

Article

# A Great Desire for Children: The Beginning of Transnational Adoption in Denmark and Norway during the 1960's

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**Abstract:** This article examines the beginning of transnational adoption in Denmark and Norway to illuminate the role of private actors and associations in Scandinavian welfare systems. Utilizing case studies of two prominent private adoption actors, Tytte Botfeldt and Torbjørn Jelstad, the article analyzes how these Nordic welfare states responded to the emergence of transnational adoption in comparison with both each other, neighboring Sweden, and the United States. This study shows that private actors and associations strongly influenced the nascent international adoption systems in these countries, by effectively promoting transnational adoption as a progressive and humanitarian form of global parenthood; while simultaneously emphasizing the responsibility of the welfare state to accommodate and alleviate childless couples' human rights and need for children. A need that was strong enough that couples were willing to transcend legal, national, and racial borders. Ultimately, Danish and Norwegian authorities not only had to show leniency towards flagrant violations of adoption and child placement rules, but also change these so that families could fulfill their great need for children by legally adopting them from abroad.

**Keywords:** transnational adoption; Nordic welfare state; family; race; cold war; humanitarianism; illegal adoptions

## 1. Introduction

Much of the historical research on transnational adoption is heavily focused on America, frequently situating transnational adoption into the broader context of domestic and transracial adoptions in North America or into the history of U.S. immigration and foreign policy. Melosh, for example, calls adoption “a quintessentially American institution”, that fits neatly into a history of recklessly optimistic faith in self-construction and social engineering, as well the national self-image of the USA as a ‘country of immigrants’. These sentiments created a climate that welcomed an individualistic form of family formation that was unconstrained by traditional notions of geography, kinship, and race (Melosh 2002, pp. 10, 166).

The Scandinavian nations are not usually associated with this kind of American individualism and pluralism, nor are they immigration countries in the same tradition as the USA. Nevertheless, Denmark, Norway, and Sweden have had some of the highest rates of international adoptions in the world per capita, that is, they received the most children in relation to their population size (Selman 2010, p. 6; Selman in Ballard et al. 2015, p. 16). They also have a history of close cooperation with each other on child welfare policies and the idea of a common “Nordic” identity that informed the political responses to social issues and the development of welfare institutions in the 20th century (Petersen in Kettunen et al. 2011, p. 41; Christiansen 2006, p. 69). Andresen et al. (2011) further notes that the Scandinavian nations have shown an especially high degree of commonality and cooperation on domestic adoption

issues. Denmark, Norway, and Sweden were willing to accommodate and modify their legislation considerably for the sake of developing a joint legal framework, or *rättslikhet*, on adoption for the sake of all Nordic children (Andresen et al. 2011, p. 263).

Despite these studies, the history of transnational and often also transracial adoption of non-Nordic children, a growing phenomenon in the 1960s, has not been studied in great detail<sup>1</sup>. In addition, much of the preexisting historical scholarship on adoption in Scandinavia—be it domestic or transnational—have focused primarily on legislation, high level policymaking, and state actors. This article seeks to expand the historical research on transnational adoption by examining the largely unexplored advent of transnational adoption in Denmark and Norway during the 1960s. The aim of this endeavor is to provide an account of the private–public partnership that facilitated transnational adoptions in the context of an expanding social welfare state and an emerging postcolonial Cold War world. Considerable attention has been given to private actors and associations because, as will be shown, these were largely responsible for promoting and organizing transnational adoptions in Denmark and Norway, as well as forcing the national authorities to take action.

Tytte Botfeldt and Torbjørn Jelstad were some of the earliest actors to arrange adoptions of foreign non-Nordic children to Denmark and Norway, respectively, on a large scale. Botfeldt began facilitating adoptions of black mix-raced children from West Germany to Danish families around the mid-1950s, while Jelstad started organizing highly publicized transports of children from South Vietnam to Norway for adoption in the late 1960s during the Vietnam War. These transracial adoptions attracted substantial amount of both publicity and controversy, as there was little to no regulation and the statutory rules on adoption and child placement were often not respected by Botfeldt and Jelstad. Danish and Norwegian child welfare officials had limited experience with transnational adoptions and Botfeldt and Jelstad's activities were a source of major headaches for the Danish and Norwegian authorities, whose confused and ambivalent response provide new comparative insight into how practices that provide childless adults with children emerge, develop, and are dealt with by welfare states.

## 2. Materials and Methods

The literature, on not just Nordic domestic adoption but European welfare states in general, has traditionally been overwhelmingly concerned with state action and top–down policymaking. This is true whatever the perspective, including the social sciences (Esping-Andersen 2013), political philosophy (Rosanvallon 2000), or history (Timmins 2017). The top–down approach also prevails in comparative studies (Baldwin 1990), or by looking at individual state or regional perspectives (Christiansen 2006). Much less attention has been paid to the importance of both family and voluntary action throughout the history of European welfare states. Within the existing literature, the history of welfare has been tied to the emergence of nation states, but a growing body of work shows that European states, rather than having monolithic welfare regimes, have mixed economies of welfare that involve both public and private action. The latter came mostly from voluntary welfare associations that worked closely with the state (Lewis in Page and Silburn 1999; Thane in Oppenheimer and Deakin 2011, pp. 121–31). Families are in some ways everywhere in the welfare state literature, but almost always as passive recipients or clients of social services rather than as actors in their own right, who both shape the services that they receive and play a crucial role in how they are delivered (Capuano 2019; Ginsborg 2014).

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<sup>1</sup> Lindgren's work on transnational adoption in Sweden is one significant exception to this. In her 2010 book *'Internationell adoption i Sverige. Politik och praktik från sextiotil till nittiotil'* (International adoption in Sweden. Politics and practice 1960s to 1990s), she also argues against Melosh's notion of adoption being particularly 'American' in nature and instead contends that transnational adoption should be studied both as an international phenomenon, influenced by structural conditions and societal processes common to much of the Western world, and as a national one, influenced by specific conditions and traditions unique to each country (Lindgren 2010, p. 13).

This article makes use of sources that primarily focuses on Tytte Botfeldt and Torbjørn Jelstad in order to move away from the dominant top–down state actor perspective, in favor of a more bottom–up perspective that both highlights private actors more and shows the actual interactions, as well as conflicts, in the public–private partnership behind transnational adoption. The section on Torbjørn Jelstad is based on his personal archive, which was deposited in *Riksarkivet*, Norway’s National Archive, after his death in 2006. The materials selected from his archive concern his work with transnational adoption and his political work as a staunch anticommunist. In addition to this, archival materials from Norway’s Social Ministry and Foreign Ministry concerning correspondence with and about Jelstad, as well as policy discussions in the wake of his activities have also been included. Tytte Botfeldt’s work with transnational adoption have been recounted in her own personal memoir, which was published posthumously in 1983 by her close confidant Monna S. Madsen after Botfeldt passed away in 1979 (Madsen 1983). Her activities have also been covered by the journalists Linde, Køningsfeldt, and Hørmand-Pallesen in their book *Børneimporten* (The Child Import), which portrays the adoption of mixed raced children from West Germany to Denmark in the 1950s (Linde et al. 2013). The section on Botfeldt utilizes these two sources as well as reports from the first meetings of *Adoptionsudvalget* (The Adoption Committee), which was formed by the Danish Justice Ministry in 1964 in response to the growing number of transnational adoptions from West Germany. Media coverage of the two actors and their activities has been utilized as well.

By closely reading these materials and comparatively analyzing the actions of the two actors, not just with each other but also with similar efforts in the U.S. and Sweden, the article presents a case study into the real-life beginnings of transnational adoption in Norway and Denmark. The wealth of details in the account of Botfeldt’s and Jelstad’s activities offer a nuanced narrative of reality that show how human behavior cannot be meaningfully understood as simply the rule governed acts found in much theory (Flyvbjerg 2006, p. 237). Their cases offer a particularly rich problematic on the diverse and complex private actors and societal processes behind transnational adoption in Scandinavia, as well as the national authorities’ contradictory reaction to these.

