# **Prostitution (Offences and Support) (Scotland) Bill**

# EVIDENCE REVIEW PAPER FOR THE CRIMINAL JUSTICE COMMITTEE

Ash Regan MSP for Edinburgh Eastern

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This paper reviews the evidence cited against the Prostitution (Offences and Support) (Scotland) Bill during Panel 2 of the Criminal Justice Committee session on 8 October (Section 1), and in the supplementary written submission provided by Dr Niina Vuolajärvi, dated 26 November and published 27 November (Section 2). It focuses on claims that criminalising buyers under Nordic Model laws increases violence, worsens safety, and fails to reduce demand.

The paper has two main elements. First, it provides a summary of the key studies and sources relied upon by opponents of the Bill, setting out for each one what was claimed and the core rebuttal. Second, it then examines those studies in detail, using their own methods and findings to assess whether they support the conclusions that were presented to the Committee.

Across both sections, the analysis finds that the studies and datasets cited in evidence do not demonstrate that buyer criminalisation increases violence or harm. In several cases, the sources have already been reviewed by higher courts or official evaluators, who have concluded that no law-driven increase in violence has been shown. In others, the data are methodologically incapable of measuring the claimed effects, or they describe harms inherent to prostitution rather than harms caused by criminalising buyers.

# SECTION 1: SUMMARY OF EVIDENCE CITED AGAINST THE BILL AND THE CORE REBUTTAL FOR EACH

# Médecins du Monde (2018, France)

Claim in Committee: Client criminalisation increases violence, poverty, harm.

### **Core Rebuttal:**

- The European Court of Human Rights (2024) assessed this study and found no reliable evidence of increased violence or harm.
- MdM itself admits non-representative sampling, recruitment via anti-law organisations, and reliance on recall, with interviews starting just three months after the law.
- The study provides no causal evidence and cannot substantiate claims made in Committee.

# Platt et al. (2018) Systematic Review - PLOS Medicine

**Claim in Committee:** Criminalisation triples violence and doubles HIV.

### **Core Rebuttal:**

- The review examines repressive policing of the people in prostitution, not Nordic Model buyer-laws.
- The only Nordic-Model jurisdictions included (Canada and Sweden) contributed no outcome data supporting the claim.
- The datasets for Canada predate national buyer criminalisation, and the single Swedish study contains no measurable outcomes.
- None of the review's findings relate to Scotland's model.

# HIV Ireland - McGarry & Ryan (2020)

**Claim in Committee:** Nordic Model increases violence, worsens mental health, increases unsafe sex.

#### **Core Rebuttal:**

- The report is based on 20 group-interview participants recruited through SWAI networks, with acknowledged gaps
- Contains no quantitative measures, no prevalence data, no HIV or STI data, and cannot attribute any harms to the law.
- Many harms describe known client behaviour documented before the law.
- Not suitable as evidence for national policy change.

# Armstrong et al. (2024, NZ/Scotland/Ireland)

**Claim in Committee:** Countries with the Nordic Model show "high rates of harmful consequences".

### **Core Rebuttal:**

- The study is qualitative, not designed to show prevalence or causation.
- The Scotland and Ireland participants were networked through decriminalisation-advocacy circles, not representative of the wider population in prostitution.
- Provides no data on violence trends, HIV, STI incidence, or any measurable outcome.
- Its findings cannot support claims that buyer criminalisation increases harm.

# Northern Ireland DOJ Review (2019)

Claim in Committee: 225% increase in assaults after buyer law.

### **Core Rebuttal:**

- The "225% increase" cited in evidence is drawn entirely from self-reported incidents submitted to the third-party safety app UglyMugs.ie, not from police, court, health-service or structured survey data.
- By the standards of the Home Office, the Office for National Statistics, Scottish Government statisticians, UNODC and the EU Agency for Fundamental Rights, self-selected, anonymous reports to an app do not qualify as crime statistics and cannot be used to measure prevalence or trends in violence. They are not recorded under the National Crime Recording Standard, not collected from a representative sample, and not subject to evidential checks or audit.
- UglyMugs.ie itself describes its purpose as a safety platform that allows users
  to check phone numbers and receive warnings, not as a system for generating
  official violence data. Its reports mix crime and non-crime incidents and are
  explicitly designed for individual safety decisions, not population-level
  measurement.
- The Northern Ireland DOJ Review does not claim that the buyer law caused an increase in violence. It treats the app figures as inconclusive and offers multiple alternative explanations, consistent with mainstream crime-statistics guidance.
- On any recognised methodology, these app submissions cannot be used as
  evidence that buyer criminalisation increased violence, and the Review does
  not support the claim made in Committee.

# SECTION 2: SUMMARY OF EVIDENCE CITED IN DR VUOLAJÄRVI'S SUPPLEMENTARY SUBMISSION AND CORE REBUTTAL

# Canada - Crago et al. (2022, Global Public Health)

Claim: Canada's end-demand law (PCEPA, 2014) increased harm and violence.

### **Core Rebuttal:**

- Cross-sectional survey conducted once, 3 to 4 years after PCEPA, in five cities, with 200 participants recruited through six organisations and purposive sampling of the most marginalised groups.
- No baseline, no national representativeness, no before and after comparison, and no ability to separate legal effects from other structural factors such as policing, drugs markets, homelessness or poverty.
- High levels of violence reported are consistent with longstanding evidence that prostitution is a high-risk setting under all legal regimes. The study cannot show that PCEPA increased violence or changed underlying risk.

# Sweden - multiple sources cited for demand and harm

**Claim:** Sweden's Sex Purchase Act has not reduced demand and has increased harms.

### **Core Rebuttal:**

- National survey data show that 9.4 percent of men report ever having paid for sex, the lowest prevalence in the Nordic region.
- Street prostitution fell by about 50 percent after 1999 and has not returned to previous levels.
- Growth in online advertising reflects a global digital shift that affects all legal regimes; the leading review cited by Dr Vuolajärvi explicitly warns against attributing this development to the Act.
- Qualitative studies cited describe the harms of prostitution itself and lack before and after comparisons; they do not provide evidence that the law increased violence.

# Northern Ireland - Backus & Nguyen (2021) modelling study

**Claim:** online activity briefly dipped then returned to baseline and sexual assaults against women rose by 10 to 22 percent after the Sex Buyer Law.

#### **Core Rebuttal:**

- The online market analysis is descriptive only and cannot attribute any change to the law.
- The sexual violence result is based on a statistical model that compares two hypothetical estimated curves of unreported crime; it is not derived from recorded crime data or victimisation surveys.
- The authors acknowledge that changes in recording practice undermine the use of official data for evaluating the law and could not validate their estimates with survey data.
- The interpretation relies on a "substitution" theory that treats prostituted women as a buffer against sexual violence toward other women, a mechanism that is unsupported by empirical evidence and ethically indefensible.
- PSNI evidence to the Committee confirms very limited implementation of the buyer law, making it implausible as a driver of population-level changes in sexual violence.

