by Japan under the ideology of eugenics.<sup>120</sup> Now, the increasingly growing population was seen as a threat to the economy, inspired by vocal scientists in the West warning about an incoming Malthusian collapse if not handled quickly. Western scholars had talked about a potential neo-Malthusian catastrophe in East Asia if the population growth would not be curbed and similar programs were set up in India, Pakistan, and the People's Republic of China.<sup>121</sup> With the national goal of capitalist modernisation, it was important to control the population and its growth through policy.<sup>122</sup> The establishment of the Planned Parenthood Federation of Korea (PPFK) in 1961 as a government agency saw the launch of many campaigns promoting different measures of population control, most of its budget stemming from foreign aid.<sup>123</sup>

This transition from the extended family to the nuclear family was facilitated by the increasing scientification and privatisation of motherhood and family, fuelled by the import of Western science.<sup>124</sup> The executive details of the family planning policy were a direct product of this growing emphasis on the authority of modern science. Even the term used for unwed mothers in Korea (*mihonmo* a combination of *mihon*, unwed, and *mo* meaning mother) is relatively new, only introduced in Korea in the mid-1960s, through translations of Western social welfare literature.<sup>125</sup> Modern scientific developments and new medicines were quickly and rigorously promoted to limit the

<sup>120</sup> Ŭn-ju Cho, *Kajok Kwa t'ongch'i: In'gu Nŭn Öttök'e Chöngch'i Ŭi Munje Ka Toeönnä* [Family and Governance: How Did Population Become Political], (Ch'angbi, 2018), 51-53.

<sup>121</sup> Marcos Cueto, Theodore M. Brown, and Elizabeth Fee, *The World Health Organization: A History*, Global Health Histories (Cambridge, United Kingdom: Cambridge University Press, 2019), 146-50.

<sup>122</sup> Yu-jöng Ch'oe, *Kajok Chöngch'aek Ŭl t'onghae Pon Han'guk Ŭi Kajok Kwa Kündaesöng: 1948-Yön - 2005-Yön Kkaji* [Family and Modernity in Korea Seen Through Family Policy: 1948 - 2005], Ihwa Tamunhwa Ch'ongso. Sahoe 1 (Pangmunsa, 2010), 170.

<sup>123</sup> Kim, *Birth Mothers and Transnational Adoption Practice in South Korea*, 51.

<sup>124</sup> Misook Baek, "Housewife's Culture and Information Programs and Gender Politics of Television in 1960s~1970s Discourse of Housewife, Post-housewife, and E-domestication of Post-housewife," *Öllon'gwa sahoe* [Media and Society] 23, no. 4 (2015): 145; John DiMoia, *Reconstructing Bodies: Biomedicine, Health and Nation-Building in South Korea Since 1945*, Studies of the Weatherhead East Asian In (Palo Alto: Stanford University Press, 2013); Ock-Joo Kim and Sang-Ik Hwang, "The Minnesota Project: The Influence of American Medicine on the Development of Medical Education and Medical Research in Post-War Korea," *Ŭi Sahak* 9 (July 1, 2000): 112-22.

<sup>125</sup> Phil-sik Shin, "1970nyöndae Shinmun'gisarül t'onghae Pon Han'gung Mihonmo Pohosaöpkwa Mihonmoüi Sahoejöng Chaehyön Pyönhwa Yön'gu: Kyönggyejöng Mosöngesö Paejedoen Yösöngüro." *Journal of Korean Women's Studies* 33, no. 3 (September 1, 2017): 324.

reproductive rights of South Korean women.<sup>126</sup> This allowed for the emphasis of the government on the families' responsibility to reproduce responsibly: the privatisation of reproduction, enabled by modern means.<sup>127</sup>

To reaffirm this duty of the women, the family planning policy highlighted the families' responsibility to have a limited number of children. The focus of the PPFK was on limiting the women's ability to reproduce through various means. This coincided with the already prevailing sentiment among South Korean women at that time: women were willing to actively participate in birth control to limit the growth of the family.<sup>128</sup> Medical IUDs, abortions, and sterilisation were the three main birth control measures promoted by the PPFK.<sup>129</sup> While abortions were illegal at that time, surveys conducted between 1958 and 1960 show that around 35% of women of childbearing age in the major cities had at least one abortion; most of these women were married and of the middle and upper class.<sup>130</sup> In addition, paradoxically, the state highlighted the importance of economic self-reliance of the *whole* family, notwithstanding the nuclear family that it was promoting as the ideal family form. All of these measures were implemented to increase the economic efficiency of the family as a unit.<sup>131</sup>

The direct consequence of this emphasis on economic modernisation was the absence of a properly developed safety net, leading to an increase in unwed mothers, that in turn directly impacted the number of children available for adoption.<sup>132</sup> In her research on the formation of adoption policy under the Park Chung-Hee regime, Cho Ga-eun also identifies adoption policy as a "developmental liberal policy aimed at transferring "problematic populations" that do not fit into the modern family while shifting social welfare costs to the public."<sup>133</sup> South Korean women were made responsible for the planning of their families, not as individuals but as subjects of the patriarchal family.

Noteworthy is that Korea is not the only country where the connection between unwed mothers and adoption is made – in the US alone, up to 4 million unwed mothers are estimated to have given up their newborns for adoption between 1940 and 1970, a

<sup>126</sup> Eun-Kyung Bae, *Hyöndae Han'guk Ŭi in'gan Chaesaengsan: Yösöng, Mosöng, Kajok Kyehoek Saöp* [Human Reproduction in the Korean Modernity], Söuldae Yösöng Yön'guso Ch'ongsö 7 (Sigan Yöhaeng, 2012), 157.

<sup>127</sup> Ibid., 187.

<sup>128</sup> Ibid., 217.

<sup>129</sup> Ibid., 159, 163, 173.

<sup>130</sup> Eunkyung Kim, "Motherhood Discourse and the Reality of the 1950s," *PNU Journals of Womens Studies* 21, no. 1 (2011): 138.

<sup>131</sup> Bae, *Hyöndae Han'guk Ŭi in'gan Chaesaengsan*, 179 - 181.

<sup>132</sup> Kim, *Birth Mothers and Transnational Adoption Practice in South Korea*, 53.

<sup>133</sup> Cho, "Formulation and Systemization of Transnational Adoption Policy During Park Chung-hees Regime: Modernization Discourse and the System of Transnational Adoption," 28.

period defined as the “Baby Scoop Era”.<sup>134</sup> An example of the politics of belonging, the unwed mothers were vilified as neglectful to enable the more permanent belonging of the child within the adoptive family while justifying adoption as a welfare intervention in the best interests of the child.<sup>135</sup> The birth parents had to undergo social death for the adoption to be possible as adoptive children had to become reimagined as natural constituent parts of their new family, society, and state. In a recent paper by Youngeun Koo, this transnational connection was expanded upon by pointing out the interplay between Korean and American social workers and how they shared common ideals and principles of social work – termed “professional liberalism.”<sup>136</sup> She explains how the use of the previously described Orphan Hojök by Korean social workers was a result of implementation of professional social work standards that blew over from the West: to adhere to the principles of the best interests of the child, Western adoptive standards demanded a legal separation between the child and its first family.<sup>137</sup>

Concludingly, transnational adoption was a biopolitical technology in engagement with a global discourse of demography and family planning, through which “social control and biological purification in the reproductive field” could be enforced over the population, thereby contributing to the shifts in discourses of womanhood, motherhood, and the problematisation of reproduction. This was an integral part of the efforts to control population during the modernisation under the Park Chung-Hee era.<sup>138</sup> The principle of the best interests of the child had become a discursive tool that enabled the adoption of children to outsource expensive social welfare to the Global North so Korea could instead invest that money on infrastructure and business ventures. The next chapter will delve into how this global discourse manifested itself in the Netherlands and laid the foundation for a strong public outcry for Korean children.

