

Executive Summary: International Comparison of Abortion Safe Access Zones Legislation: Literature Review

12 February 2024, Emily Ottley – University of Winchester

The Abortion Services (Safe Access Zones) (Scotland) Bill was introduced on 5 October 2023. Similar legislation (which creates, or provides for the creation of, a protective area around premises where abortion services are provided) already exists in a number of other jurisdictions. This research offers an overview of existing safe access zone legislation, in order to provide members of the Health, Social Care and Sport Committee with an insight into the international picture.

The research considers safe access zone legislation from England and Wales, Northern Ireland, New Zealand, the Isle of Man, Australia, Canada, the United States of America, and the Republic of Ireland. In relation to each safe access zone law, I address:

- details of the provisions contained within the legislation.
- the context informing the introduction of the legislation.
- any challenges encountered during or after the passage of the legislation.
- the impact of the legislation.

Although Spain also has safe access zone legislation, this jurisdiction has been excluded from this research because it has a civil, rather than common law, legal system. In addition, the relevant law is not available in English.

This research has been conducted using secondary research methods, specifically doctrinal analysis and a literature review. Safe access zone legislation remains a live issue, so while every effort has been made to ensure that this research is current up to the 12 February 2024, there may imminently be further developments. In particular, Committee members may wish to look out for the publication of government guidance in England and Wales and the passage of the Irish Bill through the Oireachtas.

My key findings are summarised below:

Details of the provisions contained within the legislation

Safe access zone legislation is characterised by creating, or providing for the creation of, a protective area around premises where abortion services are provided. However, the details of the provisions contained within safe access zone legislation vary considerably between jurisdictions – particularly with regard to the method for the creation of the protective areas, the size of the protective areas, the behaviour that is prohibited within the protective areas, and the penalties for violating the law.

The context informing the introduction of the legislation

Safe access zone legislation is typically passed in response to concern about current or future protest in the vicinity of premises where abortion services are provided and a desire to ensure good access to abortion services. The lack of existing legal measures that could adequately deal with such protest is a common justification for

safe access zone legislation. Often, but not always, provision for safe access zones is made alongside, or shortly after, broader abortion law reform that liberalises access to abortion services. The climate of severe anti-abortion violence is unique to the United States of America, though there have been incidences of anti-abortion violence in Australia and Canada.

Challenges encountered during or after the passage of the legislation

The most significant challenge encountered both during and after the passage of safe access zone legislation has been achieving an appropriate balance between the rights of those who wish to protest at clinics and clinic users/staff. It is necessary to strike an appropriate balance in order to comply with human rights and/or constitutional obligations. The challenge is clear from the Parliamentary debates, where those who opposed safe access zone legislation criticised Bills for “going too far” and others struggled to frame the Bills in such a way as to strike a satisfactory balance. The challenge is also clear from the various legal challenges brought against safe access zone legislation for purportedly violating the rights of protestors. Most of these challenges have been unsuccessful.

The impact of the legislation

The availability of evidence on the impact of safe access zone legislation is generally very limited, though some academic research on the efficacy of safe access zones has been conducted in Australia. This may be because much of the safe access zone legislation has been passed only very recently. Sources cited in my report have called for further research to be done in due course.