# France - Médecins du Monde (2018)

**Claim:** the 2016 buyer law increased violence and poverty.

#### **Core Rebuttal:**

- The study is already analysed in detail in Section 1. Its own authors acknowledge serious methodological limitations, including non-representative sampling and recruitment via organisations opposed to the law.
- The European Court of Human Rights examined this study and found no reliable evidence that the law increased violence or worsened conditions.

# Republic of Ireland - Ugly Mugs Ireland app data

**Claim:** buyer criminalisation has increased violence against prostituted people.

#### **Core Rebuttal:**

- The source is the same app-based reporting system already considered in Section 1 in relation to Northern Ireland.
- Self-selected, anonymous submissions to a safety app do not meet recognised standards for crime statistics and cannot be used to demonstrate a legal increase in violence.

### Norway – Bjørndahl (2012), Amnesty (2016), Vuolajärvi (2022)

Claim: Norway's Sex Purchase Act has increased harm and violence.

### **Core Rebuttal:**

- Bjørndahl explicitly states that the study cannot determine whether violence is caused by the criminalisation of buyers. The two survey waves differ in recall periods, definitions and sample characteristics, and cannot function as before and after comparisons.
- The Amnesty report focuses on immigration enforcement, landlord liability and third-party offences, and states that it is beyond the scope of the report to measure changes in violence.
- Vuolajärvi's article documents harms linked mainly to immigration law and precarious status among migrant women, which are also found in fully commercialised systems such as Germany and New Zealand. None of these sources demonstrate that buyer criminalisation increased violence.

# Israel – Brookdale Institute Evaluation (2024)

**Claim:** Israel's buyer law did not reduce demand and may have worsened conditions.

### **Core Rebuttal:**

- The authors state on the first page that the impact of the law cannot be isolated from COVID-19, the Israel—Hamas war and other concurrent events, and that three years is insufficient to assess long-term effects on the extent of prostitution.
- The two sex-buying figures (9.2 percent in 2021 and 12.2 percent in 2024) are not comparable as a trend; the report explicitly warns against treating them as evidence of change over time.
- The evaluation was not designed to measure demand reduction at this early stage and does not claim that the law increased demand or worsened conditions.
- It documents strong normative change in attitudes to buyer criminalisation and substantial positive effects from significant investment in support and exit services.

# SECTION 1: DETAILED EXAMINATION OF EVIDENCE CITED IN PANEL 2 (8 OCTOBER)

# Médecins du Monde (2018) Study

### **Full Citation**

# Le Bail, H., Giametta, C., & Rassouw, N. (2018).

What Do Sex Workers Think About the French Prostitution Act? A Study on the Impact of the Law From 13 April 2016, Against the 'Prostitution System' in France. Médecins du Monde (MdM).

# Where the Claim Appears in the Record

During Panel 2 of the Criminal Justice Committee on 8 October 2025, the Médecins du Monde study was cited by Niki Adams (English Collective of Prostitutes), who concluded:

"I feel that that is a very credible source of evidence."

This statement was made immediately after the study's size and alleged findings were described.

### Rebuttal

# 1. The European Court of Human Rights has already assessed this study and did not find it credible evidence of harm.

In its June 2024 judgment, the European Court of Human Rights:

- summarised the Médecins du Monde report,
- noted that even the study's own social-work contributors were cautious about linking the law to any increase in violence, and
- accepted the French Government's argument that the MdM survey contained "no reliable data" showing any deterioration in poverty or conditions.

Following this evaluation, the Court:

- → rejected the applicants' case,
- → found no evidence of increased violence or harm, and
- → upheld the legality and proportionality of France's buyer-law.

If the MdM study had constituted "a very credible source of evidence," these conclusions would not have been reached.

# 2. The study's methodological weaknesses are fatal.

According to its own authors, the study:

• used a non-representative sample,

- recruited exclusively through organisations already opposed to the law,
- relied on retrospective recall of pre-law conditions, and
- began data collection three months after the legislation came into force.

These are the study's own admissions. A study that cannot claim representativeness, cannot eliminate organisational bias, and cannot establish before-and-after causation is not robust evidence for national policy.

# 3. The ECHR judgment overrides an NGO survey in evidentiary terms.

The Court considered:

- seven years of post-law evidence,
- national datasets,
- expert analyses, and
- full adversarial submissions.

After reviewing all relevant material — including the MdM study — the Court held that no harm had been demonstrated.

When a small NGO opinion survey and a full European Court of Human Rights judgment conflict, the Court's findings prevail.

#### Conclusion

The Médecins du Monde study was described in evidence as 'a very credible source'. However, the European Court of Human Rights examined this study in detail, noted that even the social-work contributors were cautious about linking the law to violence, and accepted that the survey contained no reliable data showing any deterioration in conditions. The Court then concluded that no evidence of increased harm had been demonstrated. Whatever an NGO survey may claim, the highest human-rights court in Europe has already tested it and found it insufficient.

### Platt et al. (2018)

### **Full Citation**

# Platt L, Grenfell P, Meiksin R, Elmes J, Sherman SG, et al. (2018).

Associations between sex work laws and sex workers' health: A systematic review and meta-analysis of quantitative and qualitative studies. PLOS Medicine, 15(12): e1002680.

# Where the Claim Appears in Panel 2

(8 October 2025 Official Report – Criminal Justice Committee)

During Panel 2, Laura Baillie (Scotland for Decrim) told the Committee that:

- HIV rates fall under full decriminalisation,
- "any form of criminalisation, whether of the buyer or the seller," triples violence and doubles HIV,
- and that these claims come from "a systematic review of 28 years of research."

She then quoted from qualitative descriptions of police harassment in the Platt review.

These statements were presented as evidence that criminalising buyers in Scotland would increase violence and HIV risk.

#### Rebuttal

# 1. The review does not study buyer criminalisation or the Nordic Model.

The "three-fold violence" and "two-fold HIV" figures cited in Panel 2 are drawn from studies of repressive policing of prostituted women, including:

- arrest, displacement and street sweeps,
- surveillance and harassment,
- confiscation of condoms,
- extortion and arbitrary detention,
- and forced HIV testing.

These practices describe full criminalisation of prostituted people, not a model in which prostituted people are decriminalised and supported while buyers are the target of enforcement.

Scotland has not used such policing for more than a decade, and the Bill does not introduce it.

### 2. Canadian and Swedish studies: none support the claim

Across Canada and Sweden – the only Nordic-Model jurisdictions represented in the review – 21 studies were identified.

