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ABSTRACT

This article comprehensively examines the transnational dynamics that characterised sex worker activism in the United States, Britain, and France between 1973 and 1990. Within these years and in each of these countries, sex workers formed formal activist groups and established transnational networks aimed at dismantling the systemic discrimination and criminalisation that sex workers faced. Within existing scholarship, the role of transnationality has yet to be examined. This article addresses this gap by offering a nuanced exploration of how transnationality profoundly shaped sex worker activism during these nascent years. I argue that transnationality was a significant aspect of sex worker activism through the exchange of insights and experiences across borders that emerged as a defining hallmark of their activism. Through transnational networks, sex worker activists formulated and honed their analysis and perspectives and supported each other's struggles across borders. Moreover, this research delves into the ways the activism of sex workers was also deeply embedded within the geopolitical landscape of the 1970s and 1980s. I critically examine the work of sex worker activists to advance our understanding of the complex interplay between transnational activism, internal dynamics, and the potential pitfalls of well-meaning engagement. By illuminating the diverse perspectives within the movement, shedding light on transnational networks, and scrutinising the subtle manifestations of neo-colonialism, the study enriches our comprehension of this transformative era in sex worker activism.

BY

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Introduction

In the documentary *Les Prostituees de Lyon Parlent* a sex worker, speaking at the 1975 occupation of St Nizier Church, Lyon, declared, "There aren't many other ways to survive in today's world other than what we do."[1] The French occupation of St Nizier Church involved at least one hundred sex workers who took over the church for eight days from June 2, 1975. The sex workers demanded change in police conduct, an end to relentless fines and improved working conditions for those who sold sex. The occupation has come to represent one of the most enduring symbols of sex worker activism in the late twentieth century and has in many ways come to epitomise the struggle of sex workers' rights during the latter half of the twentieth century. Across the 1970s and 1980s, sex workers in Western Europe and North America formed formal activist groups, collectives and networks which criticised the construction of "the prostitute" and advocated for the legitimacy of this work as well as for the corresponding labour rights of the newly termed "sex worker."[2] These grassroots groups, though often driven by local and national goals, framed the struggle for sex workers' rights as one that transcended national boundaries. The emerging articulations of "sex work" and "sex workers" were firmly placed within an understanding of, as the opening quote articulated, "today's world." This article attempts to trace exactly how this "world" was constructed by sex worker activists in the Global North, with a particular focus on the role and limits of transnationality within the activism of sex workers in the US, Britain, and France in the 1970s and 1980s. On the one hand, I argue that transnationality was a crucial aspect of sex workers' rights activism in the US, Britain, and France. Yet, on the other hand, I point to the limits of this early activism through their universal understanding of the "sex worker" and their determination to universalise their claims across the globe.

Though historical works have called attention to the over-focus of the Global North within histories of sex worker activism, such as Kempadoo and Doezema's pioneering *Global Sex Workers*, there are nuances of the activism of Britain, France and the US that remain unexamined.[3] Specifically, this article interrogates the ways sex worker activists in Britain, France and the US engaged with "transnationalism" and how their work fits into

1 *Les Prostituées de Lyon Parlent*, directed by Carole Roussopoulos (France: Vidéo Out, 1975).

2 The term "sex work" was introduced by US activist Carol Leigh in the late 1970s. See Carole Leigh, "Inventing Sex Work," in *Whores and Other Feminists*, ed. Jill Nagle (New York: Routledge, 1997).

3 This work made extremely important shifts in the conversations around sex workers activism and highlighted the cultural hegemony of the Global North within histories of sex workers' rights. See Kamala Kempadoo and Jo Doezema, eds., *Global Sex Workers: Rights, Resistance, and Redefinition* (New York: Routledge, 1998).

wider geopolitical power dynamics. By drawing on both published and unpublished materials from sex worker groups of the 1970s and 1980s, including newsletters, position papers, and pamphlets, this article undertakes a twofold analysis of transnationality. First, it scrutinises the significance of transnational networks and exchange to sex worker activism. Second, it probes the integration of transnationalism within this activism. I focus on the largest and best documented activist groups including, the English Collective of Prostitutes (ECP) in London, the Programme for the Reform of the Laws on Soliciting (PROS) in Birmingham, UK, Call Off Your Old Tired Ethics (COYOTE) in San Francisco, the US PROStitutes Collective (US PROS) in New York and the National Task Force on Prostitution (NTFP) in the US. Each of these groups hoped to minimise the discrimination sex workers faced and reform national legislative frameworks. Yet, beyond national laws, each of these groups prioritised transnationality in their activism, and by the mid-1980s they increasingly attempted to forge groups that were not simply "sister" organisations involved in a dialogue across nations but were explicitly *international* in their activism.

