



**Submission to the House of Commons  
Standing Committee on Justice and Human Rights:  
Review of the *Protection of Communities and Exploited Persons Act***

**February 2022**

**INTRODUCTION**

Butterfly (the Asian and Migrant Sex Workers Support Network) is a grassroots organization formed in 2014 by a dedicated group of sex workers, social workers, legal and health professionals, founded on the belief that migrants and sex workers are entitled to respect and human rights.<sup>1</sup> The Butterfly team and network provides crisis support and assists workers by providing services and programming, including support in accessing social, health and legal services (e.g. providing legal information, referrals, companionship during legal proceedings, and translation services); English classes; workshops on capacity building, health and safety, and legal rights; and translating information so workers can understand policies that directly affect them.

Butterfly is one of the main social supports for migrant sex workers in Ontario and beyond and has connected with more than 5,000 sex workers, the majority of whom are Asian and migrant workers. Few Butterfly participants have citizenship status, some have permanent resident status, but most are in precarious situations, e.g. no status, students, and refugees. The sex workers that Butterfly supports typically work in massage parlours, escort services, and also indoor settings, including in apartments, condos, and hotels. We also support workers in massage parlours who do not engage in sex work because these workers are also affected by discrimination and the criminalization of sex work.

On a regular basis, Butterfly is actively in touch with about 500 migrant sex workers. While Butterfly mainly operates in Toronto, we also have connections and provide support to migrant sex workers in other cities, particularly in Vancouver, Montreal, Saskatchewan, Winnipeg, and Manitoba. Butterfly typically works with cisgender women, as well as trans-identified and male-identified workers, most of whom are middle aged. In 2019, Butterfly conducted a needs assessment survey of Asian migrant sex workers in Toronto.<sup>2</sup> In this

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<sup>1</sup> We define migrants broadly as anyone with migrant experiences, including but not limited to immigrants, temporary residents, refugees, permanent residents, and other forms of status.

<sup>2</sup> “Beyond Tales of Trafficking: A Needs Assessment of Asian Migrant Sex Workers in Toronto”.

survey of 52 workers, ages ranged from 24-64, with 10% being 25-34, 35% being 35-44, 40% being 45-54, and the remaining 15% being over 55 years old.

Many Butterfly participants find sex work empowering and rewarding. Not only does it provide them with better income, it also permits them to have more flexible working hours. Butterfly participants have reported that they prefer sex work over jobs that they had in other industries, such as factories and restaurants. In addition, some Butterfly participants have reported that they have been able to escape abusive relationships by entering the sex industry, as it has provided them with greater financial independence. Other positive aspects of sex work reported include: the ability to help others; working with colleagues who speak their own languages; happiness and satisfaction; ability to integrate into Canadian society; and ability to expand social networks.<sup>3</sup>

## **IMPACTS OF THE *PROTECTION OF COMMUNITIES AND EXPLOITED PERSONS ACT (PCEPA)* ON MIGRANT SEX WORKERS**

### **Stigma and its intersection with unfounded stereotypes of Asian and migrant sex workers**

Because the *Protection of Communities and Exploited Persons Act (PCEPA)* conveys the message that sex work is immoral and wrong, the law perpetuates stigma associated with sex work. Due to the fear of criminalization and deportation as well as the stigma that migrant sex workers experience, Butterfly participants avoid disclosing their sex work as well as any personal identifying information in any context, including at medical appointments. It can be extremely difficult to access assistance if a person's involvement in sex work is disclosed; Butterfly participants have been rejected from supports like shelters and women's organizations because of their involvement in sex work, since these services do not provide access to support and resources unless sex workers commit to "exiting" the sex industry.