#### Canada:

Most of the Canadian studies were either published before the 2014 federal buyer criminalisation law was introduced or analysed the same dataset collected on prostituted individuals before the law came into force. They therefore examine the harms of pre-reform policing of prostituted women, not a legal environment in which prostituted people are decriminalised and supported while buyers are the target of enforcement.

The few studies published after the law was introduced and using a newer dataset, do not show what is claimed because they either examine a completely different issue, find no increase in violence, no deterioration in screening, or collected no HIV data.

### Sweden:

The review includes one Swedish study, a small, non-representative qualitative paper produced by authors opposed to the law. It provides no outcome data on violence, HIV or STI trends.

### **Conclusion:**

None of the 21 studies evaluates a functioning Nordic-Model system or supports the claim that criminalising buyers increases violence or HIV risk.

### Conclusion

The Platt et al. review has been examined in full. None of the Canadian or Swedish studies evaluate buyer criminalisation or provide violence or HIV outcomes under a Nordic-Model framework. Almost all of the Canadian studies were published or analysed data collected before buyer criminalisation existed, and the single Swedish source provides no outcome data. As the review examines harms arising from repressive policing of prostituted women, a practice not used in Scotland for more than a decade and not proposed in this Bill, it cannot support the claim made in Panel 2 that criminalising buyers increases violence or HIV risk.

# HIV Ireland (2020) — Rebuttal

### **Full Citation**

# McGarry, K., Ryan, P. (2020).

Sex Worker Lives Under the Law: A Community-Engaged Study of Access to Health and Justice in Ireland. Commissioned by HIV Ireland.

# Where the Claim Appears in Panel 2

(8 October 2025 – Criminal Justice Committee)

During Panel 2, Laura Baillie stated that:

- a "2020 study commissioned by HIV Ireland" found that sex workers who
  experienced violence were increasingly reluctant to report it after Ireland
  introduced buyer criminalisation,
- that their physical and mental health were negatively affected, and
- that stigma against sex workers had increased following the 2017 law.

These claims were presented as evidence that buyer criminalisation in Ireland has caused increased violence, unsafe sex, reduced reporting and worse health.

### **Rebuttal**

# 1. The study is based on only 20 participants recruited through Sex Workers Alliance Ireland-linked networks.

The dataset consists of four small focus groups with around 20 participants, some of whom attended more than one group. All participants were recruited through:

- SWAI peer researchers,
- SWAI social-media channels and online sex-worker groups,
- · Escort Ireland, and
- SWAI-allied NGOs in Cork, Galway and Limerick.

The authors explicitly acknowledge that all participants were "in some way networked" to SWAI, who campaign against the Nordic Model, or its allies and that sex workers not engaged in these fora "did not have an opportunity to lend their voice."

This excludes isolated and highly vulnerable women and prevents any national generalisation.

# 2. The study produces perceptions, not outcome evidence.

The report collects:

- no quantitative violence data,
- no policing or reporting statistics,
- no physical- or mental-health indicators,
- no HIV or STI data, and
- no before/after comparison with pre-2017 conditions.

The findings consist solely of subjective accounts given in facilitated group discussions. No measurable outcome is reported.

# 3. The study cannot demonstrate any impact of the 2017 law.

Because the study:

- has no baseline data from before 2017,
- measures no change over time,
- collects no trend information, and
- excludes the majority of prostituted women,

it cannot establish that unsafe sex, coercion, mistrust of authorities, reluctance to report, or mental-health concerns began or worsened after buyer criminalisation.

Quotations about condom tampering, pressure for bareback, brothel exploitation, or fear of accessing services cannot be linked to the law, because the study did not measure whether these behaviours increased, decreased or remained unchanged after 2017.

# 4. The behaviours described are inherent to prostitution and not shown to be caused by the law.

The quotations placed under "impact of the law" describe:

- demands for unprotected sex,
- condom refusal or tampering,
- client entitlement and harassment,
- avoidance of health services by migrant women, and
- coercion by pimps and third parties.

These are widely recognised in prostitution research as structural features of the sex trade itself.

The report provides:

- no evidence that these behaviours were less common before 2017, and
- no evidence that their prevalence changed because buyers became criminally liable.

The study therefore does not demonstrate any legal impact; it simply records how a small group of participants perceive their situation under an already harmful system.

# 5. International evidence cited in the report does not relate to Ireland's law.

To support claims about unsafe sex, the authors cite studies from India and Bangladesh, which analyse brothel-based prostitution under very different legal and social conditions.

These international studies:

- do not examine buyer criminalisation,
- do not concern Ireland, and
- do not provide evidence about the effects of the 2017 Act.

Their use highlights that the Irish project itself did not generate outcome evidence on violence, health or enforcement.

### **Conclusion**

The 2020 HIV Ireland report cited in Panel 2 is based on 20 participants recruited through advocacy-linked peer networks. It collects no violence data, no policing or reporting data and no HIV or health outcomes, and it includes no before-and-after comparison. The behaviours it describes are well known features of prostitution and are not shown to have increased after the 2017 Act. As the findings consist solely of perceptions from a small, non-representative group, the study cannot support claims that buyer criminalisation increased violence, unsafe sex or barriers to justice.

# Armstrong et al. (2024)

#### **Full Citation**

Armstrong, L., Phillips, J., Ryan, B., Fraser, C., & Kelly, T. (2024).

"In an ideal world, it would be fully decriminalised": Stigma, discrimination, and sex work laws in Scotland, Aotearoa New Zealand, and the Republic of Ireland. Victoria University of Wellington.

### Where It Appears in the Record

# Panel 2 – Criminal Justice Committee, 8 October 2025 Witness: Laura Baillie (Scotland for Decrim)

Ms Baillie claimed that Armstrong et al.:

- is "some of the only research" comparing legal models,
- assesses the impact of decriminalisation vs the Nordic Model vs partial criminalisation,
- shows higher violence, vulnerability and structural harm in Ireland,
- · shows improved safety, agency and client-refusal capacity in New Zealand,
- and draws on "70 interviews" and "hundreds" surveyed to reach these conclusions.

She used this to argue that buyer criminalisation increases harm.

### **Rebuttal**

# 1. What the study actually contains

Armstrong et al. conducted 70 qualitative interviews between 2020 and 2022:

- 26 in *New Zealand* (commercialised system)
- 24 in *Ireland* (Nordic Model)
- 20 in Scotland (partial criminalisation)

These are *narrative accounts*. They are not violence data, not health data, not safety metrics, and not evaluative before/after analysis.

The authors themselves describe it as a study of stigma and discrimination, not law outcomes.

