BC Coalition of Experiential Communities (BCCEC)
Submission to the Standing Committee on Justice and Human Rights
Bill C-29 — An Act to Establish the Financial Crimes Agency
45th Parliament, 1st Session
November 2026

Subject: The Foreseeable Expansion of Discriminatory Financial Enforcement Against Women Who Do Sex Work

Who We Are

Since 2002, the BC Coalition of Experiential Communities (BCCEC) are a democratic organization of sex workers representing diverse race, gender and genre in sex work across the BC Region. Our work focuses on law and policy reform being based on evidence and fact and on placing the voices of sex workers at the center of all work that could impact our lives and safety.

2. Principal Objections to Bill C-29

BCCEC strongly opposes advancing Bill C-29 without a comprehensive examination of its foreseeable consequences for women who do sex work.

We are deeply concerned that this legislation is laying the groundwork for a significant escalation in the criminalization, financial exclusion and discriminatory policing of a large, readily identifiable group of women in Canada.

This is not simply a proposal to improve Canada's response to sophisticated financial crime. It would establish another federal law enforcement agency with investigative and asset-recovery responsibilities, operating within a financial intelligence system whose discriminatory consequences remain inadequately examined and addressed.

Women who do sex work have already experienced the consequences of FINTRAC's financial intelligence indicators, guidance and educational products, including discriminatory risk classifications, banking exclusion and denial of payment processing. We have challenged these practices through Canada's human rights system because of the absence of adequate gender-based analysis, human rights risk assessment, meaningful consultation and accountability.

We have also heard accounts from women whose money has been seized under existing proceeds-of-crime authorities, requiring months or years of effort to recover their earnings. In one particularly disturbing account, a woman was informed that her seized funds were irretrievable.

These concerns must also be understood against the documented history of police discrimination, abuses of authority and failures of protection involving women who do sex work.

How can the Government of Canada reasonably expect our community to trust that another federal law enforcement agency will exercise its powers fairly when existing institutions have repeatedly failed to protect our rights?

Bill C-29 threatens to deepen these existing harms by introducing additional investigative and asset-recovery capacity into a system that has already demonstrated serious deficiencies in protecting our rights.

Of particular concern is the legislation's inclusion of possession of proceeds of crime within the

definition of financial crime.

Under PCEPA, purchasing sexual services is criminalized, while women selling our own sexual services are protected from criminal liability. Yet the government has not adequately explained how this distinction protects our earnings from being characterized as criminal proceeds arising from the purchaser's offence.

The possibility that women could be investigated, deprived of their bank accounts or have their money and property seized because of offences committed by purchasers demands immediate parliamentary scrutiny.

Our concerns are further compounded by existing asset-forfeiture arrangements under which revenue from forfeited property can support law enforcement and other government activities.

The possibility that women's lawful earnings or property could be improperly seized, forfeited and ultimately used to finance further enforcement against our community represents a particularly disturbing potential abuse of state authority.

Why should women who do sex work trust that these powers will not be misused when we have already experienced discriminatory financial intelligence practices and heard accounts of unjustified seizures under existing enforcement authorities?

Why is the government proposing to expand this system before examining the harms it has already caused?

And why does Bill C-29 fail to expressly require the preventive human rights safeguards, independent oversight and gender-based analysis necessary to ensure that existing discriminatory practices are not reproduced or intensified?

This legislation represents a serious and foreseeable risk to the income, property, housing security, privacy, equality and personal safety of women who do sex work.

Parliament must examine that risk before granting additional financial crime enforcement powers.

3. The Population Project: An Identifiable Group of Women Protected Under Canadian Human Rights Law

The potential consequences of Bill C-29 must be understood in relation to the size and composition of the population affected.

The Canadian Sex Worker Population Project empirically identified **169,473 distinct people with lived experience in sex work in Canada between 2014 and 2016**, of whom approximately **83% were women**.

This is an empirical count of people identified through the research, not a statistical estimate of the population.

These findings establish that women who do sex work constitute a large, readily identifiable population in Canada.

We recognize that our community is gender diverse and includes men, transgender, non-binary and gender-fluid Canadians. All sex workers are entitled to equal protection of their human rights, regardless of gender identity or expression.

