

CONTRIBUTION TO THE LIST OF ISSUES PRIOR TO REPORTING

























Thematic Report presented by the coalition Marchons Enfants to the Committee on the Rights of the Child on the occasion of the 6th periodic review of France for the International Convention on the Rights of the Child (CRC – OPSC)

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Introduction

- 1. Marchons Enfants (Marching for children) is a coalition of 21 organizations¹ defending the dignity of each human being and mobilizing against the draft revision of the law on bioethics (Bill No. 2011-814 of July 7, 2011) that was submitted to the Cabinet meeting (Conseil des Ministres) on July 24, 2019. The coalition opposes especially the opening of assisted reproductive technologies (ARTs) to female couples and single women (hereafter referred to as ART without a father)², scientific research on the human embryo, surrogacy and the sale of human beings and their products.
- 2. In accordance with its Article 46, the Law on Bioethics has to be reviewed at least every seven years. The Bioethics revision bill was voted in first reading at the National Assembly (*Assemblée Nationale*) on October 15, 2019 and then at the Senate on February 4, 2020. The second reading by the National Assembly is expected to take place at the beginning of July 2020³.
- 3. For the *Collectif Marchons Enfants*, several key provisions of the draft revision of the law on bioethics contravene the International Convention on the Rights of the Child (CRC)⁴ that was signed by France on January 26, 1990 and ratified on August 7, 1990. According to the French legal system, international conventions and treaties acquire a higher legal value than ordinary law as soon as they are ratified, and laws that are later adopted must therefore comply with them⁵.
- 4. The arguments that are developed in this report in the context of the periodic review of France by the CRC answer this question: in what way is the draft bioethics bill contradictory to the rights of the child?

I) Background

- 5. Early bioethics bills already raised many issues for children born by ARTs, especially the anonymity of gamete donors contravening Articles 7 and 8 of the Convention relating to the right of every child to know his or her identity. This was pointed out to France in the concluding observations of its fifth periodic report in 2016⁶.
- 6. Current developments in morality and scientific techniques tend to claim a "right to a child"⁷ that is opposed to the rights of the child and only takes into account the interests of adults. A central question arises: what is a child? It appears that the status of the child as a legal subject differs significantly depending on whether he

La Manif Pour Tous, Agence Européenne des Adoptés – European Agency for Adoptees, Centre européen pour le droit et la justice (ECLJ), Collectif pour le respect de la médecine, Comité Protestant évangélique pour la Dignité Humaine (CPDH), Les Associations Familiales Catholiques, Éveilleurs d'espérance, Fédération Nationale de la Médaille de la Famille Française, Générations Avenir, Institut Famille & République, Juristes Pour l'Enfance, La Voix des Sans Père, Alliance VITA, Les Familles Plumées, Les Gavroches, Les Poissons Roses, Les Sentinelles, Les Veilleurs, Maires pour l'Enfance, Trace ta route, Vigi Gender

¹ See https://marchonsenfants.fr/

² Article 1 of the draft revision of the law on bioethics, July 24, 2019.

³ http://www.assemblee-nationale.fr/dyn/15/dossiers/bioethique_2 and http://www.senat.fr/dossiers/bioethique_2 and http://www

⁴ https://www.ohchr.org/en/professionalinterest/pages/crc.aspx

⁵ https://e-justice.europa.eu/content_member_state_law-6-fr-en.do?member=1

⁶UNCRC, Concluding observations on the fifth periodic report of France, February 23, 2016, CRC/C/FRA/CO/5, section 33

⁷ Brunetti-Pons Clotilde, *Le « droit à l'enfant » et la filiation en France et dans le Monde : Note de synthèse* (2017), pp. 14-15

or she is the subject of a parental project or not: the status of the embryo in ART and thus of the unborn child, of the fetus suffering from a disease or abnormality, or of the child born from surrogacy who is in compliance or not with the expectations of the intended parents. These different situations and the subsequent claims undermine the effectiveness of rights for all children. Children's rights cannot be subordinated to the will, plans and changing desires of adults.

