

**Comment regarding proposed amendment to the laws regarding purchase of sex
in the general penal code – case nr. S-118/2026**

I care about survivors and sex workers in my local area and therefore I ask the Minister of Justice to remove paragraph 1 from his proposed amendment to Article 206 of the General Penal Code No. 19/1940, which concerns the abolition of fines for the purchase of prostitution between adults (case no. S-118/2026), which the Minister of Justice has indicated will pave the way for the introduction of a harsher penal framework for the purchase of prostitution/sexual services.

I call on the Ministry of Justice to rather divert its efforts to educating and mobilizing the police to investigate reported incidents of violence and other crimes against sellers, with the seriousness that their cases deserve. This includes, for example, believing sellers when they come forward to report violence or other crimes against them, and prosecuting those who physically or sexually abuse sellers, do not respect their boundaries, or steal money from them. This change could also have the side effect of increasing sellers' trust in the police, which I consider very positive because such trust does not exist now, according to Gunnar Axel Davíðsson, police detective.

I also want all law changes and policy proposals related to prostitution and human trafficking to be developed in active consultation with victims of prostitution, sex workers, and victims of prostitution, because these groups know best about their own situations.

Human rights groups and organizations around the world, such as Amnesty International, the Human Rights Campaign, the United Nations, Freedom Network USA, the World Health Organization, and Doctors Without Borders, are calling for the full decriminalization of the buying and selling of sex, rather than harsher punishment for buying, and so am I. Recent research, as referenced below, shows clearly the harm that punishment for the buying of sex causes to sellers, especially to those who are most marginalised and disenfranchised.

Here you can read recent studies and reports that show that increased criminalization not only increases violent crimes against sex workers but also sexually transmitted diseases, which is a public health issue that affects everyone living in Iceland. Also included is a study that demonstrates the positive effects that full decriminalization of the sale and purchase of prostitution has on the health of sex workers:

1. Macioti, P.G. & Power, Jennifer & Bourne, Adam. (2022). 'The Health and Well-being of Sex Workers in Decriminalised Contexts: A Scoping Review.' *Sexuality Research and Social Policy*. 20. 10.1007/s13178-022-00779-8. https://www.researchgate.net/publication/366309402_The_Health_and_Well-being_of_Sex_Workers_in_Decriminalised_Contexts_A_Scoping_Review
2. Crago, A. L., Bruckert, C., Braschel, M., & Shannon, K. (2022). 'Violence against sex workers: Correlates and Changes under 'End-Demand' legislation in Canada: A five city study.' *Global Public Health*, 17(12), 3557–3567. <https://doi.org/10.1080/17441692.2022.2092181>

3. Platt L, Grenfell P, Meiksin R, Elmes J, Sherman SG, Sanders T, et al. (2018) 'Associations between sex work laws and sex workers' health: A systematic review and meta-analysis of quantitative and qualitative studies'. <https://doi.org/10.1371/journal.pmed.1002680>
4. Argento E, Goldenberg S, Braschel M, Machat S, Strathdee SA, Shannon K (2020) 'The impact of end-demand legislation on sex workers' access to health and sex worker-led services: A community-based prospective cohort study in Canada'. <https://doi.org/10.1371/journal.pone.0225783>
5. Landsberg, A., Shannon, K., Krüsi, A., DeBeck, K., Milloy, M. J., Nosova, E., Kerr, T., & Hayashi, K. (2017). 'Criminalizing Sex Work Clients and Rushed Negotiations among Sex Workers Who Use Drugs in a Canadian Setting'. *Journal of urban health: bulletin of the New York Academy of Medicine*. <https://doi.org/10.1007/s11524-017-0155-0>
6. *AMA Journal of Ethics*. 2017; 'Decreasing human trafficking through sex work decriminalisation'. <https://journalofethics.ama-assn.org/article/decreasing-human-trafficking-through-sex-work-decriminalization/2017-01>
7. Skýrsla Amnesty International frá 2022 um stöðuna á Írlandi fyrir seljendur eftir innleiðingu Sænsku leiðarinnar: <https://www.amnesty.org/en/wp-content/uploads/2022/02/EUR2951562022ENGLISH.pdf>
8. Afstaða Lækna án landamæra: https://www.medecinsdumonde.org/app/uploads/2022/04/Final_EN_health-and-rights-of-SW_MdM_F_position_paper.pdf
9. Skýrsla Amnesty International er varðar skuldbindingar stjórnvalda til þess að virða, vernda og gæta mannréttindum seljenda vændis: <https://www.amnesty.org/en/wp-content/uploads/2021/05/POL3040622016ENGLISH.pdf>
10. Afstaða Freedom Network USA, stærstu samtök Bandaríkjana gegn mansali: <https://freedomnetworkusa.org/app/uploads/2021/09/FNUSASTatementDecrimSept2021.pdf>
11. Afstaða Alþjóðaheilbrigðismálastofnunar: <https://www.who.int/teams/global-hiv-hepatitis-and-stis-programmes/populations/sex-workers>
12. Afstaða og meðmæli frá sérfræðinga Sameinuðu þjóðana þegar kemur að kaup og sölu á vændi/kynlífsvinnu: <https://www.ohchr.org/sites/default/files/2024-03/2024-march-sex-work-guide-un-report-short.pdf>

Sincerely,
[NAME]