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Africa, Latin America and Asia

Introduction

The globalized nature of the sex 'industry' is indicated not just by its presence in all countries of the world but also by, *inter alia*, huge migration flows in sex workers (especially from the global south to the global north) and by the transnational nature of units of sex-industry capital. Therefore, this chapter looks at the attempts to organize sex workers in unions in the different domestic sex 'industries' in countries of the global south. The principal developments have taken place in South Africa, India and Argentina but there is also an array of lesser developments. They primarily concern prostitution, which remains the least corporatized section of the sex industry in these countries, rather than other forms of sex work, reflecting the under-development of exotic dancing and pornography compared with the economies of the global north. A fulsome consideration of developments in Asia, Africa and Latin America responds to Aldred's (2007) noting of the limited consideration of sex-worker unionization in the global south in Gall (2006).

Africa

South Africa

There have been several attempts to establish sex-worker unions in South Africa. In the early 1990s a street-walkers' association in Durban was begun but failed quite quickly (*Cape Argus* 2 June 2007). Then, in 1995, the Self-employed Women's Union (SEWU) decided to organize commercial sex workers (Devenish and Skinner 2004). But by 1997, no progress had been made and it was decided that organizers should abandon this area of work. Failure to organize this group

was likely to have been because of a strong commitment to Christian values from SEWU's leadership and staff. Nevertheless, the advocacy and rights' group, the Sex Workers' Education and Advisory Taskforce (SWEAT), based in Cape Town and founded in 1996, has begun to make strides in gathering together the forces for conducting unionization of sex workers. It has long advocated that COSATU (Congress of South African Trade Unions) affiliate, the South Africa Commercial, Catering and Allied Workers Union (SACCAWU) should organize sex workers and established a close and positive relationship with it, leading SACCAWU to adopt a position for organizing sex workers in 2008 after such lobbying made its first breakthrough in 2005 (concerning SACCAWU educating sex workers on sexual health). Yet, and in echoes of the situation found in both the SEWU and in Canada, unionization of sex workers by SACCAWU has yet to take place as a result of internal opposition to developing the tools to do so and the challenges of the practical task of organizing.¹ However, SWEAT also helped launch the National Sisonke Sex Worker Movement of South Africa ('sisonke' meaning 'togetherness') in 2003 as another way of working for sex workers. Sisonke agreed its objectives were to unite to change laws with regard to sex work and gain recognition of sex work as work. To this end, it organized simultaneous demonstrations to present to a memorandum of demands and grievances to the Department of Justice on International Sex Workers' Rights Day in 2014 (*Daily Dispatch* 27 March 2014). Nonetheless, SWEAT continued to lobby for existing unions to undertake unionization of sex workers. As part of this, it persuaded COSATU to adopt a sex-work position and support calls for decriminalization (*Cape Times* 14 September 2009)² although when the issue came to COSATU's tenth national congress, the issue was referred back to the national executive as delegates were split on it. Thus, little progress has since been made (although the South Africa Police Union has also supported the sex-work position and calls for decriminalization as did the National Union of Mineworkers and National Union of Metalworkers of South Africa).³ SWEAT has also worked in alliance with the Women's Legal Centre in helping a prostitute sue the brothel she worked at for breach of employment rights. In 2007 the Commission for Conciliation, Mediation and Arbitration (CCMA) and then the Labour Court in 2008 ruled that prostitutes do not have rights under the country's constitution – not because of being of an employed status or not – but because the court could not sanction or encourage unlawful activity under the Sexual Offences Act (see NTUI/KWSU 2009:4–5). An earlier attempt in 2002 to strike down this Act relating

to prostitution failed. In a later case, the Labour Appeal Court found that the CCMA had jurisdiction to hear a complaint of unfair dismissal made by sex workers who are employed by brothel owners. The judgment confirmed the constitutional right relating to fair labour practices applies to all including sex workers. As a result, sex workers can now approach the relevant CCMA, Bargaining Council or the Labour Court to seek redress which could lead to reinstatement or compensation.