II) General principles (arts. 2, 3, 6 and 12)

Non-discrimination

7. Article 2 of the CRC establishes the principle of non-discrimination for every child. The lack of access to their origins for children born from third-party donor ARTs⁸ creates a de facto inequality with children born of their biological parents, father and mother, who have access to their origins or at least a right to seek the identity of their biological parents. These children are also discriminated against in terms of access to healthcare: with limited health data on their donor, appropriate medical care is made impossible.

Best interests of the child

- 8. Article 3 of the CRC places the best interests of the child as a "primary consideration" in all decisions affecting him or her, which cannot be guaranteed by opening up ART to female couples and single women. The introduction of a simple or double maternal parentage leads to the disappearance of the father, which cannot be in the best interest of the child, as raised by the association *La Voix des Sans Père* ("The voice of the fatherless") at the Human Rights Council (September 16 2019)⁹.
- 9. Numerous studies indicate that children who were raised without fathers and children who are adopted or born of ART have a higher likelihood of developing psycho-emotional and developmental disorders¹⁰. For same-sex couples, reassigning the child's genesis scene to the biological reality of parenthood is "impossible and unthinkable"¹¹. Is it therefore necessary to encourage births of children conceived through third-party ART to be fatherless and who would therefore combine several risk factors?
- 10. The Committee on the Rights of the Child already called on France to respect the best interests of the child¹². However, the institutions conducted no rigorous impact study on the psychological and material consequences for the child of the absence of paternal filiation. The information report of the National Assembly is only based on the hearings of various experts without any statistical or psychological analysis or comparative study with the countries that already allow ARTs without a father¹³.

⁸ Article 3 of the draft revision bill that was adopted by the Senate

⁹ https://eclj.org/family/hrc/fatherless-children-no-to-art-without-a-father---un-intervention?lng=fr

¹⁰ Brunetti-Pons Clotilde, Le « droit à l'enfant » et la filiation en France et dans le Monde, pp. 310-311 See also this testimony: 50% of children who are born from ARTs would feel bad about themselves : https://www.lecho.be/economie-politique/belgique/general/mon-nez-mes-pieds-mes-doigts-me-viennent-d-un-inconnu/10221593.html

¹¹ *Ibid.*, p. 311

¹² UNCRC, CRC/C/FRA/CO/5, section 26

¹³ http://www.assemblee-nationale.fr/dyn/15/rapports/bioethique/I15b1572 rapport-information

Right to life, survival and development

- 11. Article 6.1 of the CRC states that "every child has the inherent right to life". However, the measures of the bioethics draft bill make it possible to extend the prenatal diagnosis (PND)¹⁴, for the purpose of abortion of children with suspected abnormalities during these examinations.
- 12. Furthermore, the bioethics draft bill upholds the "savior sibling" technique with the selection of embryos on the basis of their compatibility with the sibling¹⁵, and introduces the extension of pre-implantation genetic diagnosis (PGD) to abnormalities in the number of chromosomes¹⁶. The multiplication of these practices entails real eugenic risks and leads to the stigmatization of disabled children. The child's right to life is not respected by these measures.

Respect for the views of the child

13. The bill infringes article 12 with regard to respect for the child's opinion in the case of children born by ART without a father with the registration of double maternal parentage on the civil registration. There is no provision for a child who so desires to refuse the registration of this fiction on his or her civil status. The precautionary principle would require the child's consent to be sought, for example, when he or she reaches the age of majority. Similarly, in the case of children born by surrogacy abroad, recent case-law has made it possible to transcribe foreign birth certificates in full¹⁷ without the children being able to express their opinion.

III) Civil rights and freedoms (arts. 7 and 8)

Registration of birth, name and nationality

- 14. "The child shall be registered immediately after birth and shall have the right from birth to a name, the right to acquire a nationality and, as far as possible, the right to know and be cared for by his or her parents" (Article 7 CRC). The word "parents" is understood here as father and mother of the child, his biological or adoptive parents, according to customary rules of interpretation of international treaties and Article 31 of the Vienna Convention "in accordance with the ordinary meaning to be given to the terms of the treaty in their context" as understood by the drafters of the Convention in 1989.
- 15. The legalization of the ART without a father¹⁹ does not respect the right of the child to know his or her father and mother. It is the very principle of the right of parentage that is called into question, since the State legally establishes children who are fatherless and deprived from the outset of any paternal parentage. The civil status