In this article I point to the issues in the attempts of Western activists to represent and forge a global pursuit of sex workers' rights in the 1980s and the aspects that represented a form of "neo-colonialism," through which sex workers in the Global North assumed their own framework and analysis as globally relevant. Here, I am using Clisby and Enderstein's definition of "neo-colonialism" which refers to, "the continued denomination of nations and peoples in the postcolonial context through economic and political structures of power," as opposed to the explicit territorial acquisition significant to "colonialism."[4] Further, within this article I consider the extent to which sex worker activist groups in the US, Britain and France formulated their construction of "sex work" and "sex trafficking" through an imperial gaze. I utilise a definition of "imperial gaze" that builds from Mary Louise Pratt's 1993 *Imperial Eyes* and the post-colonial scholarship of Ann Kaplan that underscores that this gaze assumes the superiority of the white Western subject and is unidirectional. Through this gaze, the Western voice defines how the non-Western subjects are seen, as well as how they see themselves.[5]

This article departs from conventional methodological nationalism by under-scoring the essential role of transnationality in understanding sex worker activism. As historian Stefan Eklof Amirell has argued, methodological

4 Suzanne Clisby and Athena-Maria Enderstein, "Caught between the Orientalist–Occidentalist Polemic: Gender Mainstreaming as Feminist Transformation or Neocolonial Subversion?," *International Feminist Journal of Politics* 19, no. 2, 3 (April 2017): 234.

5 E. Ann Kaplan, *Looking for the Other: Feminism, Film, and the Imperial Gaze* (New York: Routledge, 1997), 78.

nationalism is centred on the nation-state, presuming that "historical narratives and interpretations are thus structured beforehand by national perspectives, limitations, sources, concepts, and categories."[6] In contrast, this study centres an explicitly transnational approach that acknowledges the significance of transnationality not only within the activism itself but within the contextualisation and shared understandings of sex work that the US, Britain and France held. This article offers a comprehensive view of both the transformative power and limitations to the extent of "transnationality" within an activist movement. In doing so, it challenges traditional historiographical frameworks and contributes to a more nuanced understanding of the intricate interplay between sex work activism, transnational dynamics, and the quest for global recognition of labour rights. Transnationality was a useful tool for sex worker activists that was embedded in their formation, strategy, and practice, but over time its application became limited. Far from representing dependence across borders the forms of internationalism by the mid 1980s were built around one understanding and interpretation of sex work that was both "liberal" and US-centric.

Transnationality and sex worker activism: Dependence across borders

In line with many activist movements of the 1970s and 1980s, transnationality emerged as a defining cornerstone within the landscape of sex worker activism across the Global North during the 1970s and 1980s. Sex worker collectives built transnational networks of solidarity and exchanged experiences, theories, and critiques of legislation and discourses around sex work. At the same time, sex worker collectives sat awkwardly with mainstream feminist groups who problematised the plight of the sex worker as subsumed easily within a feminist framework. In this context, transnationalism became a tool for sex worker collectives to make the explicit point that the category of "the prostitute" was as universal as the category of "the woman" and, in this way, reflected many of the shortcomings of the so-called second wave by assuming a Western-defined perspective as absolute.

The centrality of transnationalism is immediately clear in the formation of sex worker collectives that sprung up across the 1970s and 1980s. As Australian scholar Eurydice Aroney has noted, the French sex workers' occupation of 1975 constituted the "building [of] a new collective that fed into

6 Stefan Eklöf Amirell, "The End of Methodological Nationalism: The Internationalization of Historical Research in Sweden since 2000," *Scandinavian Journal of History* (December 2021): 2.

the emerging global sex workers' rights movement."[7] The English translation of the book *Prostitutes, Our Life*, based on interviews with French sex workers was published in 1980. It included contributions from both US and British sex worker activists. In this, COYOTE founder Margo St James argued that "the inspiration I felt when I read of the French women's occupation of the churches was extremely important to my decision to continue the campaign in the United States. And again, the success the English women had."[8] Similarly, the ECP argued that "perhaps the greatest victory of the French strike was the birth of the prostitutes' organisations all over the world… it was now easy to decide that abolition of the prostitution laws was what we wanted."[9] In this way, the collectives and their theoretical underpinnings were formed through transnational exchanges. There was a dynamic aspect of transnationalism beyond mere expressions of international solidarity: the groups were made and remade in relation to one another. This can be seen, for example, in the fact that the ECP's largest display of activism in this period was the 1982 occupation of the Holy Cross Church in King's Cross, London. The ECP took over the church for twelve days and demanded an end to police racism with a banner that read "Mothers Need Money." This was a direct echo of the French occupation in Lyon seven years prior. During the French occupation, banners had read "*nos enfants ne veulent pas leurs mères en prison* (our children don't want their mothers in prison)." The strategies and ideological underpinnings of their activism was something that took direct influence from their French counterparts.

Activists argued that it was through transnational exchanges they were able to formulate a cogent theorisation of sex work. Though it is worth noting that there were key aspects that these groups ideologically diverged on, they ultimately shared the belief that sex work was work, sex work should be decriminalised, and that the marginalisation of sex workers was one example of the oppression of women. As the ECP argued in the introduction to the French collection *Prostitutes, Our Life*, these groups shared the belief that "prostitution laws are not only about prostitutes. They keep all women under control."[10] Further, within the undated publication "Who are the ECP?," the ECP stated that international networks of sex workers "made it possible to find out about each other's situation under different governments and types of legislation, whether 'prohibition' or 'legalisation'."[11] Here, the ECP

7 Eurydice Aroney, "The 1975 French Sex Workers' Revolt: A Narrative of Influence," *Sexualities* 23, no. 1-2 (February 2020): 64-80.

8 Margo St James, "What's a Girl Like You...?," in *Prostitutes, Our Life*, ed. Claude Jaget (Bristol, England: Falling Wall Press, 1980).