Elsewhere

In Ghana in 2010, prostitutes organized within the Commercial Workers' Union sought to raise their rates collectively in response to high inflation in Accra (*Accra Times* 18 February 2010). And, in 2012 in Zimbabwe, 300 prostitutes formed a Commercial Sex Workers' Union upon the initiative of a Bulawayo MP (*Bulawayo 24 News* 8 January 2012). It sought to provide the means to access health and education services for the women. In Namibia in 2013 *The Namibian* (20 November 2013) reported a 'newly-formed umbrella union called the Namibia National Labour Organisation (Nanlo)' covering all workers including prostitutes. It was registered with the Labour Commission in 2014. An 'informal union of commercial sex workers' was reported to be operating in Kenya (*Times* 24 January 2013).

Latin America

Argentina

The Association of Women Prostitutes of Argentina (AMMAR) was formed in 1994 by some 60 sex workers and victims of violence inflicted by police. It grew to have some 15,000 members over ten years later, particularly as it became a major organization in the national response to HIV/AIDS in Argentina, according to UNAIDS (2010) although Hardy (2010b:94, 2010a:168, 2008) stated: 'The union counts between two thousand and four thousand affiliates across ten provincial branches and is in contact with an estimated thirty thousand sex workers a year' by 2007; 'currently between 1,500 and 2,000 [are] members' and it has 'over 3800 members across Argentina' – these figures being more in line with the 1,700 members by 2004 cited in Gall (2006:154). The *Global Press Institute* (28 June 2012) quoted AMMAR as saying it had '5,000 members'. Its initial foci were against police and legal harassment and for decriminalization, recognition of sex work as work and on health and welfare provision (Hardy 2008, 2010b:94, Reynaga 2006:66). AMMAR took steps to transform itself into a 'union' in 2001 (with help

with the CTA union confederation from 1995 as a result of affiliating to it). Following this, the leader of AMMAR was shot dead in suspicious circumstances. Once part of the CTA, AMMAR instituted education outreach programmes and organized sexual health provision, and gained changes in the legal regulation of prostitution in a number of cities (Gallin 2003, Hardy 2010a, 2010b). It also succeeded in creating public space for sex work and for it to operate within. As Hardy (2010a:169) recounted, AMMAR 'almost exclusively' focused on 'street sex workers' because they are more independent than those who work in brothels or clubs. Meantime, these street sex workers are full-time, long-term sex workers with low educational training and a high number of dependants to support (Hardy 2010a:169, 172).

However, there is doubt over whether AMMAR is a labour union or is merely an association, that is, an advocacy and rights group (*cf.* Hardy 2010a, 2010b). This is because although AMMAR advocates labour and economic rights, it has not addressed the issue of the wage-effort exchange between workers and operators (albeit in the context of the absence of employment contracts, employed status and fixed work-sites). For example, AMMAR general secretary, Elena Reynaga (2005, 2006), discussed the purposes and activities of the organization. And although she freely used the terms 'labour union' and 'union' in this discussion, there was the notable absence of negotiating over the wage-effort bargain or other terms and conditions of work. By contrast, there is much public policy and law reform work. Indeed, one of AMMAR's greatest advances has been in decriminalization. This is no particular surprise given the sex workers which AMMAR organizes but it does mean that AMMAR is not a labour union. Thus, it acts as a prostitutes' rights group and others including Lopes and Clamen (2004:44) and Ross (2006:340–1) were wrong to classify it as a union. This conclusion is strengthened by Gallin's (2003) highlighting of AMMAR 2002 annual report which stated its objectives as being 'to strengthen, transmit and implement to our comrades policies of self-respect, managing their own lives and autonomy, and above all make them conscious of gender and identity issues'. These have been carried out through informal and participative workshops, where information is conveyed on HIV/AIDS, reproductive health, human rights, among other issues as well as the distribution of condoms and food parcels and the provision of health services to its members (Gallin 2003). In this regard, that both *Metro* (29 November 2011) and *Global Press Institute* (28 June 2012) reported AMMAR to be an 'unofficial' union seeking official status as a union and sex work to be recognized as work were still inaccurate. Indeed, the

Metro (29 November 2011) in an interview with Elena Reynaga gave the clear impression that AMMAR was not a union even though it sought, in its work terms, to be a union. The major activity in AMMAR in 2012 was preparing a parliamentary bill for the legislation of sex work. A group broke away from AMMAR in 2002 over whether prostitutes were sex workers or victims. Calling itself AMMAR Capital, it sought to gain support for a parliamentary bill in 2010 to support the prostitute victims of prostitution.