# 2. It does not evaluate the effects of any legal model

The study measures:

- stigma
- discrimination
- perceptions of institutional treatment

- feelings of marginalisation
- narratives about social attitudes

### It does not measure:

- violence prevalence
- violence trends
- homicide risk
- HIV or STI incidence
- condom-use behaviour
- access to police or justice
- exploitation or trafficking trends
- displacement
- safety strategies before/after a law change

Nothing in the study is capable of establishing that buyer criminalisation causes harm.

# 3. If it did, then New Zealand results *contradict* the claim that decriminalisation eliminates harm

Participants in New Zealand, under a fully commercialised system, reported:

- stigma
- discrimination
- exclusion from business premises
- negative treatment by landlords and employers
- unsafe client behaviour
- fear of disclosure

These harms arise without buyer criminalisation. They are inherent to prostitution, not products of criminal law.

This directly contradicts Ms Baillie's claim in Committee.

# 4. Ireland findings cannot demonstrate harm caused by the buyer law

The Ireland material consists of 24 qualitative interviews, recruited through existing activist networks.

### It includes:

- no baseline before 2017
- no trend data
- no police or justice data
- no measurement of violence
- no health metrics
- no causation analysis

Because the same harms appear in New Zealand (no buyer law), the Ireland section cannot demonstrate that the Nordic Model caused additional harm.

# 5. Scotland section relies on outdated and inaccurate assumptions about enforcement

Armstrong's Scotland interviews present stigma, policy hostility and fear, but the framing of Scotland as becoming "increasingly prohibitionist" is based on citations describing policing practices from the 1980s–2010s, not the last decade.

# In reality:

- Enforcement against prostituted people is now exceptionally rare.
- Scotland does not operate a zero-tolerance or punitive model.
- Early-2010s sauna operations were trafficking-driven and time-limited, not a continuing strategy, routine raids are not common practice today.

The study's depiction of Scotland therefore does not reflect current policing practice.

# 6. Sample-size claims made in Committee were inaccurate

Ms Baillie implied the Armstrong study involved "hundreds" surveyed. It did not.

It is based solely on:

- 70 interviews (26 NZ, 24 Ireland, 20 Scotland),
- with no survey component.

The "hundreds" figure belonged to the *Médecins du Monde* study in France, not Armstrong et al.

# 7. The study cannot support the claim that buyer criminalisation increases harm

#### Because:

- it does not measure violence, safety, health or policing,
- it records the same harms under decriminalisation as under buyer criminalisation,
- it provides no causal analysis,
- and its Scotland section is factually outdated,

the study cannot demonstrate that the Bill would increase harm, nor can it support the claims presented in Committee.

### **Conclusion**

Armstrong et al. (2024) is a qualitative study of stigma in three countries. It does not measure violence, safety, health or policing, and it does not assess the effects of any legal model. The same harms appear in New Zealand, Ireland and Scotland, including under a commercialised system, meaning they cannot be attributed to buyer criminalisation. The study therefore cannot be treated as evidence that the Bill would create additional harm.

### Northern Ireland - Full Rebuttal of Evidence Cited in Committee

### What Was Claimed in Committee

Opponents cited the 2019 Northern Ireland Department of Justice Review to argue that after the 2015 buyer law came into force:

- "in Northern Ireland, following a couple of years in which the type of legislation before us was introduced, the level of violence experienced by those women went up by 225 per cent. That is an astronomical number."
- harms rose under the Nordic Model

This presents the DOJ Review as evidence that buyer criminalisation increases violence.

That is not what the Review shows, and the underlying material does not meet any accepted standard for crime measurement.

# 1. The "225 percent increase" is based on self-selected app reports, not crime data

The DOJ Review's "225 percent increase" is taken entirely from incidents reported to UglyMugs.ie, a third-party safety app, rather than from:

- police-recorded crime,
- court records,
- health-service data, or
- a structured, representative victimisation survey.

UglyMugs.ie explicitly presents itself as:

"A safety platform for sex workers in Ireland. Check phone numbers, receive warnings and make reports."

Its function is to:

- allow users to check phone numbers,
- receive warnings about previously reported behaviour, and
- log reports for other users' awareness.

It does not operate as:

- a police recording system,
- an official crime statistics collection, or
- a survey designed to produce representative prevalence data.

The "increase" in incidents refers to changes in self-selected reports to a safety app, not to crime recorded under any national crime-recording framework.

# 2. Crime-statistics standards: why app data cannot be treated as evidence of prevalence or trends

Across UK and international standards, the position is consistent:

- Home Office National Crime Recording Standard and Counting Rules: incidents counted as crime statistics must be recorded by the police or accredited staff, classified under agreed rules and supported by evidential thresholds. Unverified, third-party incident lists do not qualify as recorded crime.
- Office for National Statistics (ONS): the ONS distinguishes between:
- police-recorded crime,
- large, properly sampled victimisation surveys, and
- self-selected, unverified reporting.

The third category is explicitly treated as unsuitable for measuring the level or trend of crime because it lacks representativeness, verification and standardised recording.

- Scottish Government statistical frameworks and HM Inspectorate of Constabulary: crime data are required to be systematic, auditable and consistent, based on clear rules and verifiable records.
- UNODC and the EU Agency for Fundamental Rights: international guidance states that valid violence data must come from:
- administrative sources such as police, justice or health systems, or
- representative, structured surveys.

Self-selected online reporting tools are recognised as experience-sharing platforms, not as statistical bases for prevalence or trend analysis.

UglyMugs.ie sits squarely in this third category. By design, it:

- accepts anonymous, voluntary submissions,
- does not apply national crime-recording rules,
- does not draw from a defined, representative sample, and
- is not subject to the auditing and consistency checks applied to crime statistics.

Treating such reports as if they were crime data conflicts with the core principles applied by UK and international statistical authorities.

# 3. The design of the screening tools contradicts the narrative about passport and credit card screening

In Committee, it was suggested that buyers currently hand over passports, credit cards or other official identification and that this capacity for screening would be lost if buyers became criminally liable.

However, the actual safety tools relied on in Ireland and the UK show that such exchanges are exceptional rather than routine.

#### The tools allow:

- UglyMugs.ie: checks on phone numbers and submission of reports
- NUM Checker (Great Britain): searches on
- email addresses
- phone numbers
- online profile handles
- vehicle registrations

Neither system is designed to store or cross-check passports or credit-card details. Their entire model of screening is built around limited, user-entered identifiers that buyers use because these preserve anonymity and can be replaced easily.

### This matters because:

- the same ecosystem that was described in evidence as enabling rigorous identification checks is in practice built on narrow and non-verified identifiers;
- the underlying data were never intended to operate as a forensic record of named offenders;
- the tools function as quick, informal safety aids, not evidence-gathering mechanisms.

