



ahickey@pkhl.ie

19 January 2026

**BY EMAIL ONLY**

Dear Ms. Hickey,

I refer to previous engagement and correspondence in relation to international surrogacy, and in particular, surrogacy in Ukraine.

As noted on a number of occasions since the Russian invasion of Ukraine in 2022, this Department remains extremely concerned that surrogacy arrangements continue to be made in Ukraine by Irish intending parents.

Since the outbreak of the war in February 2022, this Department has strongly advised against entering into surrogacy arrangements in Ukraine. Despite this advice, the Department continues to see a worryingly high number of applications for travel documents for children born in Ukraine, broadly consistent with pre-war levels.

As stated in our travel advice, Ukraine remains under strict martial law and the war continues to present significant risks to all parties engaged in surrogacy arrangements, including surrogate mothers, babies and intending parents.

Recent targeted attacks on energy infrastructure have led to significant disruption to the electricity, water and heating supply across Ukraine, including in Kyiv. This means that intending couples may face sub-zero winter temperatures in accommodation with no heating and experience prolonged periods without electricity and water.

While other actors may state that it is safe to commence surrogacy arrangements in Ukraine, it is our strong and considered view that it is not. Given the current conditions, intending parents, their surrogate mothers and their babies are at significant risk.

As was communicated to you in October 2024, the Department has reinstated the requirement for in-country DNA testing to be carried out to establish parentage before travel documents can be issued to a child born through surrogacy. DNA testing must be conducted in Kyiv, witnessed by an official from the embassy, and results may take in excess of four weeks to be processed, during which time the child will be unable to exit Ukraine.

The capacity of the Department and the Embassy to provide consular assistance to Irish citizens in Ukraine is extremely limited. The situation on the ground is intensely volatile and dangerous and Irish citizens who travel there against the Department's advice are putting themselves at significant risk of harm.



**The Department would therefore discourage, in the strongest possible terms, any individual from pursuing surrogacy arrangements in Ukraine.**

I would kindly ask that you bring this letter to the attention any clients of yours who are considering entering into a surrogacy arrangement in Ukraine.

Yours sincerely,

A handwritten signature in blue ink, which appears to read 'Úna Fannon', is written over a horizontal line.

Úna Fannon  
Director of Operations  
Passport Service  
Department of Foreign Affairs and Trade