Elsewhere

In Bolivia in 2004, over 100 prostitutes blockaded traffic in protest at the shutdown of the brothels they worked in, leading the Mayor of Santa Cruz to back down after six months, and in 2007 other prostitutes, numbering up to 35,000 went on strike and refused to undertake mandatory STD testing to campaign against police harassment (*Time* 24 October 2007). The action was organized by ONAEM (National Organization for the Emancipation of Women in a State of Prostitution), which *Time* (24 October 2007) magazine called 'the sex workers' union'. In Uruguay, a 'union' of prostitutes, the AMEPU (Association of Professional Prostitutes of Uruguay) was founded in 1986 and is affiliated with the Central Workers' Union (*Inter-Press Service* 11 February 1998). In Venezuela, a similar organization called Union of Men and Women Sex Workers and Associates (UNTRASEX) was founded in 1998. It was denied the right to register as a legal union because the government considered that prostitution could not be defined as work as it lacked dignity and social justice and that legal unionization would lead to the expansion of prostitution. In Brazil, no union exists largely on account of hostility from existing unions and despite the state classification of prostitution as category of work in 2002 (*Independent* 2 June 2014, NTUI/KWSU 2009:16). This meant that the *Independent* (2 June 2014) was incorrect to state that APROSMIG was 'a union for those within the [sex] industry in the state of Minas Gerais', especially when it pointed out 'the name is a contraction of the 'Minas Gerais association of prostitutes'. Davida is the main rights and advocacy group for prostitutes in Brazil. Established in 1995, and as with other cases elsewhere, MODEMU (Movimiento de Mujeres Unidas or Movement of United Women) in the Dominican Republic is often wrongly characterized as a union. Thus, it is 'a union of approximately 400 sex workers that conducts outreach for HIV/STI prevention and lobbies for policy change concerning medical and legal attention, as well as recognition of labor rights' (Haddock 2007:4). The same claim is made by Brennan

(2000) and UNAIDS (2000). Indeed, Cabezas (2009:166) asked a member of MODEMU about a group of better educated prostitutes saying: 'Why not organize them into the sex worker union?' while earlier outlining (Cabezas 2000:82) that MODEMU is:

the outcome of organizing efforts by and on behalf of sex workers and sex worker advocates seeking to educate themselves and their peers about the AIDS pandemic. ... [It] provides social and health services to sex workers and other poor women ... hold[ing] workshops in various provinces of the country to raise women's consciousness about issues of gender equality, fair wages and working conditions, and health and safety issues related to sex work. [Its] broad concept of health also includes education on issues of self-esteem and women's economic independence. Using the knowledge base of sex workers, they conduct workshops and outreach services in the sex businesses and other places where sex workers congregate.

In Paraguay, the national workers' union recognized sex workers as legitimate workers eligible to retire and receive full pension benefits (Cabezas 2000:82). But it remained the case that the aim of the sex-worker group in Paraguay, Unidas en la Esperanza (United Hope) and which was founded in 2004, is still 'to form a sex workers union to fight for our rights as worker women'.⁴ It was, thus, wrong to state that within the membership of RedTraSex, the association of sex-worker national groups in Latin America, 'five sex worker trade unions' (NTUI/KWSU 2009:18) existed. There are, of course, organizations which call themselves unions but these are not labour unions. Finally, in Trinidad and Tobago, the National Union of Domestic Employees (NUDE) has campaigned almost since its inception in 1982 for the civil, legal and economic rights of prostitutes (*Trinidad and Tobago Mirror* 8 June 2001). It called for the legalization of prostitution in 2001. However, its work does not appear to extend to the recruitment and organizing of prostitutes as a group of workers in their own right.

