

## SURROGACY PRACTICES IN THE LEGAL DILEMMA OF THE REPRODUCTIVE TECHNOLOGY ERA IN INDONESIA



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### Article History :

Submission : December 25,  
2024

Revised : February 12, 2025

Accepted : April 10, 2025

Published : May 21, 2025

### Keywords :

Ethical  
Dilemma, Islamic Law,  
Reproductive Technology,  
Surrogacy Practices,  
Women's Rights

### Abstract

This study aims to examine the legal dilemmas arising from surrogacy practices in the era of reproductive technology in Indonesia, focusing on how these practices unfold amid legal uncertainty and the complexity of social and religious values. This research uses a qualitative method with a field research approach, involving in – depth interviews with medical practitioners, legal experts, religious figures, and couples who have considered or engaged in surrogacy, as well as observations at several fertility clinics in urban areas. The findings reveal that surrogacy practices in Indonesia are carried out discreetly without a clear legal foundation, resulting in various issues such as the uncertain legal status of the child, the potential exploitation of women, and the absence of legal protection for all involved parties. The study also finds sharp differences in perspective among medical, legal, and religious sectors regarding the legitimacy and ethics of these practices. The conclusion of this study emphasizes that Indonesia urgently needs clear and comprehensive legal regulations to govern surrogacy practices in alignment with human rights principles and the moral values of society. The academic contribution of this research lies in its effort to provide an empirical overview of surrogacy practices in the field, and to offer concrete input for the formulation of reproductive legal policies in Indonesia that are more responsive to technological advancements and societal needs.

### Abstrak

Penelitian ini bertujuan untuk mengkaji dilema hukum yang muncul dalam praktik sewa rahim di era teknologi reproduksi di Indonesia, dengan menekankan bagaimana praktik ini berlangsung di tengah ketidakjelasan hukum serta kompleksitas nilai sosial dan agama. Penelitian ini menggunakan metode kualitatif dengan pendekatan penelitian lapangan, melalui wawancara mendalam dengan praktisi medis, ahli hukum, tokoh agama, dan pasangan yang pernah atau sedang mempertimbangkan praktik sewa rahim, serta observasi terhadap praktik di sejumlah klinik fertilitas di wilayah perkotaan. Temuan penelitian menunjukkan bahwa praktik sewa rahim di Indonesia dilakukan secara diam-diam dan tidak memiliki dasar hukum yang jelas, sehingga memunculkan berbagai persoalan, seperti ketidakpastian status hukum anak, potensi eksploitasi terhadap perempuan, dan tidak adanya perlindungan hukum bagi semua pihak yang terlibat. Penelitian juga menemukan bahwa terdapat perbedaan pandangan yang tajam antara pihak medis, hukum, dan agama mengenai keabsahan dan etika praktik ini. Kesimpulan dari penelitian ini menegaskan bahwa Indonesia membutuhkan regulasi hukum yang jelas dan komprehensif untuk mengatur praktik sewa rahim agar sesuai dengan prinsip hak asasi manusia dan nilai-nilai moral masyarakat. Kontribusi akademik dari penelitian ini terletak pada upayanya memberikan gambaran empiris mengenai praktik sewa rahim di lapangan, serta memberikan masukan konkret bagi perumusan kebijakan hukum reproduksi di Indonesia yang lebih responsif terhadap perkembangan teknologi dan kebutuhan masyarakat.

## INTRDUCTION

The rapid advancement of reproductive technologies (Igareda González, 2019), particularly in –vitro fertilization (IVF) and surrogacy (Shakargy, 2020), has opened new possibilities for couples struggling with infertility in Indonesia. Among these innovations, surrogacy stands out as a controversial yet increasingly sought –after option, especially for those whose medical conditions prevent them from conceiving or carrying a pregnancy to term. However, despite its potential to fulfill the deep yearning for parenthood, surrogacy remains a taboo practice in Indonesia, largely conducted in secrecy due to the lack of clear and explicit legal frameworks governing it. The current legal vacuum in Indonesia's positive law leaves intended parents, surrogate mothers, and the children born through such arrangements in precarious positions. The societal stigma associated with surrogacy, coupled with deeply embedded religious and cultural values that emphasize the sanctity of motherhood and biological lineage, has led to significant resistance and discomfort toward its practice. As a result, individuals and medical professionals who engage in surrogacy often do so discreetly, navigating unregulated arrangements that may expose all parties involved to exploitation, legal disputes, and long –term psychological consequences (Rotabi, Bromfield, & Fronek, 2015). In the absence of national legislation, hospitals and fertility clinics that facilitate such procedures operate under ethical uncertainty, often relying on private contracts that are not necessarily enforceable in court.