9 Claude Jaget, ed., *Prostitutes, Our Life* (Bristol, England: Falling Wall Press, 1980).

10 English Collective of Prostitutes, "Introduction: On the Game and On the Move," in *Prostitutes, Our Life*, ed. Claude Jaget (Bristol, England: Falling Wall Press, 1980), 21.

11 English Collective of Prostitutes, "Who Are the ECP?," n.d., ref. ECP/1, Bishopsgate

argued that the exchange of experience and knowledge, specifically under different legal frameworks, helped develop their own analysis and positionality on sex work. Indeed, in their 1980 published chapter *The Rules of the Game*, the ECP argued specifically that "although the laws in relation to prostitution differ from country to country, the effect of the laws on prostitute women is fundamentally the same all over the world."[12] At the anniversary of the French occupation in June 1976, Wilmette Brown, a member of the Black Women for Wages for Housework (USA) and representing the ECP, opened her speech by stating that, "I am here this evening to support you in the struggle of prostitute women in France, because this struggle is also the struggle of Black women in the USA."[13] Embedded throughout their work, sex worker activists drew parallels and used this to make connections between the gendered discriminations of sex workers that were not considered to be nation-based. In 1980, the ECP argued that "the differences in the laws between France and England, for example, are so minor that all the problems prostitute women face in France are faced also by prostitutes in England. The same is true for the US."[14] Throughout the mid-1970s and early 1980s, sex worker activists drew connections between the oppression of sex workers and actively sought to emphasise the similarities of their experiences. This comparison drew on both the similarities in legislation around sex work but also similarities in how prostitution was policed and who was policed under this legislation. Each country was, for example, particularly explicit on the fact that Black sex workers were those most likely to be arrested and sentenced under sex work legislation.

Newsletters of activist groups consistently highlighted the contemporary work of sex worker activists in different countries. In a 1977 bulletin of the Birmingham-based British group the Programme for the Reform of the Law on Soliciting (PROS), the PROS cited the work of COYOTE in San Francisco and promoted their newsletter "COYOTE Howls" which, they argued, "uncovers exploitation by police and hotels" in the US.[15] Similarly, within COYOTE Howls, a section "Around the World in Eighty Lays: From S.F to Rome" detailed sex workers' experiences and activism in many different cities and countries.[16] A

Institute, UK.

12 English Collective of Prostitutes, "The Rules of the Game," in *Prostitutes, Our Life*, ed. Claude Jaget (Bristol, England: Falling Wall Press, 1980).

13 English Collective of Prostitutes, "Introduction."

14 English Collective of Prostitutes, "Rules of Game."

15 Programme for the Reform of the Law on Soliciting, "PROS Bulletin, No.1," April 1977, ref. 1100/2/1, Modern Records Centre, University of Warwick, United Kingdom.

16 E.g., Call Off Your Old Tired Ethics, "COYOTE HOWLS, Volume 5, Number 1," Spring 1978, ref. 81-M32-90-M1-43, Schlesinger Library, Harvard University, United States; Call Off Your Old Tired Ethics, "COYOTE HOWLS, Volume 5, Number 2," Fall 1978, ref. 81-M32-90-M1-43, Schlesinger Library, Harvard University, United States.

1979 newsletter had submissions from the PROS and the London-based group Prostitute Laws Are Nonsense (PLAN) in an attempt to "keep up with events as they happen in this country and around the world."[17] The constant exchange of dialogue and information between these groups is prolific. The newsletters were the primary communication tool with members, and the transnational aspect of sex worker activism was continually emphasised. The contribution from Helen Buckingham, the founder of PLAN, even complained that "I still cannot get women here [in Britain] to accept that COYOTE's methods work."[18] This indicates the strained relationship between sex worker activism and mainstream feminist groups, and demonstrates the prolific nature of the shared exchange of information and tactics across borders. For Buckingham, the activism of the US appeared as more of a source of inspiration than local organising did. The purpose of the newsletters of sex worker activist groups in part was to situate local activism within a broader, international sex worker movement. Thus, the newsletters consistently underscored the transnational dimensions of sex worker activism, reflecting, reinforcing, and furthering its significance.

Within the very foundation of many of these activist groups, transnationality was an explicit goal of their activism and informed how sex worker activists framed their groups. In an undated publication titled "Who are the ECP?," the ECP recorded that "we have organised across national boundaries, helping to build a network of prostitutes' organisations which is an integral part of the international women's movement."[19] In forming and articulating their identity, the ECP centralised their transnational participation in activism. This trend of emphasising the importance of transnationality to augment the significance of the groups' activism was in no way limited to the ECP. The second listed "Accomplishment" of COYOTE in a letter of 1975 for a grant application noted the introduction of "Sister chapters in Seattle, New York, San Diego, Honolulu, Los Angeles and Mexico City, France…"[20] The development and upkeep of these "sister" chapters is preserved also within the meticulous record-keeping of the listed "sister" organisations of COYOTE updated year-on-year.[21] Language of "sister" organisations, a mainstay of "second wave feminism," permeate discussions and illusrates that sex worker initiatives saw themselves as part of a wider collective struggle that linked

17 Call Off Your Tired Old Ethics, "COYOTE HOWLS, Volume 6, Number 1," 1979, ref. 81-M32-90-M1-43, Schlesinger Library, Harvard University, United States.
18 "COYOTE HOWLS, Volume 6, Number 1," Schlesinger Library.
19 English Collective of Prostitutes, "Who Are the ECP?"
20 Call Off Your Tired Old Ethics, "Letter from COYOTE: A Loose Woman's Organisation, June 6, 1975, to Mr. Herb Allen from the 'Regional Young Adult Project'," 6 June 1975, ref. 81-M32-90-M1-26, Schlesinger Library, Harvard University, United States.
21 Call Off Your Old Tired Ethics, "Sister Organisations," ca. 1973-1977, ref. 81-M32-90-M1-26, Schlesinger Library, Harvard University, United States.

women rhetorically and ideologically. The ECP framed the social and legal struggle of sex workers as transcendent of national borders, and situated the struggle of the sex worker as a gendered and universal issue.