Comparison table 1 – size of zones

England and Wales	150 metres from any part of an abortion clinic or any access point to any building or site that contains an abortion clinic.
Northern Ireland	100 metres from each entrance to, or exit from, the protected premises. This can be extended up to 250 metres where the operator is of the opinion that 100 metres would not be adequate to afford safe access to the protected premises and it gives notice to the Department of Health that it wishes the safe access zone to be extended by a specific distance.
New Zealand	Up to 150 metres from the perimeter of any premises where abortion services are provided – determined on a case by case basis.
Isle of Man	Up to 100 metres around premises where terminations are performed or counselling is provided. The legislation allows the Department of Health and Social Care to amend by Order the maximum size of access zones specified in the legislation.
Tasmania (Australia)	150 metres from the premises at which terminations are provided.
Australian Capital Territory (Australia)	Minimum of 50 metres at any point from the protected facility. Could be a larger size that is sufficient to ensure privacy and unimpeded access to the facility, but no larger than is necessary to ensure that outcome. Determined on a case by case basis.
Victoria (Australia)	150 metres from premises at which abortions are provided.
Northern Territory (Australia)	150 metres outside the boundary of premises for performing terminations.
New South Wales (Australia)	150 metres from any part of the premises of a reproductive health clinic at which abortions are provided or a pedestrian access point to a building that houses a reproductive health clinic at which abortions are provided.
Queensland (Australia)	150 metres from an entrance to the premises, but a smaller or greater distance may be prescribed by regulation for a particular premises if the Minister is satisfied that 150 metres is insufficient, or greater than necessary, to protect the safety and wellbeing of, and respect the privacy and dignity of, (1) persons accessing terminations services, (2) persons who are employed to provide abortion services, and (3) persons who otherwise need to access the premises in the course of their duties/responsibilities.
South Australia (Australia)	Within 150 metres of the protected premises.
Western Australia (Australia)	Within 150 metres outside the boundary of premises at which abortions are provided.
British Columbia (Canada)	Not exceeding 50 metres from the boundaries of the parcel on which the facility is located – decided on a case by case basis.
Newfoundland and Labrador (Canada)	Not exceeding 50 metres from the boundaries of the land on which the facility is located – decided on a case by case basis.
Quebec (Canada)	50 metres from the grounds on which a facility or premises providing voluntary termination of pregnancy services are situated.
Ontario (Canada)	50 metres from the boundaries of the property, but the zone can be decreased or increased (up to 150 metres) by regulation.

Alberta (Canada)	50 metres from the boundaries of the parcel of land on which the facility is located, but this may be decreased or increased (up to 150 metres) in respect of a particular facility or class of facilities through regulations made by the Lieutenant Governor.
Nova Scotia (Canada)	50 metres from the boundaries of any parcel of land on which the facility is located, but this may be decreased or increased (up to 150 metres) in respect of a particular facility or class of facilities through regulations made by the Governor in Council.
Colorado (USA)	A fixed buffer zone of 100 feet (approx. 30 metres) of a facility's entrance and a floating buffer zone of 8 feet (approx. 2 metres) of another person.
Montana (USA)	A fixed buffer zone of 36 feet (approx. 11 metres) of an entrance to or exit from the healthcare facility and a floating buffer zone of 8 feet (approx. 2 metres) of another person).
Massachusetts (USA)	25 feet (approx. 8 metres) of an entrance or driveway to the reproductive healthcare facility.
New Hampshire (USA)	25 feet (approx. 8 metres) of any portion of an entrance, exit, or driveway of a reproductive healthcare facility.
Maine (USA)	8 feet (approx. 2 metres) from the centre of the entrance of a building in which patients receive health services.
Republic of Ireland (as passed by the Dáil Éireann in November 2023)	100 metres of an entrance to the relevant healthcare premises.

Comparison table 2 – penalties

England and Wales	Liable on summary conviction to an unlimited fine.
Northern Ireland	Punishable on summary conviction by a fine not exceeding level 2 (£500) on the standard scale.
New Zealand	Liable on conviction to a fine not exceeding 1,000 NZD.
Isle of Man	12 months' custody or a level 5 fine (maximum 10,000 IMP).
Tasmania (Australia)	Fine up to 75 penalty units (currently 14,625 AUD) and/or imprisonment for a maximum of 12 months.
Australian Capital Territory (Australia)	Fine up to 25 penalty units (currently 4,000 AUD).
Victoria (Australia)	Fine – 120 penalty units (currently 23,077.20 AUD) or imprisonment for a maximum of 12 months.
Northern Territory (Australia)	Fine up to 100 penalty units (currently 17,600 AUD) or imprisonment for 12 months.
New South Wales (Australia)	Fine (50 penalty units for a first offence (currently 5,500 AUD); 100 penalty units for a subsequent offence (currently 11,000 AUD)) and/or imprisonment (6 months for a first offence; 12 months for a subsequent offence).
Queensland (Australia)	Fine – 20 penalty units (currently 3,096 AUD) or imprisonment for a maximum of 12 months.
South Australia (Australia)	Fine up to 10,000 AUD or imprisonment for 12 months.
Western Australia (Australia)	Fine – 12,000 AUD and imprisonment for 12 months.