¹⁴ Article 19 of the draft bill

¹⁵ Article 19 bis of the draft bill

¹⁶ Article 19 ter of the draft bill, that was rejected on first reading by the National Assembly but voted by the Senate committee

¹⁷ Lea Jennifer and Price Lorcan, ADF International, *Advisory Opinion No. P16-2018-001 to the European Court of Human Rights Grand Chamber*, p. 23 sections 6 and 7

¹⁸ https://treaties.un.org/doc/Publication/UNTS/Volume%201155/volume-1155-I-18232-English.pdf

¹⁹ Article 1 of the draft bill

- of these children will transcribe a fictitious parentage, i.e. a child with two mothers or a single mother as unique parent²⁰.
- This fictitious parentage leads to the disappearance of the father²¹, since his legal 16. and emotional non-existence does not allow the child to maintain relations with him. Furthermore, it is a system that is designed to deliberately exclude and conceal the identity of the third-party donor. It is indeed very different for a child to have an absent but existing father, and to be legally declared fatherless and without the possibility of recourse. In the revision draft of the bioethics law, paternity proceedings will be prohibited for a child born by fatherless ART²². This new situation, which puts the will of adults and the parental project at the center, weakens for each child the legal link between him/her and his/her parents, since parentage is now part of contract law and therefore revocable, as the parental project may change over time²³. The only difference between a donor and a parent becomes the intention, which replaces the biological, intangible and stable link in time, with its consequences on responsibility towards the child. Parental authority is also undermined because it will no longer correspond to the reality of the generation: the parent will henceforth be related to a legal guardian of the child²⁴.
- 17. The consideration, in the bioethics draft bill and in political discourse, of the father as a mere progenitor, useless in the child's development, is worrying. Many voices have been raised against the denial of paternal parentage, but they have not been taken into account²⁵. Specific actions have also been carried out, such as the "Thanks to my father" (*Grâce à mon père*) campaign organized by *Générations Avenir*²⁶.

Preservation of identity

18. Under French law, access to origins and preservation of identity (article 8 of the CRC) is not guaranteed for children born by ART, as recalled in the observations of the Committee on the Rights of the Child in 2016²⁷. The anonymity of donors does not allow children to trace their origins, except through DNA tests that are illegal in France²⁸. Nor will the planned legislative changes allow this, as the identity of donors will only be disclosed with their express consent and after the child has reached the age of majority²⁹. This seems late in relation to the psychological

²⁰ Article 4 of the draft bill that was adopted by the National Assembly in first reading on the establishment of a double maternal parentage for children born by ART without a father and parentage by early declaration of will.

http://www.lefigaro.fr/vox/societe/2018/09/28/31003-20180928ARTFIG00206-l-extension-de-la-pma-systematise-l-exclusion-symbolique-du-pere.php

²² Article 4 of the draft bill

²³ Hearing of Clotilde Brunetti-Pons at the National Assembly, October 9, 2018 http://www.assemblee-nationale.fr/dyn/15/comptes-rendus/bioethique/l15bioethique1819027 compte-rendu

²⁴ Hearing of Aude Mirkovic at the National Assembly, June 20, 2018 http://www.assemblee-nationale.fr/dyn/15/comptes-rendus/cion_lois/115cion_lois/118086_compte-rendu

²⁵ Report of the *Mission d'information* on the revision of the Law on Bioethics http://www.assemblee-nationale.fr/dyn/15/rapports/bioethique/l15b1572 rapport-information

²⁶ Fathers play a vital role in society, as can be seen from the testimonials collected on the campaign website. Each person has something from his or her father: professional vocation, artistic sensitivity, strong values. https://www.generationsavenir.org/la-campagne-grace-a-mon-pere https://www.lafetedesperes.fr/

²⁷ UNCRC, CRC/C/FRA/CO/5, section 33

²⁸ Kermalvezen Arthur, *Né de spermatozoïde inconnu*, Presses de la Renaissance, 2008. This testimony met with an important audience because it is one of the first from a child born of ART who tells the story of his search for his origins and the issue of consanguinity with his wife. See also https://pmanonyme.asso.fr/category/temoignages/temoignages-de-personnes-concues-par-don/
²⁹ Article 3 of the draft bill

development of the child. Moreover, this measure will not apply to persons who were born before the revision of the law.