In this way, the emphasis on transnationality served as a strategic means of legitimising sex worker activism within the broader feminist framework. By highlighting the activism and experiences of sex workers in different countries, sex worker activists explicitly placed themselves within an ongoing transnational struggle for women's rights. The sex worker movement struggled to gain legitimacy within the broader feminist movement. Many feminists and feminist groups rejected sex work ideologically and considered sex workers collaborators of patriarchy. The notorious "sex wars" of second wave feminism continued to situate the figure of the "sex worker" in an ambiguous position in relation to women's rights- sometimes as the pinnacle of women's oppression and at other times the colluders with it. In 1976, the COYOTE newsletter included a segment from a member, Laughing Lion, who argued that "the most cruel criticism of COYOTE has come from individual feminists."[22] Similarly, in 1983, the ECP complained in their newsletter that "most so-called feminist organisations didn't bother to come to support prostitute women."[23] Through articulating demands as exclusively gendered, however, sex worker groups hoped to subsume themselves within the broader feminist struggle, highlighting the universality of sex workers' experiences as women who faced discrimination and as mothers who hoped to provide for their children.

The discourses surrounding "the prostitute" that these groups depicted overwhelmingly gendered the figure of the sex worker, and almost exclusively discussed the "sex worker" with female pronouns. They situated their own struggle for sex workers' rights as part of a broader struggle for women's rights. The ECP, for example, argued that the French national hookers' strike was "one of the most dramatic events of the women's movement internationally," whilst COYOTE spokeswoman St James argued that "whores should be on the frontline of the women's movement."[24] While all the groups acknowledged that sex work represented something of a "difficult issue" for feminists, they each decidedly placed sex worker activism within this framework.[25] By constructing the sex worker, the prostitute, or the whore as

22 Call Off Your Tired Old Ethics, "International COYOTE Howls, Volume 3, Number 1," 1976, ref. 81-M32-90-M1-43, Schlesinger Library, Harvard University, United States.

23 English Collective of Prostitutes, "Network: News from the English Collective of Prostitutes. No. 1," July 1983, ref. ECP, Bishopsgate Institute, UK.

24 English Collective of Prostitutes, "Introduction," 10; Gail Pheterson, ed., *A Vindication of the Rights of Whores* (Seattle, WA: Seal Press, 1989), 20.

25 National Task Force on Prostitution, Priscilla Alexander and Gloria Lockett, "Violence Against Prostitutes," 1987, ref. 81-M32-90-M1-33, Schlesinger Library, Harvard University,

exclusively female, sex worker activists challenged feminists who claimed prostitution a "difficult issue." When the ECP noted that, "we have organised across national boundaries, helping to build a network of prostitutes' organisations which is an integral part of the international women's movement," they touted their legitimacy as activists and as feminists.[26]

The transnationality of these sex worker groups was, however, firmly centred around the Global North. Despite making frequent claims to universality, what emerges are clear boundaries to this internationalism. COYOTE's newsletter's "Around the World" section demonstrates the unacknowledged Western centrism of some sex worker activism. It overwhelmingly includes the activities of many different states in the US, Britain, and smaller discussions of other Western and Central European countries, but rarely from beyond. The Spring 1978 newsletter, for example, contained lengthy discussions of Holland, Switzerland, Sweden, Denmark and Paris and one short paragraph on Mexico.[27] Curiously, one third of the paragraph on Mexico discussed "prostitutes in Spain" who had "threatened to divulge the names of high members of the Spanish government who frequented bordellos"; the colonial relationships between the Global North and Global South were clearly recognised but remained unproblematised. The Fall 1978 newsletter discussed only activities within the USA and Europe.[28] What begins to emerge is the limits to the "world" through which sex worker activists operated. Similarly, in the appendix of Jaget's 1980 *Prostitutes, Our Life*, the ECP argued the experiences of sex workers were the "same all over the world," yet their expansion of this argument included examples only from Western Europe and the US.[29] Thus, we can recognise the inherent tension within the framework and perspective of groups such as COYOTE and the ECP. While on the one hand, they hoped to universalise the plight of the sex worker, on the other they failed to reflect or critically analyse the ways that the figure of the sex worker was culturally produced in different ways nor their place within the geopolitical landscape. They continued to argue and depict the discrimination that sex workers experienced as globally uniform though racially stratified, but this was informed by an analysis of the experiences of sex workers only in North America and Western Europe. Thus, while they drew attention to racial differences, by highlighting the increased violence that Black women who sold sex faced, they assumed the same cultural understanding of the "sex worker" or "the prostitute": a woman who *chose* to sell sex to provide for herself and her family. It was this understanding which

United States.

