

November 2nd 2026

Dear Members of the Human Rights Committee,

On behalf of the National Council of Women of Canada (NCWC), I am writing to express our strong objection to the inclusion of the terms “sex work” and “sex worker” in the draft General Comment No. 38 on freedom of association under Article 22. **NCWC unequivocally rejects the premise that prostitution is work and does not support terminology that presents sexual exploitation as a legitimate occupation.**

Our position is abolitionist: we regard prostitution as a form of violence and exploitation, particularly against women and girls, while recognizing that boys and men are also harmed. Describing prostitution as “work” obscures the inequalities, coercion and abuse of vulnerability that underpin the system of prostitution and risks normalizing the purchase of sexual access to another person.

NCWC supports an approach that upholds the dignity, safety and human rights of people in prostitution without legitimizing the system that exploits them. Our objection is to the recognition of prostitution as work, not to the fundamental rights of those involved, including their right to freedom of association, protection from violence and access to justice and support.

We urge the Committee to give due weight to the international instruments addressing prostitution, trafficking and sexual exploitation. The preamble to the 1949 Convention for the Suppression of the Traffic in Persons and of the Exploitation of the Prostitution of Others recognizes prostitution and associated trafficking as incompatible with the dignity and worth of the human person. Article 6 of CEDAW requires States parties to suppress all forms of trafficking in women and exploitation of the prostitution of women.

The CEDAW Committee’s General Recommendation No. 38 (2020) identifies trafficking and the exploitation of prostitution in women and girls as rooted in structural, sex-based discrimination and constituting gender-based violence. Its General Recommendation No. 35 (2017) provides further guidance on States’ obligations to prevent and address gender-based violence against women. In NCWC’s view, terminology that recasts prostitution as ordinary employment risks obscuring these harms and weakening efforts to address them.

Consistent with our abolitionist position, we support the approach exemplified by Sweden, France and other countries that seeks to address demand and hold exploiters accountable while supporting people to leave prostitution. Our priority is protection,

meaningful alternatives and freedom from exploitation, not the normalization of the sex trade.

We therefore urge the Committee to remove the terms “sex work” and “sex worker” from paragraph 9 and to refrain from using them in subsequent drafts of General Comment No. 38. The Committee can and should affirm the rights of people in prostitution without endorsing the proposition that prostitution is work.

Thank you for your urgent attention to these concerns. We respectfully request that the final text uphold human dignity, substantive equality and protection from sexual exploitation.

Sincerely,

Penny Rankin
President
National Council of Women of Canada

110 Didsbury Rd M317
Ottawa K2T0C2
Canada
613-712-4419

Established in 1893 and incorporated by an Act of Parliament in 1914 the mission of the National Council of Women of Canada is directed to empowering all women to work together towards improving the lives of women, families, and society through a forum of member organizations and individuals.

Fondé en 1893 et incorporé par une loi du Parlement en 1914, le Conseil national des femmes du Canada vise à donner aux femmes les moyens de travailler ensemble pour améliorer la vie des femmes, des familles et de la société, dans un forum qui réunit des organisations membres et des individus.