Table 1. Comparative Table of Conditions for the Application of Surrogacy

Criterion	Greece [18]	Ukraine [19-21]	Italy [22]	Denmark [23]
Legal Status	Only altruistic surrogacy is permitted	Both altruistic and commercial surrogacy are permitted	Surrogacy is completely prohibited	Recognition of parental relationships arising from surrogacy is permitted (with a distinction between domestic and cross-border cases)
Compensation of the Surrogate	Remuneration is prohibited. Only the reimbursement of expenses, compensation for any positive damage damage due to absence from work, and compensation for physical strain are permitted	Both remuneration and the reimbursement of reasonable expenses are permitted	Remuneration is prohibited	Any form of remuneration is prohibited, including compensation for loss of earnings
Genetic Material	A genetic link with the intended parents is not required. The use of the oocyte of the gestational carrier is prohibited	A genetic link with at least one intended parent is required	Not applicable	A genetic link with at least one intended parent is required
Surrogacy Agreement	A written agreement is required	A written agreement executed in notarial form is required	Not applicable	A written agreement is required
Medical Inability to Carry Pregnancy of the Intended Mother	A medical inability to carry pregnancy is required (gender-based inability to carry pregnancy is excluded)	A medical indication for the use of the method is required	Not applicable	The requirement of a medical inability to carry a pregnancy is not expressly provided for in the 2025 legislative reform
Eligibility of the Gestational Carrier	Must be between 25 and 45 years of age, must not have undergone more than two cesarean sections (as provided by the National Authority for Medically Assisted Reproduction), and must not be infected with HIV, hepatitis B or C, or syphilis	Must be an adult with capacity to perform legal acts, must have previously given birth to a healthy child, and must not present any medical contraindications to pregnancy	Not applicable	Must be at least 25 years of age, must have already given birth to at least one child, and must not be subject to judicial support
Residence of the Parties	The intended mother and the gestational carrier must have their residence in Greece	Where the intended parents are foreign nationals, they must declare a temporary place of residence until the issuance of the necessary documents is completed	Not applicable	For domestic arrangements, the gestational carrier must have her residence in Denmark
Persons Eligible to Access Surrogacy	Permitted for women (married or unmarried). Not permitted for men or same-sex male couples	Permitted only for married heterosexual couples	Not applicable	Permitted for heterosexual and same-sex couples, as well as for individual persons

Table 1. Continued.

Origin of the Oocyte	The oocyte may originate from the intended mother or a third-party donor	The oocyte must not originate from the gestational carrier	Not applicable	The origin of the oocyte is not expressly specified in the 2025 legislative reform
Judicial Authorization	Prior judicial authorization is required before embryo transfer, which becomes effective once the decision granting it becomes irrevocable	Judicial authorization is not required. A written agreement executed in notarial form is required prior to embryo transfer	Not applicable	Approval by the Family Law Agency is required prior to embryo transfer
Establishment of the Parental Relationship	The intended parents are considered the legal parents from birth	The intended parents are recognized as the parents from birth, subject to the legal provisions requiring the consent of the gestational carrier	Not applicable	The intended parents are recognized as the parents, provided that the legal requirements are met and the agreement has been approved by the Family Law Agency
Application of Domestic and Cross-Border Surrogacy	Domestic surrogacy is permitted. As regards cross-border surrogacy, parental relationships established abroad are recognized, even where they are not provided for under Greek law	Surrogacy is permitted also for foreign married heterosexual couples	Not applicable	Parental relationships are recognized in both domestic and cross-border surrogacy arrangements