

Written submission

To the Council of the city of Regina,

RE: Proposed Zoning Bylaw Amendment - Body Rub Parlours

I'm writing to express my concerns regarding the new amendments to regulate Body Rub establishments in your city. I'm a health researcher specializing in the occupational health and safety of sex workers, and I'm concerned that the amendment to relocate Body Rub establishments to industrial zones may increase sex workers' vulnerability to violence.

Canadian research evidence has shown that when sex work is confined to industrial areas, these locations create health and safety risks for workers. Industrial areas tend to be isolated and poorly lit, resulting in more opportunities for predators to commit violence against workers both at and en route to their workplaces. In addition to violence directed towards individual workers, the criminalized nature of sex work in Canada makes these establishments particularly vulnerable to robbery. Because third parties in sex work (e.g., Body Rub establishment owners and managers) are criminalized, few establishment owners will call police when faced with violence or assault in the venue, due to the risk of inviting criminal charges. Qualitative research has shown that violent aggressors target sex work establishments for robbery or assault precisely because they know that the venues will not contact authorities. I am further concerned that the loss of income associated with relocating such establishments may push sex workers - who may be economically vulnerable - to accept more risky clients that they may otherwise refuse (e.g. intoxicated and potentially violent clients), in the interests of recouping lost costs.

Evidence suggests that confining Body Rub establishments to particular zones in order to get a license can proliferate the number of establishments who choose to operate without a license in other zones. Concerns regarding client traffic and safety may prompt owners to pursue unlicensed alternatives (e.g., private apartments), which have been reported by sex workers to feel less safe. In addition, sex workers have raised concerns that it is in these unlicensed establishments that trafficking and exploitation are most likely to occur, as they operate outside municipal authority awareness. Given evidence that many sex workers prefer to work in licensed, street-front establishments for their own safety, there is concern that pushing sex work venues into isolated areas would undermine the safety of these licensed indoor spaces and simultaneously proliferate unlicensed and unmonitored venues where sex workers can be more vulnerable to coercion.

I strongly urge Council not to pass this amendment, in the interests of occupational health and safety for sex workers, and to instead work on alternatives to address community concerns by working in collaboration with Body Rub establishments. Sex workers have incentives to continue to keep their businesses viable, and would have an interest in working together with Council to find acceptable alternatives.

Thank you for your time and consideration on this issue.

Best regards,
Sylvia Machat

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