



Submission to the Standing Committee on Public Safety and National Security

Re: Bill S-210: An Act to restrict young persons' online access to sexually explicit material

Our Position:

The Centre for Gender and Sexual Health Equity (CGSHE) and West Coast LEAF reiterate the concerns, research, and calls to action we have previously shared with the Standing Senate Committee on Legal and Constitutional Affairs during their study of Bill S-203 in 2022. We urge the Standing Committee on Public Safety and National Security ("Standing Committee") to reject Bill S-210 in favour of a careful and considered approach to young peoples' sexual health that incorporates sexual health education, engages with international standards and observations about age-verification, and importantly consults meaningfully with online sex workers who are directly impacted by the proposed legislation.

When deliberating laws that would impact online sexual material, we emphasize the importance of engaging with and hearing from sex workers themselves. Sex workers are experts in navigating sexually explicit materials in the online sphere and are directly impacted by Bill S-210. Considerations about sex workers' occupational health and safety must be included in the Standing Committee's deliberations about legislative and policy responses to online sexual material and young people's healthy sexuality.

A significant body of peer-reviewed empirical evidence on sex work policy unequivocally shows that punitive and restrictive regulations and policies undermine sex workers' occupational health and safety and serve only to push sex work underground. Regulatory models based on prohibition and client criminalization are not only ineffective in curbing trafficking and sexual violence, they also undermine sex workers' ability to access vital occupational health and safety protections (1-2). Digital environments have been especially identified as critical to sex workers' safety and autonomy (13-17). Deliberations about regulating online sexual material that fail to include or address sex workers' realities have the potential to create serious harms to sex workers' occupational health and safety and at the same time, are unlikely to reach the stated goals of protecting young people (1-2).

Through West Coast LEAF's monitoring of the gender-based impact of COVID-19 and preliminary empirical findings from the AESHA survey collected during the pandemic we have learned that the importance of digital environments for sex workers has only increased as many sex workers have had to pivot to or continue working online to support their economic, health and safety needs in the face of financial devastation excluded from the financial supports that had been rolled out by federal or provincial governments as relief measures during the pandemic (3,37).

The Research:

Recent Science, Policy & Legal Developments

Criminalization, policing, and punitive regulation are key drivers that continue to undermine sex workers' human and labour rights, including their occupational health and safety (4-6). In 2013, the Supreme Court of Canada (SCC) unanimously ruled unconstitutional Criminal Code provisions that criminalized some activities that denied sex workers access to safety in *Canada (Attorney General) v Bedford*, 2013 SCC 72. However, certain aspects of sex work were again criminalized under the new "end demand" laws implemented in 2014, including the criminalization of the purchase of sex. Qualitative and epidemiological research shows that the current end-demand sex work laws reproduce harms to workers, including increased risk of violence and barriers to accessing justice and health and labour protections (7-12).

Further punitive restrictions to online sex work have the potential to compromise digital work environments that have been shown to be safer for sex workers (13-17). Online sex work and solicitation is overall a safer environment for workers when compared to street-based sex work and serves as a desired space in which many workers in the sex industry earn their livelihoods (18-19).

In a context where most aspects of sex work are already criminalized, but where selling sex itself is legal in private spaces per new end-demand laws, it is imperative that sex workers' occupational health and safety is considered when deliberating about online sex workspaces. To avoid further jeopardy to the online workplaces of sex workers, sex workers themselves must be consulted on decisions about how to regulate websites that host sexually explicit content. Indeed, sex workers are experts and can provide important insights on access, protection of privacy and consent. Moreover, proactively hearing from and responding to the concerns of sex workers on the very issues that impact their lives and livelihoods is essential to promoting access to justice for this population, recognized as facing particular stigma and challenges in accessing legal remedies and safe workspaces (8, 20) (see also, *Canada (Attorney General) v Downtown Eastside Sex Workers United Against Violence Society*, 2012 SCC 45 (21)).

The evidence on punitive approaches to sex work

An Evaluation of Sex Workers' Health Access (AESHA) is a 14-year longitudinal community-based research project housed at the Centre for Gender and Sexual Health

Equity (CGSHE), which is affiliated with the University of British Columbia. AESHA includes over 900 sex workers across diverse work environments. AESHA's research adds to the growing body of evidence globally that highlights how current approaches criminalizing sex work and the punitive regulation and censorship of sexually explicit materials harm sex workers by increasing their risk of violence, jeopardizing occupational health and safety, and reducing income security.