The effects of the criminal provisions also intersect with anti-Asian racism, which often involves two dual stereotypes. On the one hand, there is the assumption that Asian women are naïve, passive, cannot consent to sex work, and are therefore victims of trafficking. This narrative suggests that Asian and migrant workers need to be "saved," thus denying them of agency. Another common stereotype that Butterfly has observed is that Asian and migrant sex workers are part of exploitative organized crime rings; these stereotypes are deployed in the media, in government meetings, and by non-government organizations. Butterfly members have themselves been framed as trafficked victims or part of exploitative organized crime, despite neither being true. These beliefs justify police raids shutting down massage parlours, which are predominately Asian-operated, or arresting and charging all third parties associated with Asian sex workers.

On the other hand, Asian women are fetishized and viewed as sexualized bodies that are sinful, immoral, and illegal. These attitudes, which are bolstered by the criminalization of

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<sup>3</sup> Butterfly, "Butterfly Voices," 2015.

sex work, fuel anti-Asian hate and violence against Asian sex workers. An example includes the recent shootings in Atlanta, where six Asian women working in massage parlours were murdered.

Since 2014, we have learned of the murder of 7 Asian workers who worked in massage parlours and the sex industry in Toronto, York Region, and Peel Region. Their murders are tied to the criminalization of sex work, as Asian migrant sex workers avoid detection from police and others for fear of negative criminal and immigration consequences. They are consequently isolated and targeted for violence. As discussed below, due to the criminalization of sex work, Butterfly participants have often reported that they are not able to seek redress for violence and other abuses. Since it is commonly known that migrant sex workers are less likely to report incidents to the police, service providers and others, aggressors have taken advantage

### **Prohibition on advertising**

After the PCEPA came into force, it became more difficult for sex workers to advertise their work. Prior to the entry into force of the new provisions, migrant workers were able to find people to assist with advertisements more easily. Notably, the cost of advertisements was lower and some services were free. Friends, family, and clients would assist with posting advertisements, including in newspapers and online. This is particularly important for migrant workers who are more likely to face barriers with respect to language and access to technology. However, now that it is a criminal offence to assist sex workers with advertising, people are less likely to help.

After the prohibition on advertising came into force, many websites were shut down. For services that did remain, policies became more restricted, and fees were either introduced and/or increased. Some websites even introduced proof of identification requirements, which poses particular challenges for migrant workers without status.

Not only has the prohibition against advertising made it more difficult for sex workers to find places to advertise, sex workers have reported to Butterfly that they have less control over the content of their postings. For example, prior to the prohibition on advertising, sex workers could describe themselves, the services offered and not offered, as well as price. But since advertising sexual services is now illegal, postings need to be vague. This creates barriers to consent. Butterfly participants reported that misunderstandings with clients have become more frequent, as it is not clear from the outset what services are and are not available.

For many sex workers, advertising is essential and it is important to be able to set one's terms and conditions upfront and to establish one's business. Clear communication through advertising also gives sex workers greater control over their own safety. For example, a migrant sex worker with language barriers might employ professional writers, family, friends, or clients to assist them in articulating their message, thereby overcoming language barriers. However, the current prohibition on advertising decreases the number of people who are available to assist. For those who are willing to take the risk, they often try to minimize the amount of communication with the worker about the nature of the

advertisement. Therefore, Butterfly participants have reported that they have less control over the message that is ultimately posted in the ad, and that this impacts their ability to set terms, screen clients, and ultimately, give consent.

Another benefit of advertising that Butterfly participants have reported is the ability to find different employers through their advertisements when their existing working conditions are problematic; these options are now reduced. As a result, Butterfly participants are more likely to remain in unfavourable and unsafe working conditions. Fewer advertisements also mean that Butterfly outreach workers, who depend on advertisements to locate and provide supports to migrant sex workers, face more challenges conducting this outreach.

### **Prohibition on purchasing sexual services**

The criminalization of purchasing and communication for the purpose of purchasing sexual services has harmed migrant sex workers. Although the PCEPA casts all clients in a negative light, effectively deeming them all to be exploitative, most clients are average people seeking intimacy. Some clients are very supportive, while others may be problematic and abusive. However, the criminalization of clients does not differentiate between them.

