

Submission on
*The Regulatory Impact Statement &
Prostitution Control (Fees) Regulations 2004 (“Fees
Regulations”) replacing provisions of the Prostitution
Control Regulations 1995.*

June 2004

Submission submitted on behalf of Scarlet Alliance membership.

Membership comprises:

Sex Worker Outreach Project (SWOP) – New South Wales;
Self-health for Queensland Workers In the Sex Industry (SQWISI) – Queensland;
Resourcing Health & education in the sex industry (Rhed) – Victoria;
NT Sex Worker Outreach Project – Northern Territory;
Sex Worker Action Group – Western Australia;
SA Sex Industry Network – South Australia
and Associate Member
ACT Sex Worker Outreach Project – Australian Capital Territory.

SCARLET ALLIANCE OBJECTIVES

Scarlet Alliance objectives seek for sex workers to be self-determining agents, building their own alliances and choosing where and how they work within a legal framework which maximises their occupational health and safety.

These objectives include:

- To promote the civil rights of past and present sex workers and to work towards ending all forms of discrimination against them.
- To lobby for legal and administrative frameworks which do not discriminate against sex workers.
- To ensure that sex industry legislation seeks to maximise rather than minimise sex workers occupational health and safety;
- To challenge and lobby government when and where it implements legislation, regulations, rules, policies or law enforcement practices which are discriminatory and/or repressive to the rights and autonomy of sex workers.
- To actively promote the right of all sex workers to work in their chosen occupation and sector, including street, brothel, escort, private or opportunistic work.
- To actively work towards guaranteeing the right of all sex workers to optimum occupational health and safety provisions. This will promote conditions where safe sex and general health knowledge can be converted to safe work practices.
- To challenge any legislation, policy or process which does not so promote the rights of the worker.
- To strive to eradicate sex worker stereotypes and stigmatisation in the popular consciousness and to communicate the diversity of ideas, opinions and aspirations of past and present sex workers.
- To liaise with international sex worker rights groups in the development of regional and international networks, programs and objectives.
- To support sex workers and sex worker organisations to become more politically active.
- To gather and disseminate sex industry related information to its members.

INTRODUCTION

Scarlet Alliance was formed in 1989 following the first HIV & Sex Work Conference. Scarlet Alliance is Australia's national peak body of community based sex worker organisations and projects, with membership made up from sex worker organisations and projects in the states and territories. Each year a National Forum and AGM is held at which time key policies are developed, an executive and spokespersons are elected, and workshops on issues for sex workers are conducted.

Scarlet Alliance currently plays an active role in Australia's response to HIV/AIDS and has produced a range of resources in collaboration with AFAO, including: *A Guide to Best Practice, Occupational Health and Safety in the Australian Sex Industry (2000)*, and *Principles for Model Sex Industry Legislation (2000)* (available at www.scarletalliance.org.au). Scarlet Alliance is a leader when it comes to advocating for the health, safety and welfare of workers in Australia's sex industry

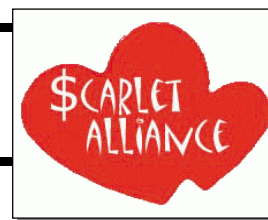
Australia has the lowest rate of HIV/AIDS amongst sex workers in the world, due to the work of community based sex worker organisations and projects who make up the membership of Scarlet Alliance along with the response by those working in the sex industry. Scarlet Alliance member organisations and projects have the highest level of contact with sex workers in Australia of any agency, government or non-government. Our projects have close to 100% access to sex industry workplaces in the major cities. Many of our sex worker organisations and projects within Australia also have CALD (Culturally and Linguistically Diverse) or NESB (Non English Speaking Background) Projects employing bi-lingual project workers.

Scarlet Alliance has played a critical role in informing Government at all levels, and informing the health sector, both in Australia and Internationally, on issues affecting sex workers in the Australian sex industry. In addition, Scarlet Alliance has been active in promoting to other countries the models of service delivery which have been most effective in minimising the transmission of HIV and STIs amongst sex workers and their clients.

Each Scarlet Alliance member sex worker organisation/project provides an extensive outreach service to sex industry workplaces, thus ensuring a high level of contact with sex workers and other sex industry staff.