### 3. The United States and the Paradigms of Transnational Adoption

The American historian Rachel Winslow has argued that transnational adoption became an enduring and embedded institution in the U.S. “... not because it was in the interest of one group, but rather because it was in the interest of many” (Winslow 2017, p. 3). The international adoption system that had come into existence in the United States by the 1970s, was a wide-ranging social, cultural, and political project centered around saving young destitute children from abroad, and supported by governments, social welfare professionals, volunteers, the media, adoptive and prospective adoptive parents. This diverse group of actors had equally diverse interests that were often in intense conflict with each other as to how to save children. Winslow argues that these conflicts gave rise to four paradigms that governed the adoption process from the mid-1940s to the mid-1970s. The first was the consumer paradigm, which essentially applied market solutions to social problems and sought to service the high demand for adoption among predominantly white middle-class families. The second was the child welfare paradigm, which prioritized the “best interests of the child” and sought to handle transnational adoption as a scientific expert-run enterprise. The humanitarian paradigm, which sought to rescue children and imbued adoption with moral and spiritual meaning, was third. Finally, the development paradigm encouraged self-help as well as modernization and focused on reconstructing indigenous social systems so that children’s welfare needs could be met in their own countries (Winslow 2017, pp. 5–6).

The institutional beginnings of transnational adoption are usually traced to the 1950s during the Korean War, when Bertha and Harry Holt, an American missionary couple, promoted transnational, permanent adoption for the Amerasian children born to male United States soldiers and Korean women. Winslow has noted that in the case of the United States, “The efforts of private organizations and individuals succeeded because at every stage Congress and federal agencies made decisions to facilitate

international adoption” (Winslow 2017, p. 6). Restrictive immigration policies were liberalized to allow what many lawmakers considered to be the “best possible immigrants” entry into American families who highly desired them. These multiracial families were in turn presented to the Cold War world as ideal civic institutions that upheld liberal postwar values of colorblindness, democratic altruism, and consumer choice, which distinguished American society from “godless communism” (Winslow 2017, p. 4). The Holts were particular adept at using the humanitarian paradigm to frame adoption as an altruistic act of Christian love and rescue, which gave them support and credibility with the American public. Winslow argues, however, that the Holts also skillfully utilized a legislative void on intercountry adoption, as well as a codependent relationship between the state and humanitarian organizations, to craft their own ad hoc international adoption policy that strongly influenced the U.S. international adoption system in its infancy (Winslow 2017, p. 72).

Looking at Scandinavia, much of this was also true for how transnational adoption transpired in Denmark, Norway, and Sweden. Tytte Botfeldt in particular is strikingly similar to the Holts in a number of respects. She, like them, had influence on the nascent Danish international adoption system and its methods; indeed, even the timeframe and children involved were almost identical to the American couple. The Holts adopted their first child in 1955, while Botfeldt adopted hers in 1956, which in both cases spurred a greater involvement in facilitating adoptions for other couples and revolved around mixed-raced children born to male United States soldiers and local women. In general, the transition from domestic adoption to transnational adoption in the Scandinavian countries during the 1960s can be interpreted as a conflict between the paradigms of child welfare and humanitarianism. Private adoption actors and associations in Denmark, Norway, and Sweden all argued that transnational adoptions could save children in need, and promoted the practice as a form of international relief work and an act of inclusivity. Both Botfeldt and Jelstad displayed an unwavering certainty that their activities were morally justified, no matter the consequences, that led them to arrange transnational adoption in ways that frequently left child welfare experts aghast, who argued that their actions were reckless, ran counter to established procedure, and fundamentally served the adoptive parents interests rather than the child’s. The Danish, Norwegian, and Swedish authorities’ view of transnational adoption was more ambivalent than in the United States, but ultimately they still made decisions that facilitated transnational adoptions.

#### 4. The Context of Domestic Adoption

According to history Professor Sonya Michel, in the modern period the laws, discourses, and policies that define families and determine their composition attempt to integrate them one way or another into the welfare state. They construct and produce specific roles for each family member and continually reset the border between the public and private, making claims about which areas should be considered the inviolable sphere of personal and intimate life and which should be considered the purview of the state (Michel in Kettunen et al. 2011, p. 121).

The institution of adoption is intimately linked with this process, because children are at the center of this. Bergman et al. notes for example that Swedish society and family life became more child centered during the 20th century. In the past, children contributed economically to their families through work. However, due to increased schooling, general prosperity, and extended childhoods, parents took on almost the entire economic burden (Bergman et al. 2011, p. 15). Children began instead to be perceived in more emotional terms, becoming, to quote the famous sociologist Viviana Zelizer, “economically worthless but emotionally priceless” (Zelizer 1994). According to Andresen et al., this social value of children have played an important role in legitimizing the political management of family formation and parenthood via welfare policy throughout Scandinavia since the late 1800s, when advances in social and medical knowledge, as well as nationalist concerns about national cohesion, led to the wide scale conclusion in the scientific community and among social reformers that children were critical for the continued reproduction of the nation (Andresen et al. 2011, p. 18).

When statistics revealed around 1900 that the infant mortality rates in Denmark, Norway, and Sweden were higher for illegitimate children than legitimate children, it spurred the first wave of legislation in all three countries as family policy. Many of these legal reforms originated in the period 1910–1912 when Danish, Swedish, and Norwegian representatives formed a joint Scandinavian committee on family law issues. These early efforts resulted in very similar laws on marriage, adoption, and foster care being drafted and introduced in Denmark, Sweden, and Norway in relatively short order. Norway and Sweden passed their first adoption law in 1917 while Denmark passed its in 1923 (Andresen et al. 2011, p. 218).

The first adoption laws were based on the premise that biological kinship was the natural and immovable foundation of the familial relation. Adoption was mainly envisioned to be a way to provide care for the most vulnerable children in society, particularly illegitimate ones. In this way, adoption functioned almost as a form of enhanced foster-care, as the adoption was not meant to supplant the biological relationship outright (Andresen et al. 2011, p. 237). In 1935, Norway introduced a new form of adoption that entailed a full change of family for the adopted child. This *strong* form of adoption completely cut the ties between the biological parents and the child, who was instead wholly incorporated into its new family with all of the rights, duties, and obligations that entailed. Norway revised its legislation in 1956 so that “strong adoptions” became the only sanctioned form of adoption, while Denmark and Sweden enacted similar revisions in 1956 and 1958, respectively (Andresen et al. 2011, p. 242).

Lindgren notes that by 1958 orphans and illegitimate children were no longer considered a political problem in Sweden; on the contrary, an increasing number of couples wanted to adopt, sometimes more than the children available for adoption, which was the case in Norway and Denmark as well. According to Lindgren, the enactment of “strong adoption” signaled that parenthood was no longer dependent on biology but on social qualities. Focus was increasingly on the child’s emotional development and the importance of a stable home environment. Accordingly, the main issue became how to ensure that the child had the most suitable parents, who could fulfill the child’s best interests, which made possible envisioning the adoptive relationship as equal or even superior to the biological one (Lindgren 2006, p. 91).

In essence, domestic adoption was politically justified as a solution to domestic child welfare problems, based on the principle of child’s best interests, which were considered to align with the nation’s long-term interests. The political justification for transnational adoption presented a more complex dilemma for the state though. The practice of transnational adoption was primarily developed by private adoption seekers on their own initiative, and any regulation of the practice would require either a ban of the practice or its acceptance. As will be shown, none of the Scandinavian states opted to ban transnational adoption, but in accepting it they also accepted a practice that was primarily in the interests of the adults who wanted to adopt.

## 5. Transnational Adoption in Sweden

Lindgren cites 1963, when transnational adoption was debated in parliament for the first time, as the beginning of the political response to the issue in Sweden. The following year a committee was formed to examine the opportunities and hindrances facing Swedes who wanted to adopt from abroad, as well as how the authorities could assist in the process. This eventually resulted in adoption agreements being signed with Greece and South Korea in 1967, and *Socialstyrelsen* (The National Board of Health and Welfare) being given the primary responsibility of assisting Swedish families with adopting from abroad. In 1965, another committee was formed to examine how the existing legislation could be adjusted to facilitate transnational adoptions, which led to a new law on transnational adoption being passed in 1971, which codified the legal procedure for adopting a foreign child from abroad. In 1969, the association *Adoptionscentrum* was established by adoptive parents who had adopted children from abroad on their own, to assist other families with facilitating adoptions from abroad. In 1973, NIA, *Nämnden för Internationella Adoptionsfrågor* (The International Adoption

Board) was created. NIA assumed the formal responsibility of facilitating adoptions from abroad from Socialstyrelsen (which primarily consisted of processing adoption applications and negotiating adoption agreements with other countries) and entered into a close partnership with Adoptionscentrum, who took on the practical responsibility of facilitating transnational adoptions to Swedish families (Lindgren 2010, pp. 23, 32).