For migrant sex workers, clients are a crucial resource and support system. In addition to contributing to and providing much needed income for migrant sex workers, clients have often acted as supports for migrant workers, as many are new to the country, face language barriers, cannot drive, and/or have precarious living situations. Clients have reached out to Butterfly to let us know that a sex worker has expressed the need for support. For example, clients have approached Butterfly because a sex worker they knew had been physically or sexually assaulted, robbed, was experiencing bad working conditions, or needed a safe place to stay.

Clients have also provided direct social, emotional, and financial support to sex workers. For example, Butterfly participants have reported that clients have assisted them with: advertising; renting spaces; managing documents; driving them to health appointments; referring them to other resources; navigating Canadian systems and policies; assisting them with travel arrangements to visit their home countries; and escaping violent situations and bad working conditions.

After the PCEPA came into place, there was a sharp change in the nature of relationships between workers and clients. Butterfly participants have reported that criminalization has inhibited their ability to form productive and supportive relationships with clients. Butterfly participants have noted that clients are not willing to provide the same level of support in the past, and that they do not want to be visible even if providing support. Since the change in the law, Butterfly has received fewer calls directly from clients.

While many clients still want to help, they are afraid and not willing to provide the same level of support, and they do not want to be visible in doing so. Butterfly participants have reported that clients are afraid of being criminally charged, incarcerated, losing their jobs,

and experiencing other negative impacts on family relationships and friendships. For example, they might just provide sex workers with Butterfly's phone number, rather than directly assisting them. Butterfly participants also report that fewer clients are willing to provide their true identities and contact information. This makes it harder to screen clients and to know who can and cannot be trusted.

Butterfly participants have reported that communication has been hindered between clients and sex workers. Clients often communicate through innuendo and suggestion rather than directly, which breeds misunderstanding and impedes consent. For example, Butterfly participants have reported that clients have assumed that particular services are offered, when they are not. This is particularly problematic in the context of massage parlours and spas, as not all of these businesses offer sexual services, and not all workers offer sexual services or provide the same services. Because there is no clear communication, it is harder to establish consent, and there have been some incidences in which sex workers have been pressured into doing more than they would like to.

### **Prohibitions on third parties and collaborative work**

Butterfly participants work with many types of third parties, including but not limited to receptionists, landlords, drivers, management at sex work establishments, and massage parlour owners. These third parties may be previously known to workers, family members, friends, or people who generally offer these services to sex workers more broadly. Third parties are particularly important for migrant sex workers, as many workers have limited resources. For example, by working at a managed establishment, migrant workers with limited access to funds can start working without paying overhead costs like rent and advertising fees. It is helpful for migrant sex workers to have access to third parties in managed settings, where there are already programs and protocols in place. Not only do third parties provide support with respect to the work itself, they also support migrant sex workers in other aspects of their lives. For example, Butterfly participants who are new to the country have relied on third parties to help them navigate life in Canada, as they have greater familiarity with the official languages and the community.

In addition, many Butterfly participants report that they often act as third parties for one another, collaborating in all aspects of the work, including renting space, purchasing supplies, advertising, coordinating with clients to book appointments, and making client referrals. Many migrant workers benefit from working in a collective environment, where they can learn from and support one another, including sharing best practices and information and safety practices. It is common for retired sex workers to assist with third party services, both paid and unpaid, by setting up appointments, arranging work space, referring clients, and training new sex workers on best practices and protective measures. As former workers, they are able to leverage their skills and knowledge of the industry to improve safety conditions for current workers.

Family members of migrant sex workers are implicated as third parties as well. Butterfly has assisted sex workers whose family members have been charged for sex work related offences. Spouses and partners often assist Butterfly participants with logistics, such as setting up appointments, paying rent and telephone bills. Additionally, those working with

and assisting migrant sex workers are often suspected of being criminal third parties, even in the absence of evidence of exploitation.