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23rd June, 2004

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Consumer Affairs Victoria
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Melbourne

RE: Prostitution Control (Fees) Regulations 2004 ("Fees Regulations") replacing provisions of the Prostitution Control Regulations 1995.

Scarlet Alliance, the National Forum for Sex Worker Projects/Organisations Inc. formed in 1989 to represent Australian State based sex worker community organizations and projects at a national level. Through its objectives, policies and programs, Scarlet Alliance aims to achieve equality, social, legal, political, cultural, health and economic justice for past and present workers in the sex industry. It is within this context that we are providing a formal submission concerning the proposed changes to the Victorian Sex Industry Legislation.

Although Scarlet Alliance commends Governments' attempt to create a framework resulting in full cost recovery, in this instance it has not been effective, and highlights one of the major draw-backs of the licensing model for regulating the sex industry. It is unlikely that there will come a point where this model of licensing regulation will result in full cost recovery. In essence the model has created a component, the licensing body, whose expenses are ever increasing and must be met by those it seeks to regulate. Scarlet Alliance does not believe these proposals will result in full cost recovery as the sex industry in Victoria is over regulated resulting in a two tiered industry, one where an illegal industry operates alongside that of a smaller legal industry. This illegal industry operates 'underground' and does not provide employees with the right to sufficient standards of occupational health and safety and also places them at risk of criminal penalties.

Instead we believe a decriminalised industry is more open to scrutiny as it is more easily accessible, police relationships with sex workers are improved and there is increased levels of reporting of crime. Increasing police powers will not improve the situation of violence against sex workers, particularly under a legislative framework which is likely to result in a large underground illegal sex industry where sex workers are unlikely to report crimes of violence and are subject to potential police corruption and control.

Scarlet Alliance does not support the proposed Prostitution Control (Fees) Regulations 2004.

Our objection to the proposals are based on:

1. Flawed rationale for the need to excessively increase the licensing fees. ¹
2. Comparison between the Victorian and Queensland compliance structures indicates an increase in compliance officers will not address the issue of illegal operators in the Sex Industry.
3. The ongoing failure of punitive responses to 'sex slavery' show that increased policing in the country of destination does not solve the issues which contribute to trafficking in country of origin.
4. Negative impact of such legislation, including increased compliance officers on individuals working in the sex industry.

¹ Department of Justice Consumer Affairs, Victoria, 'Prostitution Control Fees Regulations 2004, Regulatory Impact Statement' MAY 2004

5. Impact of the proposals on the ability for current sex industry premises to stay within the licensed industry and the increased disincentive to enter the legal industry for new sex industry businesses. The prediction that this legislation will result in a further increase in number of illegal brothels.
6. Lack of consultation on the proposal. Insufficient time for individuals to participate in the submission period.

As such Scarlet Alliance believes the proposals will not meet their objectives and therefore cannot be supported. This submission provides information regarding our objections and concludes with recommendations outlining alternative methods to address this issue.

Compliance strategies in and of themselves will not change a culture of illegality and non-compliance. Increasing the number of compliance officers will only increase opportunity for corruption and injustice. The Victorian Licensing Model of regulation is flawed it has created an unachievable cycle whereby Government attempts to address the ever-increasing illegal sector with higher levels of compliance. As such fees go up which drive more people to operate illegally and so the cycle goes on.

1. Flawed rationale for the need to excessively increase the licensing fees.

The arguments for the proposed changes offered in the Regulatory Impact Statement 2004 (RIS 2004) are flawed in a number of areas (outlined below). Scarlet Alliance believes the rationale in fact highlights the ineffectiveness of the current model of Sex Industry Regulation, not the necessity for an increased fee structure.

'Amendment of the Act in 1997 and 1999 has strengthened probity controls over applications and hence expanded the ambit of the inquiry that needs to be undertaken by the Licensed Occupations Branch of Consumer Affairs and the BLA.' For example, the BLA is now required to consider the good repute of a range of associates of the applicant.' RIS 2004

- Scarlet Alliance believes it is this level of over-regulation of the industry which is incongruent to creating a culture of compliance. By unnecessarily bringing the family members and associates of the applicant into the process, the focus is taken away from the rudimentary components of compliance and instead is placed on personal history and a level of moral judgement. We argue that strengthening probity controls is not analogous to increased scope to regulate the industry; rather it creates a barrier to individuals' ability to comply.