26 English Collective of Prostitutes, "Who Are the ECP?"

27 "COYOTE HOWLS, Volume 5, Number 1," Schlesinger Library.

28 "COYOTE HOWLS, Volume 5, Number 2," Schlesinger Library.

29 English Collective of Prostitutes, "Rules of Game," 205.

in the later decades came to complicate how certain groups reckoned with the global manifestations of selling sex, as I will detail later in this article.

The imperial gaze

Throughout the 1980s, it was not only that groups hoped to foster networks, exchange experiences, and collaborate, there were more concrete attempts to introduce formal international groups that represented sex workers globally. In contrast to "sister groups," the 1980s brought with it attempts to forge "international" collectives that sought global change. The ECP organisationally expanded to establish an international collective, and from the mid-1980s the ECP and their direct US-counterpart, the US Collective (US PROS), positioned themselves as two branches of one wider (transnational) collective called the International Prostitutes Collective (IPC) that also included representatives from Canada and Trinidad and Togabo.[30] Similarly, by the 1980s, COYOTE had emerged as the largest sex worker collective in the US, and the liberal standpoint of their analysis was clear. From the mid-1980s COYOTE, re-named the National Task Force on Prostitution (NTFP), turned also to international organising. The mid-1980s therefore represent a moment where the shift from transnational exchanges and cooperation to international platforms wholly emerged. In the following sections, I aim to analyse how this internationalism developed through analysing the work of the NTFP and its development into the International Committee of Prostitutes' Rights (ICPR). The ICPR was formed in 1985 by US-activists Margo St James and Gail Pheterson following the First World Whores' Conference held in Amsterdam.[31]

The use and perpetuation of colonial imagery in anti-trafficking campaigns have been well documented. Kempadoo argued that the construction of sex trafficking by anti-sex trafficking activists included colonial imagery "without shame" as women within the Global South were depicted as "incapable of self-determination."[32] Anti-trafficking activist groups proliferated in the 1980s, including the infamous US-based Coalition Against Trafficking in Women (CATW), led by Kathleen Barry, which was

30 Unlike the other "sister" groups which were usually defined as distinct groups with separate goals but who fostered solidarity with one another, the relationship between the ECP and the US PROS was more developed. This was reflected in the fact that their goals were the same and the two groups merely represented two "branches" of the same network.

31 Valerie Jenness, "From Sex as Sin to Sex as Work: COYOTE and the Reorganization of Prostitution as a Social Problem," *Social Problems* 37, no. 3 (August 1990): 410.

32 Kamala Kempadoo, "Introduction: Globalizing Sex Workers' Rights," in *Global Sex Workers: Rights, Resistance, and Redefinition*, ed. Kamala Kempadoo and Jo Doezema (New York: Routledge, 1998).

established in 1988.[33] Barry specifically relied on colonial imagery to further her activism, in which "vulnerable" women from the Global South were depicted as "victims" forced to sell sex for the profit of men.[34] As Doezema has argued, anti-sex trafficking campaigns were in many ways reformulations of earlier narratives of "white slavery," "moral crusades" through which activists challenged definitions and legislation around sex work.[35] Further, Doezema has situated these campaigns as a form of neo-colonialism through which Western superiority and the need to "rescue" women in the Global South were established.

I build on this analysis to argue that such discourses around the construction of the sex worker and the figure of the sex trafficked woman were embedded within many "liberal" constructions of sex work during the 1970s and 1980s furthered by some sex worker organisations. The NTFP utilised imperial discourses to argue for the "choice" of sex work within Western states. Like Barry's construction of sex trafficking, the NTFP's depiction of "forced prostitution" relied on and perpetuated imperialist discourses of women and sex workers in the Global South. In a discussion paper authored by Priscilla Alexander and published in 1987 titled, "On Prostitution," an entire page was devoted to outlining the reality of "Forced Prostitution." This paper highlighted that:

> Technological western countries, where most women are at least functionally literate and there is a significant array of occupational choices, about 10 percent of women who work as prostitutes are coerced into prostitution by third parties through a combination of trickery and violence… At the other extreme, in India, where there is massive poverty with large numbers of people dying in the streets, and where there are few occupations open to women, 70-80 percent of the women who work as prostitutes are forced into the life.[36]

In their discussions of "forced prostitution," the language and imagery around their descriptions are worth highlighting. The United States and India were depicted as "extreme" opposites, in which "technological western countries" offer the best conditions for women, in contrast to India in which people die

33 Charlotte Valadier, "Migration and Sex Work through a Gender Perspective," *Contexto Internacional* 40, no. 3 (December 2018): 505.

34 Nandita Sharma, "Anti-Trafficking Rhetoric and the Making of a Global Apartheid," *NWSA Journal* Autumn 17, no. 3 (Autumn 2005): 100.

35 Jo Doezema, "Loose Women or Lost Women? The Re-Emergence of the Myth of White Slavery in Contemporary Discourses of Trafficking in Women," *Gender Issues* 18, no. 1 (December 1999): 23-50.

36 National Task Force on Prostitution and Priscilla Alexander, "On Prostitution," February 1987, ref. 81-M32-90-M1-33, Schlesinger Library, Harvard University, United States.

on the streets and women have no, or limited, agency and are, therefore, "forced into the life" of sex work. Through this portrayal, the NTFP employed the "free" and "oppressed" dichotomy to the Global North and South: only in the West were women able to make the "occupational choices" that facilitated acceptable sex work.