Because of the criminalization of third parties, Butterfly participants have reported that third parties often do not communicate openly with sex workers. For example, massage parlour owners/managers are not able to discuss sexual services with their employees, pretending that sex work is not taking place even though they know that it is. Owners, managers, and workers typically do not contact the police when violence and abuse take place because they are afraid that they will be investigated and charged for third party offences, and that their workplace/business will be shut down. Even if they are not charged with a criminal offence, the police may inform landlords that illegal sex work is taking place on the premises, thus resulting in eviction.

Butterfly participants working in the sex industry and massage parlours are often discouraged from speaking about their work with anyone; therefore, they are not able to transparently discuss what services are and are not offered – whether with employers, clients, or colleagues. This also means that they are not able to share their work experiences, including experiences of violence and/or sexual assault, even though this information is critical for the prevention of future harm. Additionally, most Butterfly participants indicate that will not seek help from the police, as they fear that they will be implicated in crimes and their immigration status will be jeopardized. Therefore, despite working in a setting with others around, sex workers remain isolated because they cannot share their experiences.

Due to the criminalization of third parties, managers and owners are less likely to be able to provide safe and healthy working conditions. This environment of fear and concealment means managers and owners often do not speak directly about sex work. Therefore, they cannot ask what resources and policies sex workers want and need, such as the provision of safer sex tools and resources. Some massage parlour managers prohibit the presence of condoms entirely, fearing that they may be found in raids and inspections. In fact, Butterfly outreach workers are sometimes not allowed to enter sex work establishments, due to fear that there will be an association with sex work.

As with clients, Butterfly participants have reported that they are not able to obtain information about third parties who they do not already know within their personal networks, as many are not willing to provide personal details. As a result, they are not able to take measures to adequately inquire with others about the third party to ensure they are working with reliable people.

Butterfly participants have reported that the third parties who are willing to help may provide lower quality service because they are trying to avoid detection, which in turn reduces safety. Sex workers are not able to access the services they desire, as third parties are afraid of: working too closely with them; appearing at their workplace to protect their safety; and being perceived as controlling them. On one occasion, an Asian migrant sex worker was murdered during an out-call appointment. The driver informed Butterfly that he knew the worker may have been in danger because she did not respond to his

text message to verify her safety. However, he did not take immediate action because he was afraid that he would get in trouble for being involved as a sex work third party.

Butterfly has assisted Butterfly participants, family members, and former sex workers who have been investigated and, in some cases, criminally charged with crimes under the third party, procuring, and advertising provisions. These individuals were charged, even though Butterfly knew the participants and understood that there was no element of exploitation in their relationship. Rather, they were providing support to sex workers in the course of their work, including answering phones, booking appointments, posting ads, and providing a place to work.

### **Impact of the provisions on working conditions**

Since sex work is criminalized, Asian and migrant sex workers face many challenges in addressing workplace conflicts and injuries. Like any workplace, there will be good employers and bad employers. However, the prohibition on sex work businesses affects the quality of employment options available and reduces the bargaining power of sex workers. Butterfly participants have reported that they feel like they cannot leave a workplace, even if they are being mistreated, underpaid, and/or the working conditions are unsafe. They feel that they cannot leave for several reasons, including that: criminalization means conditions may be similar across workplaces; they would need to give up their existing connections and supports; it would be difficult to assess the conditions at other workplaces in any event, because of the secrecy surrounding the industry. Criminalization therefore serves as a barrier to addressing abusive working relationships.

Due to the criminal provisions, sex workers are less likely to get help when they need it. For example, the vast majority of Butterfly participants who have been injured in the workplace have not reported the injuries or sought compensation. Both sex workers and managers have indicated that they are afraid of disclosing their involvement in the sex industry. Similarly, Butterfly participants have felt that they had no recourse when facing other workplace conflicts, such as underpayment, mistreatment, harassment, and even violence. They did not believe that reporting these issues to the authorities would improve their conditions, as they would effectively be admitting their involvement in sex work businesses, which would threaten the sex worker's place of work and livelihood. The risk is even greater for migrant workers, who fear the risk of loss of immigration status and deportation.