If buyers routinely handed over passports or credit cards, the main screening tools would be designed to store and verify such information. They are not. Their design confirms that anonymity is the norm and that any exchange of formal identification occurs only in niche or exceptional circumstances.

# 4. The DOJ Review does not claim the buyer law increased violence

The DOJ Review treats the UglyMugs.ie figures carefully and with explicit caution. It acknowledges that any rise in reported incidents may be due to factors such as:

- more people involved in prostitution,
- more users engaging with the app,
- changes in awareness, reporting or recording behaviour, or
- broader patterns of crime and anti-social behaviour.

Consistent with mainstream crime-statistics guidance, the Review:

- does not assert that the buyer law caused an increase in violence,
- does not present corroborating police, court or health-service data,
- does not apply a causal analysis linking Article 64A to the reported incidents.

The strong causal claim made in Committee therefore goes well beyond anything stated in the DOJ's own interpretation of the app material.

# 5. Pre-existing and cross-model buyer behaviour

The DOJ Review includes references to buyer behaviours such as:

- pressure for unprotected sex,
- coercive or exploitative conduct by clients and third parties, and
- reluctance to report to authorities.

### These behaviours are:

- well documented in research before buyer laws were introduced in Ireland or Northern Ireland, and
- also documented in fully commercialised systems, including countries that have never criminalised buyers.

International literature attributes such behaviours to male demand and the structural power imbalance in prostitution, not to the legal status of buyers.

Using these already known patterns as evidence that the Northern Irish buyer law created new dangers is not supported by comparative research.

### 6. Evidential conclusion

From the perspective of crime and statistics methodology:

- the "225 percent increase" is derived from self-selected reports to a safety app, not from any recognised crime-statistics source,
- the data are not collected under the National Crime Recording Standard and are not based on a representative sample, and
- mainstream authorities such as the Home Office, the Office for National Statistics, Scottish Government statisticians, UNODC, the EU Agency for Fundamental Rights and leading criminologists treat this type of material as unsuitable for measuring the level or trend of violence.

The Northern Ireland DOJ Review itself does not claim that the buyer law increased violence. It treats the app figures as inconclusive and suggests multiple alternative explanations in line with established statistical caution.

### **Conclusion**

The "225 percent increase" cited in evidence is not based on police or survey data, but on self-selected reports to a safety app that does not meet any recognised standard for crime measurement. UK and international statistical authorities are clear that such data cannot be used to measure prevalence or trends in violence. The DOJ does not claim that the buyer law caused an increase in harm. The Review therefore does not provide evidence that buyer criminalisation in Northern Ireland led to an escalation in violence and cannot be relied upon to support that claim.

# SECTION 2: DETAILED ANALYSIS OF EVIDENCE CITED IN DR VUOLAJÄRVI'S SUPPLEMENTARY SUBMISSION

### **CANADA**

Dr Vuolajärvi refers only to Crago, Bruckert, Braschel & Shannon (2022) (Global Public Health), to suggest that Canada's end-demand law (PCEPA, 2014) increased harm. Due to its design, limitations and sampling the study cannot and does not provide evidence that PCEPA caused increases in violence or danger.

# 1. What Crago et al. (2022) Actually Did

### 1.1 Study design and limitations

- fieldwork between July 2017 and January 2018, meaning the data were gathered just 3–4 years after the introduction of PCEPA. This limits the ability to detect long-term effects.
- Cross-sectional survey conducted once, in five cities (Montreal, Toronto, Ottawa, Sudbury, Surrey).
- Sample of 200 individuals recruited through six organisations.
- Purposive sampling focused on the most marginalised groups (street-based, precariously housed, drug-using, disproportionately Indigenous).
- No population sampling; no randomisation; no representativeness; no baseline.

This design cannot measure national trends, nor can it establish whether conditions worsened, improved, or remained stable after PCEPA.

# 1.2 Not a before/after study in any scientific sense

Participants were asked to recall whether violence had become "worse," "better," or "the same." There is:

- no pre-2014 dataset using the same methodology,
- no longitudinal follow-up,
- no objective measure of change,
- no ability to separate the effect of PCEPA from changes in policing, drugs markets, homelessness, local bylaws, or broader economic pressures.

Retrospective perception does not equal evidence of legal impact.

### 2. What the Violence Findings Mean (and Do Not Mean)

The study reports high levels of violence among respondents who had worked both before and after 2014. This is entirely consistent with decades of evidence showing that prostitution is a high-risk setting for male violence under all legal regimes.

The findings do not demonstrate:

- that violence was lower under the previous law,
- that violence rose because of PCEPA,
- or that PCEPA altered the underlying risks faced by the most marginalised groups.

The sample's extremely high baseline vulnerability makes causal inference impossible.

# 3. The "Screening" Association Cannot Support Causal Claims

The study reports that participants who were less able to gather identifying information from buyers were more likely to have experienced violence.

This association does not establish that:

- PCEPA removed an effective safety tool,
- "screening" previously protected women from violent men,
- or that reduced screening caused violence to increase.

Criminological evidence is clear: even with full risk-assessment tools, violence prediction is unreliable. The notion that rapid, street-level "screening" can reliably detect violent offenders is contradicted by extensive empirical evidence and by numerous cases in which regular, familiar buyers committed extreme violence.

The association simply reflects a well-known pattern: the most economically constrained and least empowered women are at the highest risk of male violence – under every legal model.

# **4.** Indigenous Women and Housing: Structural Harms, Not Law-Specific Effects

The study documents severe harms affecting Indigenous women, including fear of police, housing precarity, and higher reported levels of violence. These are longstanding consequences of:

- colonial state violence,
- systemic racism,
- poverty,
- discrimination in policing and services.

The study does not demonstrate that PCEPA increased those harms relative to previous prostitution law, nor that buyer criminalisation is the relevant driver.

The study also reports that eviction pressures increase violence risk. This mirrors findings from commercialised regimes such as Germany, New Zealand and the Netherlands; housing precarity intensifies male violence irrespective of legal model.

# 5. What the Study Supports vs What It Cannot Support

Supported by the data

- Prostitution remains highly violent, especially for the most marginalised.
- Housing instability, poverty and racism significantly increase harm.
- Structural discrimination, particularly affecting Indigenous women, remains a major risk factor.

Not supported by the data

- That violence increased after PCEPA.
- That PCEPA caused any change in violence levels.
- That buyer criminalisation is responsible for harms described.
- That "screening" was a protective mechanism eliminated by the law.

The study is a documentation of ongoing harms in a highly marginalised subset of the prostitution market. It cannot show that PCEPA changed those harms, and it does not provide evidence that Canada's end-demand model "does not work."