'With charges having been laid in relation to sexual slavery in the Victoria's licensed prostitution industry, it has become apparent that a proactive program of annual compliance auditing is required to ensure continued maintenance of acceptable standards. Additional resources are required for this.' 'Inspector numbers have now been further revised, and will increase to five.' RIS 2004

- Evidence of trafficking does not indicate evidence of non-compliance with local regulation regarding the sex industry. The international movement of labour is a complex issue that has arisen from globalisation and increased global poverty. The BLA and increased policing of the symptoms at the level of Victorian brothels will not effect/deter the movement of migrant workers around the world.

'It is not possible to produce data to demonstrate the precise level of resource investment required. The proposal for five inspectors equates roughly to 1 inspector for every 40 licensed businesses. In Queensland, there are two full-time inspectors monitoring 12 licensed businesses and each responsible for as few as 12 audits per year.'

- This comparison does not support the need for an increase, as Queensland -even with a higher level of compliance officers- has been unsuccessful in reducing the level of illegal sex industry operations. (See point two)

'Applying less rigour in screening applicants to reduce costs is not a realistic option, as it would increase the risk of criminal involvement in Victoria's prostitution industry.' RIS 2004

- 'Rigorous screening of applicants' does not prevent those persons who are judged unsuitable from entering the Victorian prostitution industry, but rather prevents their involvement in the **legal industry**. This results, not in a more visible legal system open to surveillance, but in a larger illegal industry which is not transparent or regulated.

'Other reasons for costs now incurred being higher than forecast in the 1995 Regulatory Impact Statement include:

changes to the operation of the licensing system, where applications are assessed through examination of documentary evidence instead of through a hearing process

*increases in direct salary costs and salary on-costs, including wage increases **performance bonuses** and the re-introduction of annual leave loading; and*

a greater focus on ongoing policy and legislative development than originally anticipated.' RIS 2004

- Scarlet Alliance believes that increase in implementation costs for the Victorian licensing regime illustrates the problems that arise when policing a problematic regulation regime. As the licensing regime excludes operators who cannot comply, the cost of policing those who are excluded increases. As licensing regulations become stricter, more potentially compliant operators are excluded, and costs of regulation increase accordingly.
- It is inevitable that as the illegal sector increases, spurred by increasing exclusion from the legal regime, staffing costs within the regulatory system will increase as well
- For a real drop in costs, the regulation system must be reformed to include more operators and make it easier, not more difficult to comply.

Recommendation:

Scarlet Alliance recommends that the licensing model be recognised as creating a two tiered industry, which disadvantages workers in the unlicensed sector and has not resulted in improved working conditions for workers in the licensed sector.

Scarlet Alliance recommends a model of decriminalisation which encompasses current working practises of the industry and prioritises sex worker involvement at the heart of policy development.

2. Comparison between the Victorian and Queensland compliance structures indicates an increase in compliance officers will not address the issue of illegal operators in the Sex Industry.

The Regulatory Impact Statement includes the following statement indicating that the proposed increases in number of compliance officers from 2 to 5 will still remain lower than the equivalent comparison of ratio of inspectors to legal brothels in Queensland.

'There are around 100 licensee-run brothels operating in Victoria and a similar number of licensee-run escort agencies. The proposal therefore equates roughly to 1 inspector for every 40 licensed businesses. It may appear that the aim of a comprehensive annual compliance audit of every licensee could be achieved with fewer inspectors. However, in Queensland, the only Australian jurisdiction with a comparable regulatory framework for prostitution, there are two full-time inspectors monitoring only 12 licensed brothels (escort agencies are not permitted in Queensland). Compliance audits being twice-yearly in Queensland, the inspector:audit ratio is 1:12 per year.' RIS 2004

The document fails to acknowledge that Queensland with 'the only Australian jurisdiction with a comparable regulatory framework' and a rate of more than three times the number of compliance officers per brothel has not been able to sufficiently address the level of low compliance and high percentage of sex industry operating illegally.

As such this comparison does not support a need to increase the number of compliance officers nor a need to increase the expenditure of the Compliance and Enforcement Branch budget by \$202,000.

It does, however, highlight clearly that higher levels of compliance activity have been ineffective in stopping or addressing the unacceptably high level of low compliance. In fact the experience of Queensland is summed up by the following statement within the Queensland Prostitution Licensing Authorities Annual Report 2001-2002.