A Butterfly member reported that her place of work had been robbed four times. The robbers had been armed and some workers had been injured. However, they felt that they could not call the police. This experience is documented in our report *Behind the Rescue: How Anti-Trafficking Investigations and Policies Harm Migrant Sex Workers* (published April 2018, revised June 2018).<sup>4</sup> Moreover, in a 2018 survey conducted by Butterfly of workers in spa and wellness centres, which involved 61 participants, the

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<sup>4</sup> Behind the Rescue: How Anti-Trafficking Investigations and Policies Harm Migrant Sex Workers” (published April 2018, revised June 2018).

majority of the respondents (62.2%) said that they were not likely to seek help from law enforcement. Reasons reported included that: they feared being arrested, charged, fined, and/or discriminated against by police or law enforcement; previous negative experiences; and fear of subsequent retaliation by police. For example, Butterfly participants have reported incidents where law enforcement have: requested sexual favours from sex workers; searched them without warrants; seized money and valuables; and engaged in intimidation and other abuse.<sup>5</sup>

These incidents involving law enforcement are enabled by the existence of the criminal prohibitions against the sex industry. Unlike other industries, the criminalization of sex work gives police the power to investigate sex workers' workplaces, and sex workers who face abuse are deterred from reporting because they fear criminal and immigration consequences.

Butterfly participants frequently express how police raids in relation to sex work and human trafficking investigations (which are often combined) negatively affect their working conditions, as they are highly disruptive and distressing. After police raids have closed down their places of work, Butterfly participants have reported that they have been forced to work in isolated locations, rather than in shared commercial spaces. For example, many moved to more isolated areas, such as smaller cities or towns, where they were further apart from others who speak their language, other sex workers, and community supports. Butterfly participants have reported that when they are displaced to more isolated areas, such as small towns, they fear going outside. Because they are Asian, they felt that they stood out in the community and they feared being identified by neighbours and reported.

The effects of displacement are significant. Butterfly has observed that after workplaces have been shut down, some Asian and migrant sex workers have had to relocate to apartments. Thereafter, Butterfly participants have reported that they experienced more robberies, due to reduced security compared to working at a commercial establishment. Butterfly members also reported that they were more likely to feel pressured to perform sexual services they did not want to do when working alone out of an apartment, where full contact sexual services are more likely to be provided, and compared to working in a space with other workers and management present.

## **INTERSECTION OF THE PROVISIONS WITH OTHER LAWS**

The provisions, particularly the criminalization of businesses related to sex work, intersect with other laws, including: (i) tenancy laws; (ii) immigration law; and (iii) municipal by-laws.

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<sup>5</sup> “Survey on Toronto Holistic Practitioners’ Experiences with Bylaw Enforcement and Police”, published 2018. Butterfly, the Coalition Against Abuse by Bylaw Enforcement Canadian, the HIV Legal Network, and the Holistic Practitioners Alliance.



### ***a. Tenancy Laws***

Under tenancy laws, tenants may be evicted for committing an illegal act in the rental unit or by allowing others to commit illegal acts in their space. Therefore, even though sex workers are “immune” from prosecution for the sale of their own sexual services, they are still implicated in the tenancy context for allowing illegal activities to take place.

For example, a Butterfly member had been assaulted in her apartment, after which a neighbour called the police because of her screaming. The police informed her building management that she was involved in sex work, and she was subsequently evicted from her home, losing the rent and deposit she already paid for the unit as well as regular clients and the support network that she had built nearby. Therefore, when that same sex worker was assaulted on another occasion, she did not scream because she was afraid of facing a similar situation. Even if the police do not specifically alert building management, the appearance of the police at an apartment may alert neighbours, management, and landlords to occurrence of sex work.