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<sup>134</sup> Karen Wilson-Buterbaugh, *The Baby Scoop Era: Unwed Mothers, Infant Adoption and Forced Surrender* (Karen Wilson-Buterbaugh, 2017).

<sup>135</sup> See Nira Yuval-Davis, *The Politics of Belonging: Intersectional Contestations* (London: Sage, 2011); Hosu Kim.

<sup>136</sup> Koo, “The Paradoxical Development of Liberal Governance.”

<sup>137</sup> *Ibid.*, 4.

<sup>138</sup> Hübinette, *Comforting an Orphaned Nation*, 64.

## 3. The Long March to Legalising Adoptions in the Netherlands

### 3.1 The Importance of Blood

The late legalisation of adoption in 1956 itself does not mean that it was a new or unknown phenomenon. Legal notions surrounding adoption go back as far as Roman law and through the introduction of the French Code Civil in the Netherlands from 1810 till 1838, legal adoption saw a short period of possibility.<sup>139</sup> Yet, already back then, jurists were opposed to the idea arguing that “no human institution could create bonds that were not grounded in nature, and that adoption was contrary to our national character.”<sup>140</sup> As such, the new civil law introduced in 1838 did not have any provisions for adoption.<sup>141</sup> This opposition against the principle of adoption had both a social and religious nature. Social, in the sense that there was clear opposition against kinship formation that was not consanguineous, religious in the sense that this emphasis on the blood-bond was based on the will of God; adoption therefore was seen as a denial of the punishment of God that was infertility.<sup>142</sup>

The rest of the 19<sup>th</sup> century sees a slow movement towards the recognition of adoption as a measure of child protection, in tandem with a shift in thinking about children’s rights and what factors enable a healthy development, though adoption would have to wait till the 20<sup>th</sup> century before it would be more than proposals.<sup>143</sup> It must be mentioned here that in the Dutch East Indies, there was a short lived discussion surrounding adoption in the 1890s that found its origin in the discrepancy between the Chinese minority residing in the Dutch colony and the European and native populations – while the Chinese were allowed to adopt, the rest was not. Similar to Korea, there was a need to have a male heir to secure the patriarchal line and that could inherit the ancestral rites.<sup>144</sup> In contemporary orientalist fashion, this was explained as an exotic, un-Christian Chinese cultural practice, akin to trafficking, and the Dutch should not copy this behaviour by expanding the right to adoption.<sup>145</sup>

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<sup>139</sup> J. A. Nota, “De Adoptie: Rechtsinstituut in Ontwikkeling” (Dissertation, Radboud Universiteit, 1969), 9

<sup>140</sup> Tweede Kamer der Staten-Generaal, 1953-1954, Kamerstuk 3530 Nr. 3, 1.

<sup>141</sup> Nota, “De Adoptie,” 9

<sup>142</sup> Hoksbergen, *Kinderen Die Niet Konden Blijven*, 21.

<sup>143</sup> Hoksbergen, *Kinderen Die Niet Konden Blijven*, 29; Nota, “De Adoptie,” 20.

<sup>144</sup> Tweede Kamer der Staten-Generaal, 1915-1916, Kamerstuk 4 Nr. 43, 102

<sup>145</sup> Marlou Schrover, “Parenting, Citizenship and Belonging in Dutch Adoption Debates 1900-1995,” *Identities* 28, no. 1 (2021): 98; Tweede Kamer der Staten-Generaal, 1904-1905, Kamerstuk 121 Nr. 5, 17;

An important legal development necessary for adoption came in 1905 with the introduction of child protection legislation that enabled the state to remove parents from their parental authority and entrust guardianship to another person or legal entity, leading to the formation of organisations specialising in foster care for children.<sup>146</sup> Though this did not allow for the permanent legal severance of the blood ties, it was the first legal acknowledgement of ‘light’ adoption, in line of the definition of adoption given in the introduction. Foster care became the preferred method of child protection and would dampen the pressure for adoption legislation.<sup>147</sup> In 1923, parliament asks the government to enact adoption legislation, specifically for the purpose of “guardianship and nursing of the many foreign children in our country.”<sup>148</sup> Though not mentioned where these foreign children were coming from, this most likely refers to the estimated 14,000 Hungarian children that entered the Netherlands following the dissolution of the Austro-Hungarian Empire in the aftermath of the Great War. Again, the law did not get far as the blood tie was still considered predominant in determining kinship.<sup>149</sup>

### 3.2 The Mothers’ Scientification

The next decades saw the development of more measures for the state to intervene in families in the form of child protection measures, particularly in the cases of neglect and abuse, while slowly strengthening the legal position of foster parents by branding birth parents as potentially neglectful.<sup>150</sup> This strengthening was gradual and came under the continues complaining of foster parents who were afraid to lose ‘their’ child back to the birth parents. As the birth parents need to be vilified to enable the more permanent inclusion of the foster child in its new family, this can be regarded as another example of the politics of belonging in action – who has the right to a family, and who does not?

Beyond neglectful parents, another target for these politics were unwed mothers and their children. Paralell to the developments mentioned in Chapter 2, the problematisation of the unwed mother in the Netherlands came from the religious pillars

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Though not explicitly about adoption, for more information regarding child separation in the colonial context see Geertje Mak, Marit Monteiro, and Elisabeth Wesseling, “Child Separation: (Post)Colonial Policies and Practices in the Netherlands and Belgium,” *BMGN - Low Countries Historical Review* 135, no. 3–4 (November 12, 2020): 4–28.

<sup>146</sup> Hoksbergen, *Adoptie van Kinderen Uit Verre Landen*, 26; Nota, “De Adoptie,” 20–21.

<sup>147</sup> Evelien Walhout et al., “Hostages of Time: Policy, Practice and Experiences of Relinquishing a Child for Adoption in the Netherlands between 1956 and 1984,” *Annales de Démographie Historique* 2021/2, no. 142 (2022): 1; Nota, “De Adoptie,” 22.

<sup>148</sup> Eerste Kamer der Staten-Generaal, 1923–1924, Kamerstuk 2 IV Nr. 2, 46/163, 82/300; Tweede Kamer der Staten-Generaal, 1923–1924, Handelingen 26-02-1924, 881.

<sup>149</sup> Schrover, “Parenting, Citizenship and Belonging in Dutch Adoption Debates 1900–1995,” 99.

<sup>150</sup> Nota, “De Adoptie,” 21.

in society who deemed it necessary to protect the values of family and marriage. Those pregnant before marriage were deemed immoral and protestant and catholic organisations set up special homes to house these “fallen women.”<sup>151</sup> While excluded from the Sickness Act of 1913 that covered support for pregnant women, in 1930, an umbrella organization for the support of unwed mothers was founded with implicit support from the government: FIOM.<sup>152</sup> Fuelled by the increasing scientification of social welfare, they worked hard to professionalise the care for unwed mothers and supported mothers in raising their own children.<sup>153</sup> They established a central committee to mediate foster placements in a professional manner, not only to protect the mother and child but also to suppress the spread of illegal adoption channels.<sup>154</sup> During this period, PAPs would post requests in the public advertisement section of newspapers, while unwed mothers posted advertisements for available children.<sup>155</sup>

It was once again war that created new momentum for adoption. The Second World War had left Jewish children in the temporary care of foster families and institutions, though efforts were made to make this separation from their parents permanent, even if they had not passed during the war. Jewish organisations reacted furiously to these plans that privileged the position of the foster parents over those of the Jewish community. The regulation was softened and instead of fully ‘relieving’ the Jewish parents of their parental rights, instead they were suspended and had a month to report themselves to reinstate their rights.<sup>156</sup>

At the same time there was a push in parliament to legalise adoption – despite this pressure the Minister of Justice resisted, again on the basis of the “natural relation of parent and child.”<sup>157</sup> However, there was an additional moral reason: the Minister wanted the children to honourably bear the names of their “real and legal” parents who had lost their lives due to the “cruelty of the occupier,” saying that they “have the right to have their own child grow up under their own name.”<sup>158</sup> In 1947, the Children’s Act was

<sup>151</sup> Walhout et al., “Hostages of Time,” 5.

