

The World of Small States 5

Jennifer Corrin
Sue Farran *Editors*

The Plural Practice of Adoption in Pacific Island States

 Springer

The World of Small States

Volume 5

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The Plural Practice of Adoption in Pacific Island States

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The World of Small States

ISBN 978-3-319-95076-1

ISBN 978-3-319-95077-8 (eBook)

<https://doi.org/10.1007/978-3-319-95077-8>

Library of Congress Control Number: 2018955293

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The registered company address is: Gewerbestrasse 11, 6330 Cham, Switzerland

Foreword

The family is described by the *United Nations Convention on the Rights of the Child* as the ‘fundamental group of society’ and ‘the natural environment for the growth and well-being of all its members . . . particularly children’. Adoption is known in all societies and is central to what constitutes family. Its practice differs among cultures. That is well illustrated by the comparative exercise undertaken in this study of the diverse cultures that make up the populations of Pacific Island states.

As a social and cultural construct, the manner and consequences of adoption reflect the different values and traditions of the communities in which it occurs. A degree of plurality in the legal order is therefore not uncommon in relation to adoption with diverse populations, as is the pattern in some of the states of the Pacific. Such diversity adds additional complexity to a comparative study across the Pacific region. In addition to cultural and social values, the traditions of adoption and family also touch on universal human rights. They are concerned with human identity and belonging and all the consequences in law that flow from such connection and are important in any state. National laws may give expression to the values and traditions of the different communities in recognition of customary forms of adoption (although not all of the states surveyed in this study do so). National laws also provide frameworks for protection for state interests and the rights of the individual, often under the influence of constitutional norms and international obligations.

The Plural Practice of Adoption in South Pacific States is pioneering work of some complexity. This is original scholarship which addresses a neglected topic of practical and ethical importance. It reviews the legal and customary approaches to adoption throughout the Pacific, paying close attention to the historical, cultural and ethnic diversity in the region and what is unique to each in adoption practices. Modern challenges arise from the rapidly changing social structures in the Pacific and the movement of peoples around the region and reflect the economic and social strains common to many of the jurisdictions. A number of the challenges identified arise out of the continuing legacy of colonial laws and administration. The

comparative approach taken in the study also allows common principles and common challenges to be seen clearly. In this, the work identifies likely further evolution.

Adoption in plural states is not well-traversed subject matter. Its social and legal importance is evident. This comprehensive account of adoption law and practice across the Pacific region fills a real gap. It makes accessible information that is not easy to come by, including valuable background about population growth and migration in the region and social changes such as the increase in teenage pregnancies and its social impacts. The work also provides practical information about the social and government systems in place to provide support. Much value is added from the authors' own connections with the Pacific.

This is a valuable contribution to the literature on family law, adoption law and pluralism in Pacific Island states. It will be of considerable help to practitioners, judges, scholars and those developing policy in government. It will be welcome also to a wider community interested in adoption and comparative family law. The Pacific Island perspectives are of great interest to other nations which struggle to balance customary with state adoption practices and those who are interested in plurality in law. The work provides food for thought about basic social needs. It does not shy away from confronting hard questions.

Supreme Court of New Zealand
Wellington, New Zealand

Dame Sian Elias

Acknowledgements

The authors would like to thank Professor Don Paterson for generously sharing the results of his unpublished fieldwork on customary adoption in Vanuatu. They would also like to thank Ms Josephine Vidler for her excellent research assistance and the TC Beirne School of Law for funding this work.

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Sue Farran is Professor of Laws at Northumbria University Law School and an Associate of the Centre for Pacific Studies, St Andrews University. Sue's main area of interest is the impact development has on economic, social, cultural and human rights. She is particularly interested in the complexities of plural legal systems, the use of comparative methodology to address new and emerging legal issues and the interface of different legal systems. Much of her research uses Pacific Island case studies to explore wider and more global themes such as the rights of indigenous people to determine their own futures, women's and children's rights and the challenges posed by the different and often conflicting agendas of global players and state sovereignty in the context of small island developing states. Sue's recent Pacific law publications include 'Developing legislation to formalise customary land management: deep legal pluralism or a shallow veneer?' with Jennifer Corrin (2016)

10(1) *Law and Development Review* 1–27; ‘Human rights perspective on the protection of traditional knowledge and intellectual property: a view from island states in the Pacific’ in C. Geiger (ed.) *Research Handbook on Human Rights and Intellectual Property*, Edward Elgar, Cheltenham, 2015, 641–658; and ‘The challenges to human rights posed by threats to food security in the Pacific Islands’ (2014) 12 *New Zealand Yearbook of International Law*, Canterbury University, Christchurch, 153–176 (published 2016).