Landlords have also taken advantage when they are aware of the tenant’s involvement in sex work, even when they do not work from their homes. For example, landlords have demanded higher rent and illegally evicted Butterfly participants without abiding by the formal process. However, the Butterfly participants did not feel that they could assert their rights, as they feared that being ‘outed’ as sex workers would result in a criminal investigation and/or problems with immigration authorities.

### ***b. Immigration Law***

Even if charges are not laid, criminal investigations result in severe consequences for migrant sex workers, including the seizure of money, electronic devices, and other valuables. Butterfly participants say they fear that they will be criminally charged, that they will be found in violation of immigration conditions that prohibit them from working in the sex industry. Migrant workers also fear that they will be removed from Canada because of their involvement in sex work.

In many cases, after Butterfly participants have encounters with the police (e.g. during raids of massage parlours or their apartments on the basis of allegations of sex work offences, or when migrant sex workers report violence or other violations), the Canada Border Services Agency (the “CBSA”) may get involved. Many Butterfly participants have been arrested and subsequently lost their immigration status. Butterfly participants have been deemed inadmissible because of their involvement in sex work

At least 30 Butterfly participants have had to leave Canada after having an encounter with the government, e.g. the police or immigration authorities. Some workers are required to leave because they are formally deported, while others are provided departure orders or deportation orders, requesting the individual to leave “voluntarily”. These impacts are not limited to the sex workers themselves. There have been incidents involving Butterfly participants, where their family members and partners have been impacted. For example,

a sex worker sought Butterfly's help when the CBSA demanded that her boyfriend, who was on a student visa, leave the country voluntarily because of his involvement with her.

### **c. Municipal By-laws**

The criminal provisions have resulted in the creation of municipal bylaws that target businesses that are commonly associated with sex work, even if no sex work is taking place. Due to the existence of the criminal provisions, municipalities create regulations that seek to eliminate criminal venues and the sex industry more broadly. In Toronto and Newmarket, for example, Butterfly has observed that bylaws related to massage parlours have facilitated further surveillance and displacement of sex workers. Used in conjunction with the criminal provisions, municipal bylaws further isolate sex workers and put them in more precarious situations.

## **CONCLUSION**

As detailed above, the PCEPA has reduced the range of options for migrant sex workers, reducing their bargaining power and increasing dependency on the options that are available. This has led to greater opportunities for exploitation. Sex workers have different preferences about how they would like to work: some enjoy running their own business, advertising, and daily administration, while others prefer working in a managed setting. However, criminalization has inhibited sex workers from making these decisions for themselves, and instead push them toward isolation. The PCEPA has consequently forced sex workers to work in settings where they have less options, agency, and control over their working conditions.

Therefore, we urge the Standing Committee on Justice and Human Rights to recommend:

- The immediate repeal of all sex work–specific criminal laws, including the offences in the *Protection of Communities and Exploited Persons Act*;
- The immediate repeal of all immigration regulations that prohibit migrant people from working in the sex industry, and have led to the detention and deportation of migrant sex workers; and
- The end of all raids, detentions and deportations of sex workers through anti-trafficking, anti-sex work and immigration laws and ensure Canada Border Services Agency is never involved in anti-trafficking investigations, because their involvement exacerbates migrant workers' fears of detention and deportation and inhibits reporting of violence if it occurs.
- Attached are the statements and reports about how the Asian and migrant sex workers are affected by PCEPA

## Statements:

Statement to support migrant sex workers Justice (signed by over 4000 individuals and organizations)

<https://drive.google.com/file/d/1nfJg09ywMzsLXoD34fzx5AP6N-qJV8nD/view?usp=sharing>

## Reports:

Butterfly (2018) *Sex work and Migration is not trafficking*.