<sup>152</sup> Hoksbergen, *Kinderen Die Niet Konden Blijven*, 33.

<sup>153</sup> Anton van Renssen et al., *De Federatie van Instellingen Voor Ongehuwde Moederzorg (F.I.O.M.) van 1956 Tot 1984*, Bronstudie, Deelonderzoek Historische Bronnen (Internationaal Instituut voor Sociale Geschiedenis (IISG), 2025); Nelleke Bakker, “In the Interests of the Child: Psychiatry, Adoption, and the Emancipation of the Single Mother and Her Child – the Case of the Netherlands (1945–1970),” *Paedagogica Historica* 55, no. 1 (2019): 128.

<sup>154</sup> Bakker, “In the Interests of the Child,” 129.

<sup>155</sup> Anton van Renssen et al., *De Federatie van Instellingen Voor Ongehuwde Moederzorg (F.I.O.M.) van 1956 Tot 1984*, 140 - 141.

<sup>156</sup> Geert Johannes van Klinken, *Strijdbaar & omstreden: een biografie van de calvinistische verzetsvrouw Gezina van der Molen* (Boom, 2006), 204 – 208.

<sup>157</sup> Tweede Kamer der Staten-Generaal, 1946-1947, Handelingen 03-12-1947, 585.

<sup>158</sup> Ibid.

revised and strengthened both the position of the foster parents as well as that of the unwed mother. In 1951, Dutch parliament passed a new law for foster children, hoping to prevent “irresponsible child abandonment.”<sup>159</sup> Both times, regulation of adoption was deemed unnecessary as the protection through foster care was seen as enough to support the best interests of the child.

This deferral of adoption legalisation, despite most nations in Europe having adoption legislation,<sup>160</sup> was supportable until FIOM published a report in 1952, concluding that the legalisation of adoption was beneficial to unwed mother care. The FIOM conclusions had such major impact because up to 90% of children in foster care came from unwed mothers.<sup>161</sup> FIOM was careful in its wording though, only in favour of separating mother from child “in those few cases, when it must be assumed that the mother, continuously aware of the extraordinary circumstances, is not in the position to fulfil her natural duty nor will be there in the future.”<sup>162</sup> They also wanted the inclusion of a three-year long probation period, during which the mother could reclaim her child.<sup>163</sup> This outward shift in FIOMs norm surrounding mother-child relations can be seen as a tacit acceptance of defeat – the result of a failure in damming in illegal adoptions, despite their own best efforts; rather have well-organised legal adoption than the proliferation of unsafe illegal adoption practices.

This development needs to be read in consideration of the global discursive shift in the 1950s. Under the influence of psychiatrists and sociologists, the scientification of care had replaced the moral and religious basis for the nuclear family. Now, instead of regarding it a symbol of sin, unwedded motherhood was deemed a result of mental illness and a broader social problem that went beyond the individual; intervention by society was therefore justified. The conclusion of psychiatrists that a child needed to have a strong and secure attachment to a mother for a healthy development, contrasted with the impersonal care of the children’s home, was interpreted as such that unwed mothers were deemed unfit as such mother figures. The idea was that their precarious social position meant they could not provide the care necessary, and thus it was in the best interests of the child to separate them. As the recent report drawn up by the Committee Domestic

<sup>159</sup> Jacques Dane and Evelien Walhout, *De Geschreven Werkelijkheid Onderzoek Naar Historische Bronnen over Binnenlandse Afstand En Adoptie* (Internationaal Instituut voor Sociale Geschiedenis (IISG), 2025), 167.

<sup>160</sup> For a study looking into the broader European context at this time, see Yves Denéchère, “Regulating a Particular Form of Migration at the European Level: The Council of Europe and Intercountry Adoptions (1950-1967),” paper presented at Peoples and borders: movement of persons in Europe, to Europe, from Europe (1945-2015), Padua, Italy, *Migration Flows and Policies in Western Europe From the Second World War to the Rome Treaties*, HAL open science, 2014, halshs-01101137.

<sup>161</sup> Nota, “De Adoptie,” 38.

<sup>162</sup> Ibid., 23.

<sup>163</sup> Ibid., 27.

Relinquishment and Adoption 1956-1984 installed in 2022 by the Dutch Minister of Legal Protection, concludes: “The “best interests of the child” virtually always outweighed those of the biological mother, who had relinquished.” The decline in the significance of religion in the narrative simultaneously strengthened the resolve of childless married couples to find a child – no longer under a punishment of God, they were instead an incomplete nuclear family that needed to fulfil their purpose.<sup>164</sup>

### 3.3 The Affect’s Demand

With the failure of the lobby for an adoption law in the late 1940s, foster parents united themselves in 1950 in an organisation, the NVP. In their eyes, their legal position as parents was precarious so long there was no complete legal severance of the original blood ties.<sup>165</sup> After FIOM had published their report on what a potential adoption law might look like, the NVP published their own report in 1953, supporting the regulation of adoption as a measure of child protection and the best interests of the child.<sup>166</sup> Smeenk calls the argumentation used by the NVP and those in favour of the adoption law “sentimental,” and gives an example of portrayals of children of unwed mothers as precarious, the description under the photo asking the reader “Where should they go?”<sup>167</sup> This question has embedded in it the implicit assumption that these children from unwed mothers are by definition in need of replacement. The debate was not about whether they should be removed from their birth mothers, instead asking only where they should be placed after this removal. The manifestation of the desire for a child from the PAPs in the form of the NVP and the lobby for the adoption law was framed along the lines of the best interest of the child, not their own egoism. Pointing towards the necessity for stability for these precarious children and then presenting adoption as the solution, is another clear example of the politics of belonging at play and this lobby proved to be successful.

On November 1<sup>st</sup>, 1956, the new adoption law finally goes into effect.<sup>168</sup> It was an important step towards intercountry adoption in that it acknowledged the possibility of legal severance of the blood ties between birth mother and child. The law provided for the recognition of the adoptive child as if it was by blood related to the adoptive parents. After a mandatory three-year foster period, this adoption could only be proclaimed by a

<sup>164</sup> Bakker, “In the Interests of the Child,” 122; Hoksbergen, *Kinderen Die Niet Konden Blijven*, 60-61.

<sup>165</sup> Hoksbergen, *Kinderen Die Niet Konden Blijven*, 32.

<sup>166</sup> A. Stempels, *Adoptie, ontstaan en bestaan van pleeggezinnen* (J.H. de Bussy, 1953), 12-13.

<sup>167</sup> Smeenk, “Migratie En Beleid: Een Paradox. Het Nederlandse Interlandelijke Adoptiebeleid 1956-1980,” 33-34.

<sup>168</sup> Nota, “De Adoptie,” 25.

court based on the best interest of the child. Something that becomes clear from this history is that some form of social pressure for adoption had always been there, suppressed due to a politics of belonging that was under heavy influence of a strong belief in the natural ties between mother and child. This had been battered down slowly by a continuous appeal to the best interests of the child, partially informed by an increasing scientification, problematization, and subsequent development of care programs for unwed mothers. The legalisation of adoption not only was the completion of a long push for the de-sanctification of consanguineous kinship, but it also opened the flood gates for a demand for children that could finally voice itself legally.