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Philip Kanairara graduated from the University of the South Pacific (USP) with a Bachelor of Laws in 2006, a Professional Diploma in Legal Practice (PDLP) in 2008, a Professional Diploma in Legislative Drafting (PDL) in 2011 and a Master of Laws (LLM) in 2012.

Eric Kwa is currently the Secretary and Chief Executive Officer of the Papua New Guinea Constitutional and Law Reform Commission, a position he has held since 2011. Dr Kwa is playing a pivotal role in reforming the Constitution and the laws of Papua New Guinea, many of which date back to the country’s colonial era. Dr Kwa was formerly a Professor of Law at the University of Papua New Guinea and a former Dean of the Law School. Dr Kwa holds a PhD in Environmental Law from the Auckland University, New Zealand. He also has a Master of Laws with Honours (LLM (Hon)) in Environmental Law from Wollongong University, Australia, and Law Degree with Honours (LLB (Hon)) from the University of Papua New Guinea. Dr Kwa has researched and published widely in both local and international journals and books and participated in various international and regional legal forums. Dr Kwa has published personally and with others nine law textbooks. Dr Kwa is one of Papua New Guinea’s most respected leading legal scholars and a legal expert in the South Pacific region. In recognition for his efforts in supporting and promoting the women of Papua New Guinea, the Government of Papua New Guinea awarded him the Schola Kaskas Award in 2015.

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Unaisi Narawa graduated in 2008 with a Bachelor of Laws from the University of the South Pacific and began her academic career as a tutor with the School of Law. After receiving her Master of Laws from the University, she was offered an Assistant Lecturer post in 2010. She has taught at both the undergraduate and postgraduate levels in the subjects of legislation, law and society and family law. She moved to Nauru in 2014 and took up a position as a Senior Government Lawyer focused on legislative drafting with the Department of Justice and Border Control. In 2017, she became the Legislative Counsel for the Parliament of Nauru and currently holds this position. Unaisi's research interests include family law, environmental law, deep sea mining and its impact on PICs, customary law and legal pluralism.

Anuleshni N. Neelta is currently a law lecturer at the University of the South Pacific in Fiji where she teaches on Professional Legal Training Programme (PDLT). Anuleshni has also taught undergraduate courses on contract law and law clinic. Before joining the University, Anuleshni worked as a barrister and solicitor in Fiji for approximately 15 years. Prior to joining USP, she worked in private practice and in a Government statutory body. Her areas of practice include general civil litigation, transport law, conveyancing, family law and wills and estates. Anuleshni also taught as sessional lecturer at Campus Group (Fiji) Limited which was a branch of Central Queensland University on contract, company and commercial laws. Anuleshni has a Bachelor of Laws Degree and a Master in Law from the University of South Pacific.

Nathan Onom graduated with a Bachelor of Laws Degree from the University of Papua New Guinea in 2010 and got admitted to the bar to practice law in November 2012 after completing Legal Training studies the same year.

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Mele Tupou is from Tonga. She is a PhD candidate at the University of Otago. She was the Chief Executive Officer of the Ministry of Justice, Tonga. Admitted as a Legal Practitioner in both Tonga and Fiji, Mele Tupou has worked as an academic staff member of the University of the South Pacific and has had a career in law and

the Government of Tonga as Legal Officer for the Ministry of Justice, a prosecutor at the Crown Law Department, Principal Assistant Secretary for the Public Service Commission and the Deputy Clerk for the Legislative Assembly of Tonga.

She holds a Bachelor of Arts Degree in Law from the University of the South Pacific and a Master in Law specialising in Public International Law from Queen Mary University of London, UK.