*'After two years of the Prostitution Act, the illegal sex industry in Queensland remains alive and well.'*²

As such your statement 'Budgeting for an increase in enforcement resources to a level where a rigorous compliance program can be sustained will counteract any trend towards unlicensed or non-compliant operation' is not supported by the Queensland experience where there is an even higher number of compliance offers.

In fact, the Chairperson of the Queensland Licensing Authority acknowledges that the methods proposed in the Prostitution Control (Fees) Regulations 2004 to address illegal operations are not the answer and have not been successful in a state with a comparable model.

*'It needs to be understood that the policing of the illegal sex industry is time-consuming and difficult, and that detection and prosecution are not always the most effective tools in curbing the incidence of illegal prostitution.'*³

Recommendation:

Scarlet Alliance believes that the proposed formula for addressing the short fall in cost recovery of the current model of sex industry legislation creates a dangerous cycle whereby the illegal sector will continue to increase (as it has in Queensland where the current strategies of high level of compliance already exist), compliance staff numbers increase, processes are more extensive and time consuming and therefore more expensive in order to address this increase, resulting in fees increasing which in turn drives more people to operate illegally and so the cycle goes on.

² Prostitution Licensing Authority Annual Report 2001-2002,

³ Prostitution Licensing Authority Annual Report 2001-2002, 'message for the chair', W.J.Carter QC, Chair,

3. *The ongoing failure of punitive responses to 'sex slavery' show that increased policing in the country of destination does not solve the issues which contribute to trafficking in country of origin.*

'With charges having been laid in relation to sexual slavery in the Victoria's licensed prostitution industry, it has become apparent that a proactive program of annual compliance auditing is required to ensure continued maintenance of acceptable standards. Additional resources are required for this'.(RIS2004)

Scarlet Alliance does not believe that an increased number of compliance officers or 'annual compliance auditing' will be effective in detecting individual cases of 'sex slavery'.

This month, June 2004, a Parliamentary Joint Inquiry into the ACC and the legislation covering 'trafficking for the purposes of sexual servitude' released its report. This report stated that it was unable to determine the level of 'sexual servitude' in Australia and recommended the Australian Crime Commission focus their investigations on the methods by which people traffickers are able to circumvent detection.

Scarlet Alliance agrees that addressing the issue of 'sex slavery' is not best achieved through targeting individuals in the sex industry. Current laws have amounted to ad-hoc attempts to uncover evidence and an increased police presence among legal businesses employing Asian migrant workers. This has resulted in little more than over-regulation of the industry based on ethnic identity, and has fallen short of assisting the real victims of coercion.

This issue is best addressed strategically and at an international policy level rather than at a licensing branch level where officers will not have been trained or equipped to deal either with the individuals involved or to detect such incidence.

Punitive notions of control will require constant injections of money until a more international approach is adopted.

Recommendation:

Scarlet Alliance recommends that there be a renewed commitment to the rights of migrant workers, from all backgrounds, in Australia. In particular those affected by illegal trafficking deserve culturally appropriate services and support.

4. Impact of proposed fee increases and the proposed increased number of compliance officers on individuals working in the sex industry.

As the National body representing the service providers who deliver a broad range of services to female, male and transgender sex workers, one of our main concerns, should this proposal be successful, is that it will impact negatively on the occupational health and safety of sex workers in Victoria. We are also concerned about the impact on public health outcomes and the impact on the ability of our membership organizations to provide services to sex workers in Victoria as explained below:

- Increased fees are likely to prevent a percentage of, particularly smaller, operations from operating legally. The overheads associated with operating a legal brothel in comparison to that of an illegal brothel has often been cited as a hindrance to legal brothels staying in operation. As such illegal brothels can often offer sex workers a considerably higher cut of each job as their overheads are lower. Thus there is an incentive for sex workers to operate illegally.
- When a higher percentage of sex industry premises are operating illegally compared to legally it becomes more difficult for individual sex workers to gain employment in the legal sector. If the power is with brothel management who can afford to set unachievable standards for workers wanting to be employed in the legal sector. This does not prevent a person from working in the sex industry but rather offers no access to legal employment only illegal employment. It also reinforces discrimination in employment, particularly in relation to age, race etc.