The driving forces behind these institutional and legislative changes were an increasing number of families who wanted to adopt from abroad, and an intense public debate concerning the involvement of the Swedish state in transnational adoption. Lindgren argues that the emergence of transnational adoption in Sweden was connected to not only a decreasing number of Swedish children available for adoption, which created long waiting lists and a waiting time spanning multiple years, but also to wider societal changes during the 1960s and 1970s. In Sweden, more and more women were entering the workforce and the welfare state was assuming greater responsibility for childcare. Traditional family roles were under intense debate and children started being seen as social, independent individuals, who were more influenced by their social environment than their family origin. People had also become more aware of the many children in need across the globe via TV, as well as from working overseas and being involved in humanitarian relief work. These factors gave rise to, what Lindgren describes as a popular movement, in which transnational adoptions were regarded as not only fulfilling childless couples' needs for family, but were also a way for Swedes to show global responsibility and solidarity, by rescuing children in desperate need around the world (Lindgren 2010, pp. 51, 154).

The Swedish authorities had a more ambivalent attitude initially, and the facilitation of transnational adoption was not regarded as a concern of the state until increasing public pressure made it so, e.g., the 1963 parliament debate revolved around negative comments made by the Swedish authorities regarding the ability of children belonging to other racial groups to adjust to a life in Sweden. The comments were accused of being racially prejudiced and the authorities were encouraged by members of both parliament and the public to support and assist Swedish citizens who wanted to adopt from abroad (Lindgren 2010, p. 21). The first government report on transnational adoption "Adoption av utländska barn" (The adoption of foreign children) published in 1967, by the 1964 committee, which had been charged with examining how Swedish couples could be assisted with adopting from abroad, was also quite ambivalent with regards to the state's involvement in transnational adoption. The report determined that it was not the state's duty to facilitate the large-scale adoption of children to Sweden, but paradoxically also concluded that society should support those who wanted to adopt from abroad. According to the report, the adoption of foreign children presented unique difficulties for both the adoptive parents and the child, and it was not entirely clear if the child would be able to achieve a good life in Sweden. On the other hand, transnational adoption could offer children living under dire circumstances a family and, most likely, a better life in Sweden than in their home countries. Adoption was described as a "behjärtansvärd verksamhet" (heartwarming activity) that should not be restricted nor impeded. According to Lindgren, the report reveals how transnational adoption was considered to be problematic but also inevitable by state officials. She suggests that the accusations of racial prejudice, the strong support for international relief work, and the lack of children available for domestic adoption had made outright opposition towards transnational adoption politically untenable (Lindgren 2010, p. 30).

To be able to organize and regulate the process, the state needed to involve itself in transnational adoptions, but its initial efforts to assist with adopting from abroad could not match the rapidly growing demand, and most people who wanted to adopt a child from abroad continued to do so on their own. Some of these adoptive parents started using their experience and the contacts they had made abroad to aid other Swedish families, which led to the creation of Adoptionscentrum in 1969. By the time Adoptionscentrum entered into its partnership with NIA in 1973, the association had grown to around 2500 members and had contacts that could facilitate transnational adoptions in about 20 countries. Besides aiding families who wished to adopt, the association also organized

informational campaigns about transnational adoption, which encouraged more people to adopt, which in turn, increased the pressure on the already swamped Socialstyrelsen (Lindgren 2010, p. 34).

According to Lindgren, the creation of NIA in 1973 and its partnership with Adoptionscentrum was an attempt by the authorities to take control of transnational adoption, which had become a 'free field' where children were brought to Sweden in a completely unregulated way to be adopted by parents who had not undergone any kind of approval process with child welfare services. These so-called private adoptions continued to occur in great numbers even after NIA's creation though, and eventually resulted in a major reform of the institution in 1979 (Lindgren 2010, p. 155).

## 6. The Beginning of Transnational Adoption in Denmark

As in Sweden, domestic adoptions continued to fall in Denmark during the 1960s due to increasingly fewer children being given up for adoption; on the other hand, more and more couples wanted to adopt. In 1960, for example, Mødrehjælpen (Mother's Aid), a semipublic association that regulated most domestic adoptions at the time, reported that the previous year their waiting list for adoption had 3200 applicants, and that the average waiting time for adopting a boy or girl was  $3\frac{1}{2}$  and  $4\frac{1}{2}$  years, respectively. Mødrehjælpen could also report that in some cases people had left from the waiting list because they had adopted a child through other means that were unknown to them<sup>2</sup>. This admission of ignorance is indicative of the problems associated with finding accurate statistics for the earliest transnational adoption cases, as many of these were done outside of the purview of the authorities and often had very little documentation. Mødrehjælpen was almost completely unaware of the rapidly growing number of mixed-raced children of black American soldiers stationed in West Germany who were being adopted by Danish parents with the assistance of Tytte Botfeldt, until this growing number of unregulated transracial adoptions eventually caught the attention of the newspapers.

On 16 February 1963, the front page of Danish tabloid *BT* read: "Illegal Import of children to Denmark." The newspaper claimed that secret adoption centers had illicitly brought upwards of 1000 "colored" children from West Germany to Denmark for adoption in the last two years. These children were predominantly the mixed-race offspring of German women and African-American soldiers stationed in the country. The paper reported that the lack of Danish children for adoption had given birth to a flourishing network of underground adoption centers that arranged adoptions from German Jugendamts and orphanages. These adoptions were in violation of Danish law, as they had not been approved by either the authorities or the institutions that were licensed to oversee domestic adoptions: Mødrehjælpen, De Danske Plejehjemsforeninger (the Danish Nursing Home Associations), and child protective services. This also meant that there was no screening or evaluation of the adoptive parents and *BT* could report that some children had changed homes in Denmark two or three times, due to being rejected by their adoptive parents, and were in danger of being sent back to Germany. Most explosively, the tabloid also claimed that the Danish authorities were well aware of these illegal adoptions and knew the addresses of the secret adoption centers. The authorities had even been contacted by the international child welfare organization ISS (International Social Service) about the issue, but had willfully failed to take action until now<sup>3</sup>.

That claim is beyond the scope of this article to either verify or deny. Records from the Danish national archives do reveal, though, that the authorities started investigations into the issue that year in direct response to the media attention. On 27 September, a meeting was held at the Justice Ministry attended by officials from the Justice and Social Ministries as well as representatives from various child welfare services to discuss the adoptions from Germany. The immigration office had reviewed

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<sup>2</sup> Betænkning vedrørende børneforsorgen og mødrehjælpen. Betænkning nr. 161. Afgivet af det af socialministeriet 24. maj 1955 nedsatte udvalg. København, 1960; p. 69.

<sup>3</sup> Jespersen, K. (16 February 1963). Illegal import af børn til Danmark. *BT*, 26–27.

their records and disputed the numbers reported by *BT*, stating that around 200 German children were officially registered as having been issued residence permits for the purpose of adoption in the period 1960–1962. They also admitted there was presently a significant backlog of pending adoption cases from Germany. In addition, the police reported that the individuals who were chiefly responsible for illicitly arranging adoptions to Denmark had been identified, and the most active of these was Thyra (Tytte) Gerner Botfeldt (1920–1979)<sup>4</sup>.

### 6.1. The Mixed-Race German Adoptions

From around 1955, a small number of German mixed-race children started being sent to a Danish children's camp for several weeks of recuperative vacation as part of the so-called "Guldberg Plan". The camp was run by Stig Guldberg, a retired Danish military officer who had lost both his hands during a training exercise in 1947. Short stays with Danish families were also arranged for the children, which was how Tytte Botfeldt became involved. She hosted a 10-year-old mixed-race girl in 1956, whom she ended up adopting after a protracted process that included her contacting the Danish Minister of Justice in person. According to her biography "It was all so much fun!" (Madsen 1983, p. 18).