### **SWEDEN**

Dr Vuolajärvi cites five sources to argue that Sweden's Sex Purchase Act has not reduced demand and has increased harms. A close review of those sources does not support the claims presented to the Committee.

# 1. Market Effects and the "Displacement" Claim

Street prostitution

All parties agree that visible street prostitution fell by around 50% after 1999. This outcome is well-documented in government evaluations and remains stable over time.

### Online growth

Dr Vuolajärvi presents the rise in online ads between 2006–2014 as evidence that the law merely "displaced" activity. However, the leading scholarly review she herself cites, Holmström & Skilbrei (2017), directly contradicts that interpretation.

# They write:

"A shift towards contact establishment through the internet and a shift towards indoor arenas are developments taking place in many countries, including countries with very different laws from Sweden. While the Sex Purchase Act might play a role in how this shift takes place and is experienced in this particular setting, there is no reason to consider the Act as the reason for this development." (Holmström & Skilbrei, 2017, p. 97)

This is reinforced by the County Administrative Board of Stockholm, which monitors the online market and attributes growth primarily to digitalisation, not legal change. Conclusion:

Online growth reflects a global technological shift, not failure of the Swedish model.

# 2. Buyer Prevalence - Correction of Dr Vuolajärvi's Data

Dr Vuolajärvi states that lifetime sex-buying in Sweden is "10–15%," comparable to Finland, Norway and Denmark. This is not what her cited source reports.

Official SRHR survey data

The 2017–19 SRHR population study states:

"Knappt en av tio (9,4 procent) av samtliga män har någon gång gett ersättning för sexuella tjänster."

This translates to just under one in ten men have ever paid for sexual acts and this is the national prevalence: 9.4%.

The only figure near 15% refers exclusively to a subgroup:

- Homosexual/bisexual men ~15%
- Heterosexual men ~10%

Dr Vuolajärvi merges subgroup values into a "10–15%" national range, which is inaccurate.

Comparison with neighbouring countries

Using each country's own national surveys:

Sweden: 9.4%Finland: ~11–13%

Norway: ~13%Denmark: ~13%

Sweden has the lowest prevalence of male sex-buying in the Nordic region.

Trend over time

Population surveys show:

- long-term decline in Sweden; and
- lower levels than neighbouring countries.

### Conclusion:

Far from showing "no difference," the correct figures show reduced demand in Sweden relative to all Nordic neighbours.

# 3. Public Attitudes - Misinterpreted

Dr Vuolajärvi cites survey findings suggesting that ~60% support criminalising the sale of sex. This originates from Kuosmanen (2008), where the question used gender-neutral wording ("selling sex"). The Swedish Crime Prevention Authority (BRÅ) warns that such wording likely caused respondents to think about procuring/trafficking, not penalising prostituted women. There are no surveys more recent than 2008 that have asked that question and, based on the criminalisation of buying but not selling online sexual acts in 2025, there is no reason to assume that the Swedish people want to see sellers criminalised.

More robust measures show:

- Strong and sustained support for criminalising buyers, especially among women.
- No clear evidence that Swedes support criminalising the selling of sex.

### Conclusion:

Public attitudes have shifted in line with the goals of the Act.

### 4. Harms Cited – What the Evidence Actually Shows

The harms listed by Dr Vuolajärvi (reduced screening, police pressure, stigma, safety concerns) come from qualitative studies that describe women's experiences of prostitution, not causal effects of the 1999 Act.

Key points:

Holmström & Skilbrei (2017)

The same review she cites concludes:

- The knowledge base is "patchy and biased."
- Claims about harm often lack methodological rigour.
- No evidence the Act caused the online shift (p. 97).
- No evidence of increased violence caused by the Act.

# Other qualitative studies

Scoular; Edlund & Jakobsson; Levy describe prostitution as dangerous, isolating, and stigmatised, but:

- they do not provide before/after comparisons;
- they cannot attribute causation to the law;
- they often focus on the most marginalised subgroups, not the full population.

Official evaluation (2010)

The Government's review, which synthesised police, social services and frontline practice, found:

- no evidence of increased violence linked to the Act;
- improved police capacity to detect trafficking.

### Conclusion:

These studies document the harms of prostitution itself, not harms caused by criminalising buyers.

# 5. Absence of "Systematic Before/After Data" Does Not Support the Claims

Where Sweden lacks perfect longitudinal datasets, this creates limitations, not evidence of failure.

From the available data:

- · Demand has declined.
- Street prostitution has shrunk and not returned.
- Sweden has the lowest sex-buying prevalence in the Nordic region.
- Sweden remains one of the least affected countries by trafficking in Europe (EU & GRETA).

#### Conclusion:

Nothing in the evidence cited by Dr Vuolajärvi shows that the Nordic Model in Sweden increases harm or fails to reduce demand.

#### OVERALL CONCLUSION: SWEDEN

After correcting misinterpretations and re-examining her sources, Dr Vuolajärvi's claims do not hold.

- The actual prevalence of male sex-buying is 9.4%, the lowest in the region.
- The online shift is an international digital phenomenon, not caused by the Act.
- Qualitative studies cannot demonstrate that the Act creates harm.
- Official evaluations show no law-driven increase in violence.
- Sweden shows long-term reductions in demand and one of Europe's lowest rates of prostitution-related trafficking.

The Swedish evidence, properly interpreted, does not demonstrate that the Nordic Model fails. It points instead to reduced demand, reduced visibility, and no evidence of harm caused by criminalising buyers.

### **Northern Ireland**

Dr Vuolajärvi cites one source for Northern Ireland:

Backus & Nguyen (2021) – a modelling paper analysing online sex-market data and police-recorded sexual-violence data.

Her letter makes two claims:

- a temporary 53% drop in online activity that later returned to baseline;
- a 10–22% increase in sexual assaults against women after the Sex Buyer Law.

The study does not support the conclusion that the Sex Buyer Law increased violence.

### Online sex-market activity: descriptive only, not causal

Backus & Nguyen observe a temporary drop in online buyer—seller review counts after 2015 and a return to baseline thereafter and conclude the law has not reduced demand. Yet this is simply a description of one dataset. It does not show:

- whether demand fell in real terms,
- that the law caused the drop,
- or that any harms followed from it.

Online review activity fluctuates for many reasons (platform moderation, market migration, policing visibility, seasonal variation).

The PSNI also told the Committee that they do not proactively enforce the buyer offence and prioritise trafficking cases. A short-lived dip in online adverts cannot meaningfully evidence the effects of the law.

### 2. Sexual-violence claim: not based on recorded crime

This is the most significant misinterpretation in Dr Vuolajärvi's letter.