'A complement of five inspectors will allow Consumer Affairs to contribute effectively to co-operative efforts with other relevant agencies (such as Victoria Police and municipal councils) to reduce the problem of illegal provision of prostitution services, which is of great concern to the licensed industry.' RIS 2004

As detailed earlier (see point 2) it is unlikely that an increase in the number of compliance officers will be effective against an illegal industry, as such Scarlet Alliance does not believe that these costs should be borne by the sex industry. We are particularly concerned that the RIS has discussed briefly how they have sought to address the impact of costs on the Sex Industry businesses, yet there has been no discussion of the impact on individual sex workers. Like all increased overheads for business, Scarlet Alliance believes that these costs will be passed on to the workers in the industry in some way. For example, through increased prices to the clients, affecting the number of clients and therefore the wages of individual employees. Or employers may reduce the percentage per job that sex workers receive, again reducing the income of sex workers. It is our concern that the implication of increased costs will be borne by employees of legal brothels, creating yet further incentive for individuals to join the illegal sex industry.

Scarlet Alliance is particularly concerned that any such increase in sex workers working in illegal sex industry businesses equates to an increase in the number of sex workers likely to be charged with non-compliance offences and in contact with the Justice system.

Recommendation:

Scarlet Alliance recommends against the increase in fees because of the likely impact on individual sex workers.

Scarlet Alliance recommends against the increase in number of compliance officers as a strategy to address the illegal industry.

5 Impact of the proposals on the ability for current sex industry premises to stay within the licensed industry, and the increased disincentive for new sex industry businesses to enter the legal industry.

Scarlet Alliance believes the proposed fee structure will act as a barrier to new businesses entering the legal industry and will result in businesses choosing instead to operate illegally.

This outcome is projected by the Department in the following comment:

'Because of the large increases involved, there can be no guarantee that participation rates in the licensed industry will be unaffected. However, the model seeks to ameliorate the impact of the increases on existing and potential businesses which may be less well capitalised by generating slightly more than half of licence fee revenue from the component of the fee that varies according to (proxies for) the size of the licensed business' RIS 2004

Scarlet Alliance believes the proposed fee structure will not counteract the likelihood of an increased incentive for sex industry businesses to operate illegally.

'Budgeting for an increase in enforcement resources to a level where a rigorous compliance program can be sustained will counteract any trend towards unlicensed or non-compliant operation'. RIS 2004

In the experience of Queensland where an even more 'rigorous compliance program' than that proposed has not counteracted a trend toward non-compliance (see Point 2 above) as such it is unlikely that it shall occur in Victoria.

'In order to comply with the requirements laid out in the Act, it is necessary to undertake a variety of checks and searches to ensure that applicants and their associates are of good repute and do not have interests in criminal activities'. RIS 2004

Considering the history of criminalisation of sectors of the sex industry in Australia, sex workers are likely to have been prosecuted in the past. In other states of Australia and formerly in Victoria sex workers were not considered to be 'of good repute'. Probity checks discriminate against sex workers moving into management/owner roles within the Victorian Sex Industry. These people are prevented from compliance by excessive over-regulation and over-zealous probity checks.

As the illegal industry expands due to low incentive to comply Scarlet Alliance believes this will have a negative effect on the Occupational Health and Safety of sex workers.

An increase in the illegal sector will potentially have a direct impact on the ability of our member Organisation, RhED, to provide HIV/AIDS and STI (Sexually Transmissible Infection) education in the workplaces of sex workers.

Australia's National Strategy on HIV/AIDS recognises the important role sex worker organisations have played in health promotion and outlines the need for Governments to enhance the capacity of sex worker organisations to design, manage and participate in peer-based health promotion activities, and to participate in the broader partnership response to the epidemic. Australia makes a commitment to involving affected communities, of which sex workers are identified, at every level including planning; delivery and evaluation of HIV programs and policies; the creation of an enabling legal and policy environment for HIV prevention, treatment and care programs; and promotion of voluntary and confidential testing services.

The success of the Australian response to HIV/AIDS prevention strategies are reliant on our ability to provide services and currently legislation in Victoria hinders the ability of such services to operate. The two tiered system is a potential barrier for health services accessing sex workers.

Recommendation:

Scarlet Alliance recommends that the licensing system should be re-evaluated in light of the current high level of illegal operations, the admittance that the Prostitution Control Act can not be successfully implemented without an excessive increase in fees and with no assurance that these fees will not continue to rise.