Chapter 1

Introduction



Sue Farran and Jennifer Corrin

1.1 The Context of Adoption in Pacific Islands

The focus of this book is the law and practice of adoption in the island states of the Pacific. It explores the law and practices governing both state and customary adoptions and the relationship between the two. As discussed later in the following chapters, whilst the term ‘customary adoption’ is a convenient shorthand for referring to informal adoptions made outside the state system, the arrangements for the child may bear little resemblance to the introduced concept.

Although culturally and linguistically distinct, the states under consideration share a number of common features, including their colonial history, which subjected them to English common law. Further, a number of Pacific Island countries have rapidly growing populations, including a large percentage of children. Estimates and projections of Pacific island countries compiled by the South Pacific Community¹ indicated that at the mid-point of 2016 children under 14 made up 36.4% of the population in Papua New Guinea, 41% in Solomon Islands and 37.5% in Vanuatu. In Samoa the percentage was 38.7% and in Tonga 35.3%. In Nauru, nearly 40% of the population were aged 0–14.² Traditionally children have been part of the extended family unit, valued for their potential to contribute to the survival of the family, clan or village group. Large families have historically been an insurance

¹Pacific Community (2016).

²Nauru 39.5%.

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against old age, a source of labour and social support. Today, the extended family remains an important feature of society and this has implications for both state and customary adoptions. The family structure includes children who are not born to the adults with whom they live, but who are accepted as part of the family. In some cases, these children may be members of the immediate or extended family, but that is not necessarily the case.

In some parts of the Pacific, however, the traditional patterns of social ordering are breaking down due to diminishing respect for tradition and traditional authority. Causes of this include urbanisation, the development of individualism rather than communalism, and migration for purposes of education and employment. One of the consequences of this break down is disregard for traditional 'taboos' governing social relationships, including sexual activity. This has resulted in an increase in teenage pregnancy, which has been cited as a cause for concern by the United Nations, with the UN Population Fund (UNPFA) reporting 85 pregnancies for every 1000 teenage girls in Marshall Islands and a rate of 6–8% teenage pregnancy in Nauru, Papua New Guinea, Solomon Islands and Vanuatu.³ A consequence of this is that there may be more babies not being cared for by their natural parents. Instead, they are either being cared for by other family members, for example, in Fiji, grandparents often care for children born to single parents; or they are placed for adoption straight from the maternity wards of hospitals, as is happening in some cases in Vanuatu. Incomplete data across the region both in respect of births registered and customary adoption make it difficult to assess the scale of adoption of babies of teenage mothers. However, SPC demographic data indicate that the teenage fertility rate for girls aged 15–19 is high in Papua New Guinea, Solomon Islands and Vanuatu, and these countries also have population growth rates of 2.8% for Papua New Guinea and Solomon Islands, and 2.5% for Vanuatu. In Marshall Islands, while the population growth rate is low the teenage fertility rate is the highest in the region with Nauru close behind. In the Cook Islands, Samoa and Tonga population growth rates are low but teenage fertility rates in Cook Islands and Samoa are still fairly high. Family size is also quite high with an average household size of 5.7 in Tonga and 7 in Samoa. Kiribati and Nauru all have average households of over six people whereas in Fiji and Vanuatu households are under five people. Households may of course include a number of family members including children staying in the household to attend school or indeed adults doing so for purposes of employment. Large households may also create pressure on household resources, and one of the reasons for adoption given in a number of the chapters that follow is the inability to provide for a child and/or the desire for that child to have a better material life.