Backus & Nguyen explicitly state that recorded sexual-violence data cannot be used to evaluate the effect of the law because:

- the 2014 HMICFRS inspection showed serious under-recording in England & Wales,
- the rise in recorded sexual offences from 2014 reflects recording-practice reform, not real increases in violence,
- Northern Ireland and Great Britain had different recording baselines and responded differently to the inspection.

Because recorded crime cannot be used, the authors do not compare:

- recorded sexual violence before the Sex Buyer Law with
  - recorded sexual violence after the Sex Buyer Law.

Instead, they build a statistical model to estimate:

- 1. how many sexual assaults they believe were actually committed in Northern Ireland after the law (not recorded), and
- 2. how many assaults would have been committed in a hypothetical Northern Ireland where the Sex Buyer Law was never introduced.

Their headline claim, that sexual assaults increased by 10–22%, comes from the difference between two hypothetical modelled curves, not from observed offending.

Key points from the paper:

- Recorded NI sexual-violence data show no sharp post-2015 increase.
- The model's estimated direction of effect flips depending on how many factors the authors choose to include.
- The authors could not use NI victimisation-survey data to validate their estimates (sample too small).

The paper therefore does not show that violence increased.

It shows only that, under certain modelling assumptions, a statistical estimate of unreported crime may appear higher.

This is not usable evidence of real-world harm.

# 3. Why the sexual-violence argument cannot stand

# 3.1. The narrative constructed around the modelling result is also unsound

The argument presented by Backus & Nguyen is essentially:

- The Sex Buyer Law may have reduced demand (temporarily),
- STI rates may have fallen,
- but sexual assaults against women allegedly increased,
- therefore the Nordic Model produces "harm,"
- and policymakers should question whether demand reduction is "worth" an increase in violence.

This reasoning relies on a hypothetical mechanism referenced in earlier econometric papers cited by Backus & Nguyen that is both unsupported and ethically untenable:

that prostitution functions as a "substitution" preventing some men from committing sexual violence against women in the wider population.

# This rests on the ethically indefensible premise that prostituted women form a "special class of rapeable women", whose availability allegedly protects other women from male violence.

There is no empirical evidence that:

- access to prostituted women reduces male sexual offending,
- men "redirect" violence away from other women when prostitution is available, or
- buyer criminalisation causes men who previously purchased sex to commit sexual assaults.

The criminological and public-health research consistently finds that:

- men who buy sex show higher levels of hostility, entitlement and sexual aggression than men who do not;
- men in prostitution markets are over-represented among perpetrators of coercive and violent acts;

• the assumption that prostitution reduces sexual offending is not supported by data from any jurisdiction, including countries with full commercialisation such as Germany, the Netherlands or New Zealand.

# 3.2. The "substitution" theory collapses under basic scrutiny

If the argument were taken at face value, its internal logic would imply:

- that the men who leave the prostitution market when purchasing becomes riskier are the same men who then go on to commit sexual violence,
- meaning the so-called "good clients", those who avoid purchasing under buyer criminalisation, would have to be the men committing these assaults.

# This contradicts both:

- the claim that only the "bad clients" remain in the market under the Nordic Model, and
- extensive empirical evidence that violence in prostitution is overwhelmingly committed by men who often appear as "good clients": outwardly non-violent and "regular."

The substitution hypothesis therefore fails logically, empirically and ethically.

# 3.3. The substitution myth misunderstands who the buyers are

The substitution hypothesis also rests on a false assumption about the men involved.

Empirical research across multiple jurisdictions and legal models consistently shows that the majority of men who buy sexual access to women are in ongoing relationships with women (married or cohabiting, with regular sexual access).

The idea that these men would otherwise be "sexually deprived" and therefore likely to commit sexual violence is contradicted by the evidence.

### 3.4. Conclusion on the sexual-violence claim

Backus & Nguyen's modelling cannot isolate the effect of the Sex Buyer Law from contemporaneous changes in crime-recording practices.

#### Their claim:

- is highly sensitive to modelling choices,
- is not corroborated by recorded-crime data or crime-survey evidence,
- and depends entirely on comparing two hypothetical estimated crime curves, not observed offending.

The theoretical mechanism used to interpret the modelling result is unsupported and ethically indefensible.

The study provides no credible basis for asserting that the Sex Buyer Law increased sexual violence against women.

### 4. PSNI evidence: limited implementation of the buyer law

The PSNI letter to the Committee confirms:

- the prostitution market in Northern Ireland is predominantly off-street,
- there are no proactive buyer-focused operations,
- resources are targeted at trafficking cases,
- only 26 charges for paying for sexual services have been brought in a decade.

For a law to have substantial population-level effects (positive or negative), it must be implemented and enforced. The available policing evidence suggests that the Nordic Model in Northern Ireland has been applied only in a limited way.

This context further undermines the plausibility of attributing significant changes in national sexual assault rates to the law.

### **France**

Source cited: Médecins du Monde (2018).

This study is already analysed in Section 1. As shown there, its design does not allow any causal conclusions about the 2016 law. No further evidence on France is provided in Dr Vuolajärvi's letter.

### Republic of Ireland

Source cited: Ugly Mugs Ireland (app-based reporting).

This source is analysed in Section 1 in relation to Northern Ireland. As shown there, its data cannot be used to demonstrate increased violence following the 2017 law. No further evidence on the Republic of Ireland is provided in the letter.

### **Norway**

Dr Vuolajärvi cites three sources for Norway:

- Bjørndahl (2012), Dangerous Liaisons
- Amnesty International (2016), The Human Cost of "Crushing" the Market
- Vuolajärvi (2022), Criminalising the Sex Buyer: Experiences from the Nordic Region

None of these sources provides evidence that Norway's Sex Purchase Act increased violence because of buyer criminalisation. All three sources suffer from clear methodological limitations and, crucially, document phenomena that occur in every prostitution regime, including countries with full commercialisation such as Germany or New Zealand: high levels of male violence, unstable markets, and harms concentrated among migrant women.

# 1. Violence: What Bjørndahl (2012) Actually Shows

Dr Vuolajärvi cites the headline numbers suggesting an increase post-law:

Indoor: 33% → 43%
 Outdoor: 58% → 76%

• Both indoor/outdoor:  $68\% \rightarrow 83\%$ 

These figures cannot be used to infer that the Sex Purchase Act increased violence.

### 1.1. Bjørndahl explicitly states the study cannot answer this question

The report states:

"This data does not answer whether the high amount of violence and the vulnerability women in prostitution experience is caused by the criminalization of the purchase of sexual services or other factors."

This removes any foundation for causal claims.

# 1.2. The two survey waves are not comparable

The 2007/08 and 2012 studies differ fundamentally:

Different recall windows

- 2007/08 measured violence "in the last year," "during the whole career," and "in private life."
- 2012 measured only after 1 January 2009 (a period of up to three years).