She started helping Guldberg with organizing the visits to Denmark and eventually took over the full administration of the private stays with Danish families. Through this work she began advising families on how they could adopt the children staying with them. This was a violation of the laws governing adoption, as they explicitly banned private individuals without state authorization from facilitating adoptions, but Botfeldt was undeterred by this. She advised parents on how to bring the children to Denmark for adoption and cultivated a network of local contacts in West Germany who assisted her with finding children. One of the most important of these was a Danish exile, Anna Lorenzen, based in Hamburg. She had been exiled to Germany in 1956 after serving 11 years in Danish prison for her active involvement with the so-called "Lorenzen Group", a paramilitary group of Danish collaborators under the Gestapo, during the Nazi occupation of Denmark. According to Lorenzen's biography, she had decided to help children in need shortly after her arrival to Germany, and she contacted Botfeldt after reading about her work with German mixed-raced children. They became close friends and divided the work on adoption between them (Haaest 2007, p. 22).

Botfeldt found parents in Denmark, while Lorenzen located the children in West Germany by visiting orphanages and seeking out single mothers, whom she tried to convince to give up their children for adoption. Having found a child, Danish parents could simply take custody, as no foster care license was required by the German authorities or by most of the orphanages. In cases where the local orphanages did require a license, Botfeldt assisted with getting it from the Danish authorities. Doing so was very easy according to Linde et al., who argue that there were no real consequences of circumventing the rules. Bringing children from Germany to Denmark was also remarkably easy. They could be dropped off at the border, put on a train on their own if they were old enough or escorted directly to the family, though it seems that most parents came and collected their children from Germany (Linde et al. 2013, p. 125).

By the early 1960s, Denmark had become the primary destination for the adoption of German mixed-race children according to West German child services (Fehrenbach 2018, p. 163). Exactly how many children were adopted from Germany to Denmark is unknown, due to the illicit nature of their adoption. *BT* had obtained the figure of 1000 from unspecified sources in Germany. The Danish immigration office had registered around 200 children in the period 1960–1962, but these represented only cases where the adoptive parents had specifically applied for residence permits. By Tytte Botfeldt's own account, she had arranged around 2000 adoptions of German mixed-race children to Denmark, while Linde et al. estimates a figure of around 2000–3000 (Linde et al. 2013, pp. 9, 30). Botfeldt applied for a legal permit for "the Guldberg Plan" to conduct adoptions in 1960, but was denied this.

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<sup>4</sup> Adoptionsudvalget, Mødereferat 27. September 1963.



She tried again in 1962, after having collected 400 signatures from senior doctors and psychiatrists who supported her efforts, but was denied again. On both occasions she was warned by the Justice Ministry that her activities were in violation of the law, but the authorities did not take any further steps against her. Linde et al. argue on the basis of this that the authorities had known about the illegal adoptions since at least 1960, when the Justice Ministry first reprimanded Botfeldt, but had been deliberately ignoring the issue until public attention forced their hand in 1963 (Linde et al. 2013, pp. 68, 131).

The meeting at the Justice Ministry on 27 September 1963 was the first of a series of meetings that eventually led to the formation of a standing committee tasked with devising a new scheme for the adoption of foreign children in Denmark<sup>5</sup>. The committee quickly established that the existing institutions that handled domestic adoptions were neither willing nor capable of taking on the responsibility for transnational adoptions. Furthermore, these institutions also stated that, as a matter of principle they did not believe finding foreign children for Danish couples was their responsibility. On the other hand, the committee members realized that something had to be done about the unregulated procurement of children for Denmark. Consequently, on 28 May 1964, they recommended that the association Glemte Børn (Forgotten Children) be given permission to arrange adoptions of German mixed-raced children<sup>6</sup>.

Glemte Børn had been founded four months earlier by Tytte Botfeldt and a group of adoptive parents to apply for permission to arrange adoptions of foreign children in need in Danish homes, as well as to provide support and assistance to people who wanted to adopt from abroad<sup>7</sup>. Tytte Botfeldt, who had been reprimanded but never suffered any further sanction for her illegal activities, thus ended up being a key, arguably even founding, figure in the Danish international adoption system. The association was only permitted to facilitate contact between Danish adoption seekers and foreign adoption authorities and institutions after one of the Danish adoption institutions had examined the Danish couple as well as the foreign child and approved both. This, then, followed the same procedure as for Danish adoptions. Glemte Børn was not permitted to arrange adoptions from Denmark, Norway, Sweden, Finland, and Iceland. The association itself had taken steps to open up contacts in Greece, India, and South Korea, and the Justice Ministry had signed an agreement with a Greek orphanage on 30 October 1964 that enabled the adoption of Greek children. The committee wished Glemte Børn good luck with its endeavors and hoped that the association would be successful in both finding good homes for the many foreign children in dire straits, as well as satisfying Danish married couples' great desire for adopted children<sup>8</sup>.

## 6.2. Racial Issues

Nelson and Myong argue that color blindness, the denial of race as a category of importance, is a defining characteristic of the reporting on transnational adoption in Denmark, where it is often depicted as a heroic feature of the Danish adopters. Danish accounts tend to focus more on racist conditions in the adoptees' birth countries and how this is a threat to them, rather than on racial issues within Denmark. This narrative has been present since the mixed-race adoptions from Germany first came to the media's attention in the 1960s and remained more or less unchallenged until the 1990s, when transnational adoptees themselves started to share their experiences of racism in Denmark (Nelson & Myong in Wills et al. 2020, pp. 109, 114).

In the case of the mixed-race German adoptions, Danish families were depicted as providing loving, ordinary homes without any racial issues, in sharp contrast to the pervasive racism from

<sup>5</sup> Adoptionsudvalget, Kontaktudvalget vedr. adoption af udenlandske børn 1964–1973.

<sup>6</sup> Beretning fra adoptionsudvalget vedrørende spørgsmålet om ændrede retningslinjer for behandling af sager om udenlandske børn. p. 9.

<sup>7</sup> Notat vedrørende adoption af udenlandske børn i Danmark. pp. 3, 20–21.

<sup>8</sup> Beretning fra adoptionsudvalget vedrørende spørgsmålet om ændrede retningslinjer for behandling af sager om udenlandske børn. pp. 9–10.

Hitler's Nazi regime that was thought to be still lingering in German society. There were reports of the children encountering racism in Denmark, including by Botfeldt herself, who recounted in a 1957 interview with the newspaper *Social-Demokraten*, how her adopted daughter had to endure racial slurs on her first day of school<sup>9</sup>. However, these were usually framed as minor episodes by immature individuals rather than as signs of deeper xenophobia in Danish society. This was the view of Botfeldt, who believed that the racial abuse that her daughter encountered was just childish antics. She was also dismissive of concerns about possible racial issues later in life, declaring that the children would be Danes with Danish families and stated, in another interview with the newspaper *Politikken* in 1963, that their race would in fact be advantageous for them in Denmark. "During their upbringing, mulatto children in Denmark will probably experience preferential treatment and pampering—for who does not find them adorable, and many in our country harbor a weakness for foreignness" (Nelson & Myong in [Wills et al. 2020](#), p. 108)<sup>10</sup>.

### 6.3. The Aftermath

In 1965, the committee convened again on two occasions to discuss ongoing problems with the new scheme for foreign adoptions. Many impatient Danish couples had continued to travel to Germany and pick up children on their own. The Danish adoption institutions were swamped by the many applications to adopt a foreign child in addition to the Danish cases. *Mødrehjælpen* also stated, that it was often impossible to make as thorough examinations of the German cases as with Danish ones because they received insufficient information from the German institutions<sup>11</sup>. The chairwoman of *Mødrehjælpen*, Vera Skalts, also told the media that year that the adoption process had entered into a vicious circle, because the authorities were powerless to prevent children from being brought to Denmark and *Mødrehjælpen* was often forced to approve adoption cases that they would not otherwise have accepted ([Linde et al. 2013](#), p. 138).

Tytte Botfeldt was also experiencing internal difficulties in *Glemte Børn*. According to her, the problems stemmed from her desire to promote the adoption of physically disabled and older children, while others in the organization wanted to focus more on healthy infants, who were in most demand by Danish parents ([Madsen 1983](#), pp. 17, 23–24). Interviews with other members of the board conducted by Linde et al. suggest that there was also growing consternation about her leadership style, which many considered to be both disorganized and dictatorial ([Linde et al. 2013](#), p. 177). As a result of this, she helped found the Danish branch of *Terre des Hommes* in 1967. *Terre des Hommes* was an international child aid organization founded in 1960 in Lausanne Switzerland. Under Botfeldt's and her allies' influence, the Danish branch also became involved in arranging adoptions of disabled and older children from abroad in Denmark besides its other aid activities ([Madsen 1983](#), p. 39).

