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City of Toronto, General Government and Licensing Committee, Tuesday, May 21, 2019. Item GL5.2, Review of Body Rub Parlour and Holistic Centre By-laws - Consultation and Research Findings.

"Stimulating, by any means, of a person's body for the purposes of appealing to erotic or sexual appetites or inclinations"; that is how the City of Toronto defines the purpose of its 25 licenced Body Rub Parlours. It's is a reasonable definition of sexual services, and it's the reason men visit these establishments. But the purchase of such services became a criminal offence in 2014.

In my work, as a human trafficking specialist, I've interviewed former Toronto body rubbers. Some of whom started in the industry when sexual intercourse was less common in these establishments, and the obligatory "happy ending" was most often performed by use of their hands. Now they are houses of "full service" prostitution.

Some say that it was around the year 2000 when things really changed in the industry. How before that, body rubbers seldom had pimps. They speak of increasing violence, and that they were not protected by management; how the infrequent of drug use among their peers became a common way of coping with the trauma associated with the exploitation.

They tell about the underage girls who they saw being exploited; girls as young as 14 years old; and how the real purpose of security cameras seemed to be watching for police. They recall that, sometimes, money was given to police officers, in exchange for an advanced warning of massage parlour raids.

They know how the industry destroys young women. They've seen it. They've experienced it. And they've all lost friends.

I relay, to you, the observations of those who were no longer immersed in the darkness of that criminal world, because they had the perspective and clarity to speak truthfully about it. It's important to know, they were not able to speak accurately about it, when they were in it. These are the voices of the survivours, and they must be heard.

Municipal Licencing and Standards proposes the removal of licensing restrictions; to allow much greater numbers of Body Rub Parlours to dot the city. MLS also claims that ensuring the "well-being of persons" is important. I wonder which "persons" they are referring to, because it can't possibly be the women. It also recommends that Body Rubbers be "provided with information on how to access resources and supports," instead of preventing the need for those supports.

MLS is, however, correct that a large number to Toronto's licenced Holistic Centres are also operating as brothels.

Yesterday I spoke with a parent whose school-age daughter was being trafficked by a pimp. One particular evening, it was discovered that she was in a certain holistic centre in Etobicoke. The 17 year old was advertised in a prostitution ad on the internet. My friend went into the nearest Toronto Police station with her daughter's passport and evidence that she was being exploited at that location.

"We don't have the resources to respond," came the reply, and with that, the couple was turned away. Without protection, the pimp continued to traffic the girl in Toronto and surrounding regions.

When the sale of sexual services is tolerated or normalized or decriminalized, the demand for it increases. And with more money on the table, more human trafficking occurs. Toronto City is complicit in the criminal activities happening at all its licensed Body Rub Parlours, and a great many of its Holistic Centres, and, one could argue, is party to the human trafficking these establishments facilitate.

I appeal to this committee to make the protection of vulnerable women and girls your highest priority regarding this matter. When you do, you'll see the recommendations, before you, from Municipal Licensing and Standards, fall short. Instead, I urge to adopt the following:

- 1. Stop issuing Body Rub licences.
- 2. Clearly define the purposes for Holistic Centers and ensure the bylaws are adequate enforcement tools.
- 3. Step up enforcement, permanently shut down noncompliant Holistic Centres, and get rid of unlicensed establishments.

I trust that, going forward, the City of Toronto will put the needs of women ahead of the wants of men; that it will uphold the rule of law, and work together with its partners to end the exploitation in its massage industry.