As can be seen in Figure 5, there is a clear trend in the development of the number of domestic adoptions following the legalisation. Placement fluctuates until 1965, experiences growth till 1970, and only then sharply declines. It is noteworthy then that all estimates made by the CBAA for relinquishments by unwed mothers point to a similar trend: low rates of separation until the 1960s, growth in the early 1960s, a peak in the late 1960s and decline from 1970.<sup>169</sup> This is not simply a correlation, as previously mentioned, most children available for domestic adoption were relinquished by unwed mothers, up to 90%. By the end of the 1960s, due to the introduction of social welfare regulations in 1965 it had become easier for unwed mothers to keep their child, norms around the nuclear family started to break down and the stigmatisation of unwed mothers would come under fire within the sciences.<sup>170</sup> The contraceptive pill becomes available for prescription to unwed mothers in 1970 and an immediate reduction is visible in unplanned pregnancies: 28% of pregnancies reported to be unplanned between 1966 – 1970 to only 8% in 1971-1975.<sup>171</sup>

As mentioned in the introduction, this reduction in domestically available children, combined with a more robust system for adoption, is used as a causative explanation for the increase in the number of intercountry adoptions. With a reduction in supply, an increase in pressure from the demand side led to more interest in adoptions from abroad. Yet, if taken a look at Figure 5, this growth is incremental and starts around 1965, when both relinquishments and domestic adoption rates were at their peak. This statistical review weakens the established argument that the counterculture of the 1960s was an indirect reason for increasing pressure for intercountry adoptions in 1967: the

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<sup>169</sup> Mariëlle Bruning et al., *Schade Door Schande Rapport van de Commissie Onderzoek Binnenlandse Afstand en Adoptie 1956-1984*, 32.

<sup>170</sup> Jacques Dane and Evelien Walhout, *De Geschreven Werkelijkheid Onderzoek Naar Historische Bronnen over Binnenlandse Afstand En Adoptie*, 134, 157-158.

<sup>171</sup> Mariëlle Bruning et al., *Schade Door Schande Rapport van de Commissie Onderzoek Binnenlandse Afstand en Adoptie 1956-1984*, 22; Jacques Dane and Evelien Walhout, *De Geschreven Werkelijkheid Onderzoek Naar Historische Bronnen over Binnenlandse Afstand En Adoptie*, 154

results of this counterculture showed its effects when a system for intercountry adoptions was already established in the 1970s. The arguments of supply and demand as explained by Hoksbergen cannot apply here: supply was at its peak when demand to adopt from overseas peaked at the same time. Instead, it should be recognised that the demand for children, regardless of geographic location, was simply higher than the peak of supply in the Netherlands.

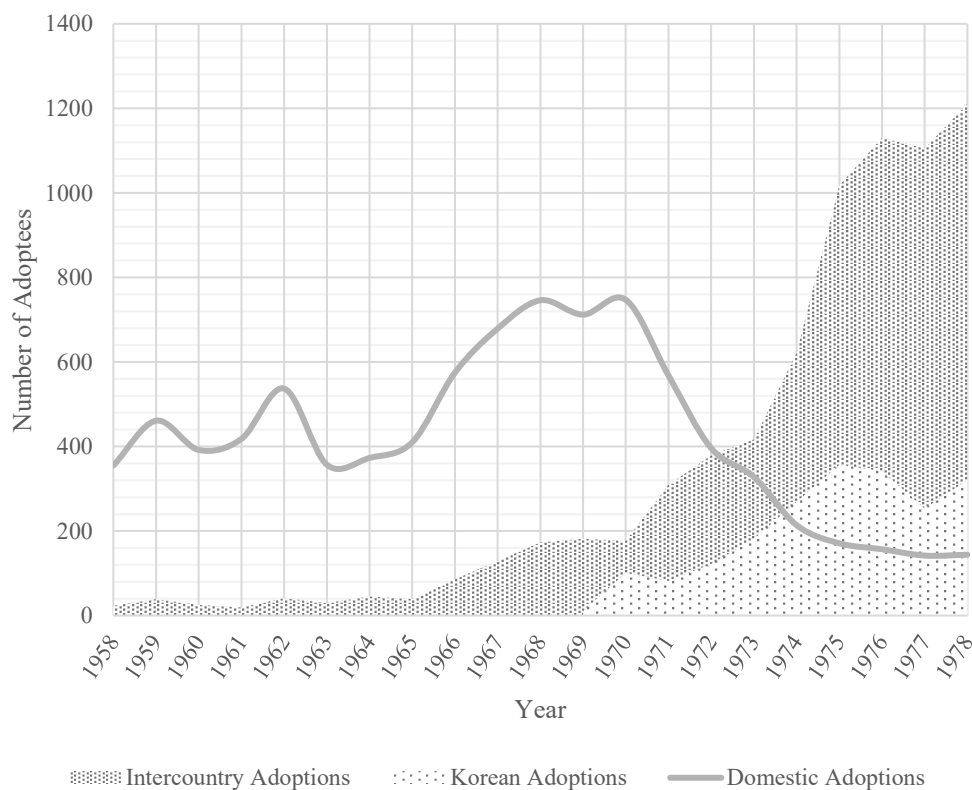


Figure 5 Transnational and Domestic Adoptions in the Netherlands per year, including Korean adoptions, 1958 ~ 1978

Source: R. Hoksbergen, *Kinderen Die Niet Konden Blijven: Zestig Jaar Adoptie in Beeld* (Soesterberg: Uitgeverij Aspekt, 2011).

## 4. Transnational Entanglement in Child Welfare

### 4.1 The Policy of Migration

From 1956, with the passing of the law, there is a slow but steady increase in the number of intercountry adoptions, despite the law having no regulations facilitating intercountry adoption. At the same time, it also did not forbid the practice. Limited availability of domestically adoptable children, from the perspective of the PAPs, led to long waiting times. Though the NVP informed its members of the new regulations in terms of domestic adoption, individuals quickly turned their attention to children across the border. By comparing intercountry adoptions with domestic procedures, media indirectly promoted them as quicker and easier.<sup>172</sup> The Minister of Justice commented on these PAPs that the search abroad did not seem to stem from the explicit complexity of Dutch adoption law but was more that “in our country exists a lack of children, eligible for adoption, as such in opposition to some other countries.”<sup>173</sup> From the 1000-ish placements from overseas between 1957-1970, almost half are from Greece.<sup>174</sup> Greek adoption started after an active search for adoptable children; PAPs found a willing partner in the Athenian children’s home *Mitera*. These adoptions from Greece came under fire in 1966 due to allegations of trafficking and *Mitera* closed to foreigners in 1969.<sup>175</sup> These Greek adoption cases were discussed in parliament in 1961, as an important question emerged: is a Greek court order for adoption, legally binding in the Netherlands?<sup>176</sup>

This question was thrown in the legal vacuum that emerged due to two different types of legislation being at work, not necessarily in tandem with each other. Intercountry adoptions had to abide by both the regulations set by the adoption law but were also subject to migration law. The problem was that the migration regulations set in the decree of the Ministry of Justice were about foster children, not adoptive children. Under the assumption that the adoption could only be legalised in a Dutch court after three years of successful foster care, this decree from 1957 could not answer the question. These regulations also assume a pre-existing relation between the PAPs and the foster child, something that in practice rarely existed.<sup>177</sup> With a new migration law going into effect in

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<sup>172</sup> Schrover, “Parenting, Citizenship and Belonging in Dutch Adoption Debates 1900-1995,” 104.