British Columbia (Canada)	First conviction: a fine of not more than 5,000 CAD, imprisonment for not more than 6 months, or both. Second or subsequent conviction: a fine between 1,000 CAD and 10,000 CAD or both a fine between 1,000 CAD and 10,000 CAD and imprisonment for not more than 12 months.
Newfoundland and Labrador (Canada)	First conviction: a fine of not more than 5,000 CAD, imprisonment for not more than 6 months, or both. Second or subsequent conviction: a fine between 1,000 CAD and 10,000 CAD or both a fine between 1,000 CAD and 10,000 CAD and imprisonment for not more than 12 months.
Quebec (Canada)	A fine of 250 CAD to 1,250 CAD. If the person threatened or intimidated someone trying to access/leave the facility, however, the level of the fine increases to between 500 CAD and 2,500 CAD.
Ontario (Canada)	First offence: a fine of not more than 5,000 CAD, imprisonment for not more than 6 months, or both. Second or subsequent offence: a fine between 1,000 CAD and 10,000 CAD, imprisonment for not more than 12 months, or both.
Alberta (Canada)	First offence: a fine of not more than 5,000 CAD, imprisonment for not more than 6 months, or both. Second/subsequent offence: a fine between 1,000 CAD and 10,000 CAD, imprisonment for not more than 12 months, or both.
Nova Scotia (Canada)	First offence: a fine of not more than 5,000 CAD, imprisonment for not more than 6 months, or both. Second/subsequent offence: a fine between 1,000 CAD and 10,000 CAD, imprisonment for not more than 12 months, or both.
Colorado (USA)	A 'pretty offense' punishable by a fine not exceeding 300 USD and/or ten days imprisonment.
Montana (USA)	A fine not exceeding 100 USD.
Massachusetts (USA)	First offence: a fine not exceeding 500 USD, no more than 3 months imprisonment, or both. Second/subsequent offence: a fine between 500 USD and 5,000 USD, imprisonment for no more than 2 1/2 years, or both.
New Hampshire (USA)	First violation: a written warning. Subsequent violation: a citation which carries a minimum fine of 100 USD.
Maine (USA)	A violation constitutes a Class E crime, which is punishable by a fine not exceeding 1,000 USD, imprisonment for up to 180 days, or both.
Republic of Ireland (as passed by the Dáil Éireann in November 2023)	First offence: liable on summary conviction to a class E fine (500 euros), imprisonment for not more than 1 month, or both. Second offence: liable on summary conviction to a class D fine (1,000 euros), imprisonment for not more than 3 months, or both. Third or subsequent offence: liable on summary conviction to a class C fine (2,500 euros), imprisonment for not more than 6 months, or both.