She quickly became fully devoted to *Terre des Hommes* and remained so until her death in 1979, though not before causing a major rupture in *Glemte Børn* that split it into two organizations in 1969. That year, the simmering conflicts about Tytte Botfeldt's leadership and the issue of disabled children came to a head. At an extraordinary general assembly, allies of Botfeldt deposed the sitting board, which quit the association and formed its own international adoption organization, *Adoption Center*, in response. These three international adoption agencies were responsible for most transnational adoptions in Denmark for the rest of the 20th century and beyond: *Glemte Børn* (later *Danadopt*), *Adoption Center* (later *AC Børnehjælp*), and *Terre des Hommes* ([Linde et al. 2013](#), pp. 179–81).

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<sup>9</sup> Om negerpigen MONIKA der har tre hvide søskende. (11 August 1957). *Social-Demokratens Søndags-Magasinet* Nr. 32, 4.

<sup>10</sup> According to Fehrenbach, German authorities also believed that Denmark was free of racial prejudice, at least in comparison to the United States, which had been the primary destination for the mixed-race adoptions in the 1950s. German child welfare officials who visited Denmark reported that the children were flourishing with their Danish families, in stark contrast to the children sent to America who were subjected to racial segregation and Jim Crow laws ([Fehrenbach 2018](#), p. 169).

<sup>11</sup> Referat af møde i kontaktudvalget 25. November 1965; pp. 1–2.

## 7. The Beginning of Transnational Adoption in Norway

In Norway, Ingvaldsen notes that transnational adoptions increased from 77 in 1968 to 412 in 1977. Improved access to birth control and abortion, as well as better economic and social conditions for single mothers had contributed to fewer children being given up for adoption, which she argues was the main reason behind childless couples starting to adopt children from poor third-world countries (Ingvaldsen 1996, p. 26). There had been adoptions from Germany, including war children from the occupation, and from Greece immediately after the war. In 1967, Norway, as well as Denmark and Sweden, signed the European Convention on the Adoption of Children (CETS 58), which committed the signatories to apply national laws on the protection of children, such as appropriate assessment of adopters, to children from other states as well<sup>12</sup>. Norsk Koreaforening (Norwegian Korean Association) was the first association granted permission in 1969 from the Social Ministry to arrange transnational adoptions, primarily via Holt Adoption Agency in South Korea; which eventually became the main country of origin for most transnational adoptions to Norway<sup>13</sup>. However, prior to Norsk Koreaforening receiving its permit, another association had also been granted permission in 1968 to transport a large number of Vietnamese children to Norway for adoption. The association, Komiteen for Sydøst-Asia (The Norwegian Committee for South-East Asia), would not receive any further permits to carry out transnational adoptions, though, due to the manner in which these adoptions were conducted under the leadership of Torbjørn Jelstad.

On 20 October 1968, a plane arrived in Oslo after a 28 h journey from Saigon. It had been specially chartered to bring some 70 Vietnamese children, a team of doctors and nurses, and four members of KSA Komiteen for Sydøst-Asia (The Norwegian Committee for South-East Asia), who were responsible for the transport. According to a NRK (Norway's public broadcasting company) article from 2014, the arrival was covered heavily by the Norwegian media and that evening people could watch on their televisions as the infants were handed over to their Norwegian parents one by one<sup>14</sup>.

According to KSA's official report on the trip, which was submitted to the Norwegian Social Ministry in March 1969, 69 children were brought to Norway on 20 October 1968, another five arrived later on 10 November, and the last three arrived in the beginning of January 1969. Two children had unfortunately passed away subsequent to their arrival, one just two days after arriving in October and the other shortly before Christmas. In spite of this, the KSA chairman deemed the trip to be a great success overall. The other children were doing well with their adoptive families after mostly minor stays at local hospitals, while the respective Norwegian families of the two dead children had handled it remarkably well, and one family had already received a replacement with the last arrival in January<sup>15</sup>.

The Norwegian Social Ministry did not agree with this assessment. Even before the KSA members' departure to Vietnam in September 1968, officials from the Ministry had flagged several outstanding issues that not only remained unresolved a year later but had also turned into major complications for the authorities. The enthusiastic insistence at the end of the report by the KSA chairman, Torbjørn Jelstad, on organizing a new transport of Vietnamese children to Norway as soon as possible was consequently met with an inordinate amount of skepticism on the side of the Norwegian authorities. This would do little to deter Jelstad from taking further actions on the matter, though, and his stubborn determination in the face of growing resistance from the authorities eventually led to a major overhaul of the international adoption process in Norway.

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<sup>12</sup> Council of Europe. (24 April 1967). *European Convention on the Adoption of Children*. Treaty Office. <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/058>.

<sup>13</sup> NOU 1976: 55. pp. 11, 13, 25.

<sup>14</sup> Roalsø, M. (1 October 2014). Et fly fullt av barn fra Vietnam. NRK. <https://www.nrk.no/dokumentar/xl/et-fly-fullt-av-barn-fra-vietnam-1.11951709>.

<sup>15</sup> D/L0003—Rapport fra KSA til Sosialdep. ang. adopsjon av Vietnamesiske barn til Norge 17.3.69. p. 2.

### 7.1. The 1968 Transport

Torbjørn Jelstad's involvement with transnational adoptions began in 1967, when he visited South Vietnam with a KSA delegation, which had been founded in 1966 to support the U.S. and South Vietnamese government in the Vietnam War. During this trip, Jelstad and the other KSA members visited local orphanages and were shocked by the living conditions of the children. For some unexplained reason, they brought back two Vietnamese children who were both adopted by Norwegian parents. After the KSA delegation's return to Norway, their stories about their trip and the plight of the orphaned children spurred a great deal of public interest in adopting children from Vietnam as a form of humanitarian aid. In an article from the newspaper *Aftenposten* in August 1968, the association mentioned that they had been approached by around 300 families interested adopting a child from Vietnam. As a result of this, the committee applied for and was granted permission to bring a limited number of children from Vietnam to Norway for the purpose of adoption. According to a letter sent from the Norwegian Social Ministry in February 1968, the KSA could bring back a total of 60 children, provided they met all the government's conditions and regulations. This latter included proper travel documents for the children that allowed for return passage to Vietnam, medical examinations, and the formal approval of the adoptions and the adoptive parents by the relevant Norwegian and Vietnamese authorities<sup>16</sup>.

In a letter sent at the end of May 1968, the Ministry expressed their first of many concerns about the adoptions upon learning that the Vietnamese authorities agreed to the transportation of the children to Norway before their adoptions had been processed in Vietnam. This would make them foster children upon arrival in Norway and prevent them from being legally adopted by their Norwegian parents until their adoption cases were finalized in Vietnam. The Social Ministry appear to have been quite shocked by this decision by the Vietnamese authorities and confused as how to react to it. In August 1968, they settled on a solution where the children could be approved for adoption by the Norwegian authorities. Proper documentation had to be provided that showed that the legal guardians of the children consented to their adoption as well as written certified statements from the relevant Vietnamese authorities that they agreed to the transport of the children to Norway for adoption and would not seek their return. Moreover, all of the documents had to be submitted to the Norwegian Justice Ministry for approval before any children could be issued visas and transported from Vietnam to Norway<sup>17</sup>.

This did not happen. Prior to the KSA delegation's arrival in Vietnam, the Norwegian consulate in Saigon was notified by the Foreign Ministry about their visit and requested to assist with sending the required documents to Norway. On 11 October 1968, the consulate informed the Norwegian immigration office that they had not yet received any documentation from the KSA except a list with the names of 74 children and three Vietnamese nurses who would accompany them to Norway. In spite of this, the consulate still requested that visas be issued to the children and nurses named on the list. "As the NCSEA (Norwegian Committee for South-East Asia) has already made the necessary charter engagement with Thai International who will have a plane in Saigon on the 19th October, 1968 it is of utmost importance that all the children as well as their 3 Vietnamese nurses have their entry visas for Norway the least 24 hours before that date"<sup>18</sup>.

Exactly why the consulate thought it was so important to assist the association with getting visas, even though the required documentation was lacking, is unclear. In a later communiqué to the Foreign Ministry, the consulate implied that it had been tricked somehow by Jelstad. In a letter to the Justice Ministry on 6 March 1969, Jelstad stated that they had received the written consent from the managers of the orphanages, who had full custodial rights over the children. However, these documents had

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<sup>16</sup> D/L0003—Brev fra Sosialdep. ang. Adopsjon av Vietnamesiske barn 2.2.68.