<sup>173</sup> Tweede Kamer der Staten-Generaal, 1961-1962, Kamerstuk 6569 Nr. 5, 1.

<sup>174</sup> Hoksbergen, *Kinderen Die Niet Konden Blijven*, 65.

<sup>175</sup> M.R. Duintjer-Kleyn, “Adoptie van Buitenlandse Kinderen,” *Justitiële Verkenningen*, Justitiële verkenningen, 6, no. 4 (1979), 11; Schrover, “Parenting, Citizenship and Belonging in Dutch Adoption Debates 1900-1995,” 104.

<sup>176</sup> Tweede Kamer der Staten-Generaal, 1961-1962, Kamerstuk 6569 Nr. 4, 1.

<sup>177</sup> Swart-Babbé, “De Toelating van Buitenlandse Adoptiefkinderen in Nederland,” 13.

1965, it took until 1967 for the Ministry of Justice to forward new regulations for prospective adoptive children: the Directive on Entry of Foreign Foster Children.<sup>178</sup>

These new regulations mandated that, not only should the intake of the foreign foster child be in the best interest of the child, the PAPs had to prove that “on the basis of their very particular personal circumstances, an exceptional motive exists for taking in a foreign child.”<sup>179</sup> The regulations provide two avenues: the moral obligation flowing out from family or friendship bonds; or the family circumstances of the PAPs that prompt the admission of a foreign foster child. It also defines two exclusionary clauses for the latter: families that already have two or more children are exempted from application (*getalscriterium*; number criterium) and applications should cover no more than one child at a time. The number criterium did not exist for domestic adoptions, something that would come to be addressed later. These regulations permitted the Ministry with a broad mandate to decide whether or not to permit the immigration of a child and did not touch upon the standards set by the adoption law. The family circumstances described here in the Directive refers to a desperation due to the absence of a child in the family planning. This makes the migration regulations one solely focused on the rights of the adoptive parents, leaving the best interests of the child to the regulations under the adoption law.

In its critical conclusion on transnational adoption, the Joustra-report reads that the Dutch state did not see itself as responsible for policy nor oversight over transnational adoptions, regarding it as a private matter.<sup>180</sup> Yet, migration was already clearly a policy area in which the government imagined a role for itself – an example of this is the stringent policy on family reunification of labour migrants throughout the 1950s and 1960s, motivated by a strong conviction that the Netherlands was densely overpopulated.<sup>181</sup> This means that the Dutch state either intentionally placed transnational adoption outside of the migratory domain or *failed* to recognise it as a form of migration. Invoking the concept of the interior frontier<sup>182</sup>, I recognise here a demarcation between those who were allowed to use migration for the purpose of family formation (prospective adoptive parents; PAPs) and those who were not (labour migrants). The Directives of 1967 clearly state that the PAPs cannot have more than two children in their

<sup>178</sup> The regulations were located at Nationaal Archief, Den Haag, Nationale Federatie voor Kinderbescherming, nummer toegang 2.19.052.01, inventarisnummer 166 “x354.51.075.347.633 (100) Commissie richtlijnen buitenlandse pleegkinderen.”

<sup>179</sup> Swart-Babbé, “De Toelating van Buitenlandse Adoptiefkinderen in Nederland,” 14.

<sup>180</sup> Commissie onderzoek interlandelijke adoptie, “Rapport Commissie Onderzoek Interlandelijke Adoptie,” 133.

<sup>181</sup> S. A. Bonjour, “Gezin En Grens: Debat En Beleidsvorming Op Het Gebied van Gezinsmigratie in Nederland Sinds de Jaren Vijftig,” *Migrantenstudies* 23, no. 1 (2007): 2–23.

<sup>182</sup> Ann Laura Stoler, *Interior Frontiers: Essays on the Entrails of Inequality*, Heretical Thought (Oxford, New York: Oxford University Press, 2022).

family prior to the adoption, must have already cared for the adoptive child as guardians for a certain period of time, and the child must not yet have reached the school age of 4 years old<sup>183</sup>; the conclusion of the Dutch report fails to recognise that transnational adoption policy was in its core very much biopolitical and subject to governance, in a Foucauldian sense.<sup>184</sup> The problem that the Joustra-report should have addressed is therefore not an absence of policy, but the absence of a policy that took the best interests of the child into account.

## 4.2 The Narrative of Saviourism

These strict regulations emerged not only due to critical questioning by members of parliament but in direct response to requests from the public to the Ministry of Justice. Examples of letters sent to the government between 1965 and 1967 reveal a common demand: there must be something that can be done for the war orphans in Vietnam! Most letters appeal to the emotional argument as they decry the horrid state these “hordes of children without parents” are living in.<sup>185</sup> They often refer to memories of the Second World War and the feeling that they could now act to prevent what they could not back then. The adoption of the children surely was better than leaving them there! “If we can send 1 ship, it should be easily possible to fetch 1000 to 1500 and it should not be difficult to find foster families for them.”<sup>186</sup>

One of the letters for Vietnam specifically calls specifically back to a national aid campaign for a project for people with disabilities. These campaigns were a phenomenon that started in 1951 and made good use of the new medium of the television to appeal to the population to donate for the cause. The letter refers to the most famous of these actions, when tv-host Mies Bouwman presents for 23 hours straight, making her instantly famous.<sup>187</sup> Mentioning her action and the vast amount of money raised, the letter writer states that finances should not be an issue “with our jar of aid money.”<sup>188</sup> In the minutes

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<sup>183</sup> Commissie onderzoek interlandelijke adoptie, “Bijlagen Commissie Onderzoek Interlandelijke Adoptie,” 42.

<sup>184</sup> Foucault, *Power / Knowledge*, 87-104; Michel Foucault and David Macey, *Society Must Be Defended: Lectures at the Collège de France, 1975-76*, ed. Mauro Bertani (New York: Picador, 2003), 239-264.

<sup>185</sup> Nationaal Archief, Den Haag, Ministerie van Buitenlandse Zaken: Code-archief 1965-1974, nummer toegang 2.05.313, inventarisnummer 8907 “Opname van Zuid-Koreaanse en Zuid-Vietnamese kinderen doorparticulieren. 1965-1968”

<sup>186</sup> Ibid.

<sup>187</sup> Pamala Wieping, “Een Halve Eeuw Vrijgevigheid in Beeld. Nationale Acties Voor Het Goede Doel in Nederland,” in *Filantropie in Nederland. Voorbeelden Uit de Periode 1770-2020.*, ed. Marco Van Leeuwen and Vibeke Kingma (Amsterdam: Aksant, 2007).