Throughout this submission, we deliberately use the term **“women who do sex work”** because women constitute the overwhelming majority of the identified population and because sex is an expressly protected ground under the *Canadian Human Rights Act*.

Our use of this terminology does not exclude other members of our community or diminish the discrimination they may experience, including discrimination based on gender identity or expression.

Rather, it identifies the gendered consequences of financial intelligence, policing and enforcement practices that disproportionately affect women.

The government is not proposing legislation that may incidentally affect a small or undefined population. It is establishing another federal financial enforcement institution whose powers could affect a large, empirically identified population composed overwhelmingly of women.

The government has a responsibility to examine the foreseeable consequences of those powers for this identifiable group before the legislation proceeds.

This responsibility is particularly important given the documented history of discriminatory policing, financial exclusion and the reported misuse of proceeds-of-crime authorities against women who do sex work.

Parliament cannot disregard the size of the affected population, its predominantly female composition or the history of discrimination when determining whether Bill C-29 contains adequate human rights protections.

The foreseeable risk of discriminatory financial enforcement against women who do sex work must be addressed expressly in the legislation, through meaningful consultation with our community and enforceable safeguards protecting our lawful activities, earnings, property and personal information.

4. FINTRAC's Activities and Services Have Not Been Subjected to Adequate Human Rights Examination

FINTRAC's responsibilities extend beyond regulating financial institutions and other reporting entities.

It produces and distributes financial intelligence indicators, guidance, educational materials and other products that influence how financial institutions assess their customers, identify suspicious activities and make decisions concerning financial transactions.

These activities and services have significant consequences for Canadians who are not themselves regulated entities.

Women who do sex work have experienced discriminatory risk classifications, denial of banking and payment processing services, account restrictions and barriers to participating in Canada's increasingly cashless economy.

BCCEC has challenged FINTRAC's practices through the Canadian Human Rights Commission and the Federal Court.

Our concerns include the absence of adequate gender-based analysis, meaningful consultation with women who do sex work, assessment of discriminatory consequences, and accountability for the impacts of FINTRAC's guidance and intelligence indicators.

The fact that FINTRAC produces information for use by regulated entities does not mean that the

consequences of those products are confined to regulated entities.

Financial institutions act upon that information, and their decisions affect the lives, livelihoods and financial security of women who do sex work.

Before Parliament authorizes another federal agency to operate within this system, it must determine whether FINTRAC's existing activities and services comply with Canada's human rights obligations.

How can Parliament be satisfied that the proposed agency will not reproduce or intensify existing discrimination when the government has not adequately examined the consequences of FINTRAC's current activities?

What independent mechanism presently examines the discriminatory effects of FINTRAC's financial intelligence indicators, educational materials and guidance on identifiable groups of Canadians?

What gender-based analysis has been undertaken?

Which sex worker organizations have been consulted?

And what effective mechanisms exist to correct discriminatory intelligence once it has been distributed to financial institutions and law enforcement agencies?

Parliament must examine the actual consequences of FINTRAC's activities and services before authorizing another agency to rely upon the information generated within that system.

5. The History of Police Abuse and Misapplication of Proceeds-of-Crime Laws

Women who do sex work have repeatedly experienced discrimination, abuse of authority, violence, harassment and denial of protection by police. These experiences have been documented through public inquiries, research, human rights proceedings and the accounts of women within our community.

The Missing Women Commission of Inquiry revealed profound failures in policing and the protection of women who do sex work. More than a decade later, we continue to challenge discriminatory police practices, including the denial of policing services, inappropriate surveillance, interference with our livelihoods and the misuse of enforcement authorities.

Our concerns about Bill C-29 must be understood against this history.

How can the Government of Canada reasonably expect women who do sex work to trust that another federal law enforcement agency will exercise its powers fairly when existing police institutions have repeatedly failed to protect our rights?

How can Parliament contemplate expanding financial investigative and asset-recovery powers without first examining the history of police abuse against our community and the reported misuse of proceeds-of-crime authorities to seize women's earnings?

The proposed agency would have opportunities to access financial intelligence, cooperate with police and other enforcement authorities, participate in investigations and contribute to asset recovery.

These powers cannot be considered in isolation from the institutions and practices through which they will operate.