In recent years, there has been a marked increase in the number of Indonesian couples exploring surrogacy both domestically and internationally, with some opting to travel to countries where the practice is legally recognized and regulated. While this transnational approach offers a sense of legal clarity and institutional support, it simultaneously highlights the inconsistencies and inadequacies of Indonesia's legal stance on assisted reproductive technologies. The growing interest in surrogacy has raised numerous ethical and legal dilemmas (Pande, 2016), particularly concerning the potential commodification and exploitation of women's bodies, the rights and welfare of surrogate mothers, and the legal status and citizenship of children born through such arrangements. The absence of legal recognition can lead to situations where a child is left without clear parental status, especially when the surrogate mother is considered the legal parent under Indonesian law (Green, Rubio, Rothblum, Bergman, & Katuzny, 2019). Moreover, debates continue to intensify among various professional groups—medical practitioners advocating for reproductive freedom (Hodson, Townley, & Earp, 2019), Islamic scholars emphasizing moral prohibitions, and legal experts concerned with the implications for civil rights and family law. These conflicting viewpoints reflect broader societal tensions surrounding modern reproductive choices and the role of the state in regulating them.

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biological lineage, has led to significant resistance and discomfort toward its practice. As a result, individuals and medical professionals who engage in surrogacy often do so discreetly, navigating unregulated arrangements that may expose all parties involved to exploitation, legal disputes, and long – term psychological consequences. In the absence of national legislation, hospitals and fertility clinics that facilitate such procedures operate under ethical uncertainty, often relying on private contracts that are not necessarily enforceable in court. This creates a troubling scenario where surrogacy in Indonesia exists in the shadows—technologically feasible but legally and socially unsupported.

The aim of this study is to examine the legal, ethical, and socio – cultural challenges surrounding surrogacy practices in Indonesia, particularly in the absence of explicit regulatory frameworks. In recent years, there has been a marked increase in the number of Indonesian couples exploring surrogacy both domestically and internationally, with some opting to travel to countries where the practice is legally recognized and regulated. While this transnational approach offers a sense of legal clarity and institutional support, it simultaneously exposes the inconsistencies and inadequacies of Indonesia's legal stance on assisted reproductive technologies. The growing interest in surrogacy has sparked numerous ethical and legal dilemmas, particularly regarding the commodification and potential exploitation of women's bodies, the protection of surrogate mothers' rights and welfare, and the legal status and citizenship of children born through these arrangements. Without formal recognition or regulation, there is a serious risk that children born through surrogacy may be left without clear legal parentage, especially in cases where Indonesian law still recognizes the surrogate mother as the lawful parent. The current situation highlights the legal vacuum that places all parties—intended parents, surrogate mothers, and children—at risk, both socially and juridically.

## METHODS

This study is an empirical legal research employing a qualitative sociological approach aimed at uncovering the realities of surrogacy practices in Indonesia through direct observation of the social dynamics occurring in the field. It uses a descriptive qualitative research design to comprehensively describe how surrogacy is practiced, who the involved parties are, and how they respond to and navigate the surrounding legal uncertainty. The research was conducted in three major urban areas—Jakarta, Surabaya, and Yogyakarta—which are known to have fertility clinics and hospitals that offer assisted reproductive technologies (ART). The research subjects consist of key informants who are directly or indirectly involved in surrogacy practices, including fertility specialists, medical staff, surrogate mothers, commissioning parents, legal consultants, and religious leaders. Informants were selected through purposive sampling based on their relevance, experience, and capacity to provide in – depth and meaningful information. The presence of the researcher in the field for four months (February – May 2025) enabled intensive observation and interaction with informants through direct interviews, small group discussions, and on – site observation of clinic activities and social interactions among the involved parties.