<sup>188</sup> Nationaal Archief, Den Haag, Ministerie van Buitenlandse Zaken: Code-archief 1965-1974, nummer toegang 2.05.313, inventarisnummer 8907 “Opname van Zuid-Koreaanse en Zuid-Vietnamese kinderen doorparticulieren. 1965-1968”

of the Council of Ministers of January 28<sup>th</sup>, 1966, the Minister of Social Affairs Gerard Veldkamp explains that it is not possible to arrange for the permanent move of Vietnamese children to the Netherlands and moreover, that such a project is undesirable.<sup>189</sup> It should be mentioned that adoption was not the only measure proposed to provide aid for Vietnam, for example the Dutch division of Terre des hommes had started an action to arrange for temporary hospitalization project in the Netherlands for Vietnamese children.<sup>190</sup>

On the 29<sup>th</sup> of July, 1965, does a Dutch mission doctor located in South Korea, Date Jan Mulder, contact the ministry by mail. He describes the terrible state the orphanages are in and that he is aware that “the solution should not be found in adoption” but that there is no alternative due to the lack of foster families in Korea itself. Stating that he is aware of the “large demand in the Netherlands for adoptable children, particularly young children” and that he knows of an organisation, Holt Adoption Programme, that could arrange for the sending of “about 20 children” for the purpose of adoption.<sup>191</sup> Officials in the Ministry reject this idea, stating in internal memos that “The objection to the admission of foreign foster children is only lifted in cases – numerous, but considered incidental in the context of admission policy – where there is psychological distress within families established here.”<sup>192</sup>

The psychological distress referred to is explained in a meeting between the Minister of Justice and the MPs of the Judiciary Commission of the Lower house, where the Minister explains that these requests for adoptions are based upon two pillars: 1) there is a family in emergency; 2) that family wishes to adopt a child, that is also in a state of emergency. The requests for adoption could not be permitted under his watch as they “fundamentally differ from previous requests,” in that they “do not request for the admission of a particular child. They ask for any child from Vietnam or, like Mrs. Blauw, from Asia.”<sup>193</sup> The government had advised against giving permission for a visa, as the Minister “felt nothing such a impersonal handling of children. He would not even know

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<sup>189</sup> Nationaal Archief, Den Haag, Ministerie van Buitenlandse Zaken: Code-archief 1965-1974, nummer toegang 2.05.313, inventarisnummer 8907 “Opname van Zuid-Koreaanse en Zuid-Vietnamese kinderen doorparticulieren. 1965-1968”

<sup>190</sup> National Archive, 14-06-1967, Verslag van het mondeling overleg Vaste Commissie voor Justitie met de MvJ,

<sup>191</sup> Nationaal Archief, Den Haag, Ministerie van Justitie: Algemene en Juridische Zaken (AJZ) van de Hoofdafdeling Vreemdelingenzaken en Grensbewaking, nummer toegang 2.09.52, inventarisnummer 252 “Korea 1965, 1968-1972 1965, 1968-1972”

<sup>192</sup> Ibid.

<sup>193</sup> “Verslag van het mondeling overleg Vaste Commissie voor Justitie met de Minister van Justitie”, June 14, 1967, 5 as located in Nationaal Archief, Den Haag, Ministerie van Justitie: Beleidsarchief Immigratie- en Naturalisatiedienst (IND) [periode 1956-1985], nummer toegang 2.09.5027, inventarisnummer 1220 “Commissie Buitenlandse Pleegkinderen 1967-1971”.

how that would have to work in practice.”<sup>194</sup> It would only be two years later that the first Korean children would enter the Netherlands for the purpose of adoption.

It was on the basis of immigration policy that Mulder’s request was rejected, though in the letter the Ministry sent to him they state that, as long as the PAPs have the permission following the adoption law, “they do not principally object the intake of a foreign foster child,” though they also state they require the PAPs to travel abroad, discuss with the relevant institutes there the possibility for the adoption “to prevent disappointment.”<sup>195</sup> What becomes clear from this communication between the Ministry of Justice and Mulder is that they are principally not opposed against adoptions from Korea, but will only permit them if such migration would provide for the relief of distress otherwise not possible.

It is with this background that Jan de Hartog appears on television on the 10<sup>th</sup> of February 1967, interviewed by Mies Bouwman, famous for her national aid campaign, where he introduces his two Korean adoptive daughters. He lives in Houston and adopted through the programme of Pearl Buck’s Welcome House, where he himself had become an active member of the Friends Meeting for Sufferings of Vietnamese Children.<sup>196</sup> There is another adoptive child on her way from Vietnam. He explains about the terrible situation the mixed-race children in Korea and that he is working with the Quakers to set up an organisation to help Vietnamese children, the plan being the proxy adoption of about 60 children. When Bouwman asks if saving one child is enough, he replies with his famous call-to-action: “Even if we only save, with this whole movement now...let us save one at least! Now you may ask: why is this important? I would respond by suggesting that you can best understand this by asking yourself the following question: imagine if that one person was me.”<sup>197</sup>

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<sup>194</sup> Ibid.

<sup>195</sup> Ibid.,

<sup>196</sup> “Enige gegevens naar aanleiding van het televisie-interview, dat Mies Bouwman op 10 Februari jl. met Han de Hartog heeft gehad,” 1 -3 as located in Nationaal Archief, Den Haag, Ministerie van Justitie: Algemene en Juridische Zaken (AJZ) van de Hoofdafdeling Vreemdelingenzaken en Grensbewaking, nummer toegang 2.09.52, inventarisnummer 241 “Vietnam/Korea 1967”.

<sup>197</sup> Transcript produced by the Voorlichtingsdienst van het Ministerie van Justitie as located in Nationaal Archief, Den Haag, Ministerie van Justitie: Algemene en Juridische Zaken (AJZ) van de Hoofdafdeling Vreemdelingenzaken en Grensbewaking, nummer toegang 2.09.52, inventarisnummer 241 “Vietnam/Korea 1967”.

259 requests for permission to adopt from abroad would be delivered to the Ministry of Justice by June 12<sup>th</sup> of that year, about the total number of intercountry adoptions in the prior six years combined! This is also the reason why this ‘event’ is of transracial intercountry adoptions in the Netherlands: it was merely the start of what would become a long history of adoption. While it deserves that attention, this chapter has shown that for this show to be as effective as it was, a few shifts were necessary beyond the simple demand for children. First, a population empathetic to global issues had to be created and national aid campaigns had to become normalised, creating a receptive audience. Second, migration policy had to be lenient enough to allow for the possibility of intercountry adoption while simultaneously discouraging the matter on the basis of issues not related to the best interests of the child. Third, developmental aid and adoption had to become conflated with each other, made possible by the prevalence of the principle of the best interest of the child in the adoption discourse and the imagery of orphans in the narratives of the Korean and Vietnam War. It is these three factors combined that enabled the organisation of PAPs to pressure the government to give permission for adoptions from Vietnam and Korea.



*Mag ik naar Nederland komen?*

*Image 2: “May I come to the Netherlands?”*

*Source: De tijd : dagblad voor Nederland. “ACTIE-COMITE HEEFT REEDS MEER DAN DUIZEND OUDERS Voorzichtig Met Adoptie van Koreaanse Kinderen.” April 25, 1968, Dag edition.*

## 5. Conclusion

The CBP was established within eight months after the appearance of Jan de Hartog on television. It was given the order to investigate: 1) the future of the number criterium; 2) what adoption procedure from overseas would have to look like; and 3) what contacts can be established to guarantee that it would be in the best interest of the child. Is it correct to state then that the CBP was founded due to public pressure? Yes, with a lot of asterisks.

The existing complication that this public pressure existed due to a decline in the number of domestic adoptions due to the "sexual revolution" misses the mark, as can clearly be seen by the abrupt simultaneous shift in the number of domestic vs transnational adoptions; social change is sticky and takes time. This pressure came not simply due to the television of the Jan de Hartog narrative; such a retelling misses the necessary development of a narrative of saviourism that had slowly built-up overtime and already had started to show signs of its existence long before – he was merely the match that lit the powder. This saviourism was enabled by a reframing of the best interests of the child, which had become a mask to hide behind an egoistic demand for children.

Meanwhile in Korea, the principle had become a function of the regime, first to forward racist politics against mixed-children and later to systemically enable the outsourcing of child welfare to redirect funds to economic growth. Under the zealous thrust to develop, the Park Chung-Hee regime instituted a marketization of the adoption system that would simultaneously reinforce the normative discourses of the patriarchal nuclear family while vilifying unwed motherhood.

The pull for the children in the Netherlands and the push outward in Korea were both justified under the acceptance that the separation of mother and child, performed legally by the state, in practice by social workers, in favour of those who were deemed normal and capable of raising the child, was in their best interest. Which populations were affected by these politics of belonging changed over time, as deemed fit, but operated under a global regime of truth, enabled by a common understanding of motherhood and child development that had emerged in academia in the 1950s.