Asia

India

In India, there are an estimated two million female sex workers (of which 85,000 are in Karnataka) (NTUI 2011). The vast majority of these are prostitutes, with four organizations claiming to be unions for sex

workers, that is, prostitutes.⁵ The first is in Karnataka and called the Karnataka Sex Workers Union (KSWU). Formed in 2006, it claimed 1,000 members initially (NTUI 2011) although Sukthankar (2012:322) subsequently put this at 'two hundred members' while Vijayakumar *et al.* (2015a:85) stated the figure of 'approximately 2,500 members [who] pay a joining fee and then a monthly subscription in order to register' (see also Vijayakumar *et al.* 2015b) and the *Asia Sentinel* (31 January 2013) put it at 1,400 members.

According to the *Asia Sentinel* (31 January 2013), the KSWU is 'considered to be one of the first trade unions of sex workers in India'. In its own words, KWSU states it is a 'trade union of women, men and transgender sex workers, who live in the state of Karnataka. The Union seeks to be registered as a trade union in India. We advocate for the rights of all sex workers. ... We organise all persons who are working or have worked as sex workers in Karnataka. We strive to secure for them fair treatment and humane working conditions that will promote their living conditions and well-being. And we do this only through democratic, legitimate and constitutional methods. We plan to take care of our members through sickness, unemployment, old age, accident, and death'.⁶ The KWSU also stressed it sought to 'organise and render relief to sex workers during sickness, unemployment, old age, accident and death to the extent possible; enable access to legal assistance for sex workers in respect of all matters arising out of their work and to help secure all their rights and facilities available under various statutes; [and] assist sex workers and their dependants with all facilities for educational, cultural, social, political and economic development'.⁷ Thus, not only did the KWSU not address the issue of collectively determining the wage-effort bargain, but it also sought to operate as much as a friendly or mutual insurance society. Interestingly, the KWSU added: 'we have always called ourselves businessmen or businesswomen, others have seen us as victims. The union is one way of asserting our right to choose the work we do, and the right to work on our own terms'.⁸

So while the KSWU explicitly calls itself a union and formally rejected the alternative of being a provider of services to sex workers, saying it was 'a people's organisation governed fully by us' and not a 'a service-provider, a caretaker of the underprivileged, generally governed by others who are concerned about the marginalised'⁹ (see also Gall 2012:60, Vijayakumar *et al.* 2015b *cf.* Hardy 2010b:93), its desire to be a labour union remained a vague and distant aspiration (especially as there is no evidence of seeking collective regulation of the wage-effort bargain). Indeed, Vijayakumar *et al.* (2015b) suggested it has, in line

with the informal workers' movement, focused upon demanding social protections from the state rather than demanding higher wages from employers. Moreover, the KWSU has acted in a way similar to other sex-worker 'unions' in campaigning for decriminalization and better labour standards through public policy and legal reform, and it has begun to provide some of the services that other non-union sex-worker organizations do (Vijayakumar *et al.* 2015b). Casting doubt over whether the KWSU is a labour union has not been influenced by the rejection of its application in 2008 to the Trade Union Registrar (Karnataka) to be registered as a union because rejection was on the grounds that sex work is illegal and sex workers have no 'employer' (Vijayakumar *et al.* 2015a:89).