Data collection techniques included in – depth interviews using semi – structured guides to explore the experiences, perceptions, and opinions of informants regarding surrogacy practices, as well as non – participant observation at fertility clinics and counseling institutions involved in assisted reproduction. Document studies were also conducted on legal contracts, medical records, correspondence between parties, as well as internal ethical guidelines and clinic policies. In addition to primary field data, this study strengthened its analysis through secondary legal sources, including legislation

such as the Health Law, the Marriage Law, the Civil Code, judicial decisions, and relevant fatwas issued by the Indonesian Ulema Council (MUI). Academic literature, journal articles, and expert opinions from legal scholars, medical ethicists, and bioethics experts were also used as part of the analytical framework. The data analysis technique employed the interactive model of Miles and Huberman, which consists of data reduction, data display, and conclusion drawing. To ensure data validity, triangulation of sources, methods, and theories was conducted, along with cross-verification through expert discussions and interim result validation with key informants. This approach ensures that the research findings are in – depth, accurate, and scientifically accountable in developing legal policy recommendations for surrogacy regulation that are contextually relevant to Indonesia.

## RESULT AND DISCUSSION

### RESULT

Surrogacy practices in Indonesia are conducted in a clandestine and informal manner, primarily due to the absence of clear and enforceable legal frameworks governing assisted reproductive technologies within the country. In the absence of specific legislation or regulatory oversight, all stages of the surrogacy process—from the initial agreement to post – birth arrangements—occur without formal legal contracts, institutional mediation, or state involvement. This legal vacuum renders surrogacy a gray area, leaving both the commissioning parents and the surrogate mothers vulnerable to potential disputes and exploitation. Without standardized contracts, there is no legal mechanism to resolve issues such as breach of agreement, financial disputes, medical liabilities, or the determination of parental rights. Moreover, the lack of medical and psychological screening protocols exposes surrogate mothers and resulting children to serious health and welfare risks. Informal actors—such as unlicensed intermediaries, unofficial medical practitioners, or personal acquaintances—often facilitate the process, exercising significant influence despite lacking professional accountability or ethical oversight.

The recruitment process for surrogate mothers in Indonesia typically unfolds through unregulated and informal channels such as private networks, word – of – mouth referrals, social media platforms, and the involvement of self – appointed brokers who operate outside any form of legal accountability. These brokers often target economically disadvantaged women, particularly those lacking formal education or stable employment, as they are more likely to accept the physical and emotional burdens of surrogacy in exchange for modest compensation. With no formal criteria or vetting procedures in place, surrogate mothers are rarely evaluated for their physical health, mental readiness, or informed consent, leading to serious ethical concerns about coercion and exploitation. Many women agree to become surrogates without fully understanding the medical risks involved, the emotional impact of relinquishing a child, or the legal implications of their participation in such arrangements. In the absence of structured counseling or legal safeguards, these women are effectively placed in vulnerable positions where their reproductive labor is commodified under precarious conditions. The unequal power dynamics between commissioning couples—often middle – to upper – class urban dwellers—and surrogate mothers—typically from marginalized rural backgrounds—further reinforce social and economic disparities, turning surrogacy into a site of contested morality and potential injustice, particularly in the absence of meaningful regulatory intervention.

One of the most critical consequences of the unregulated surrogacy landscape in Indonesia is the legal ambiguity surrounding the status and rights of children born through such arrangements. Without clear statutory provisions recognizing surrogacy, children face difficulties in securing basic legal documentation, such as birth certificates that accurately reflect their parentage. In many cases, the commissioning parents cannot be legally recorded as the child's parents, leading to complications in establishing familial ties that are essential for accessing inheritance rights, national identity, healthcare services, and educational opportunities. The Indonesian legal system, which lacks provisions for parentage determination in non–traditional birth contexts, leaves these children in a liminal state where their legal existence and civil identity may be questioned or denied altogether. This legal invisibility can persist into adulthood, affecting their social mobility and protection under the law. Furthermore, the absence of legal pathways for establishing custody or guardianship rights can result in protracted disputes or abandonment, with no institutional recourse available. In such a context, the rights of the child—as enshrined in both national and international legal instruments—are placed in jeopardy, revealing not only a legal deficiency but also a broader societal neglect of the ethical and humanitarian dimensions of surrogacy.