6 Lack of consultation on the proposed changes and insufficient time for individuals to participate in the submission period.

Scarlet Alliance does not believe that a one month turnaround on comments addressing these proposals was sufficient. Nor was the level of community engagement with the changes. Scarlet Alliance was not contacted with regard to providing comment on the changes and believes many in the industry are not aware that this process exists.

'The RIS process will be the mechanism through which consultation on the current proposed fees model will take place.' RIS 2004

Scarlet Alliance believes best practise community engagement should begin with consultation of the affected communities. Without consultation, there can be no effective assessment of the impact of current policy or future changes. If compliance with sex industry regulation is to be achieved, sex workers are the first stake holders that should be involved.

'Consumer Affairs undertook preliminary consultation with the Business Licensing Authority, Victoria Police, sex workers and a brothel manager in relation to the principle of an increase in prostitution licensing fees. This was prior to the decision to increase enforcement resources.' RIS2004

Scarlet Alliance believes the above statement can not be considered consultation in relation to fee increases when participants were obviously not provided with full information. It is particularly not relevant considering the large percentage of fee increases which are for increased enforcement resources.

'The common view expressed then was that there was a need to increase the application fee to encourage applicants to think seriously about their ability to satisfy the requirements of the Act and reduce the number of applications by people without suitable qualifications and resources ...' RIS 2004

Scarlet Alliance believes the conflation of financial capacity with intention to comply is flawed. There could be many factors attributed to the reason people do not continue with an application.

One of the aims of the Victorian sex industry legislation is to safeguard the occupational health and safety of sex workers. This most recent dialogue regarding changes to the fee structure in Victoria has effectively excluded sex workers through a lack of consultation. It cannot, therefore consider that the impact on sex workers in Victoria has been sufficiently garnered.

Lack of consultation will result in a lack of compliance, and in particular, amplify the current marginalisation of sex industry workers who work outside the regulated industry.

Recommendation:

Scarlet Alliance recommends that any changes to sex industry policy must first incorporate the primary stakeholders; sex workers.

Recommendations:

Scarlet Alliance does not support the '*Prostitution Control (Fees) Regulations 2004*'

Scarlet Alliance recommends a comprehensive evaluation of the current Victorian Sex Industry legislation as we are concerned that the rationale for increasing licensing fees in the proposed '*Prostitution Control (Fees) Regulations 2004*' are in fact clear indicators that the current licensing model of legislation is at best ineffective and at worst is resulting in many Victorian sex workers now working in illegal environments.

Scarlet Alliance recommends the introduction of a decriminalisation model of sex industry policy in order to realise best practice public health outcomes, promoting the health and safety of sex workers and the broader Victorian community.

Scarlet Alliance recommends that the licensing model be recognised as creating a two tiered industry, which disadvantages workers in the unlicensed sector and has not resulted in improved working conditions for workers in the licensed sector.

Scarlet Alliance recommends a model of decriminalisation which encompasses current working practises of the industry and prioritises sex worker involvement at the heart of policy development.

Scarlet Alliance recommends that there be a renewed commitment to the rights of migrant workers, from all backgrounds, in Australia. In particular those affected by illegal trafficking deserve culturally appropriate services and support.

Scarlet Alliance recommends against the increase in fees because of the likely impacts on individual sex workers, including cost shifting, further criminalisation..

Scarlet Alliance recommends against the increase in number of compliance officers as a strategy to address the illegal industry as it has not been successful in Queensland in meeting the objectives set out by this proposed Bill.

Scarlet Alliance recommends that the licensing system should be re-evaluated in light of the current high level of illegal operations, and the admittance that the Prostitution Control Act can not be successfully implemented without an excessive increase in fees and with no assurance that these fees will not continue to rise.

Scarlet Alliance recommends that any changes to sex industry policy must first incorporate the primary stakeholders; sex workers.

Scarlet Alliance believes that the proposed formula for addressing the short fall in cost recovery of the current model of sex industry legislation creates a dangerous cycle.

The illegal sector will continue to increase (as it has in Queensland), compliance staff numbers will also increase, application processes become more extensive and time consuming (therefore more expensive), all resulting in fee increases which in turn drive more people to operate illegally and so the cycle goes on.

Yours sincerely,

Janelle Fawkes
President