The Durbar Mahila Samanwaya Committee (DMSC or Durbar)¹⁰ is another reputed union, being established in 1995 and claiming to represent some 65,000 sex workers in West Bengal. The misconception that it is a labour union of any type is widespread. For example, when talking of 'sex workers' labor organizations and social movement building', Aimee *et al.* (2015) commented: 'In India, for example, the Durbar Mahila Samanwaya Committee is an active union representing 65,000 prostitutes' while Cobble (2010:289) called it 'the largest union of prostitutes' and the International Prostitute's Collective called it 'Calcutta Sex Workers' Union'.¹¹ This is not helped by Durbar referring to itself as a 'sex workers' union' (Ghose 2012:295) and Ghose also repeatedly referred to Durbar as a 'union' in an interview with *State News Service* (17 January 2013). But rather as a community forum, credit cooperative (called Usha), campaigning group and provider of sexual health services, it is not a labour union.¹² This is reinforced by considering its own aims of 'improvement of image and self-esteem of marginalized communities; influencing existing norms, policies and practices, operating at all levels in the society and out the nation state; empowering communities through a process of collectivisation and capacity building; addressing power relations within the trade and outside; [and] building formal and informal alliances with individuals, groups, institutions and movements'.¹³ Indeed, its membership is open to brothel managers and madams, that is, house mothers or supervisors (Ghose 2012:295). Moreover, Durbar is more akin to other sex-worker organizations in India like SANGRAM and VAMP. SANGRAM is a sex-worker rights and anti-HIV/AIDS organization and Veshya Anyay Mukti Parishad (VAMP) is its affiliated sex-worker activist collective.

However, Durbar did establish the Binodini Srameek Union (BSU), sometimes the Binodini Shramik Union, and roughly translated as

Entertainers' Labour Union or Union of Entertainment Workers in 1997 with the BSU expressing a particular Marxist approach to prostitutes as worker victims of capitalism (Kotiswaran 2011:222,228). Although it defines sex workers as having a wider commonality of interests with other entertainers (singers, dancers, musicians), it has been described as 'a fledging trade union organisations of [sex workers]' (AIDSTAR-One 2011:32) and 'a putative trade union of sex workers' (Bandyopadhyay 2008:6) because it primarily seeks to organize sex workers, namely, prostitutes. Its first application for registration as a union was in 1999 under the Trade Union Act. Some five years later, the Registrar of Trade Unions sought clarifications which were submitted but, by late 2011, the union lodged a writ petition in the Calcutta High Court under Article 226 of the Indian Constitution. The High Court ordered the Registrar of Trade Unions to communicate immediately but no reply has yet been received by the union. Both the KSWU and BSU were still campaigning to be registered as labour unions in 2013. Recognition of the unions at regional and national level in India through registration is an important step to take in order to avail the unions of rights in law to assist with representation and bargaining.

In 2007, the BSU organized a festival for all entertainment workers, of which the majority were sex workers (3,000 of the 5,000) (Crago 2008:37) and the NTUI reported in early 2012 the BSU in Kolkata was 'representing several thousand sex workers in the city' and organizing 'a rally of over thousand sex workers' to mark International Women's Day. The union has also organized conferences for other unorganized workers. However, the claim by the NTUI (2012) that the BSU is 'a trade union representing over fifty thousand sex workers in Bengal' is improbable for it either conflates the BSU membership with that of the DMSC or elides the *de facto* role of the BSU with the *de jure* role of the DMSC. Indeed, without union registration, the BSU has effectively become a proselytizer for decriminalization of prostitution, campaigner for sexual-health facilities and advocate of sex work as work. Both the KSWU and BSU are affiliates of the peak body, the New Trade Union Initiative (NTUI), whose motto is 'Unity, democracy, militancy'. It was established in 2001 when several independent unions in the organized and unorganized sector came together. The NTUI became a federation in 2006 and positions itself on the radical left. It was the first national union centre to recognize sex work as work and affiliate unions of sex workers.

Founded in 2004 by a feminist non-sex worker, the Bharatiya Bar Girls' Union (BBGU, sometimes Bharatiya Dance Bar Girls Union)

operates in Mumbai and the wider region of Maharashtra (Dalwai 2012, Subrahmanian 2008:129). The BBGU was not formed in response to the proposed ban on dance bars as a result of the attempt to undermine prostitution as Makhija (2010:21) believed. Rather, as its founder explained:

the union was getting its foothold into the industry and slowly taking up issues such as better proportions of tips and conditions of work, when suddenly the ban was introduced. Within eight months of the Union registration, the struggle for the survival of the occupation surpassed any other concern or demand of the union. (In Dalwai 2012:212)