We have witnessed police practices that place our privacy, security and livelihoods at risk.

What evidence has the government provided that the systemic problems affecting existing institutions

have been identified and corrected?

What independent assessment demonstrates that financial intelligence indicators, investigative criteria and asset-recovery practices will not reproduce discriminatory assumptions about women who do sex work?

What safeguards will prevent police and participating enforcement agencies from abusing their authority to investigate, seize or pursue the forfeiture of our lawful earnings and property?

The government must demonstrate that effective safeguards exist. It cannot reasonably expect women who do sex work to accept assurances of responsible enforcement in place of independent oversight, evidence-based risk assessments and enforceable protections.

Our distrust of these institutions is not an ideological position. It is grounded in decades of experience with police discrimination, abuses of authority, failures of protection and inadequate accountability.

Parliament has a responsibility to consider that history before establishing another federal agency with powers that could be used against our community.

It should be required to demonstrate, before granting them, that they cannot be used to perpetuate the abuses we have already experienced.

6. The Criminalization of Purchasing Sexual Services and the Proceeds-of-Crime Framework

BCCEC is deeply concerned that Bill C-29 proposes to establish another federal financial crime enforcement agency without addressing the consequences of existing criminal laws for women who do sex work.

Under PCEPA, purchasing sexual services is criminalized, while women selling our own sexual services are protected from criminal liability.

In *Canadian Alliance for Sex Work Law Reform v. Canada*, 2023 ONSC 5197, the Ontario Superior Court accepted the position that the underlying transaction is prohibited and distinguished statutory immunity from the legal status of the activity itself.

This interpretation creates a serious unresolved question about the status of the earnings received by women who do sex work.

Bill C-29 expressly includes possession of proceeds of crime within its definition of financial crime and establishes a specialized agency mandated to investigate financial crimes and contribute to the recovery of criminal proceeds.

What prevents the government from treating money lawfully received by women who do sex work as proceeds of crime arising from the criminalized conduct of purchasers?

This is not an abstract legal concern.

Women in our community have reported having their earnings seized under proceeds-of-crime authorities and subsequently spending months or years attempting to recover those funds. In one account shared with us, a woman was informed that her money was irretrievable.

Parliament must investigate these experiences before authorizing additional enforcement capacity.

The legislation's definition of financial crime encompasses designated offences generating proceeds of

crime. Its provisions also establish broad investigative authority, cooperation with domestic and foreign law enforcement agencies, and responsibility for recovering criminal proceeds.

The criminal liability of the purchaser must not become the financial punishment of the woman who sells her own sexual services.

Parliament must ensure that the criminalization of purchasing sexual services cannot be used to deprive women who do sex work of the earnings we are legally entitled to receive and retain.

7. Asset Forfeiture as a Threat to Women's Safety and Housing Security

Financial enforcement has consequences extending far beyond criminal investigations.

For an impoverished woman who does sex work, the seizure of a few hundred dollars can mean the loss of rent, food, transportation or other necessities.

The freezing of a bank account can prevent her from accessing her earnings, paying her bills or maintaining her housing.

The seizure or forfeiture of a vehicle may eliminate her transportation, while proceedings involving a home can threaten the stability and security of her entire household.

These consequences can occur even where an individual is never convicted of an offence.

The deprivation of income and property is itself capable of producing serious harm long before the legality of a seizure is determined.

Women who lose access to their financial resources may be forced to work in more isolated circumstances, accept less desirable working conditions or become increasingly dependent upon others.

The government's stated objective of preventing exploitation cannot justify enforcement practices that increase our vulnerability to exploitation.

Before expanding asset-recovery powers, Parliament must examine whether existing proceeds-of-crime enforcement has contributed to homelessness, poverty, financial exclusion and unsafe working conditions among women who do sex work.

The Financial Incentives Created by Asset Forfeiture

BCCEC is also concerned about the financial relationships between asset forfeiture and law enforcement funding.

Canada's *Seized Property Management Act* provides for the sharing of certain proceeds from forfeited assets with jurisdictions whose law enforcement agencies participated in the investigations.

In British Columbia, the Civil Forfeiture Office operates on a self-funded basis, using forfeiture recoveries to cover its operational and legal expenses.

These arrangements raise legitimate questions about whether asset recovery can create institutional financial incentives that influence enforcement priorities.