These periods cannot be compared.

Non-standardised exposure time

- In 2007/08, "whole career" could mean weeks or decades.
- In 2012, "after 1 January 2009" could also represent anything from several weeks to several years depending on each woman's entry into prostitution.

The two samples capture different populations, with no controls for duration in prostitution.

Definition of violence changed

The 2012 survey added new categories of violence not present in 2007/08. This alone can inflate the prevalence of self-reported harm.

Sampling concerns acknowledged by the authors

The researchers themselves note:

- under-reporting,
- over-reporting,
- memory displacement,
- participation by women who may not have sold sex after 2009 but who still took part (because a participation gift was offered).

# Sample characteristics

The 2012 study is based on questionnaires completed by 123 women who attended a particular support service. It is not representative of the wider prostitution market.

Given these methodological differences, the two datasets cannot function as a before/after comparison.

# 1.3. The study confirms only that prostitution is extremely violent

Bjørndahl's results reinforce longstanding evidence that women in prostitution face pervasive violence irrespective of legal model.

Nothing in the report supports the claim that the Sex Purchase Act increased violence.

# 2. What Amnesty International (2016) Actually Shows

### 2.1. Not a study of the Sex Purchase Act's effects

- Based on qualitative interviews with 30 individuals (27 women and three men).
- The authors do not attempt before/after comparisons.
- The sample is not representative.

Fieldwork was carried out November 2014 to February 2015.

# 2.2. The report documents immigration enforcement, not buyer criminalisation

Amnesty's findings relate overwhelmingly to:

- immigration controls and deportations,
- landlord liability and evictions,
- enforcement of third-party offences (promotion, brothel-keeping).

These are not outcomes of buyer criminalisation.

# 2.3. The "condoms as evidence" issue is unrelated to the Sex Purchase Act

Using condoms as evidence relates to:

- brothel-keeping investigations,
- landlord penalties.

It does not arise from criminalisation of buyers.

# 2.4. No evidence of increased violence linked to the Sex Purchase Act

- Amnesty did not measure violence before and after 2009.
- No causal claims are made or supported.
- The harms described relate primarily to immigration law.

The report states:

"It is beyond the scope of this report to measure whether violence experienced by sex workers has increased in Norway." (p. 56)

# 3. What Vuolajärvi (2022) Actually Shows

Dr Vuolajärvi's article has already been examined in detail in *Bending Reality to Match Ideology* (Nordic Model Now, 2023). That analysis highlights that:

- The harms described in the article, particularly for migrant women, relate overwhelmingly to immigration law enforcement,
- and these are the same harms experienced by women in prostitution in commercialised systems such as Germany, New Zealand and the Netherlands,
- not harms caused by criminalising sex buyers.

Her paper provides no evidence that buyer criminalisation increased violence in Norway.

### Israel

Source cited: Brookdale Institute, Evaluation of the Prohibition on Consumption of Prostitution Services Law (2024)

The Brookdale Institute study is a government-commissioned, mixed-methods evaluation covering public attitudes, consumption surveys among men, administrative data, and extensive interviews with individuals in prostitution and service providers. It is the first attempt to build an empirical evidence base for Israel's 2020 law.

A crucial point appears on page 1 of the report, noting that the impact of the law:

"cannot be isolated from the effects of other processes that took place in Israel at the same time, including COVID-19 and the Israel-Hamas war... the three-year duration of this study is insufficient for examining the Law's long-term impact on the extent of prostitution. The researchers are cautious with regard to conclusions regarding the Law's direct or indirect effects."

The findings therefore cannot be treated as a long-term assessment of the buyer law.

# 1. The sex-buying figures cannot be interpreted as post-law change

The report provides two measurements:

- 9.2% of men reporting having paid for sexual services in the previous five years (2021)
- 12.2% reporting the same (2024)

These numbers may give the impression of an increase after the law. However:

- 2021 data were collected during COVID-19, when mobility, income, and sexual behaviour were severely disrupted.
- 2021 is not a pre-law baseline; the law had already been approved and partially implemented.
- The report explicitly states that the two measurements cannot be compared as evidence of change over time.
- Sampling frames and contextual conditions differed significantly.

Brookdale does not interpret these figures as a trend or as evidence that the law increased or failed to reduce demand.

# 2. The study was not designed to measure demand reduction at this early stage

The researchers note that:

- Israel lacks reliable historical indicators of market size.
- The law's enforcement period has been short and disrupted.
- Administrative fines only began to be issued in 2020.
- Enforcement was minimal until late 2022.
- COVID-19 and subsequent national emergencies significantly affected behaviour, policing, and data collection.

The evaluation therefore cannot determine whether the law reduced, increased, or had no effect on the prevalence of prostitution or the demand for paid sex.

This is entirely consistent with early-stage evaluations in all jurisdictions adopting buyer criminalisation: meaningful assessment requires a longer time horizon.

# 3. What the study does show

# 3.1 Strong normative change

Public support for criminalising buyers rose to around 70% (2024), up from 26% in 2008. This is a core intended effect of demand-side law: shifting social norms about men's entitlement to sexual access.

# 3.2 Mixed short-term impacts for prostituted individuals

The report identifies:

- Loss of income for some (a predictable consequence of any demand-side intervention).
- Significant expansion of exit and support services, funded at scale.
- Improved sense of protection among some individuals because enforcement was directed at buyers, not sellers.
- Greater access to housing, counselling, financial support, casework, retraining, and multi-agency assistance.

These positive outcomes arise from Israel's unusually strong investment in the support side of the model.

### 3.3 No measurable conclusions on market size

Brookdale states that it is not possible at this stage to determine whether prostitution has increased or decreased, because:

- too little time has passed,
- enforcement has been limited, and
- indicators lack reliability for trend analysis.

# 4. The role of strong support funding

Israel invested tens of millions of shekels in support and exit services — one of the most substantial implementations of the support pillar globally.

The evaluation attributes many positive outcomes to this investment. This shows:

- support funding works as intended;
- individuals can and do use services to exit prostitution;
- directing enforcement at buyers can increase women's sense of safety.

These findings are fully consistent with what proponents of the Nordic Model expect in the early years.

### **Conclusion on Israel**

The Brookdale evaluation does not show that Israel's buyer law "failed," nor does it provide evidence of increased demand. It does not claim that sex buying rose after the law, nor that the law worsened conditions for prostituted people.

Instead, the report shows:

- early-stage data cannot yet measure market-size change,
- enforcement has been limited and disrupted,
- support-side investment has produced tangible benefits,
- public attitudes have shifted significantly.

These findings are typical of an early evaluation of a major social-norm reform. They do not contradict the aims or expected trajectory of the Nordic Model.