<sup>17</sup> RA/S-6794/D/Da/Dad/L3652/0005—Korrespondance mellem KSA og Sosialdep. Maj–August 1968.

<sup>18</sup> D/L0003—Korrespondance mellem KSA, Konsulatet i Saigon & Sosialdep. 10.10.68-30.8.68-11.10.68-24.8.68.

to be handed over to the Interior Ministry of Vietnam for processing and it was impossible for the delegation to make copies due to extreme time constraints. He apologized for this, but claimed that they had received assurances directly from the presidential office of South Vietnam that the cases would be expedited<sup>19</sup>.

This lack of documentation meant that the Social Ministry's worst fears were realized. The children could not be legally adopted in Norway until their adoption cases were processed and approved in Vietnam, a process that could drag on for several years. The Ministry was also annoyed that Jelstad had brought almost 80 children to Norway, well in excess of the maximum of 60 set by the state and well known to the association. The Social Ministry informed Jelstad in February 1969 that it would not grant the association permission to conduct any more adoptions until the pending adoption cases had been resolved and warned him about creating false expectations among Norwegian couples<sup>20</sup>.

This refusal was restated in the Social Ministry's short response in May 1969 to the official KSA report. It was very unclear when the existing adoption cases from Vietnam would be finalized and the Foreign Ministry had relayed a press communiqué from the Prime Minister of South Vietnam, who did not favor foreign adoptions. In the view of the Social Ministry officials, this made it quite unlikely that a speedy resolution of the existing cases would be forthcoming and they would not permit any more adoptions until this had taken place. In November 1969, another letter was sent to Jelstad from the Social Ministry. The Ministry reminded Jelstad that the association had not been granted permission to conduct any further adoptions, and expressed concern that the KSA had been informing Norwegian families about a soon-to-be new transport of Vietnamese children and begun to solicit a "risk fee" from potential adopters<sup>21</sup>.

## 7.2. Racial Issues

The 1968 child transport to Norway elicited more overt concern about possible racial issues among Norwegian families than in Denmark, at least initially. In an *Aftenposten* article about the arrival of the transport and the children being placed with their Norwegian parents, one family mentioned having anxieties about taking on the responsibility for a Vietnamese child, especially with regards to potential racial problems. However, eventually the family came to the conclusion that the child would be much better off with them in Norway, no matter what issues might arise<sup>22</sup>. This sentiment was repeated in an article in the newspaper *Morgenbladet* on 1 March 1969, which followed up on how four Vietnamese children were doing with their Norwegian families since the arrival in Norway the previous year. The article mentioned that many of the new families who were interested in adopting a Vietnamese child also had various concerns about skin color, racial discrimination, and the child standing out in Norwegian society. The families interviewed for the article were more relaxed about potential racial issues for their children.

The Berglund family, in particular, was quite dismissive of any potential issues that might arise in the future. They believed that their daughter would have died in Vietnam if she had not been brought to Norway, where she would also have much better life chances. Any future difficulties were, in their view, "not even worth talking about". They also argued that transracial adoptions could in fact help combat racism: "In associating with other people who look different from us, we have to ignore the outer differences and rather emphasize the inner qualities of man. The degree to which we practice this will cause our dealings with other races to be less affected by visible differences. In this way a cultural and racial amalgamation could take place". In contrast to this, the Skard family was more concerned about their daughter developing the wrong kind of racial identity. There had been discussions about starting an association for adoptive parents of Vietnamese children, but the Skard family was not

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<sup>19</sup> D/L0003—Korrespondance mellem KSA og Justisdep. 6.3.69 & 17.2.69.

<sup>20</sup> RA/S-6794/D/Da/Dad/L3652/0005—Gjenpart brev til KSA fra Sosialdep. 20.2.69.

<sup>21</sup> D/L0003—Breve til KSA fra Sosialdep. 26.11.69-30.5.69-20.2.69.

<sup>22</sup> 72 vietnamesiske adoptivbarn. (21 October 1968). *Aftenposten*, 9.

interested in joining: “We would be deliberately creating a minority group. That would be a disservice to our child’s long-term interests. Through such an association the children would come to know each other. They would seek each other’s company to a much higher degree than necessary. They would perhaps even neglect the companionship of their more natural comrades. We have adopted Cecille as our daughter nothing more than that”<sup>23</sup>.

Nelson and Myong’s points about colorblindness in Denmark are largely applicable to Norway as well. Even though there was more overt concern about racial issues in Norway, these were quickly dismissed. The physical threat to the children’s lives in their home country marginalized any future racial issues, that might or might not confront them in Norway, to such a degree that they were “not even worth talking about”. To the extent that they had to talk about race, colorblindness was also thought to be the ideal response. Transracial adoptions could teach society not to see race and ignore outward differences. The children could also be absorbed into Norwegian culture so completely that they would just be the same as everyone else, as long as they were prevented from seeing other children that could remind it of their difference. In this regard, white Scandinavian adoptive families were perhaps not that different from white American ones who, according to Winslow, also embraced colorblindness and consequently “... were reinforcing white privilege while denying the realities of racism. The exoticism bound up in adopting a foreign child heightened the appeal of international adoption without motivating adoptive parents to consider their own racial identity” (Winslow 2017, p. 10).

### 7.3. The Aftermath

Torbjørn Jelstad’s reply regarding the concerns raised by the Social Ministry came in the beginning of January 1970. He continued to defend the efforts by himself and the KSA to conduct more adoptions. He believed that the ongoing adoption cases would be resolved soon and that there was no reason for couples in Norway to delay the application process for approval as adoptive parents by the Norwegian authorities. Indeed, Jelstad wanted to organize a new transport in 1970. He also dismissed the critique from the South Vietnamese Prime Minister the year before, as he had been replaced, and the new Minister was more positive towards foreign adoptions. Jelstad ended the letter with a request for the Ministry to process adoption applications by the Norwegian families quickly, so they could know if they were eligible or not as soon as possible<sup>24</sup>.

This more or less set the tone for the correspondence between Jelstad and the Norwegian authorities for the rest of the year and well into 1971. The Social Ministry continued to deny Jelstad’s repeated requests to arrange more adoptions from Vietnam and grew steadily more exasperated about his constant efforts to do so. Ministry officials found it particularly indefensible that the KSA continued to sign up Norwegian couples for adoption, as they were not only led to believe falsely that they could adopt a Vietnamese child, but also had expenses imposed on them by the association<sup>25</sup>. For his part, Jelstad ignored the critique from the Social Ministry and told his followers and the families that had signed up for Vietnamese adoptions that another transport of children was imminent. They need only wait for the Norwegian authorities to come to their senses<sup>26</sup>.

On 17 July 1971, Jelstad announced that he was travelling to Vietnam for the purpose of bringing back eight children for six Norwegian families who were prepared to foster them until their adoption cases were concluded<sup>27</sup>. On 26 July, the Social Ministry issued a string of letters to Torbjørn Jelstad and the Norwegian families. The Ministry warned Jelstad that he was acting in violation of Norwegian child protection law and risked fines or time in jail. The families were told that the Ministry would

<sup>23</sup> Tømmerbakk, B. (1 March 1969). Adopsjonen har reddet dem. *Morgenbladet*, 9.

<sup>24</sup> D/L0003—Brev til Sosialdep. fra KSA 4.1.70.

<sup>25</sup> D/L0003—Brev til KSA fra Sosialdep. 29.4.70.

<sup>26</sup> D/L0003—Nyhedsbrev til adoptivforeldre fra KSA 15.6.70.

<sup>27</sup> D/L0003—Brev til Justisdep. fra Torbjørn Jelstad 16.7.71.

not allow Torbjørn Jelstad to bring children from Vietnam to Norway for the purpose of adoption, and that they could instead contact Norsk Koreaforening, who had permission to adopt children from South Korea<sup>28</sup>. Jelstad returned to Norway on 29 August 1971 with ten Vietnamese children. According to a police report from that day, the children were brought illegally to Norway, as they did not have entry visas, and were to remain at the national hospital until their formal removal from Norway could be arranged<sup>29</sup>. According to the 2014 NRK article, the ten children were never sent back due to the massive media coverage that followed. One of the children unfortunately passed away due to heart failure a week after arriving in Norway, and Jelstad sent another letter in September to inform the orphanage about her death as well as request a replacement for the affected Norwegian family<sup>30</sup>. Torbjørn Jelstad received a fine for violating the child protection law, which he paid in 1972. He thought it was outrageous that he was being fined but felt absolutely no remorse or doubt about his actions<sup>31</sup>. Jelstad was also banned from working with adoptions ever again. This did not really deter him, though, and he continued to advise and assist families who wanted to adopt Vietnamese children until the fall of Saigon in 1975 put a stop to his involvement with transnational adoption.