Although Bill C-29 does not expressly authorize the agency to retain forfeiture revenues for its own budget, existing federal and provincial forfeiture arrangements permit funds to be distributed to participating jurisdictions and used for authorized governmental purposes.

We are particularly concerned that women engaged in visible, independent sex work could become accessible targets for financial investigation, even though the proposed agency is being established to address serious and complex financial crimes.

The government must demonstrate that the new agency's investigative priorities will be determined by evidence of serious financial criminality, not discriminatory risk classifications, the accessibility of particular populations or the potential financial value of recoverable property.

Police Support for Bill C-29 and the Conflict of Interest in Asset Recovery

BCCEC is particularly concerned that the Canadian Association of Chiefs of Police (CACP), in its October 23, 2026 submission to the Standing Committee on Justice and Human Rights, supports the expansion of asset-recovery capabilities while simultaneously asking Parliament to address the distribution of recovered assets among participating jurisdictions.

On page 5 of its submission, the CACP expressly raises uncertainty concerning whether recovered proceeds will be distributed among provinces and recommends a framework that recognizes the investigative contributions of provincial and local police services.

This recommendation must be considered alongside Canada's existing asset-forfeiture arrangements, under which proceeds from forfeited property may be shared with participating jurisdictions and used for authorized government and enforcement purposes.

This creates a serious potential institutional conflict of interest: police organizations advocating expanded asset-recovery powers may represent institutions that could benefit financially from the proceeds of investigations conducted under those powers.

The issue is particularly troubling given the documented history of discriminatory policing against women who do sex work and the accounts we have received of police seizing women's earnings under existing proceeds-of-crime authorities.

How can Parliament accept recommendations from police organizations concerning the distribution of recovered assets without independently examining whether those organizations or their participating agencies stand to benefit financially from the enforcement powers they are advocating?

What prevents recovered assets from supporting the operational costs, staffing, equipment or future investigative activities of agencies participating in their seizure?

What safeguards ensure that anticipated forfeiture revenues do not influence decisions about which individuals or communities are targeted for investigation?

And why should women who do sex work be expected to trust these arrangements when our community has already experienced discriminatory policing, financial surveillance and the seizure of earnings?

The CACP submission emphasizes the need for consultation with police organizations concerning the development of the new agency. Yet women who do sex work, whose earnings, assets and financial security may be directly affected, have not been afforded an equivalent role in shaping the proposed legislation.

Parliament must not permit the institutions that exercise financial enforcement powers, and that may benefit from the resulting forfeiture arrangements, to determine the rules governing those

powers without independent scrutiny and meaningful participation by affected communities.

BCCEC recommends that Parliament require full disclosure and independent examination of existing and proposed asset-forfeiture revenue-sharing arrangements, including whether recovered funds may be used to finance police operations, personnel, equipment or further enforcement activities.

The legislation must establish enforceable safeguards preventing financial interests from influencing investigative priorities, seizure decisions or the treatment of identifiable populations.

Women who do sex work must not be subjected to a system in which police can improperly seize our earnings and property, benefit institutionally from their forfeiture, and use those resources to support further enforcement against our community.

8. Existing Discriminatory Financial Intelligence Could Become the Foundation for New Investigations

Bill C-29 authorizes the proposed agency to investigate financial crimes, establish investigative criteria, cooperate with domestic and foreign law enforcement agencies, and enter agreements involving information sharing.

The legislation does not expressly require independent human rights assessments of the intelligence products, risk indicators or investigative criteria upon which the agency may rely.

This is deeply concerning.

BCCEC has already challenged financial intelligence practices that associate ordinary activities of women who do sex work with potential trafficking, exploitation, money laundering and other criminal conduct.

We have also documented the consequences of financial institutions adopting policies that restrict or deny services to our community.

How can the government guarantee that these same discriminatory assumptions will not be transferred into the investigative practices of the proposed Financial Crimes Agency?

What prevents an existing financial intelligence indicator from becoming the basis for an investigation, the sharing of personal financial information, or an application to seize property?

What assessment has been undertaken to determine whether the information already circulating within Canada's financial intelligence system is accurate, evidence-based and compliant with the *Canadian Human Rights Act*?