Both Seshu (2004) and *Business Line* (17 September 2004) also indicated the established of the BBGU well in advance of the ban coming in, being announced or discussed. The founder had previously noted the protests of the bar girls in 1996 and early 2004 against restrictions on the dance bars in terms of opening hours and regulation of dancers. Thus, Subrahmanian (2008:129) recounted: 'The bar dancers' protests have led to the incipient formation of a union, led by the "Womanist Party", a recently registered women's political party'. In seeking to repeal the ban, the BBGU claimed some 5,000 members (High Court of Judicature at Bombay 2005:17, Supreme Court of India 2006:10). However, the *Economic and Political Weekly* (30 October 2010) claimed of the period not long after its foundation that it had 'a membership of about 40,000 women'.

The BBGU does not solely comprise prostitute members for not all bar girls solicit or sell sexual services but a large number do with the remaining number being merely dancers. Yet the extent of bar girls being prostitutes is disputed (see Seshu 2004, Subrahmanian 2008:128–9). The closure of dance bars ended employment for dancers and the means by which prostitutes solicited clients. When the ban was proposed and then came into force in 2005, the BBGU campaigned alongside the Bar Owners' Association against it and for its repeal (via legal action) which was finally achieved in 2013 after an earlier victory in 2006 was overturned.

Subrahmanian (2008:129) characterized the BBGU as being 'aimed at strengthening the women's position within the industry, while also recognising the vulnerabilities they face in the course of their work'. Seshu (2004) noted that the range of issues the BBGU sought to loosen the control of bar owners over the women, as well as ensuring regular

medical check-ups, HIV/AIDS awareness, encouraging regular savings and familiarizing the women with sex workers' unions across the world. Citing research from 2006 by the Research Centre for Women's Studies, SNDT Women's University and the Forum Against Oppression of Women, the *Economic and Political Weekly* (30 October 2010) reported:

Before the announcement of the possibility of the ban, the union was fighting against the police raids common on bars when women were picked up and harassed. It has also been negotiating with the bar owners to get a better deal for the dancers, who technically do not get a wage but pay a commission to the bar owner of the tips that they individually earn. Successful negotiations with the union had helped reduce the owners' cuts in many bars from 70–80% to 60%. Since the announcement of the ban, however, the union is forced to join hands with the owners and fight for their collective interest of keeping the bars open.

However, in terms of being an independent organization Dalwai (2012:212) noted the BBGU 'was criticised for conniving with the owners and not being a credible labour union, for "claiming to be a Union without fighting with the bar owners and management" and "colluding with the management"' with Seshu (2004) noting the support of the Bar Owners' Association for the BBGU. Sukhthankar (2012:315, 317) went as far as stating the BBGU 'had been initiated by the bar owners in 1996' and was 'revived in an effort to challenge the ban' and that the *modus operandi* of the BBGU was to 'collaborat[e] with management in support of workers' whereby 'the union's entire budget was underwritten by the bar owners' association'. After the ban, one member reported: 'The union did their best, but I think they are also just in the business of taking our money. The police kept increasing our hafta after the ban. From every side, we were being bled dry' (*Firstpost India* 16 July 2013). The impact of the ban was that the BBGU 'lost its members and the spirit for further struggle. Media found other juicy topics to move on to. By 2008, the union had almost disintegrated and [its leader] was left with few bargirls around her' (Dalwai 2012: 213). Upon repeal of the ban, the BBGU still existed but very much as a reduced force, with many previous bars slow to reopen owing to continuing legal uncertainty over their regulation (*Tehelka*, 3 August 2013). In campaigning against the ban, the *Times of India* (29 April 2005) noted that the BBGU's founder claimed no prostitution took place in the bars and what the girls did after work was a consensual adult business.