Comparison table 3 – automatic protection

England and Wales	Y	'Abortion clinics', ie. places approved by the Secretary of State for the purposes of section 1 of the Abortion Act 1967, and hospitals identified in a notification to the Chief Medical Officer under the Abortion Act 1967 in the current or previous calendar year and published identifying them as such.
Northern Ireland	N	The operator of premises where treatment, information, advice or counselling related to abortion is carried out must notify the Department of Health that it wishes the premises to be protected.
New Zealand	N	Safe areas are created through regulations made by the Governor-General by Order in Council on the recommendation of the Minister of Health (after consultation with the Minister of Justice). The Minister of Health may recommend the creation of safe area regulations if he/she is satisfied that (1) a safe area is desirable to address any risk to the safety and wellbeing of, or to respect the privacy and dignity, of persons seeking to access abortion services/advice/information or persons providing/assisting with providing abortion services/advice/information and (2) prescribing a safe area can be demonstrably justified in a free and democratic society as a reasonable limitation on people's rights and freedoms.
Isle of Man	N	The Department of Health and Social Care may establish an access zone (1) by Order for any national health service hospital (for the purpose of facilitating access to abortion services) and (2) by notice <i>on request</i> for other premises providing abortion services/counselling.
Tasmania (Australia)	Y	Premises at which terminations are provided.
Australian Capital Territory (Australia)	N	The Minister for Health may declare that an area around an approved medical facility or a place where an abortifacient is prescribed, supplied or administered is a protected area.
Victoria (Australia)	Y	Premises at which terminations are provided (does not include a pharmacy).
Northern Territory (Australia)	Y	Premises for performing terminations (does not include a pharmacy).
New South Wales (Australia)	Y	Any premises at which medical services relating to aspects of human reproduction or maternal health are provided (does not include a pharmacy).
Queensland (Australia)	Y	Termination service premises (does not include a pharmacy).
South Australia (Australia)	Y	Any premises at which abortions are lawfully performed (does not include a pharmacy).
Western Australia (Australia)	Y	Premises at which abortions are provided (does not include a pharmacy).
British Columbia (Canada)	N	The Lieutenant Governor may establish, by regulation, an access zone for a specific facility.
Newfoundland and Labrador (Canada)	N	The Lieutenant Governor may establish, by regulation, an access zone for a specific facility.
Quebec (Canada)	Y	All facilities/premises providing voluntary termination of pregnancy services.
Ontario (Canada)	Y/N	Abortion clinics (ie. places other than hospitals which have the primary purpose of providing abortion services) have access zones automatically. Any other place where abortions are provided (eg. hospitals, healthcare centres or pharmacies) can request that the Attorney General creates an access zone by regulation.

Alberta (Canada)	N	An access zone is established for every facility (ie. place where abortions are provided) or class of facility specified by the Lieutenant Governor in the regulations. The Lieutenant Governor must be of the opinion that activities referred to in the Act are being engaged in.
Nova Scotia (Canada)	N	An access zone is established for every facility (ie. place where abortions are provided) or class of facility specified by the Governor in Council in the regulations. The Governor in Council must be of the opinion that activities referred to in the Act are being engaged in.
Colorado (USA)	Y	Healthcare facilities (not limited to abortion/reproductive health).
Montana (USA)	Y	Healthcare facilities (not limited to abortion/reproductive health).
Massachusetts (USA)	N	Anti-abortion protestors may be required to move back from the entrance of a reproductive healthcare facility for eight hours or until the facility closes for the day (whichever is earlier), if police decide they have 'substantially impeded access to or departure from an entrance or driveway to a reproductive healthcare facility'.
New Hampshire (USA)	N	A healthcare facility is required to clearly demarcate the zone using a sign containing specific information that is set out in the law. A reproductive healthcare facility must first consult with law enforcement and local authorities who have responsibility for approving the locations and size of signage to ensure compliance with local ordinances.
Maine (USA)	N	At the provider's request, the relevant municipality will demarcate the zone in the way prescribed by the law.
Republic of Ireland (as passed by the Dáil Éireann in November 2023)	Y	Premises where abortion services may be provided – ie. premises where obstetricians and general practitioners provide healthcare services, as well as hospitals that provide acute inpatient services.