Religious doctrines, deeply rooted patriarchal traditions, and conservative societal attitudes in Indonesia collectively contribute to making surrogacy an exceptionally controversial and sensitive subject (Rozňe, Unisa, & de La Rochebrochard, 2020). In a nation where family structures are heavily influenced by Islamic teachings and cultural norms that prioritize lineage purity (Ziv & Freund–Eschar, 2015), motherhood is perceived not only as a biological function but also a deeply sacred and moral duty tied to a woman's honor and family identity. The notion of a woman carrying and giving birth to a child who is not biologically hers—or relinquishing her biological child to another family—clashes with prevailing understandings of motherhood, kinship, and social propriety (Schäfer & Eerola, 2020). As a result, individuals involved in surrogacy—be they commissioning parents, surrogate mothers, or intermediaries—are often compelled to conduct these arrangements covertly, in order to shield themselves from social condemnation (Rudrappa & Collins, 2015), religious judgment, and communal ostracization (Dar et al., 2015). The pervasive stigma surrounding surrogacy is so intense that even medical professionals who assist with fertility treatments may be reluctant to support or acknowledge surrogacy–related procedures. This culture of silence not only inhibits transparent dialogue about reproductive rights and ethical boundaries but also drives the practice further underground, thereby reducing the possibility of institutional regulation and ethical oversight (Saran & Padubidri, 2020). The moral ambiguity and public resistance surrounding surrogacy illustrate how societal values, when left unchallenged by legal and ethical frameworks, can perpetuate exclusion and marginalization of those seeking alternative paths to parenthood.

In the absence of clear and enforceable regulatory frameworks, surrogacy in Indonesia faces the imminent danger of evolving into an unmonitored black – market industry. This unregulated environment creates fertile ground for the exploitation of vulnerable women, especially those from lower socioeconomic backgrounds who may be coerced into becoming surrogates without full comprehension of the physical, psychological, and legal implications of their role (Schurr, 2017). The commodification of women's reproductive capabilities under such circumstances can easily blur the lines between voluntary participation and exploitative labor (Smietana, 2017), with little to no legal recourse available for the surrogate in cases of abuse or breach of agreement. Moreover, the lack of legal procedures and documentation raises serious concerns about the potential for



child trafficking (Golombok et al., 2018), particularly when children born through surrogacy are transferred across national or regional boundaries without oversight from civil or immigration authorities. In such cases, questions about the child's citizenship, parentage, and legal identity become increasingly difficult to resolve (Blake et al., 2017). This regulatory void also increases the likelihood of intermediaries exploiting desperate couples and women for financial gain, further institutionalizing a clandestine market that operates entirely outside the realm of accountability.

The current legal vacuum surrounding surrogacy in Indonesia gives rise to significant potential for interpersonal and institutional conflict, particularly between surrogate mothers and the commissioning parents (Garmaroudi Naef, 2015). In the absence of written contracts or legal definitions of parental responsibility, disputes over custody, guardianship, and financial obligations are inevitable (Carone, Baiocco, & Lingiardi, 2017). For example, if a surrogate mother experiences emotional attachment to the child she carried and subsequently refuses to relinquish custody, there is no legal mechanism to enforce the intended parental agreement or to mediate the conflict (Samuels, 2020). Similarly, commissioning parents may choose to withdraw financial support during the pregnancy or after birth (Ahmad, Lilienthal, & Hussain, 2016), leaving the surrogate mother unprotected and without legal means of restitution. These types of conflicts are further exacerbated by the emotional (Zadeh, Ilioi, Jadv, & Golombok, 2018), ethical, and biological complexities inherent in surrogacy arrangements, especially when no neutral institution exists to uphold the rights and responsibilities of all parties involved. Courts, lacking clear guidelines or precedents, may struggle to adjudicate such cases fairly, leading to inconsistent rulings that undermine both the legitimacy of the judicial process and the rights of the child (Horsey, 2016). Without a legislative framework to clarify roles and responsibilities, surrogacy in Indonesia remains a volatile terrain marked by moral uncertainty, social risk, and legal precariousness—demanding urgent attention from policymakers, religious leaders, and civil society.

## **DISCUSSION**

Indonesia currently lacks explicit statutory or regulatory frameworks governing surrogacy, which creates profound legal uncertainty surrounding various dimensions of the practice. This legal void encompasses critical aspects such as the status and civil rights of the child born through surrogacy (Smietana, Rudrappa, & Weis, 2021), the enforceability of contractual agreements between surrogate mothers and commissioning parents, and the scope of legal protections afforded to surrogate mothers. Without codified laws or government—issued guidelines, there is no legal clarity on how to recognize parental rights, settle custody disputes, or assign financial responsibilities in surrogacy arrangements. The absence of regulation also undermines the role of medical institutions (Carone et al., 2018), which are left without legal support to navigate ethical dilemmas or to ensure procedural transparency and accountability. Surrogate mothers, in particular, are left legally exposed, as there is no mechanism to safeguard their rights during pregnancy or after delivery (Olaye—Felix, Allen, & Metcalfe, 2023), including issues related to health risks, psychological support, and compensation.