- Harms of sex work criminalization. AESHA's research has highlighted the pivotal role of criminalization, policing and surveillance in shaping the health, safety and human rights of sex workers (7-10). Criminalization and policing disproportionately affect target marginalized populations of sex workers, including workers who are racialized and Indigenous, im/migrant workers, trans sex workers and sex workers who use drugs (9-12), and are often determined by the socio-spatial features of sex work venues and locations (22-24). Moreover, Canada's end demand laws, including the criminalization and surveillance of clients, perpetuate and exacerbate existing harms for sex workers, including elevated risk of violence, barriers to accessing justice and continued stigma and fear that prevent access to safe, secure housing, healthcare, and social protections (26-30). These harms disproportionately impact racialized, im/migrant sex workers, who are viewed categorically as victims of exploitation, but at the same time seen as unworthy of occupational protections (25-30).
- Online access is necessary for sex workers' safety, agency, and security. Digital tools used for solicitation, content distribution, client communication and violence reporting support sex workers' safety, by allowing for improved client screening, increased control and worker autonomy (13-15). Online censorship policies, punitive laws and increased surveillance jeopardize sex workers' access to these occupational health and safety strategies. Rather than increased punitive regulation AESHA's research demonstrates the need to remove barriers to access online spaces for sex work and access to digital technologies (13-15).
- Decriminalization and destigmatization of sex work and porn, not heightened punitive regulation, is necessary for safer online spaces. Additional regulation and censorship of online spaces where sex workers operate will further hinder sex workers' ability to work in safe conditions and is more likely to foster exploitation by pushing sex work and pornography further 'underground'. The peer-reviewed evidence indicates that decriminalization, and sex worker-led harm reduction strategies, rather than regulation or punitive approaches, are most effective in addressing trafficking, exploitation and violence in the context of sex work (31-32).

Alternatives to censorship: Best Practices from Research and Upholding the Rights of Young People to Access Comprehensive to Sexual Education

In a time when the internet plays such a large role in how young people find information, the importance of supporting young people to navigate and develop a healthy relationship with their sexuality is critical. To address this need, we call on the federal government to uphold their human rights obligations, as outlined in [International Covenant on Economic, Social and Cultural Rights](#), the [Convention on the Elimination](#)

[of Discrimination Against Women](#), and the [Convention on the Rights of the Child](#), to ensure that young people have access to comprehensive sexual education. An approach that affirms healthy sexuality and supports sex education will be a more effective response to the harms that Bill S-210 purports to address. What is not needed is legislation that will at best be ineffectual and ill-conceived (and at worst, violate fundamental freedoms and privacy rights, along with harming the health, safety, wellbeing and rights of sex workers across the country).

As emphasized by Action Canada for Sexual Health and Education, “[g]overnments are required to uphold all people’s rights to health, well-being, and equality. This requires the delivery of unbiased, scientifically accurate sexuality education.”(40) Research shows that when young people are asked about what would support them in navigating sexually explicit material online, they want the ability to access comprehensive, destigmatizing education supports and resources where they can ask questions, reflect on their own experiences and not be isolated (41-43). As Dawson, Gabhainn and MacNeela (2020) explain, “[o]ur findings suggest that objectives for porn literacy interventions should center on reducing shame regarding pornography engagement and improving critical thinking skills related to the following sexual health topics: increasing acceptance of and reducing stigma around pornography; sexual consent and communication; body image comparisons; the realities of sex in the real world; sexual pleasure and orgasm; physical safety; sexual and gender based violence; the role of pornography as an educator; and the sexualizing and fetishizing of gay and transgender communities” (42).

These findings are supported by the experience of other similar jurisdictions. Australia has relatively recent experience in studying the possibility of mandating an age verification regime. Australia also struck a government committee to study the viability of online age verification. The Australian committee recommended that their eSafety Commissioner develop a roadmap for implementing a regime of mandatory age verification for online pornography. The Office of the eSafety Commissioner carried out extensive research over several years, conducted comprehensive consultations with diverse and targeted stakeholders on the issue, the results of which available [online](#). The eSafety Commission ultimately found it was premature to mandate age assurance or age verification due to concerns and outstanding questions about reliability and effectiveness, challenges in implementation and impacts on privacy and security rights (43). The Australian Government accepted these findings in August 2023, and looked to other strategies, including support for recommendations that the Government fund new, evidence-based resources about online pornography for educators, parents and children, and engage in further work to identify barriers to the uptake of technologies such as internet filters and parental controls (44).