Elsewhere

In Cambodia, the Womyn's Agenda for Change (WAC) was established in 2000 to empower Cambodian women workers. The WAC is staunchly opposed to neo-liberal development policies and supports sex-worker empowerment, helping launch the Women's Network for Unity (WNU) which seeks to unionize and empower Cambodian sex workers. It was established in 2000 and has some 5,000 members (Oxfam 2007:8). The Cambodian Prostitute Union (CPU) was established in 1998 following discussions among prostitutes and support workers in massage parlours, beer gardens and karaoke bars in the red light district of Toul Kork on the abuses and exploitative conditions they faced.¹⁴ The CPU is 'wholly owned, governed and sustained' by these workers, with the explicit goal of taking control of their lives.¹⁵ The CPU has three main activities: education and training, advocacy, and documentation and monitoring, supporting its members by providing information and counselling on: prevention of STIs and HIV; how to take care of themselves in the event of illness; the impact of drug abuse and how to make positive decisions to improve their daily lives.¹⁶ It is supported by the Cambodian Women's Development Agency. It is not clear what the relationship between the two organizations is. Notwithstanding this, it is wrong to say that Cambodian sex workers had 'succeeded achieving a place in the mainstream trade union movement [there]' as claimed by Lopes (2006a:276). However, the Cambodian Food and Service Worker Federation did represent a small number of massage workers within its entertainment section (*Inter Press Service* 22 February 2013). With the clampdown on brothels, prostitutes migrated to other places of work within the entertainment section and here some massage workers also sell sex.

In South Korea in 2005, the National Female Workers' Association began trying to organize prostitutes as sex workers into a union-type organization (*Korea Times* 24 June 2005). Out of this emerged a formative union called the Democratic Coalition of Sex Workers (DCSW), which with 220 members in the Kyonggi province, reached a collective bargaining agreement with brothel owners (*Korea Times* 26 September 2005). However because prostitution is illegal, the agreement had no legal binding leading the *Korea Times* (26 September 2005) to speculate that the DCSW will be forced to act as a human rights pressure group rather than a union. Indeed, the National Female Workers' Association took up the cudgels of campaigning to overturn the criminalization of prostitution. With between one and ten million sex workers in China (HRA 2013:9), Zi Teng is an advocacy and rights group for sex workers

(mainly prostitutes) and comprises social workers, labour activists and researchers specializing in women studies and church workers. It also conducts outreach work, provides educational service and conducts research on the situation and needs of sex workers.¹⁷ It has often wrongly been reported as prostitutes' 'trade union' and 'union' (see *South China Morning Post* 11 November 2003, 15 October 2005). Similarly, the Blue Light in Hong Kong, a sex-worker support and advocacy group for male prostitutes established in 2006, was referred to as a 'union' (*South China Morning Post* 11 November 2007). In Taiwan, the Taipei Alliance of Licensed Prostitutes (TALP) 'developed its organisation and structure and formed itself into a union-like organisation with branches in various districts'¹⁸ after the criminalization of prostitution in 1997. An allied organization to TALP was the Taipei Union of Legal and Illegal Prostitutes for Self-help (TULIPS) which was established in 1998 given the criminalization. The rights and advocacy group, Collective of Sex Workers and Supporters (COSWAS), was established from these two groups in 1999. There are no indications of any attempts to establish sex-worker unionization projects in Japan (see Morishima 2008).

Chapter conclusion

There is little evidence of attempts to establish *bona fide* sex workers unionization projects in the global south. The strongest evidence of attempts to do so was found in Ghana, India, South Africa, South Korea and Zimbabwe. But even here the evidence was still relatively thin. In regard to India, the view on the KWSU and BSU must remain provisional for until they are availed of the right in law to representation and bargaining it cannot be determined whether they would or would not use it to seek to co-determine the wage-effort bargain with operators. That aside, and in regard to the DMSC, BBGU as well as the KWSU and BSU, their orientations still coalesce around the goals and purposes of sex-worker rights groups, providing no basis for Hardy's (2010b:92–3, see also 2010a:168) optimism on sex workers' unions there. Part of the explanation for the paucity of developments in and towards sex-worker unionization in the global south is to be found in the focus of some of the aforementioned organizations on independent prostitutes who are genuinely self-employed as owner operators and not on brothel prostitutes who are *de facto* employees.