What should be dully noted is the diverging paths of Korea and the Netherlands in thinking about social welfare and motherhood in the 1970s, after adoption from Korea to the Netherlands becomes a possibility. While Dutch society became less strict as norms surrounding family and motherhood weakened, such norms only hardened in Korean society. The marginalisation and criminalisation of unwed mothers in Korean society only became worse in the 1970s; the proliferation of transnational adoption in this time and the vertical integration of maternity homes, birth clinics, and the adoption agencies allowed for the existence of a social punishment if women did not abide by the norms set by the

government: have your child being taken away for adoption. In the Netherlands, the adoption of children from overseas disabled the possibility for a continued pressure by PAPs on demanding adoptable children, a pressure that had clearly existed before as could be seen through the history of the Dutch adoption law.

As such, on a more theoretical level, the development of the human right to family planning, its proliferation, and interaction with the principle of the child's best interests since the 1950s needs to be explored in future studies to gain a better understanding of the development of our modern understanding of reproductive rights and its unforeseen consequences.<sup>198</sup>

Throughout this study of the archival materials, many other future possible avenues for critical investigation became apparent. The acquiring of Dr. Mulder's diary opens the possibility for a micro history into mission life in Korea in the 1960s while it also offers a glimpse into the daily life of a social worker and paediatrician touring around rural Korea. I was also able to locate all meeting minutes from the CBP and the early years of SIA, as well as private letters between CBP and SIA board members, and communication with social workers and Korean adoption agencies. This allows for a future investigation into the internals of the CBP and the possible influence that Korean adoption agencies had on the decision-making process of the CBP. There were also signs of critique from the Dutch Ministry of Foreign Affairs in 1970-1971 on the widespread adoption of Korean children and mentions of corruption. What these critiques were, what signs there were, and what happened to these reports should be investigated, especially in light of the recognition by the TRC of human rights abuses.

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<sup>198</sup> See for example Amrita Pande, "Blood, Sweat and Dummy Tummies: Kin Labour and Transnational Surrogacy in India," *Anthropologica* 57, no. 1 (2015): 53–62.

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## Appendices

### Appendix 1: Number of Korean Adoptees per country<sup>1</sup> per year

Year	Total	US	CA	AU	FR	DK	SE	NO	IT	DE	CH	UK	NL	BE	LU	Etc. <sup>2</sup>
1953	4	4														
1954	8	8														
1955	59	59						0								
1956	671	668						3								
1957	486	485					0	1				0				
1958	930	922					2	5				1				
1959	741	737					3	1				0				0
1960	638	627					2	6				2				1
1961	665	655					2	3				0				5
1962	254	244					1	2				1				6
1963	442	439					0	3				0				0
1964	462	441					5	8	0	0		3				5
1965	451	421				1	23	3	1	1		0				1
1966	494	392	0			0	93	6	0	0		1				2
1967	626	450	6		0	5	135	23	0	0	0	2				5
1968	949	624	5		12	7	225	25	2	0	34	2	0	0		13
1969	1190	755	2		33	12	198	37	10	2	86	4	19	28		4
1970	1932	998	3		47	126	340	71	25	2	85	6	96	130		3
1971	2725	1252	1		112	308	511	148	38	9	30	1	83	229		3
1972	3490	1671	7		120	347	602	186	45	62	55	2	118	267		8
1973	4688	2329	11		163	555	618	259	26	135	120	3	182	286		1
1974	5302	2661	32		188	542	636	389	18	148	228	3	285	162		10
1975	5077	2995	73	0	155	246	308	109	63	176	227	6	307	408		4
1976	6597	4008	107	5	376	419	266	247	94	194	171	18	300	388		4
1977	6159	3711	7	26	571	460	355	302	0	119	53	1	282	269		3
1978	5917	2942	48	60	972	417	312	269	43	121	8	13	348	364		0
1979	4148	2347	33	53	560	406	169	112	13	136	1	0	171	146		1
1980	4144	2404	28	19	522	403	156	173	2	137	1	0	198	98		3
1981	4628	2684	77	25	484	402	279	246	0	140	0	0	198	93		0
1982	6434	3862	98	67	827	483	315	285	0	144	1	2	257	93		0
1983	7263	4854	81	155	859	347	278	287	0	148	1	0	172	81	0	0
1984	7924	5348	117	275	942	295	288	287	0	137	1	0	118	112	2	2
1985	8837	6021	125	278	975	402	301	234	1	164	4	0	159	151	22	0
1986	8680	6138	137	303	703	401	367	198	0	128	1	0	166	118	20	0
1987	7947	5707	151	306	589	336	280	212	1	110	1	0	108	114	32	0
1988	6463	4710	175	216	417	270	240	149	0	75	0	0	112	82	17	0
1989	4191	3343	45	156	204	109	83	147	0	35	0	0	6	43	20	0
1990	2962	2315	9	62	161	136	88	124	0	16	0	1	5	24	21	0
1991	2197	1744	2	32	89	115	83	91	0	10	0	0	8	9	14	0
1992	2045	1563	0	72	79	101	97	103	0	0	1	0	11	0	18	0
1993	2290	1807	0	69	85	139	60	104	0	0	0	0	4	1	21	0
1994	2262	1696	0	83	97	105	102	122	0	0	1	0	27	0	29	0
1995	2180	1614	0	72	86	120	110	126	0	1	0	0	15	1	34	1
1996	2080	1546	2	77	73	80	137	108	0	1	0	0	24	0	32	0
1997	2057	1620	5	61	66	65	66	112	0	0	1	0	36	0	25	0
1998	2443	1854	0	84	115	63	111	131	0	0	0	0	54	0	31	0
1999	2409	1786	17	73	107	65	136	128	0	0	0	0	65	0	32	0
2000	2360	1752	49	93	73	68	116	118	0	0	0	0	60	0	31	0
2001	2436	1798	90	115	61	61	123	109	0	0	0	0	62	0	17	0
2002	2365	1797	98	94	66	45	98	106	0	1	0	0	35	0	25	0
2003	2287	1748	98	108	53	56	110	81	0	0	0	0	8	0	25	0
2004	2258	1713	102	108	48	53	123	87	0	0	0	0	0	0	24	0
2005	2101	1623	98	96	34	46	98	80	0	0	0	0	0	0	26	0
2006	1899	1503	96	54	19	43	90	70	0	0	0	0	0	0	24	0
2007	1264	1013	68	44	14	22	80	20	0	0	0	0	0	0	3	0

Year	Total	US	CA	AU	FR	DK	SE	NO	IT	DE	CH	UK	NL	BE	LU	Etc. <sup>2</sup>
2008	1250	988	78	18	8	20	76	45	1	0	0	0	0	0	16	0
2009	1125	850	67	34	8	21	84	40	4	0	0	0	0	0	17	0
2010	1013	775	60	18	6	21	74	43	4	0	0	0	0	0	12	0
2011	916	707	54	21	4	16	60	33	6	0	0	0	0	0	15	0
2012	755	592	45	13	4	10	49	26	7	0	0	0	0	0	9	0
2013	236	181	15	0	2	5	19	7	4	0	0	0	0	0	3	0
2014	535	412	38	7	4	7	33	20	5	0	0	0	0	0	9	0
2015	374	278	22	6		5	36	10	11	0	0	0	0	0	6	0
2016	334	222	23	10	3	5	31	23	14	0	0	0	0	0	3	0
2017	398	274	28	24	5	6	25	20	11	0	0	0	0	0	5	0
2018	303	188	22	14	7	7	28	19	12	1	0	0	0	0	5	0
2019	317	232	23	10	5	3	13	12	15	0	0	1	0	0	3	0
2020	232	156	19	17	2	3	18	7	9	0	0	0	0	0	1	0
2021	189	126	17	11	1	3	14	7	7	0	0	0	0	0	3	0
2022	142	99	10	2	4	5	9	6	4	0	0	0	0	0	3	0
2023	79	48	10	3	0	0	8	4	5	0	0	0	0	0	1	0
2024	58	41	4	5	0	0	3	3	2	0	0	0	0	0	0	0
<b>Total</b>	<b>169767</b>	<b>114577</b>	<b>2638</b>	<b>3554</b>	<b>11220</b>	<b>8819</b>	<b>9801</b>	<b>6581</b>	<b>503</b>	<b>2353</b>	<b>1111</b>	<b>73</b>	<b>4099</b>	<b>3697</b>	<b>656</b>	<b>85</b>