IV) Family environment and child protection (art. 18)

Common Parental Responsibilities, Support for Parents and Provision of Child Care Services

- 19. Article 18 of the CRC affirms the responsibility of both parents towards the child to ensure his or her proper development. Is it the responsibility of the French State to voluntarily create children who are ab initio orphans of father? The responsibility to raise the child will therefore be weakened by the fact that there will be only one parent to meet the child's emotional and material needs. These children will be more likely to be neglected, to become orphans, to be dependent on the community or to live in precarious situations due to the more complicated access to employment for single parents³⁰.
- 20. Studies show that the use of ARTs is often late, as the age of parenthood is getting older³¹. The bioethics draft bill will create situations where the joint responsibility of parents to raise the child to autonomy will not be properly guaranteed, due to the advanced age of the parent(s), with a greater likelihood of becoming an orphan.

V) Disability, health and well-being (arts. 23, 24 and 27)

Disabled children

21. The rights of children with disabilities as described in article 23 of the Convention include the right to "enjoy a full and decent life, in conditions which ensure dignity". Eugenic practices, such as the PND, prenatal testing and abortion, do not guarantee the rights of these children who are aborted before birth because they are considered unworthy of life³². This observation is alarming: in France, the abortion rate in case of suspicion of Down syndrome would be 77% (2015 figures)³³. The *Fondation Jérôme Lejeune*, a specialist in Down syndrome, questions the very existence of systematic and non-invasive prenatal screening (NIPT) for Down syndrome, as biasing the consent of future parents: if the Down syndrome has to be screened in utero, the child is not only different but undesirable³⁴.

22. Similarly, the facilitation of human embryonic stem cell research and the extension of the duration of in vitro embryo³⁵ culture raise many questions about the search

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³⁰ https://www.france24.com/fr/20181012-france-pauvrete-publics-difficultes-famille-monoparentale-jeunes-chomage-precarite

³¹ Agence de biomédecine, *L'âge de procréer*, Conseil d'orientation – Session of June 8, 2017 https://www.agence-biomedecine.fr/IMG/pdf/2017-co-

¹⁸ age de procre er version finale 14 juin 2017.pdf and https://www.inserm.fr/information-ensante/dossiers-information/assistance-medicale-procreation-amp

http://www.genethique.org/fr/nous-avons-tous-la-meme-valeur-et-nous-devrions-tous-avoir-la-meme-valeur-73239.html#.XrngwRP7R0s, see also https://www.la-croix.com/Sciences-et-ethique/Sante/Trisomie-21-nouveaux-tests-font-craindre-hausse-avortements-2019-03-20-1201010189

³³ http://www.genethique.org/fr/la-trisomie-21-eradiquee-par-lavortement-68079.html#.XsZ4JxP7R0s, see also_https://www.lesoir.be/98815/article/2017-06-09/ivg-et-trisomie-21-des-chiffres-qui-doivent-nous-interpeller

³⁴ https://www.fondationlejeune.org/bioethique-transhumanisme-humanisme-politique-france-bilan-2012-2017recommandations-2017-2022dpn/

³⁵ Article 14 of the draft bill

for the perfect baby³⁶ and artificial procreation (artificial gametes and uterus). Instead of protecting all children, the bioethics revision bill endorses the lack of tolerance of differences and tends towards the eradication of disabled children.

Health and health services, in particular primary health care

- 23. Article 24 of the Convention calls for ensuring the highest attainable standard of health and access to medical services for every child. For children born by ART, ignorance of the donor's medical history does not ensure the physical and mental well-being of these children, and the failure to monitor the health of donors over the long term prevents the prevention of hereditary, communicable and non-communicable diseases. In addition, studies are now identifying the health problems of children who were conceived by ARTs³⁷.
- 24. In terms of reproductive health, the bioethics draft bill does not include any policy to combat infertility³⁸ and promotes ART and gamete self-preservation³⁹, which undermines the ability of future generations to procreate naturally. Recent studies show on the one hand that the success rates of ARTs are very low⁴⁰, and on the other hand that children born by ARTs are less fertile and will therefore have themselves to resort to ART to conceive⁴¹.