At the same time, these statistics must be approached with caution, not only because many are estimates due to irregular household surveys and population

³ABC, 'Teenage pregnancies in the Pacific still cause for concern, says United Nations', ABC News (online), 23 April 2014. www.abc.net.au/news/2014-04-23/an-united-nations-says-teenage-pregnancies-still-cause-for-conc/5407574?pfmredir=sm. See also Simmons M, 'Teen birth worry', Fiji Times (online), 20 July 2016, reporting that 'about three in every 100 teenagers get pregnant every year in Fiji.'

censuses, but also because they may not paint the whole picture. For instance, the age of marriage in many Pacific countries is still quite low, especially for girls. The common law imports a minimum age of consent of 14 for a male and 12 for a girl,⁴ and this is still the prevailing state law in some countries of the region. Consequently, the fertility rate for teenagers may well include young married mothers. Similarly, the extended family and kinship obligations may account for large household sizes and these averages do not always distinguish between rural and urban households. Although the region still has relatively high rates of infant mortality compared to the near neighbours of Australia and New Zealand,⁵ the increase in the juvenile population in most Pacific island states suggests that a great many children are surviving birth and the majority of these are integrated into families either of their birth parents or close relatives. Where populations are growing there is inevitably pressure on private and state resources.

As the following chapters show, the integration of children into families can take place along a broad spectrum of arrangements, ranging from formal, state regulated adoption and long-term guardianship, to temporary custody or fostering. The distinctions between these options are not always clear-cut. However, these arrangements do share the characteristic of being ‘in family’ placements rather than institutional arrangements. In the Pacific, very few unplanned or unwanted children are placed in institutions partly due to the strong ties within extended families, referred to above, and partly because, apart from a few charitable or religious organisations, these do not exist. Nevertheless, there are children whose birth parent(s) cannot care for them and who are abandoned or orphaned. There are also childless couples or individuals who seek to adopt children. In the developed world there is a shortage of babies for adoption partly because of the growing acceptance of single and unwed parenthood, the availability of effective contraception and laws that permit abortion.⁶ A UN survey in 2009 also pointed to factors such as delay in getting married, the postponement of child-bearing until later in life, and higher levels of biological childlessness, contributing to a demand for adoption.⁷ The report states that ‘the number of domestic adoptions has been declining in many countries, both because of the dwindling supply of adoptable children and the decline in the number of adoptions by step-parents and other relatives (a factor which does not apply in the Pacific). At the same time the number of inter-country adoptions has been rising both in absolute terms and as a percentage of all adoptions.’⁸ While this

⁴*Arnold v Earle* (1758) 2 Lee 529.

⁵Per 1000 births the infant mortality rate in 2016 in Australia was estimated to be 3.10 and that of New Zealand 4.50, compared to Fiji where it was 18.70; Kiribati 42.40; Papua New Guinea 42.40; Vanuatu 23.10. Data from World Bank (2018).

⁶See, e.g., Abortion Law Reform Act 2008 (Victoria).

⁷Population Division, United Nations Department of Economic and Social Affairs (2009).

⁸*Ibid.*, p. 86. More recent data suggests that inter-country adoption is declining (see below). This report includes in the appendix country profiles which include a number of Pacific island countries although much of the information here is missing. One of the achievements of this book will be to fill some of those gaps.

report acknowledges that accurate data on adoptions is difficult to come by it does highlight changing trends of adoption not only in terms of the shift from domestic adoption to inter-country adoption in many developed countries, but also in terms of the countries of origin of adopted children. It is also the case that in an interconnected world, potential adopters can trawl the internet for agencies facilitating adoption so that babies and young children may be sourced from countries and regions that had previously been ‘off the map’. As will be seen, not all of these agencies act in the best interests of children, adoptive parents or natural parents.⁹

Sometimes internal crises or policies mean more children are available for adoption from one particular country than another.¹⁰ Path dependence is also an important theory in explaining the pattern of inter-country adoptions. Historical connections are relevant in a number of ways. Firstly, some countries of the region have historical, political and economic ties with more developed countries of the region. For example Cook Islands and Niue are self-governing, in free association with New Zealand. Those countries closer to America such as Marshall Islands and Federated States of Micronesia have links there and the proximity of Samoa to American Samoa creates another pathway.¹¹ In recent years an increasing number of Fijian Indians have left Fiji to go to New Zealand, Australia and elsewhere. There is a large Samoan and Tongan population in New Zealand and, also, a large number of Tongans live in America. In more recent times, these political and social links have given rise to bi-lateral arrangements regarding adoption, for example, Fiji has an Inter-country Adoption Bilateral Programme with Australia and New Zealand.¹² Secondly, there has been an influx of non-indigenous persons to countries such as Solomon Islands, under the Regional Assistance Mission to Solomon Islands (RAMSI), Vanuatu, as a result of passport sales and efforts to boost inward investment from China, and elsewhere. More generally there is an ebb and flow of aid workers, advisers, tourists and others to the Pacific Islands. A number of the adoption cases referred to in the chapters that follow concern applicants from New Caledonia, New Zealand and Australia. As illustrated by the court cases discussed in the following chapters, inter-country adoptions pose a number of dilemmas for the courts particularly in balancing the welfare or best interests of the child against the black letter of the law: a dilemma that is aggravated by a number of those laws being

