

To the Australian Government: Department of Infrastructure, Transport, Regional Development and Communications,

I'm writing in regard to Part 9 of the *Online Safety Bill 2020* (Cth) currently under consultation by the federal government, and the detrimental effects this will have on both professional and hobbyist sex workers across Australia.

Firstly, a primer on the importance of legal sex work and online content creation within Australia, and across the globe at large. Sex work is a vital yet underrepresented industry when it comes to political discussions. Sex work is one of Australia's oldest industries, going as far back as the First Fleet in 1788. In modern times, sex work is one of the most innovative industries, taking advantage of access to the internet (through camming, and services such as OnlyFans and PornHub).

Restrictions on sex work, including pornography, disproportionately affect minority groups, particularly the queer community, for many of whom sex work is either the primary or only source of income. It's also important to establish that in 2020 many of these sex work businesses were heavily affected by the COVID-19 pandemic, and moving into online content creation was vital in keeping these businesses alive and these individuals with the financial means necessary to survive.

Australia is the 8th largest market of pornography consumers according to statistics released by PornHub, and it's important to keep the size of this local market in mind when discussing this new proposed Online Safety Act.

The current draft bill is a hostile piece of legislation that will decimate large aspects of the sex work industry in Australia, far beyond what is already a stigmatised industry.

As discussed by Jarryd Bartle here:

<https://twitter.com/JarrydBartle/status/1351697701927219200/photo/1>, at present a number of consensual and safe practices, such as bondage, spanking, wax play, golden showers, and consensual sexual violence (here I'm referring specifically to the risk aware and fully informed practice of BDSM activities) are deemed Class 1 material, and therefore would be refused classification and therefore be removable from social media as a result of this bill. Furthermore, practically any consensual sexual activity would be removable from social media under the restrictions placed on Class 2 material in this new bill.

This is a problem for a number of reasons. Firstly, sex workers within the queer community are far more likely to create and publish content within this Class 1 specification, given the more open nature of their interests in the field of BDSM and fetish material.

Secondly, social media consists of a number of vital platforms for individuals to build and maintain a following of consumers. In particular, Twitter has become the de facto platform for sex work marketing on social media given they are one of the few platforms left that hasn't banned adult content as a result of the American SESTA and FOSTA acts. Part 9 of the Online Safety Bill would force all sex workers off of social media and harm their ability to build and maintain their careers.

Part 9 of the Bill should either be revoked, or alternatively, introduce requirements for platforms to build systems to remove revenge porn, child pornography, and other obscene content, this is not in dispute. But blanket removal of all sexual content from social media is an overreach that will negatively harm thousands of Australian content creators, not to mention the millions of pornography consumers within Australia. Part 9 could incorporate better age validation requirements as an alternative to blanket deletion and removal of an entire industry from the internet.

Furthermore, on the back of this feedback, the classification standards of Australia require an overhaul to match the consumer awareness and attitudes of the modern day. As can be evidenced by the success of the Fifty Shades franchise here in Australia, Australian consumers have a much more aware and accepting attitude towards BDSM, bondage, spanking, et cetera, and these changed consumer attitudes need to be reflected in the current classification standards.

Thank you for your consideration,

Lady Jane Bubbles,

Adult Content Creator