Standard of living

25. Article 27 of the CRC calls for every child to enjoy "a standard of living adequate for the child's physical, mental, spiritual, moral and social development". France is in the process of legally organizing new situations of fragility and injustice with the opening of ART to single women, while many studies show that single-parent families are more prone to precariousness⁴²: this is detrimental to the psychoaffective development of the child⁴³ as well as to his or her learning⁴⁴.

https://www.theguardian.com/society/2016/feb/07/life-on-hold-with-frozen-eggs.

³⁶ Streb Blanche, Bébés sur Mesures: Le monde des meilleurs, Artège, Paris, 2018

https://www.valeursactuelles.com/societe/quand-la-pma-sera-un-probleme-de-sante-publique-104011 and http://www.genethique.org/fr/les-traitements-de-fertilite-plutot-que-lage-de-la-mere-en-cause-dans-les-troubles-epigenetiques#.XsZwfhP7R0u
 25% of infertility cases remain unexplained: https://www.inserm.fr/information-en-sante/dossiers-

³⁸ 25% of infertility cases remain unexplained: https://www.inserm.fr/information-en-sante/dossiers-information/infertilite

³⁹ Article 2 of the draft bill, adopted at the National Assembly, suppressed at the Senate

⁴⁰ According to reports from the *Agence de Biomédecine*, success rates for ARTs are around 20% (12% for artificial insemination): https://www.procreation-medicale.fr/vos-questions/. In cases of egg self-preservation, the birth rate would be between 2 and 12%:

⁴¹ https://www.valeursactuelles.com/societe/quand-la-pma-sera-un-probleme-de-sante-publique-104011

⁴² Rapport sur la pauvreté en France, Observatoire des inégalités et Compas, éd. Observatoire des inégalités, October 2018 : one child in ten lives below the poverty threshold in France because of his parents' low income.

https://www.inegalites.fr/IMG/pdf/web rapport sur la pauvrete en france 2018 observatoire des in egalites et compas.pdf

⁴³ http://www.enfant-encyclopedie.com/pauvrete-et-grossesse/selon-experts/limpact-du-faible-revenu-ou-de-la-pauvrete-en-periode-prenatale

⁴⁴ https://www.futura-sciences.com/sante/actualites/cerveau-pauvrete-aurait-impact-developpement-cerveau-enfants-59120/

VI) The case of children born by surrogacy abroad (art. 35 and the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography)

State of international law

- 26. There is a broad consensus in UN bodies that surrogacy practices pose a threat to the rights of women and children and may be related to human trafficking.⁴⁵
- 27. Article 35 of the present convention relating to the prohibition of the sale, trafficking and abduction of children calls on States to make every effort at the national and international level to ensure this right to children. However, no diplomatic effort has been made by France to promote the international abolition of surrogacy, as called for by many associations, including the *Collectif Marchons Enfants*⁴⁶.
- 28. Moreover, article 2 of the Optional Protocol to the Convention on the sale of children clearly states the prohibition of the sale and trafficking of children: "any act or transaction whereby a child is transferred by any person or group of persons to another for remuneration or any other consideration" In this sense, any surrogacy convention contravenes international law.

French legislation and case-law

- 29. Article 16-7 of the *Code Civil* prohibits surrogacy in France: "any agreement relating to procreation or gestation on behalf of another person is null and void". However, this practice does exist on French territory, as shown by the *Collectif contre la traite des êtres humains*⁴⁸ (Coalition against Trafficking in Human Beings). A child born by surrogacy would arrive in France every three days (2014 figure)⁴⁹.
- 30. The bioethics draft bill reaffirms the prohibition of surrogacy and of the full transcription of foreign civil status records showing a father or mother in the absence of a biological link⁵⁰. However, with ART without a father, it creates an inequality between male and female couples, opening the door to claims of "right to a child" through surrogacy⁵¹.
- 31. France allows the issuance of certificates of French nationality to children born by surrogacy abroad and ordered by French "intended parents"⁵², and adoption by the intended parent with no biological link⁵³. The prohibition of surrogacy has thus become de facto null and void and the French justice system turns a blind eye to human trafficking. Though, the absence of a complete transcript was recognized as valid with regard to the respect of the best interests of the child by the ECHR in 2019⁵⁴. However, a reversal of case-law in 2019 authorized the full transcription of

https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=22763&LangID=Ehttps://www.ohchr.org/EN/Issues/Children/Pages/ChildrenBornSurrogacyArrangements.aspxhttps://adfinternational.org/news/experts-at-un-event-on-surrogacy-modern-exploitation-of-women-and-children/