Comparison table 4 – activities prohibited within the zone

England and Wales	Any act done with the intent of, or reckless as to whether it has the effect of (a) influencing any person’s decision to access, provide or facilitate the provision of abortion services at an abortion clinic, (b) obstructing or impeding any person accessing, providing, or facilitating the provision of abortion services at an abortion clinic, or (c) causing harassment, alarm or distress to any person in connection with a decision to access, provide, or facilitate the provision of abortion services at an abortion clinic.
Northern Ireland	Any act done with the intent of, or reckless as to whether it has the effect of (a) influencing a protected person, whether directly or indirectly, (b) preventing or impeding access by a protected person, or (c) causing harassment, alarm or distress to a protected person. Recording a protected person without that person’s consent and with the intent of, or reckless as to whether it has the effect of (a) influencing a protected person, whether directly or indirectly, (b) preventing or impeding access by a protected person, or (c) causing harassment, alarm or distress to a protected person.
New Zealand	Obstructing a person in a safe area who is approaching, entering, or leaving any building in which abortion services are provided. Making a visual recording of another person in a safe area in a manner that is likely to cause emotional distress to a person accessing, providing, or assisting with providing, abortion services. Doing any of the following in a safe area in a manner that could be easily seen or heard by another person (A) who may be accessing, providing, or assisting with providing, abortion services: (1) advising or persuading A to refrain from accessing or providing abortion services; (2) informing A about matters related to the provision of abortion services, other than during the course of providing those services or assisting with provision of those services; or (3) engaging in protest about matters relating to the provision of abortion services.
Isle of Man	Prohibited after having been warned not to do so by a constable: engaging in pavement interference; protesting about abortion services or counselling with the intention of dissuading anyone from providing, or a patient from using, abortion services or receiving counselling; observing (continuously or repeatedly) any premises in or from which abortion services or counselling are provided, for the purpose of dissuading anyone from providing, or a patient from using, abortion services or receiving counselling; placing oneself close to, and importuning (a) a person providing abortion services or counselling for the purpose of dissuading that person from doing so, or (b) a patient for the purpose of dissuading the patient from using abortion services or receiving counselling; harassing or intimidating (a) a person providing abortion services or counselling for the purpose of dissuading that person from doing so, or (b) a patient for the purpose of dissuading the patient from using abortion services or receiving counselling; graphically recording a person providing abortion services, or a patient, for the purpose of dissuading any person from providing or using abortion services; repeatedly approaching, accompanying, or following someone, or engaging in threatening conduct directed at someone, for the purpose of dissuading them from providing or using abortion services;

	and repeatedly communicating with someone without that person's consent for the purpose of dissuading them from providing or using abortion services.
Tasmania (Australia)	Besetting, harassing, intimidating, interfering with, threatening, hindering, obstructing or impeding a person; intentionally recording a person accessing, or attempting to access, the premises without that person's consent; protest in relation to terminations that is able to be seen or heard by a person accessing, or attempting to access, premises at which terminations are provided; footpath interference in relation to terminations; and any other prescribed behaviour.
Australian Capital Territory (Australia)	Harassing, hindering, intimidating, interfering with, threatening or obstructing a person if it is intended to stop the person entering the facility, having an abortion, providing a surgical abortion in the facility, or prescribing/supplying/administering an abortifacient in the facility; capturing visual data (moving or still images) of a person if it is intended to stop the person entering the facility, having an abortion, providing a surgical abortion in the facility, or prescribing/supplying/administering an abortifacient in the facility; protest by any means in relation to a person entering the facility, having an abortion, providing a surgical abortion in the facility, or prescribing/supplying/administering an abortifacient in the facility; and any act that can be seen or heard by anyone during the protected period and that is intended to stop a person from entering the facility, having an abortion, providing a surgical abortion in the facility, or prescribing/supplying/administering an abortifacient in the facility.
Victoria (Australia)	Besetting, harassing, intimidating, interfering with, threatening, hindering, obstructing or impeding a person accessing, attempting to access, or leaving the premises; intentionally recording a person accessing, attempting to access, or leaving the premises without that person's consent and without reasonable excuse; communicating by any means in relation to abortions in a manner that is able to be seen or heard by a person accessing, attempting to access, or leaving the premises and that is reasonably likely to cause distress or anxiety; interfering with or impeding a footpath, road, or vehicle in relation to premises at which abortions are provided (without reasonable excuse); and any other prescribed behaviour.
Northern Territory (Australia)	Harassing, hindering, intimidating, interfering with, threatening or obstructing a person where the conduct may result in deterring the person from entering/leaving the premises or performing/receiving a termination at the premises; recording a person without that person's consent and without reasonable excuse, where this may result in deterring the person from entering/leaving the premises or performing/receiving a termination at the premises; and any act that can be seen or heard by a person in the vicinity of the premises that may result in deterring the person or another person from entering/leaving the premises or performing/receiving a termination at the premises.
New South Wales (Australia)	Harassing, intimidating, besetting, threatening, hindering, obstructing or impeding a person accessing, leaving, or attempting to access or leave, the clinic; intentionally capturing visual data (moving or still images) of another person who is within the safe access zone without that person's consent and without reasonable excuse; communication by any means that relates to abortions in a manner that is able to be seen or heard by a person accessing, leaving, or attempting to access or leave the clinic, or inside the clinic, and that is