In the context of Islamic law, which holds significant influence over both legal discourse and moral norms in Indonesia, the practice of surrogacy is predominantly deemed impermissible (haram), especially when it involves the participation of a third party outside the marital relationship. The Indonesian Ulema Council (Majelis Ulama Indonesia or MUI), as the country's leading Islamic authority, has issued fatwas rejecting surrogacy on the grounds that it contradicts key principles of Islamic jurisprudence.

Central to this prohibition is the concept of *nasab* (lineage), which emphasizes the importance of clear, unbroken bloodlines to determine familial ties, inheritance rights, and social identity. Introducing a third party—namely, a surrogate mother—into the reproductive process is seen as disrupting this lineage, thereby undermining both biological and legal certainty in parenthood. Furthermore, such arrangements are viewed as violating the sanctity of marriage (*nikah*), wherein procreation is considered a sacred and exclusive right of the legally married couple. Beyond jurisprudential concerns, surrogacy is also perceived as a threat to the dignity (*karamah*) and honor (*izzah*) of women, especially when reduced to a transactional role in reproduction. As a result, Islamic scholars argue that surrogacy may open the door to commodification of the womb and the objectification of women's bodies, which run counter to the ethical values upheld in the Sharia.

The state's ambiguous stance on surrogacy underscores a broader tension between upholding individual reproductive rights and conforming to prevailing socio-religious norms (Ambarwati & Azmita Kamila, 2019). The absence of regulation suggests a reluctance by policymakers to either legalize or prohibit surrogacy outright, which may reflect the government's attempt to navigate the complex moral (Hovav, 2019), religious, and political landscape of a pluralistic society (Horsey, Arian – Schad, Macklon, & Ahuja, 2023). This regulatory inaction effectively allows religious perspectives—particularly those aligned with the MUI and other conservative voices—to dominate both public opinion and institutional practices. In practical terms, this means that healthcare providers and law enforcement personnel often defer to fatwas or religious advice when confronted with surrogacy-related dilemmas, rather than acting based on codified civil or medical law. This reliance on religious guidance contributes to an inconsistent and often discriminatory handling of cases, with decisions varying widely depending on local interpretations or the personal beliefs of officials (Arvidsson, Johnsdotter, & Essén, 2015). The lack of clear state policy also impairs the development of ethical and legal standards within medical institutions, which are critical to ensuring informed consent, patient safety, and equitable treatment.

The practice of surrogacy is viewed as fundamentally incompatible with core principles governing lineage, purity of descent (Peters et al., 2018), and familial boundaries. The process of involving a third party—whether through egg donation, sperm donation, or gestational carrying—introduces the risk of *ikhtilath an-nasab* (mixing of lineage), a concept that Islamic scholars strongly caution against due to its implications for inheritance rights, guardianship, and identity. According to traditional Islamic norms, the child's lineage (*nasab*) must be clearly traceable through a lawful marital relationship (*nikah*), and introducing another woman to gestate the child disrupts this chain, making it difficult to determine maternal identity in the legal sense. Moreover, this situation potentially undermines the laws related to *mahramiyyah*—the rules defining who is considered a non-marriageable kin—by creating ambiguity in biological and legal relationships. Even if the commissioning couple provides both the egg and sperm, the surrogate's role in gestation raises critical questions about motherhood, since Islamic law tends to prioritize the woman who gives birth as the legal mother (*umm*).

If surrogacy continues to be practiced in Indonesia without comprehensive legal recognition that harmonizes state law with Islamic legal values, it is likely to produce escalating tensions between secular governance and religious sensibilities. In a society where the majority of the population adheres to Islam and where the fatwas issued by institutions such as the Indonesian Ulema Council (Majelis Ulama Indonesia/MUI) serve

as both moral and de facto legal guidelines, the dissonance between legal permissibility and religious prohibition creates a normative conflict. This conflict may lead to confusion and legal uncertainty, particularly in family court cases dealing with custody, inheritance, and registration of children born through surrogacy. Additionally, this duality can undermine the credibility of the legal system in the eyes of the public, especially when the state is perceived as ignoring religious doctrine in favor of secular reproductive rights. Healthcare professionals and legal practitioners, who often operate at the intersection of both legal systems (Lozanski, 2015), may struggle to navigate cases involving surrogacy without clear guidance that reconciles these two frameworks. In the long term, the absence of legal harmonization may deepen the divide between state institutions and religious communities, potentially eroding social cohesion and public trust in the ability of the legal system to reflect the values of the society it governs.