⁴⁶ See https://marchonsenfants.fr/, asks to the French government

⁴⁷ https://www.ohchr.org/EN/ProfessionalInterest/Pages/OPSCCRC.aspx

⁴⁸ Collectif Ensemble contre la traite, *Les nouveaux visages de l'esclavage*, « né pour être vendus », p. 69, les éditions de l'atelier, Paris, 2015. For the *Collectif* see http://contrelatraite.org/

⁴⁹ Motto of the *Manif pour tous* in October 2014, on the occasion of the first scientific symposium on surrogacy in Paris

⁵⁰ Article 4 of the draft bill, adopted in first reading at the Senate

⁵¹ Brunetti-Pons Clotilde, Op. cit., pp. 29-30

⁵² Administrative Circular named « Taubira » of January 25, 2013 : http://www.textes.justice.gouv.fr/art_pix/JUSC1301528C.pdf

⁵³ Cass. ass. plén., July 3rd 2015, n° 14-21.323 and Cass. ass. plén., July 3rd 2015, n° 15-50.002

⁵⁴ http://hudoc.echr.coe.int/fre?i=003-6380431-8364345

- the birth certificates of children born by surrogacy⁵⁵. This undermines the protection of children's rights against sale and exploitation⁵⁶, and encourages trafficking in human beings⁵⁷ in contradiction with Article 35 of the CRC.
- 32. Furthermore, researches in Europe⁵⁸ reveals that some clinics, including BioTexCom in Ukraine, provided false birth certificates to children born by surrogacy who had no biological link with the intended parents. In this context, the French justice system should not transcribe foreign civil status records without prior DNA verification of the biological links between the intended parents and the child, in accordance with France's international obligations.

VII) Recommendations

- 33. The bioethics draft bill carries many risks for the rights of the child, as outlined in this report. In this context, it would seem appropriate for the French Government to apply the precautionary principle, which requires that in the event of reasonable doubt about the negative externalities of a piece of legislation under discussion, it should be withdrawn. The most controversial issues in this case are the modification of the rules on access to ART and parentage, the deepening of embryo research, and the open door to surrogacy.
- 34. The French State must respect its international commitments and guarantee access to the origins of children born by ART without compromise and without delay in order to respect their rights.
- 35. The international ban on surrogacy must become a major thrust of France's diplomatic policy, along with strict enforcement of national legislation and penalties for offenders, in order to put an end to child trafficking.

VIII) Proposals of questions to the CRC for the French Government

- How does the French State intend to guarantee the principle of non-discrimination for children born by ART in access to their origins?
- How is the birth of fatherless children consistent with the best interests of the child? How can the French State guarantee compliance with Article 7 of the CRC with the extension of ART to female couples and single women?
- How could the French State guarantee the right to life of children with disabilities or abnormalities with the extension of the PND and prenatal testing, as well as the extension of abortion? How does France protect unborn children from eugenics?
- How does the French government ensure the common responsibility of both parents and a decent standard of living for children born by ART without a father?
- How does the French government intend to preserve the prohibition of surrogacy and its effectiveness on French territory? Why does France not defend the international abolition of surrogacy in accordance with Article 35 of the Convention?

⁵⁵ Cour d'Appel de Rennes, judgement n°628, November 25, 2019, https://www.dalloz-actualite.fr/files/resources/2019/11/doc271119-27112019155318.pdf

⁵⁶ Lea Jennifer and Price Lorcan, ADF International, Op. cit., pp. 2-3

⁵⁷ Comité Protestant Evangélique pour la Dignité Humaine, *Etats Généraux de la Bioéthique*, *Audition par la Conseil Consultatif National d'Ethique (CCNE*), April 6, 2018

⁵⁸ Caritas, Des enfants invisibles, un crime impuni : Agir contre l'exploitation et la traite des enfants ! Une recherche-action en Europe et au Moyen-Orient, December 2019, p. 67