	reasonably likely to cause distress or anxiety to such a person; and obstructing or blocking a footpath or road leading to any reproductive health clinic at which abortions are provided (without reasonable excuse).
Queensland (Australia)	Any conduct that relates to terminations (or could reasonably be perceived as relating to terminations) that would be visible to someone entering/leaving the premises and would be reasonably likely to deter someone from: entering/leaving the premises; requesting/undergoing a termination; or performing/assisting with the performance of a termination – whether or not another person sees/hears the conduct or is in fact deterred. Recording persons in or near the premises.
South Australia (Australia)	Threatening, intimidating or harassing another person; obstructing another person approaching, entering or leaving protected premises; recording images of a person approaching, entering or leaving the premises; protest in relation to abortion; and communication by any means in relation to abortion in a manner that is able to be seen or heard by a person accessing, attempting to access or leaving the premises and that is reasonably likely to cause distress or anxiety.
Western Australia (Australia)	Besetting, harassing, intimidating, interfering with, threatening, hindering, obstructing or impeding a person accessing, attempting to access or leaving premises at which abortions are provided; recording (a photograph or digital image) another person accessing, attempting to access or leaving the premises without that person's consent and without reasonable excuse; communication by any means in relation to abortion in a manner that is able to be seen or heard by a person accessing, attempting to access or leaving the premises and that is reasonably likely to cause distress or anxiety; interfering with or impeding a footpath, road, or vehicle in relation to abortion (without reasonable excuse); and any other behaviour prescribed by the regulations.
British Columbia (Canada)	Advising or persuading, or attempting to advise or persuade, a person to refrain from making use of abortion services (by any means) ('sidewalk interference'); informing, or attempting to inform, a person concerning issues related to abortion services (by any means) ('sidewalk interference'); any act of disapproval, or attempted act of disapproval, with respect to issues related to abortion services (by any means) ('protest'); continuously or repeatedly observing a service provider, doctor who provides abortion services, patient, or building in which abortion services are provided; physical interference with, or an attempt to interfere with, a service provider, a doctor who provides abortion services, or a patient; intimidating, or attempting to intimidate, a service provider, a doctor who provides abortion services, or a patient; graphically recording, by any means, a service provider, doctor who provides abortion services, or a patient, for the purpose of dissuading that person from providing, facilitating the provision of, or using abortion services.
Newfoundland and Labrador (Canada)	Advising or persuading, or attempting to advise or persuade, a person to refrain from making use of abortion services (by any means) ('sidewalk interference'); informing, or attempting to inform, a person concerning issues related to abortion services (by any means) ('sidewalk interference'); any act of disapproval, or attempted act of disapproval, with respect to issues related to abortion services (by any means) ('protest'); continuously or repeatedly observing a service provider, doctor who provides abortion services, patient, or