[https://www.butterflysw.org/files/ugd/5bd754\\_5826c5ca074f408988ee248d5f614219.pdf](https://www.butterflysw.org/files/ugd/5bd754_5826c5ca074f408988ee248d5f614219.pdf)

Fudge, J., Lam, E., Chu, S.K. Sandra & Wong, V, (2021). *Caught in Carceral web: Anti-trafficking laws and policies and their impact on migrant sex worker*. [https://www.butterflysw.org/\\_files/ugd/5bd754\\_71be1154f6ff4bbb94a03ed7931a32df.pdf](https://www.butterflysw.org/_files/ugd/5bd754_71be1154f6ff4bbb94a03ed7931a32df.pdf)

Lam, E. (2018a) *How anti-trafficking investigation and policies harm migrant sex workers*. Butterfly. Retrieved from: [https://www.butterflysw.org/\\_files/ugd/5bd754\\_bbd71c0235c740e3a7d444956d95236b.pdf](https://www.butterflysw.org/_files/ugd/5bd754_bbd71c0235c740e3a7d444956d95236b.pdf)

Lam, E. (2018b) *Survey on Toronto Holistic Practitioners' Experiences: with Bylaw Enforcement and Police*. Butterfly. [https://576a91ec-4a76-459b-8d05-4ebb42a0a7e.filesusr.com/ugd/5bd754\\_6d780ceba3cb4f6c85de4d3e9e0b7475.pdf](https://576a91ec-4a76-459b-8d05-4ebb42a0a7e.filesusr.com/ugd/5bd754_6d780ceba3cb4f6c85de4d3e9e0b7475.pdf)

Butterfly. (2018). *Fanny's story: How migrant sex workers are arrested in anti-trafficking raid*. Retrieved from: [https://docs.wixstatic.com/ugd/5bd754\\_26e05b9179164105bca95697ba43887b.pdf](https://docs.wixstatic.com/ugd/5bd754_26e05b9179164105bca95697ba43887b.pdf)

Butterfly (2019). *Stories of migrant sex workers*. Retrieved from: [https://www.butterflysw.org/files/ugd/5bd754\\_b8357a1ec3b7482b9255294e85fa0a84.pdf](https://www.butterflysw.org/files/ugd/5bd754_b8357a1ec3b7482b9255294e85fa0a84.pdf)

Butterfly. (2021). *How are Asian and migrant workers in spa, holistic centres, massage parlours and the sex industry affected by COVID-19 pandemic?* Retrieved from: [https://www.butterflysw.org/files/ugd/5bd754\\_bacd2f6ecc7b49ebb3614a8aef3c0f5f.pdf](https://www.butterflysw.org/files/ugd/5bd754_bacd2f6ecc7b49ebb3614a8aef3c0f5f.pdf)

Malla, A., Lam, E. van der Meulen, E. & Peng, J. (2019) *Beyond tales of trafficking: A Need Assessment of Asian and Migrant Sex Workers in Toronto*. Butterfly. Retrieved from: [https://576a91ec-4a76-459b-8d05-4ebb42a0a7e.filesusr.com/ugd/5bd754\\_a35d8e085c21475fa97e1ff759d26648.pdf](https://576a91ec-4a76-459b-8d05-4ebb42a0a7e.filesusr.com/ugd/5bd754_a35d8e085c21475fa97e1ff759d26648.pdf)

Santini, T. & Lam, E. (2017). *Upholding and promoting human rights, justice and access for migrant sex workers*. Retrieved from: <https://www.butterflysw.org/legal-information-for-services-prov>

Santini, T. & Lam, E. (2020). *A pathway to end violence against migrant sex workers: Access safety, justice and dignity*. Retrieved from [https://www.butterflysw.org/\\_files/ugd/5bd754\\_d680b25295cb40bdbbcc03f34a88c267.pdf](https://www.butterflysw.org/_files/ugd/5bd754_d680b25295cb40bdbbcc03f34a88c267.pdf)