Notes: 1. Countries are represented by two-letter country codes; 2. Though not specified, known destinations include Ireland, Finland, India, Ethiopia, New Zealand, Taiwan, Poland, Paraguay, Tunisia, Hong Kong, and Japan.

Source: 1953, 1954: Tobias Hübinette, “Korean Adoption History,” in *Community 2004: Guide to Korea for Overseas Adopted Koreans*, ed. Eleana Kim (Seoul: Overseas Koreans Foundation, 2004), 14; 1955 ~ 1968: Ministry of Public Health and Social Affairs, T’onggyeyŏnbo [Annual Statistics] (Seoul); 1969 ~ 2005: Ministry of Health and Welfare, “Kukkabyŏl Ibyanghyŏnhwang(1958~2015) [State of Adoption by Country(1958~2015)],” Korea Adoption Services, April 18, 2016; 2006~2024: Ministry of Health and Welfare, “Kungnaeoe Pyanghyŏnhwang [Current Status of Domestic and International Adoptions],” Preliminary Information Disclosure, [https://www.mohw.go.kr/board.es?mid=a10107010000&bid=0040&act=list&list\\_no=356055&tag=&cg\\_code=&list\\_depth=1](https://www.mohw.go.kr/board.es?mid=a10107010000&bid=0040&act=list&list_no=356055&tag=&cg_code=&list_depth=1).

## Appendix 2: Number of Korean Adoptees to the Netherlands per year

Year	According to South Korean Ministry of Health and Welfare <sup>1</sup>	According to KSS <sup>2</sup>	According to Hoksbergen <sup>3</sup>
1969	19	11	10
1970	96	101	101
1971	83	82	82
1972	118	122	122
1973	182	184	181
1974	285	270	269
1975	307	357	357
1976	300	345	342
1977	282	253	253
1978	348	320	321
1979	171	210	210
1980	198	181	180
1981	198	211	211
1982	257	248	247
1983	172	175	173
1984	118	108	108
1985	159	167	165
1986	166	157	157
1987	108	116	116
1988	112	107	107
1989	6	10	13
1990	5	6	6
1991	8	7	9
1992	11	11	11
1993	4	4	4
1994	27	27	27
1995	15	15	15
1996	24	30	30
1997	36	36	36
1998	54	42	42
1999	65	77	77
2000	60	60	60
2001	62	61	61
2002	35	27	27
2003	8	17	17
<b>Total</b>	<b>4099</b>	<b>4155</b>	<b>4147</b>

Sources: 1. Ministry of Health and Welfare, “Kukkabyöl lbyanghyönhwang(1958~2015) [State of Adoption by Country(1958~2015)],” Korea Adoption Services, April 18, 2016; 2. Dobong-gu, “1958nyön ~ 2022nyönkkaji Kigwanbyöl, Kukkabyöl Haeoeipyang t’onggye, Han’guksahoebongsahoe [Statistics on Overseas Adoptions by Agency and Country from 1958 to 2022, Korea Social Service, Inc.],” 2023; 3. R. Hoksbergen, *Kinderen Die Niet Konden Blijven: Zestig Jaar Adoptie in Beeld* (Soesterberg: Uitgeverij Aspekt, 2011), 141, 247, 371

### Appendix 3: Number of Korean Adoptees from KSS per country per year

Year	US	NL	% to NL	DK	CH	Etc.	Total
1964	2			1		1 (SE)	4
1965	28			1			29
1966	73						73
1967	83						83
1968	83			1			84
1969	112	11	9%				123
1970	179	101	29%	71		1 (CA)	352
1971	271	82	17%	126		2 (BE)	481
1972	319	122	18%	166	55	1 (UK)	663
1973	314	184	22%	231	119		848
1974	434	270	23%	271	217		1,192
1975	500	357	29%	146	248		1,251
1976	443	345	27%	288	209		1,285
1977	428	253	24%	302	61		1,044
1978	345	320	34%	270			935
1979	285	210	28%	253			748
1980	331	181	23%	285	1		798
1981	197	211	31%	281			689
1982	141	248	35%	328			717
1983	124	175	36%	184	1		484
1984	50	108	36%	141			299
1985	90	167	36%	204			461
1986	197	157	24%	292			646
1987	344	116	18%	194			654
1988	323	107	18%	170			600
1989	267	10	3%	81			358
1990	224	6	2%	68			298
1991	135	7	3%	69			211
1992	128	11	6%	49			188
1993	112	4	2%	74			190
1994	66	27	20%	43			136
1995	42	15	15%	45			102
1996	48	30	26%	38			116
1997	53	36	36%	12			101
1998	55	42	43%				97
1999	75	77	51%				152
2000	71	60	46%				131
2001	59	61	51%				120
2002	59	27	31%				86
2003	77	17	18%				94
2004	128						128
2005	92						92
2006	80						80
2007	65						65
2008	36						36
2009	19						19
2010	22						22
2011	21						21
<b>Total</b>	<b>7,630</b>	<b>4,155</b>	<b>25%</b>	<b>4,685</b>	<b>911</b>	<b>5</b>	<b>17,386</b>

Sources: Dobong-gu, "1958nyŏn ~ 2022nyŏnkkaji Kigwanbyŏl, Kukkyabyŏl Haeoeipyang t'onggye, Han'guksahoebongsahoe [Statistics on Overseas Adoptions by Agency and Country from 1958 to 2022, Korea Social Service, Inc.], 2023.

## 국문요약

### 입양을 “‘무슨 수를 써서라도’ – 한국 입양기관, 네덜란드 사회복지사, 그리고 아동의 최선의 이익에 대한 (재)정의, 1953 ~ 1967

이 논문은 한국에서 네덜란드로의 초국가적 입양 역사의 첫 번째 장으로서 네덜란드가 왜 한국에서 아동을 입양하기 시작했는지에 대한 답을 제시한다. 한국에서는 박정희 정권 하에서 아동 포기의 체계적인 시장화와 세계적으로 모성과 인구의 과학화에 기반한 담론 체제로서 아동의 최선의 이익 원칙의 장기적인 발전이라는 두 가지 주요 발전이 있었기에 가능했다. 네덜란드와 한국 정부 내부 메모, 비공개 서한, 이해관계자 간의 소통을 살펴본 결과 아동의 최선의 이익 원칙과 초국적 입양이 부합하는지에 대한 입양 기관과 사회복지사 간의 국제적 논쟁이 드러남으로써 네덜란드의 한국 아동 입양 문제가 단순히 네덜란드 정부와 예비 입양 부모 간의 대립을 넘어 초국적 입양의 본질에 대한 문제였다는 것이 드러났다.

핵심 되는 말: 한국 입양, 초국적 입양, 아동 복지, 아동의 최선의 이익, 모성, 가족 계획