	building in which abortion services are provided; physical interference with, or an attempt to interfere with, a service provider, a doctor who provides abortion services, or a patient; intimidating, or attempting to intimidate, a service provider, a doctor who provides abortion services, or a patient; graphically recording, by any means, a service provider, doctor who provides abortion services, or a patient, for the purpose of dissuading that person from providing, facilitating the provision of, or using abortion services.
Quebec (Canada)	Demonstration conducted in any manner and intervening in any way, in an attempt to (a) dissuade a woman from obtaining an abortion or condemn her choice of obtaining or having obtained an abortion, or (b) dissuade a person from providing, or from participating in the provision of, abortion, or condemn the person's choice of providing, or participating in the provision of, abortion, or working in a facility that provides abortion services.
Ontario (Canada)	Advising or persuading, or attempting to advise or persuade, a person to refrain from accessing abortion services; informing, or attempting to inform, by any means, a person concerning issues related to abortion services; performing, or attempting to perform, by any means, an act of disapproval concerning issues related to abortion services; and persistently requesting that a person refrain from accessing abortion services, or a protected service provider refrain from providing, or assisting with the provision of, abortion services. When done for the purpose of dissuading a person from accessing abortion services or dissuading a protected service provider from providing, or assisting with the provision of, abortion services: continuously or repeatedly observing the clinic/facility, or persons entering/leaving the clinic/facility; physically interfering with, or attempting to interference with, the person/provider; intimidating, or attempting to intimidate, the person/provider; and graphically recording (in any way) the person/provider. Plus, anything else prescribed by regulation for the purpose of the clause.
Alberta (Canada)	Advising or persuading, or attempting to advise or persuade, another person to refrain from accessing abortion services, or a physician/service provider to refrain from providing, or facilitating the provision of, abortion services ('interference'); informing or attempting to inform, by any means, another person concerning issues related to abortion services ('interference'); any act of disapproval, or attempted act of disapproval, by any means, concerning issues related to abortion services ('protest'); continually or repeatedly observing a patient, physician who provides abortion services, service provider or a building in which abortion services are provided/facilitated; requesting that a patient refrain from accessing abortion services or a physician/service provider refrain from providing, or facilitating the provision of, abortion services; physically impeding, or attempting to impede, the passage of a patient or physician who provides abortion services/service provider; intimidating, or attempting to intimidate, a patient or a physician who provides abortion services/service provider; any audio, visual, or audio-visual recording of a patient, physician who provides abortion services, or a service provider, without his/her consent.
Nova Scotia (Canada)	Advising or persuading, or attempting to advise or persuade, another person to refrain from accessing abortion services, or a physician/service provider to refrain from providing, or facilitating the provision of, abortion services ('interference'); informing or attempting to inform, by any means, another person concerning

	issues related to abortion services ('interference'); any act of disapproval, or attempted act of disapproval, by any means, concerning issues related to abortion services ('protest'); continually or repeatedly observing a patient, physician who provides abortion services, service provider or a building in which abortion services are provided/facilitated; requesting that a patient refrain from accessing abortion services or a physician/service provider refrain from providing, or facilitating the provision of, abortion services; physically impeding, or attempting to impede, the passage of a patient or physician who provides abortion services/service provider; intimidating, or attempting to intimidate, a patient or a physician who provides abortion services/service provider; any audio, visual, or audio-visual recording of a patient, physician who provides abortion services, or a service provider, without his/her consent.
Colorado (USA)	Knowingly approaching within 8 feet (approximately 2 metres) of another person, without that person's consent, in order to: pass a leaflet/handbill; display a sign; or engage in oral protest, education or counselling with that person.
Montana (USA)	Knowingly approaching within 8 feet (approximately 2 metres) of a person who is entering or leaving a healthcare facility to: give the person written or oral information; display a sign; or to protest, counsel, or educate about a health issue (when that person does not consent to that activity).
Massachusetts (USA)	Presence in the zone (having received a withdrawal order).
New Hampshire (USA)	Knowingly entering or remaining on a public way or sidewalk within the zone.
Maine (USA)	Knowingly entering into, remaining in, or creating an obstruction in the zone.
Republic of Ireland (as passed by the Dáil Éireann in November 2023)	When done without lawful authority and with intent to obstruct or impede a person from availing of, or providing, termination of pregnancy services: engaging in any conduct that is likely to obstruct or impede another person from accessing a relevant healthcare premises. When done with intent to influence the decision of a person in relation to availing of, or providing, termination of pregnancy services, or being reckless as to whether such a decision is thereby so influenced: communicating material to, or otherwise engaging in conduct directed at, the public or a section of the public in a manner that is likely to influence the decision of another person in relation to availing of, or providing, termination of pregnancy services; engaging in conduct that is likely to threaten or intimidate a person who is accessing, or attempting to access, a relevant healthcare premises; accompanying, following or repeatedly approaching a person who is accessing, or attempting to access, a relevant healthcare premises; and photographing, filming or otherwise recording, by any means, a person in a safe access zone.