This depiction fits with the arguments of postcolonial scholar Chandra Talpade Mohanty on the construction of the "third world woman" by Western feminists.[37] Mohanty argued that, within certain feminist depictions, the "third world woman leads an essentially truncated life based on her feminine gender (read: sexually constrained) and being 'third world' (read: ignorant, poor, uneducated, tradition-bound, domestic, family-oriented, victimized, etc)."[38] These constructions can be seen within the NTFP's depictions which drew on the "poverty," illiteracy, occupation options which were all highlighted as limiting the agency Indian women were afforded.[39] Certainly, women living in India were victimised through this narrative in which they had limited "choices." This fits Mohanty's assertions that Western feminism can erase "the fundamental complexities and conflicts which characterize the lives of women of different classes, religions, cultures, races and castes." Such descriptions constructed the "third world woman" as homogenous and as the antithesis to the Western woman; though womanhood was universal it was only within the West that true "freedom" could be experienced. Mohanty argued that it is through the construction of the "third world woman" that Western feminists were able to create the "(singular and privileged) first world" through a binary analytic.[40]

The NTFP's discussion of forced prostitution was expanded later in the same paper with the assertion that "In India, young girls are sometimes sold by their parents to traders, allegedly for service to the 'goddess,' but actually for work in brothels in major cities."[41] The NTFP's assumptions and lack of critical interrogation of stereotypes, which were of course created, reflected, and furthered through such language, is apparent. The NTFP's construction of the Global South was explicitly predicated upon the superiority of a (Western) secular society for the control which women had over their own lives, which Mohanty argued was a significant aspect of the discursive self-presentation of Western feminists.[42] The NTFP's arguments followed this framework,

37 Chandra Talpade Mohanty, "Under Western Eyes: Feminist Scholarship and Colonial Discourses," *Boundary 2* 12/13 (1984): 353.
38 Mohanty, "Under Western Eyes," 337.
39 "On Prostitution," Schlesinger Library.
40 "On Prostitution," Schlesinger Library.
41 "On Prostitution," Schlesinger Library.
42 Mohanty, "Under Western Eyes," 353.

as the construction of sex work in India was used to reinforce the freedom and choice that Western women were afforded and absolve Western sex workers, within this context, from charges of sex trafficking. This situated "sex trafficking" as something very real but predominantly external to the US/ the West and lent into the solution of the intervention and "saving" of women in the Global South, in this example in India.

In 2001, Doezema argued that depictions of sex workers in the Global South utilised by anti-trafficking activists served to contrast between the "liberated" woman and the oppressed and became the "image of sexually subordinated womanhood."[43] While Doezema analysed the notorious Coalition Against Trafficking in Women (CATW), these same colonial divisions and understandings of women in the Global South are recognisable in the work of the NTFP, an association that was assumed to be far more radical, left-wing and supportive of sex workers' rights. As Doezema highlighted, these constructions of women in the Global South were not new. Rather, these constructions can be seen as reformulations of understandings of sex work, innocence, and gender "established by over a century of feminist, abolitionist and colonialist discourse."[44] Despite being acutely aware of the racialised dynamics of sex work within the West as well as attempting to forge an international plight for sex workers' rights, the NTFP's work was overshadowed by uninterrogated assumptions. The dichotomised depiction of sex workers in the Global North and the Global South was not based on the incorporation of standpoints from a diverse range of countries. The NTFP's construction of sex trafficking relied on constructed and reinforced colonial understandings of gender in the Global South, through which divisions between the Global North and Global South were discursively maintained.

Discursive borders: The worldwide whore?

The First World Whores Congress, held in Amsterdam in 1985, was, as gender studies scholar Penny Weiss argued, "the result of years of local organizing and coalition building in many sites around the world."[45] It was a congress organised by COYOTE/NTFP and led by Margo St James, a former sex worker leader of COYOTE/NTFP, and Gail Pheterson, an American researcher of sex work. At this Congress, the International Committee of Prostitutes' Rights (ICPR) was formed, drafting the World Charter for Prostitutes' Rights (WCPR),

43 Jo Doezema, "Ouch! Western Feminists' 'Wounded Attachment' to the 'Third World Prostitute'," *Feminist Review*, no. 67 (2001): 32.
44 Doezema, "Western Feminists," 32.
45 Penny A. Weiss, ed., *Feminist Manifestos: A Global Documentary Reader* (NYU Press, 2018), 302.

and establishing an international newsletter, the World Wide Whore's News (WWWNews). Criminologist Valerie Jenness argued that the ICPR and World Charter were the culmination of the attempt to forge a collaborative international movement by St James and Pheterson and, thus, represented "COYOTE's international crusade."[46]

Jenness' use of the term "crusade" to describe the process through which COYOTE aimed to "redefine prostitution as a social problem" is particularly striking.[47] The term "crusade" has a long history not least within histories of sex work in which it is usually associated with a "moral crusade against prostitution" seen within, for example, white slavery campaigns in the late nineteenth and early twentieth centuries or, from the 1980s, in association with anti-trafficking campaigns.[48] Yet, it is also deeply related to colonial histories of territorial and cultural domination and acquisition.[49] Thus, while Jenness was uncritical of this term, the term "international crusade" is pertinent to the histories of the ICPR. The leaders of this "crusade" were Western European and American and while they hoped for the congress to build a global movement, the ability to achieve this was limited. As an "international crusade," both the ICPR and the WCPR illustrated the Western-centrism and neo-colonial aspects which were embedded in earlier sex worker activism of the 1970s. Indeed, though in 1981, St James complained that "the whores of Manila, as the ones in Bangkok, don't care much about the theories of the feminists in the developed countries," the events of the 1980s saw the expansion of international attempts at organising.[50]