⁹See, for example: The Schuster Institute for Investigative Journalism, Brandeis University (2011) News Reports of Adoption Irregularities in Samoa.

¹⁰China’s one baby policy, for example, seems to have provided a flow of adoptive children to America. The Financial Times reported that in 2005 ‘15,000 Chinese children—mostly little girls, as a result of the one-child policy—were adopted by families from other countries’: Romei V, ‘Inter-country adoption falls sharply’, Financial Times (online), 6 December 2016. <https://www.ft.com/content/eb32208a-b625-11e6-ba85-95d1533d9a62>.

¹¹On Marshall Islands see Walsh (1999) Adoptions and agency: American adoptions of Marshall-ese children. www.adoptionbirthmothers.com/adoption-and-agency-american-adoptions-of-marshall-ese-children/; on Micronesia more generally see Triede (2004), pp. 127–141. In this collection see also Damian (2004) and Anderson (2004).

¹²See, e.g. Department of Social Services, Australian Government (2017).

outdated and out of touch with developments in children's rights. There is also the question of the weight to be given to cultural ties, which is particularly pertinent in the Pacific, where diverse, unique traditions and practices remain strong.

One of the issues which has arisen in the case of inter-country adoption from the Pacific islands, is that there is a mismatch between western understandings of adoption and Pacific understandings. This is illustrated by an online blogger's response to a query about adopting a Pacific child:

When we adopted, we originally looked into, among other places, the Marshall islands. We decided against though, because there are some fundamental misunderstandings about what adoption is by the families giving up children. They believed they were simply sending their children to live with another family for a while, they didn't really understand they were giving them up forever.¹³

This has been an issue in Vanuatu, where there is anecdotal evidence of misleading practices regarding consent. The significance of this is particularly pertinent when the safeguards for obtaining the birth parent's consent for formal adoption are scrutinised, especially when that parent is herself a child. It should also be borne in mind that natural parents may be under considerable pressure to comply with the wishes of the immediate or extended family, a factor which is of even more concern in customary adoptions, where there are no formal safeguards.

This confusion is largely attributable to the fact that Pacific Islands countries have legal systems which are characterised by pluralism. This means that there is more than one law that might apply to the same set of facts, or that different laws may apply to some aspects of the situation, or to some of the individuals involved, even though they are within the same country. Such pluralism is a consequence of the imposition of introduced colonial law on pre-existing traditional or customary systems of law, and of post-colonial legal development, both domestic and international. Legal pluralism is particularly pertinent in areas commonly regarded as private law, especially family law. Consequently, and as will become evident in the chapters in this book, the law on adoption is complicated by the existence of several systems of adoption: formal adoption exists alongside customary adoption, which is a very different concept; different ethnic groups may be governed by different customs and different introduced laws or by different provisions in the same legislation.¹⁴

¹³Adopting from the Pacific Islands, Adoption Reddit (2014). https://www.reddit.com/r/Adoption/comments/2au26q/adopting_from_the_pacific_islands/. This is a point illustrated by an article by Joyce K, 'Do you understand that your baby goes away and never comes back?', New Republic Magazine, 22 April 2015. <https://newrepublic.com/article/121556/do-understand-baby-goes-away-never-comes-back>; and Peet E, 'The Tragic Confusion of Adoption from the Marshall Islands', The Wilson Quarterly, 25 June 2015. <https://wilsonquarterly.com/stories/the-tragic-confusion-of-adoption-from-the-marshall-islands/>.

¹⁴See Farran (2009).