It was also in 1975 that the Social Ministry began exploring better ways to regulate foreign adoptions. In the Ministry's first report on the issue, Torbjørn Jelstad was mentioned by name as the person responsible for previous large-scale illegal adoptions to Norway from Vietnam. The report also mentioned that there had been disagreements and internal conflicts between the Social and Justice Ministries in the handling of the Vietnamese adoption cases. In the view of the Social Ministry, the Justice Ministry had been much too "liberal" in allowing people to conduct foreign adoptions on their own instead of requiring them to work through a legitimate organization. This had not only led them into the arms of people like Jelstad, but also risked creating private adoption networks that operated outside the authorities' control. The report concluded that the main issue was that the regulation of foreign adoption was effectively split between the two ministries, who handled cases contrary to each other and did not communicate well. The report recommended, therefore, the creation of a dedicated cross-ministerial body that could properly regulate foreign adoptions to Norway<sup>32</sup>. This body was created on 26 May 1978 as "Rådet for Internasjonale Adopsjoner" (Council for International Adoptions), which was Norway's first regulatory body for transnational adoptions<sup>33</sup>.

## 8. Discussion: The Competing Arguments of Humanitarianism and Child Welfare

Lindgren has mentioned that in the case of Sweden, many of the people who facilitated transnational adoption during the 1960s and 1970s used terms such as 'savior mentality', 'pioneer spirit', and 'popular movement' in order to describe what lay behind their engagement and drive. There was a sense that transnational adoption was something "that had to be done" in order to save as many children as possible and make the world a better, more inclusive, place (Lindgren 2010, p. 51). Tytte Botfeldt and Torbjørn Jelstad expressed similar sentiments.

Botfeldt stated multiple times that her utter dedication to the adoption of destitute children from abroad, especially those with physical disabilities, was the main driving force behind her work with transnational adoptions. In her memoir, a persistent sense of adventure and unbridled excitement can also be detected behind her single-minded drive to promote transnational adoptions. She argued that adoption was the only ethical way of having children and that the adoption of foreign children represented a comprehensive solution to the issue of global child poverty. She was particularly fond of what she called the "recycling" aspect of transnational adoption. Unwanted children from poor third

<sup>28</sup> D/L0003—Breve fra Sosialdep. & Utlendingskontoret ang. adopsjon av Syd-Viet barn 26.7.71 & 22.4.71.

<sup>29</sup> D/L0003—Asker og Bærum Politikammer 29.8.71.

<sup>30</sup> D/L0003—Brev til Pere Olivier Hau fra Torbjørn Jelstad 23.9.71.

<sup>31</sup> D/L0003—Brev til Asker og Bærum Politikammer fra Torbjørn Jelstad 19.9.72.

<sup>32</sup> RA/S-3454/1/D/Da/L0016/0003—Problemnotat Om Adopsjon Av Utenlandske Barn 22.9.75.

<sup>33</sup> Pressemelding om opprettelse av rådet for internasjonale adopsjoner 26.5.78.

world countries, who were otherwise doomed to waste away, were granted a second chance at life with Danish families. This alone, in her view, justified all potential physical or mental risks for the foreign child in connection with their adoption to Denmark (Madsen 1983, p. 26).

In Torbjørn Jelstad's case, he consistently stressed the urgent need to aid the children of war-torn Vietnam in his correspondence with the Norwegian authorities. To quote Jelstad: "It is too late to put out a fire once the house has burned down. The committee's project in 1968 was but a small drop, however it is undeniable that many human lives were saved"<sup>34</sup>. Formal and practical difficulties were not valid objections to the adoption of Vietnamese children, who needed help here and now in the view of Jelstad. He was therefore incredulous at the Social Ministry's persistent resistance to his desire to arrange more adoptions, since his actions were purely motivated out of the apolitical desire to help desperate children in need<sup>35</sup>. Jelstad's confrontational interactions with the Norwegian authorities on this issue, as well as his publicized law violations, ensured though that he was officially banned from participating in transnational adoptions. His actions were still influential in shaping the international adoption system in Norway. Arguably, he forced the Norwegian government to bring it into being in order to provide a more legitimate and regulated alternative for prospective adoptive parents.

The response of the Danish and Norwegian authorities to the emergence of transnational adoption was more ambivalent. As has been shown, the authorities were consistently wrongfooted and outmaneuvered by Botfeldt's and Jelstad's actions, but were also unwilling to take decisive action against them. The lack of serious sanctions for their illegal activities can be explained by the wide public support for the adoptions that they arranged. However, even the authorities themselves were never opposed outright to the idea of adopting children from abroad, as was directly stated by the Norwegian Social Ministry. In January 1971, officials from the Social Ministry explained to Jelstad that they did not principally oppose the adoption of children from other countries to Norway and referenced the permits given to KSA in 1968 as proof of this. However, they simply did not believe that Jelstad and his associates were capable of conducting adoptions in a professional and ethical manner<sup>36</sup>.

In the case of Denmark, the issue of when the authorities knew about these adoptions is of less interest to this article than the fact that there was never any serious consideration of putting a stop to them, returning the children or punishing those who brought them across the border. The recommendations for the new adoption scheme in the committee report from 28 May 1964 were founded on the committee members' fundamental conviction that the government could not prevent Danish couples from going abroad on their own and bringing children back with them to Denmark. Representatives from the institutions in charge of domestic adoptions also strongly advised against removing children from their Danish families, even if they had been brought illegally into the country, in all but the direst of circumstances. Mødrehjælpen explained, that they were very averse to subject not only the child but also the adoptive parents, to the trauma of being removed from the adoptive family and potentially sent back to their home countries. On the other hand, the association also believed that the adoption of foreign children was much too serious to be left to random chance, and was almost equally averse to approve adoptions, where there had had been no pre-examination of the parents. This left them in a predicament, though, when confronted with cases where families had pursued private transnational adoptions on their own and already brought children into their homes, which were the majority of cases at the time<sup>37</sup>. As mentioned earlier, Mødrehjælpen was

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<sup>34</sup> RA/S-6794/D/Da/Dad/L3652/0005—Gjenpart brev til KSA fra Sosialdep. 20.2.69.

<sup>35</sup> In the 2014 NRK article, the Norwegian historian James Godboldt argued though that Jelstad and the KSA also used the adoptions to further their political objectives. At the time the KSA was losing public support for their primary goal, namely to support the government in Saigon and the US war. The Vietnamese adoptions gave them a different, more humanitarian profile that was not only much less controversial to the general public but also generated popular support for Torbjørn Jelstad.

<sup>36</sup> D/L0003—Brev til KSA fra Sosialdep. 21.1.71.

<sup>37</sup> Beretning fra adoptionsudvalget vedrørende spørgsmålet om ændrede retningslinjer for behandling af sager om udenlandske børn. pp. 11, 16–17.



essentially powerless in that situation and found themselves being forced to approve unregulated private transnational adoptions in 1965, despite their deep misgivings. In effect, the association could only hope that more people would go through the regulated channel established with Glemte Børn rather than pursue transnational adoption on their own in the future.

This can be interpreted as a confrontation between the competing paradigms of child welfare and humanitarianism. What is significant is how the child welfare paradigm, as represented by child welfare officials, had to give way, or at least give concessions, to the humanitarian one, as represented by Tytte Botfeldt and Torbjørn Jelstad. Even in welfare systems that are traditionally considered to be more regulated and comprehensive than the U.S. system, the state was forced both to respond to families' great desire for adopted children, which was strong enough that couples were willing to transcend legal, national, and racial borders, and also accommodate them largely on their own terms.