As with the previous newsletters of individual campaigns, the continued Western centrism of the WWWNews is significant. The newsletter itself included reports from various countries and in the first newsletter, the WWWNews included contributions from Italy, Germany, Switzerland, France, Belgium, England, USA over four pages of the eleven-page newsletter.[51] In a separate section, the WWWNews included two short paragraphs on

46 Jenness, "From Sex as Sin," 410.
47 Jenness, "From Sex as Sin," 403.
48 E.g., Brian Donovan, *White Slave Crusades: Race, Gender, and Anti-Vice Activism, 1887-1917* (Urbana: University of Illinois Press, 2006); Ronald Weitzer, "The Social Construction of Sex Trafficking: Ideology and Institutionalization of a Moral Crusade," *Politics & Society* 35, no. 3 (September 2007): 447-475.
49 E.g., Livingstone M. Huff, "The Crusades and Colonial Imperialism: Some Historical Considerations Concerning Christian-Muslim Interaction and Dialogue," *Missiology: An International Review* 32, no. 2 (April 2004): 141-148.
50 Margo St James, "Letter from 'Margo, Jennifer, et Al'," 5 March 1981, ref. 81-M32-90-M1-546, Schlesinger Library, Harvard University, United States.
51 International Committee for Prostitutes' Rights, "World Wide Whore's News, Volume 1, Number 1," December 1985, ref. 81-M32-90-M1-557, Schlesinger Library, Harvard University, United States.

experiences of sex workers in Japan and Egypt in significantly less detail. As Kempadoo and Doezema have highlighted, it was not until the 1990s that sex worker activism began to emerge within the Global South.[52] It was not that groups and newsletters actively excluded or minimised the activism of countries within the Global South, but rather that they uncritically positioned themselves as the leader of an assumed "global" campaign with little consideration for the regional specificities of their positionality or activism.

The ICPR was shaped by a distinctly liberal and US-centric understanding of "sex work," "sexuality," and "consent" under the leadership of COYOTE / NTFP members. The 1985 World Charter stated that the ICPR's first demand was to "Decriminalize all aspects of adult prostitution resulting from individual decision."[53] Many of the position papers of COYOTE and the NTFP had similar conclusions around consent and sex work, such as an undated paper on sex worker legislation of the NTFP which argued "All sexual behaviour, in private, between consenting adults should be outside the purview of the law."[54] This analysis reflected the liberal perspective of COYOTE and the NTFP which centred "choice" and "privacy" in constructing legality around sex work. This liberal perspective was significant especially within the context of the prominence of radical feminism in the US, as radical feminists and anti-trafficking activists argued that sex work "willingly entered into is as damaging as forced prostitution."[55] Situated within these debates, liberal sex worker activist groups such as COYOTE and the NTFP frequently distinguished sex work from "forced prostitution" to underline the consent and agency that sex workers had. The ICPR's charter replicated and reinforced a liberal framework of sex work which was built especially from COYOTE/ the NTFP's understandings of sex work. How sex work was framed within the ICPR's analysis, and how it was legitimised, was through a North American lens. The ICPR was firmly based on liberal and American understandings of legitimate (and illegitimate) forms of sex work.

According to law scholar Chi Adanna Mgbako, sex worker activists' utilisation of a human rights framework served as a "powerful feminist critique of whorephobia, the politics of rescue, and carceral feminism." I argue, however, that this utilisation of the concept of human rights only

52 Chi Adanna Mgbako, "The Mainstreaming of Sex Workers' Rights as Human Rights," *Harvard Journal of Law & Gender* 43 (2020): 136.

53 Penny A. Weiss, ed., "World Charter for Prostitutes' Rights: First World Whores' Congress; International Committee for Prostitutes' Rights; Amsterdam, Netherlands; February 1985," in *Feminist Manifestos: A Global Documentary Reader* (New York: NYU Press, 2018).

54 National Task Force on Prostitution, "Prostitution and the Constitution," n.d., ref. 81-M32-90-M1-33, Schlesinger Library, Harvard University, United States.

55 Kate Sutherland, "Work, Sex, and Sex-Work: Competing Feminist Discourses on the International Sex Trade," *Osgoode Hall Law Journal* 42, no. 1 (2004): 160.

