



Global Network of Sex Work Projects
Promoting Health and Human Rights

22nd September 2016

Dear CEDAW Committee Members

Draft update of General Recommendation No. 19

Regarding the consultation on the above draft we would like to submit the following brief comments.

The draft update of GR 19 appears to be a strong, clearly worded update and will help protect the human rights of sex workers.

NSWP's core values are based upon human rights principles, instruments and international law. **Sex workers are right holders like all other women and should be recognised as such.** Indeed we were pleased to find reaffirmation (*page 4, paragraph 11*) of article 2 of the Convention that 'discrimination against women is inextricably linked to other factors that affect their lives', and that 'criminalisation of prostitution' is again included in the list of those factors (*page 4, footnote 17*).

Criminalisation of sex work contributes to violence against sex workers – including violence perpetrated by state actors, human rights violations such as mandatory testing, stigma and discrimination in health services, and fear of seeking government-supported services. The criminalisation of sex work keeps governments and employers from making workplace health and safety for sex workers a priority.

CEDAW notes that states should "take all appropriate measures, including legislation, to suppress [...] exploitation of prostitution of women." It is important that this statement does not imply that all 'prostitution' is exploitative: rather, it means that where exploitation exists, it must be addressed. Overbroad anti-trafficking laws that are abused to criminalise sex work, and the conflation of sex work with trafficking, impact negatively on all sex workers. It is important that this update of GR 19 avoids doing this.

Kindest regards

A handwritten signature in black ink that reads "Ruth Morgan Thomas".

Ruth Morgan Thomas
Global Coordinator