## 9. Conclusions

The transition from domestic to transnational adoptions was completed during the 1970s where the yearly rate of adoption rose rapidly again in Denmark, Sweden, and Norway, but where the majority of children now came from abroad, being mostly of East Asian origin (Andresen et al. 2011, p. 245). The rate of transnational adoptions in Scandinavia would continue to increase rapidly during the rest of the 20th century and beyond, reaching a highpoint in the early 2000s. Since then, the rates of transnational adoptions have fallen massively, with Norway reporting that in 2016 only 126 adoptions had taken place that year compared to almost 800 in 2002<sup>38</sup>, while Sweden saw a fall from around 750 adoptions in 2009 to 144 in 2019<sup>39</sup>. In Denmark, the last remaining transnational adoption agency DIA (Danish International Adoption) closed down its adoption services in 2019, due to financial issues stemming from a drastic decrease in the rates of adoptions over the last 10 years<sup>40</sup>. This closely mirrors the global trend, where statistics show that the annual rate of transnational adoptions in the world rose dramatically from around 31,000 in 1998 to a little over 45,000 in 2004. Since the peak in 2004, however, there has been a sharp decline in transnational adoptions around the world, having already dropped by more than half to around 16,000 in 2013 (Selman in Ballard et al. 2015, pp. 9, 15–16). With the end of transnational adoption seemingly in sight, the time is ripe for historical appraisals of its beginning and the unique public–private relationship behind it.

Transnational adoptions to Denmark and Norway present a clear example of where private associations and individuals played a decisive role in shaping the institutions governing transnational adoption. This was a complicated and often obstinate relationship marked by close cooperation as well as fierce opposition with both the state and each other. In this process, state actors frequently appeared overwhelmed and confused as to what role they should play in the face of a new form of family formation that stretched across borders and race. For the adoptive parents and the people who assisted them, transnational adoptions were both humanitarian acts of rescue and the fulfillment of a fundamental human need for family, which they also believed, especially in the case of Sweden, that the state had a responsibility towards addressing.

The Danish, Swedish, and Norwegian authorities were more ambivalent, and did not greet the emergence of transnational adoption with the same enthusiasm as in the USA, where the new multiracial families were hailed as examples of American benevolence and tolerance by U.S. lawmakers. The public perception of, and support for, transnational adoption as a form of global child relief work, meant, though, that it was both practically and politically impossible to outright ban them. Focus was

<sup>38</sup> Humberst, K. (2 June 2017). Aldri før er det gjennomført færre adopsjoner i Norge. *Aftenposten*. <https://www.aftenposten.no/familieogoppvekst/i/na9p5B/aldri-foer-er-det-gjennomfoert-faerre-adopsjoner-i-norge>.

<sup>39</sup> T.T. (25 December 2019). Bättre ekonomi leder till färre adoptioner. *Sydsvenskan*. <https://www.sydsvenskan.se/2019-12-25/farre-adoptioner-till-sverige>.

<sup>40</sup> Ingvorsen, E. S. (5 December 2019). Slut med adoption fra udlandet: Dansk adoptionsbureau i store økonomiske problemer. *DR*. <https://www.dr.dk/nyheder/indland/slut-med-adoption-fra-udlandet-dansk-adoptionsbureau-i-store-oekonomiske-problemer>.

instead on finding pragmatic solutions that could quickly bring these adoptions under government oversight and institutionalize the process, so that parents could adopt children from abroad legally. This frequently made the authorities dependent on the same individuals and associations that had originally assisted families with carrying out private, unregulated adoptions, though, as these were the only ones who had the necessary experience and international contacts in sending countries. Their citizens' great "need for children" compelled the authorities to accept practices that were primarily in the interests of the adults who wanted to adopt, even as they signed onto treaties such as the European Convention on the Adoption of Children, which stated that adoptions, both domestic and transnational, could only be granted if they were determined to be in the child's best interest.

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## References

- Andresen, Astri, Olöf Gardarsdóttir, Monika Janfelt, Cecilia Lindgren, Pirjo Markkola, and Ingrid Söderlind. 2011. *Barnen Och Välfärdspolitik: Nordiska Barndomar 1900–2000*. Stockholm: Dialogos Förlag.
- Baldwin, Peter. 1990. *The Politics of Social Solidarity: Class Bases of the European Welfare State, 1875–1975*. Cambridge: Cambridge University Press.
- Ballard, Robert L., Naomi H. Goodno, Robert F. Cochran, and Jay Milbrandt. 2015. *The Intercountry Adoption Debate: Dialogues across Disciplines*. Newcastle upon Tyne: Cambridge Scholars Publishing.
- Bergman, Helena, Maria Eriksson, and Roger Klinth. 2011. *Föräldraskapets Politik: Från 1900-Till 2000-Tal*. Stockholm: Dialogos.
- Capuano, Christophe. 2019. *Vichy et la Famille: Réalités et Faux-Semblants d'une Politique Publique*. Rennes: Presses Universitaires de Rennes.
- Christiansen, Niels Finn. 2006. *The Nordic Model of Welfare, a Historical Reappraisal*. Copenhagen: Museum Tusulanum.
- Esping-Andersen, Gosta. 2013. *The Three Worlds of Welfare Capitalism*. Oxford: Polity Press, Available online: <http://ebookcentral.proquest.com/lib/eui/detail.action?docID=1584052> (accessed on 19 February 2019).
- Fehrenbach, Heide. 2018. *Race after Hitler: Black Occupation Children in Postwar Germany and America*. Princeton: Princeton University Press.
- Flyvbjerg, Bent. 2006. Five Misunderstandings about Case-Study Research. *Qualitative Inquiry* 12: 219–45. [[CrossRef](#)]
- Ginsborg, Paul. 2014. *Family Politics: Domestic Life, Devastation and Survival, 1900–1950*. London: Yale University Press.
- Haaest, Erik. 2007. *Anna: Hipochefens Enke*. Århus: Documentas.
- Ingvaldsen, Siri. 1996. *Rette Foreldre og Virkelige Barn: Norsk Adopsjonslovgivning 1917–1986*. Bergen: Hovudoppgåve i Historie Universitetet i Bergen.
- Kettunen, Pauli, Klaus Petersen, Stein Kuhnle, and Kees van Kesbergen. 2011. *Beyond Welfare State Models: Transnational Historical Perspectives on Social Policy*. Cheltenham: Edward Elgar.
- Linde, Amalie, Mathilde Hørmand-Pallesen, and Amalie Kønigsfeldt. 2013. *Børneimporten: Et Mørkt Kapitel i Fortællingen om Udenlandsk Adoption*. Copenhagen: Kristeligt Dagblad.
- Lindgren, Cecilia. 2006. *En Riktig Familj: Adoption, Föräldraskap Och Barnets Bästa 1917–1975*. Stockholm: Carlsson Bokförlag.
- Lindgren, Cecilia. 2010. *Internationell Adoption i Sverige: Politik Och Praktik Från Sextiotial till Nittiotial*. Stockholm: Myndigheten för Internationella Adoptionsfrågor.
- Madsen, Monna S. 1983. *Hjerteligst i Hast, Tytte*. Karrebæksmind: Jessen's Forlag.
- Melosh, Barbara. 2002. *Strangers and Kin: The American Way of Adoption*. Cambridge: Harvard University Press.
- Oppenheimer, Melanie, and Nicholas Deakin. 2011. *Beveridge and Voluntary Action in Britain and the Wider British World*. Manchester: Manchester University Press.
- Page, Robert M., and Richard Silburn. 1999. *British Social Welfare in the Twentieth Century*. London: Macmillan International Higher Education.

- Rosanvallon, Pierre. 2000. *The New Social Question: Rethinking the Welfare State*. Princeton: Princeton University Press.
- Selman, Peter. 2010. Intercountry Adoption in Europe 1998–2008: Patterns, Trends and Issues. *Adoption & Fostering* 34: 4–19. [[CrossRef](#)]
- Timmins, Nicholas. 2017. *The Five Giants [New Edition]: A Biography of the Welfare State*. London: HarperCollins UK.
- Wills, Jenny Heijun, Tobias Hubinette, and Indigo Willing. 2020. *Adoption and Multiculturalism: Europe, the Americas, and the Pacific*. Ann Arbor: University of Michigan Press.
- Winslow, Rachel Rains. 2017. *The Best Possible Immigrants: International Adoption and the American Family*, 1st ed. Philadelphia: University of Pennsylvania Press.
- Zelizer, Viviana A. 1994. *Pricing the Priceless Child: The Changing Social Value of Children*. Princeton: Princeton University Press.

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