reinforced the Western framing that the ICPR represented, and homogenised the construct of the "prostitute" that was relatively incompatible outside a Western framework.[56] In other words, though Mgbako stated that "the mainstreaming of sex workers' rights as human rights should mark the end of feminist debates regarding sex work," it is, I argue, pertinent to concede that the universalisation of Western understandings of rights is at its core in conflict with anti-colonial feminism. The ICPR's framework explicitly defined sex work against sex trafficking, the Global North against the Global South and seemingly colluded with (not critiqued) "the politics of rescue." Feminist philosopher Ranjoo Seodu Herr has argued that human rights campaigns, and especially feminist human rights campaigns, "may replicate the imperialist stance of the colonial era and erode culturally diverse modes of gender justice in the Global South."[57] The experiences of those who sold sex in the Global South were not included in the ICPR's demands or critiques. During the Second World Whores Congress in 1986, the special session on human rights had testimonies which were overwhelmingly from the Global North and especially Europe. Of fifteen reports, four were from the Global South (Ecuador, India, Vietnam, Thailand), and eleven were from Western and Central Europe and North America. In Pheterson's 1989 *A Vindication of the Rights of Whores,* she provided a transcript of testimony from the human rights sessions of the Second World Whores' Congress. Within the fifty pages, only eight and a half refer to testimonies from the Global South. Criticising the present-day "Women's Rights as Human Rights" movement, Seodu Herr argued that this fails to exemplify "transnational feminist solidarity," as it does not "represent the standpoint of marginalized/oppressed women in the Global South."[58] These same conclusions, I argue, can be drawn from the recourse to human rights for sex workers. Despite this, the ICPR made continual claims to universality, setting the terms of debate and platforming their own interpretations of the "sex worker." The representation at the Congress itself was telling. As Meg Weeks has noted, in lieu of representatives from non-Western countries, "Pheterson and St James asked immigrant advocates living in the Netherlands to speak about the status of sex work in their home countries."[59] This was explained as the ICPR had been unable to provide economic compensation for international flights and accommodation to allow for individuals from non-Western countries to travel to the Congress held in Europe. Though this on the one hand reflects the difficulties of international

56 Mgbako, "Mainstreaming of Sex Workers," 136.

57 Ranjoo Seodu Herr, "Women's Rights as Human Rights and Cultural Imperialism," *Feminist Formations* 31, no. 3 (2019): 118.

58 Seodu Herr, "Women's Rights," 118.

59 Meg Weeks, "A Prostitutes' Jamboree: The World Whores' Congresses of the 1980s and the Rise of a New Feminism," *Journal of the History of Sexuality* 31, no. 3 (September 2022): 273-301.

organising and obtainment of funds for discussions around sex work and sex worker liberation, on the other hand it points to the priorities of the ICPR that nonetheless claimed to be wholly "international."

There was, therefore, a clear tension between how the ICPR grew to construct the "sex worker" around a language of "choice" so typical of the neoliberal shift in the 1980s. In a 1989 chapter titled "Reports and New Voices," Pheterson partly acknowledged this when she expressed her hopes that the ICPR would expand beyond being "a young organisation which began in the West," and stating that: "In the coming months we expect to expand our network as we organise the next World Whores' Congress, a meeting which will prioritise the rights of sex workers from developing countries."[60] Yet, this third Congress never occurred and the activity of the ICPR declined at this point. The integration of "developing countries" would require a more expansive framework of the "sex worker" than the ICPR employed. Through building an understanding of sex work around choice, these same cultural manifestations were unable to translate easily in the ICPR's pursuit of global expansion. From the 1980s sex workers in the Global South formed their own collectives, as Kempadoo and Doezema have chronicled. These groups largely rejected the frameworks of the ICPR and called attention to the neocolonial dynamics of the late twentieth century. In this way, their aims and approach held markedly different priorities, most notably with the centrality of AIDS from the mid-1980s to their plight.[61] These groups made critical interventions to understandings of the "sex worker" and rejected a neoliberal framework of selling sex.

Through an analysis of Western sex worker activism in the late twentieth century it is possible to chart not only the impact of neoliberalism on the sex workers' rights movement but also an understanding of how certain constructions of "sex work" have morphed over time. Transnationality was undoubtedly a central aspect of sex worker activism for those organising in the US, Britain and France in the late twentieth century. Across the 1970s and the early 1980s as sex worker collectives emerged, they were brought into a wider conversation amongst sex worker activists both nationally and internationally. Through these networks, groups developed their positionality, organised events, and promoted international activism. The representation within these transnational networks is significant as well as the emphasis given to predominantly North American and Western European voices. Further, by focusing on the NTFP, an American liberal sex worker group, I have also argued

60 Gail Pheterson, ed., *A Vindication of the Rights of Whores* (Seattle, WA: Seal Press, 1989), 259.

61 Kempadoo and Doezema, *Global Sex Workers*.

that some Western sex worker activists were involved in the construction of sex work and sex trafficking that represented and perpetuated a form of neo-colonialism. The figure of the "sex worker" as well as the concept of "sex trafficking" was constructed within a Western liberal framework that emphasised the centrality of "choice" within debates around sex work.

From the mid-1980s, Western sex worker activists specifically aimed to pursue an international campaign. While this may have been in recognition of the shared discriminations that sex workers faced, this was also built from an understanding of the West as culturally superior, as leaders of "women's rights." As they explicitly attempted to universalise their demands, these continued to form from and through the experiences of women in the West who sold sex, though now they explicitly spoke for a wider audience. The emerging dominance of a liberal and American perspective within so-called international activism is a crucial limitation of this early activism. Within their organising and praxis, activists grappled with how to navigate both emerging calls for decolonial approaches to feminism whilst also attempting to assimilate within the broader mainstream feminist movement. Yet, through the attempts to globalise sex worker demands these activists also spoke over and for the Global South; despite the "international" nature of the organising, the dominant framing of sex worker rights was formed in opposition to the Global South.