Canada should look to Australia’s recent experience in studying age verification as the Australian experience offers relevant lessons and recommendations derived from a strong research and evidence-based approach to law and policy design (43).

Policy Implications:

While ostensibly being directed at regulating young people's online access to "sexually explicit material", Bill S-210 will have broad, potentially unanticipated, and harmful impacts on the ability of sex workers to protect themselves in their online workspaces. The Bill would make any individual criminally liable for any instance in which an underage user is able to obtain sexual content they have created. The scope of this criminalization is vast and directly engages the rights and interests of sex workers who work online "for commercial purposes." Sex workers would be called upon to verify the legal adult age of every user through an as-yet unidentified age-verification method, the effectiveness of which has been called into question, and then store that data for an unknown period of time, with no further guidance with respect to data privacy (33).

Despite being frequently positioned as serving to protect women and young people, AESHA's findings indicate that criminalization and policing undermine sex workers' occupational health and safety. Similarly, the current broad discussion to further regulate online pornography fuels stigma against sex workers and violates sex workers' human rights by exacerbating risk for sex workers and communities already vulnerable to violence and exploitation. In other jurisdictions, such as the United States, further criminalization and regulation of online sex work has been found to be ineffective in discouraging trafficking or sexual violence but has proved to harm sex workers and pushed the industry further underground and outside the parameters of safe(r) online spaces (16, 17, 34). As well, recent attempts in the US to introduce online age verification have been met with backlash from labour groups representing adult performers and sex workers and have been deemed unconstitutional by State judges based on evidence brought forward by American Civil Liberties Union (35,36).

In line with the recommendations made by international policy bodies such as the World Health Organization, UNAIDS and Amnesty International (37-39), the above outlined peer-reviewed empirical evidence demonstrate the negative impacts of criminalization and punitive regulation on sex workers' occupational health and safety. We urge the Standing Committee on Public Safety and National Security to refrain from further entrenching the criminalization of sex work, and instead make an evidence-based call to:

- Meaningfully consult with sex workers in any deliberations about online sexually explicit content;
- Collaborate and learn from sex educators who work with young people to explore safe and appropriate approaches to improving young people's digital literacy and understandings of healthy sexuality;
- Refrain from implementing further punitive restrictions to regulate online sex work environments.

About the AESHA Project at the CGSHE:

The Centre for Gender and Sexual Health Equity's AESHA Project is a 14-year longitudinal community-based research project that includes a quantitative cohort and qualitative/ethnographic arm. As part of the quantitative arm, AESHA operates a community-based prospective cohort of over 900 sex workers across diverse work environments. The qualitative arm is focused on documenting the lived experiences of sex workers of all genders, and third parties who provide services for sex workers (e.g. receptionists, venue managers, owners and security personnel). Over the past 5 years, the AESHA project focused on evaluating the impact of evolving legislative approaches to the regulation of sex work including the Canadian "end demand" laws (The Protection of Exploited Persons and Communities Act) on sex workers' health, safety, and human rights. This research has been shared in over 40 peer-reviewed articles including in the Lancet & BMJ and a recent report on the harms of end-demand legislation, which our team submitted to the federal Department of Justice and all MPs and Senators. AESHA is built on partnerships with SWUAV, SWAN, PACE, WISH, HIM/HUSTLE, Pivot, Canadian HIV/AIDS Legal Network, and the BCCDC.

About West Coast LEAF:

West Coast LEAF is dedicated to using the law as a strategy to work towards an equal and just society for all women and people who experience gender-based discrimination. Since our founding in 1985, we have helped bring about some of Canada's most important feminist victories for reproductive rights, workplace standards, fairness in family law, legal protections from sexual harassment, and more. In collaboration with community, West Coast LEAF uses litigation, law reform, and public legal education strategies to create social change. While we are focused on issues in British Columbia, we also take action in matters of national significance that are important to the equality and human rights of people in British Columbia. We aim to transform society by achieving access to healthcare; access to justice; economic security; freedom from gender-based violence; justice for those who are criminalized; and the right to parent.

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