1. BENEFITS OF LICENSED BROTHELS

- Safe clean environment for sex workers and their clients
- Protect the health and well being of sex workers and their clients
- Covid industry plan regularly audited for compliance
- Highly regulated to prevent infiltration by organised criminals, human traffickers and money launderers
- Minimise unwanted community exposure to the industry
- We pay tax and GST

2. SET UP TO FAIL

- PLA only regulate brothels but the Terms of Reference for the QLRC review clearly identify massage parlours, escort agencies, illegal brothels as part of the industry but unregulated.
- High cost of licensing and compliance for legal brothels restricts the amount that can be paid to sex workers
- Planning restrictions on brothels but not the rest of the industry
- Illegal operators flourishing in an unregulated environment
- Reluctance to investigate and prosecute illegal operators
- Penalties well under licence fees so no disincentive to operate illegally
- Brothels restricted to in house services and shut out of the outcalls market
- Advertising guidelines not written for the digital age
- Room numbers and staff numbers strictly limited
- Ethical objection by banks, landlords and suppliers penalise legitimate businesses

3. RECENT SUBMISSION FOR CHANGES

- The PLA and QABA have made many submissions for change over the years and all have been ignored. A copy of our latest is attached.
- Respect Qld complain that sex workers are forced to work outside the legal brothels due to lack of places on rosters by levelling the playing field, legal brothels would be a viable business opportunity for professional operators thereby offering more places for sex workers.
- Providing outcalls from licensed brothels would allow further opportunities for sex workers and their clients to connect via a safe, contactable provider
- Allowing brothels to use words such as massage, escort and describe services in their online advertising would allow then to complete with the illegal trade for clients.

4 TERMS OF REFERENCE FOR QLRC REVIEW

- Clearly, decriminalisation appears to be the aim but it does not mean unregulated
- Despite several recent communications with the Attorney General's department, QABA were not nominated as an organisation to be consulted yet several sex worker representative bodies were. As the organisation representing licensed brothel owners in Queensland, we have information and viewpoints worth considering.
- Licensed brothel owners have invested considerable capital into building and maintaining venues that operate within the law. We should be part of the review and any solutions.

5. ISSUES TO BE ADDRESSED

- Decriminalisation of sex work but more importantly the acknowledgement of sex work as a legitimate, legal occupation
- Ensuring all venues, operators are treated equally under the law
- Regulation of all providers to prevent infiltration by organised crime
- Planning restrictions on all suppliers of sexual services to minimise unwanted community exposure