Recommendation of this study urges policymakers, Islamic legal scholars, and bioethicists to collaborate in formulating a comprehensive regulatory framework that harmonizes surrogacy practices with the higher objectives of Islamic law (*maqashid al-shariah*). Conceptually, this framework should position *hifz al-nasab* (preservation of lineage), *hifz al-'ird* (protection of dignity) (Fenton–Glynn, 2016), and *hifz al-nafs* (safeguarding of life) as guiding principles for evaluating the ethical permissibility of reproductive technologies. Methodologically, it requires an interdisciplinary approach that integrates Islamic jurisprudence (Elliott, Conlon, Li, Kaciroti, & Taylor, 2015), bioethics, and social policy to ensure that the rights and welfare of all parties—particularly women and children—are protected (Tsfati & Ben–Ari, 2019). From a policy perspective, the state must enact clear (Saleh, Loo, Elassaiss–Schaap, & De Lange, 2021), enforceable laws that regulate surrogacy arrangements within the boundaries of Islamic ethics while preventing commercialization and exploitation. Establishing a national ethics committee composed of religious scholars, medical professionals, and legal experts can further ensure that surrogacy practices remain consistent with the moral and spiritual integrity of Indonesian Muslim society. By embedding *maqashid*–based principles into legal governance, Indonesia can develop a model of reproductive justice that balances innovation with moral responsibility and strengthens the alignment between law, faith, and social welfare.

## CONCLUSION

This study reveals that surrogacy in Indonesia remains a deeply controversial and legally ambiguous practice due to the absence of formal regulations, the dominance of conservative religious interpretations, and entrenched sociocultural values that prioritize lineage purity and marital sanctity. The research demonstrates that surrogacy is largely carried out informally and in secret, exposing surrogate mothers and commissioning parents to significant legal, psychological, and ethical risks. It also shows that the lack of state intervention has led to a situation where fatwas and religious norms function as de facto law, creating tension between civil and religious legal systems. These dynamics are further complicated by the risk of lineage confusion (*ikhtilath an-nasab*), commodification of women's bodies, and the legal invisibility of children born through such arrangements. As a result, surrogacy in its current form not only challenges the principles of Islamic jurisprudence—particularly *hifz al-nasab*, *hifz al-'ird*, and *hifz al-nafs*—but also undermines the integrity of the family as a social institution. The findings affirm that without an integrated legal framework that balances reproductive rights, religious morality, and social



justice, surrogacy will continue to exist in a grey area fraught with conflict, exploitation, and uncertainty.

This research highlights the urgent need for the Indonesian state to craft a nuanced and culturally contextualized regulatory model that addresses the legal, ethical, and theological dimensions of surrogacy. Such a model should be rooted in the principles of *maqashid al-shariah* while also accommodating evolving biomedical realities and the reproductive aspirations of citizens. Theoretically, the study contributes to ongoing discourses on bioethics, Islamic legal thought, and the interface between religion and modern law in pluralistic societies. Practically, it offers a critical reference for policymakers, medical practitioners, and legal professionals who grapple with the complexities of surrogacy in contexts where formal legislation is lacking. Nevertheless, the study acknowledges its limitations, including the scarcity of empirical data due to the clandestine nature of surrogacy practices, and the potential bias in interpreting religious rulings that vary across regions and scholars. Future research is therefore encouraged to explore comparative regulatory frameworks in other Muslim–majority countries, conduct in–depth ethnographic investigations into the lived experiences of surrogate mothers, and examine the potential for legal harmonization between Islamic norms and state law in managing reproductive technologies. These recommendations aim to inform not only academic debates but also real–world policy formulation and institutional reform.

## DECLARATIONS

### AUTHOR CONTRIBUTION STATEMENT

Novia Rina was responsible for the conception and design of the research, conducted the data collection and analysis, and interpreted the findings within the context of relevant legal and religious frameworks. She also drafted and revised the manuscript, ensuring the accuracy and coherence of the arguments presented. All aspects of the research, including literature review, methodology development, and conclusion formulation, were carried out under her direct supervision and intellectual guidance.

### FUNDING STATEMENT

This research received no specific grant from any funding agency in the public, commercial, or not–for–profit sectors.

### DATA AVAILABILITY STATEMENT

The data supporting the findings of this study are available from the author upon reasonable request.

### DECLARATION OF INTERESTS STATEMENT

The author declares that there are no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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