Without such an examination, Parliament risks expanding an enforcement system without understanding the human rights consequences of the information upon which it operates.

The Expansion of Financial Enforcement Under the Guise of Combating Human Trafficking

BCCEC is deeply concerned that Bill C-29 will provide another mechanism through which the criminalization of purchasing sexual services, and the continued conflation of consensual sex work with human trafficking, can be used to justify increased financial surveillance, investigations and interference with the lawful earnings of women who do sex work.

We have already witnessed the consequences of policing and financial intelligence practices that associate our lawful activities with trafficking, exploitation and financial crime. These practices have

contributed to our exclusion from financial services, interference with our businesses and increased surveillance of our community.

Parliament is now considering establishing another federal enforcement agency without first addressing the systemic discrimination we have identified within existing institutions, including FINTRAC and the RCMP.

Nor should unsupported assumptions about trafficking be permitted to transform our lawful financial activity into grounds for investigation.

We ask Parliament to explain why it is establishing another financial crime enforcement agency before resolving serious questions about human rights accountability within the existing federal financial intelligence system.

We further ask Parliament to require an independent assessment of the potential discriminatory consequences of Bill C-29, including its interaction with PCEPA, FINTRAC's financial intelligence practices, existing anti-trafficking initiatives and the *Criminal Code*'s proceeds-of-crime provisions.

The protection of people experiencing trafficking is a legitimate and important public responsibility. It cannot justify policies that expose women who do sex work to additional discrimination, financial exclusion or unnecessary surveillance.

The Government of Canada must not use the protection of women as justification for creating additional powers that can be used to deprive those same women of their income, privacy, security and equal protection of the law.

9. Recommendations: Explicit Protection of Women Who Do Sex Work

BCCEC calls upon the Standing Committee on Justice and Human Rights to recommend that Bill C-29 not advance until its foreseeable discriminatory consequences for women who do sex work have been examined and addressed through explicit legislative protections.

Our recommendations arise from decades of documented discriminatory policing, failures of police accountability, financial exclusion, and reported misuse of proceeds-of-crime powers against women who do sex work.

These experiences are directly relevant to the proposed Financial Crimes Agency's investigative authority, access to financial intelligence, information-sharing arrangements and asset-recovery mandate.

The history of discrimination and abuse against our community must be central to the legislative design of the new agency, rather than treated as an issue to be addressed after the agency has commenced operations.

Recommendation 1: Explicitly Name and Protect Women Who Do Sex Work

Bill C-29 must expressly recognize women who do sex work as an identifiable group whose lawful activities, earnings, assets and personal information require protection against discriminatory financial enforcement.

The legislation should explicitly provide that:

The lawful sale of one's own sexual services, the receipt and possession of earnings from those

services, and the ordinary financial activities associated with those earnings shall not, in themselves, constitute grounds for investigation, financial surveillance, seizure, restraint or forfeiture by the Financial Crimes Agency.

The criminalization of purchasing sexual services must not be used, by itself, to justify treating the earnings or property of the person selling those services as proceeds of crime.

Nor should the agency be permitted to treat a person's status as a sex worker, or their association with sex work, as an indicator of criminal activity.

These protections must extend to independent sex workers, including women working indoors, from their homes, through advertising platforms and in other lawful arrangements.

Nothing in these protections would prevent investigations based on evidence of trafficking, coercion, exploitation or other actual criminal conduct.

The purpose is to ensure that women who do sex work are not subjected to financial criminalization simply because Parliament has criminalized the conduct of those who purchase our services.

Recommendation 2: Mandatory Consultation With Women Who Do Sex Work

Bill C-29 must expressly require meaningful consultation with sex workers and democratic, sex worker-led organizations before the agency develops or adopts policies, investigative criteria, financial intelligence practices or information-sharing arrangements that may affect our community.

Consultation must occur during the legislative process and continue throughout the agency's operations.

It must include women with direct experience of discriminatory banking practices, proceeds-of-crime investigations, asset seizures, police surveillance and financial exclusion.

Consultation must be accessible, adequately funded and structured to protect the privacy and safety of participants.

Consulting police organizations, financial institutions and government agencies cannot substitute for consulting the women whose rights, property and livelihoods may be affected by their decisions.

We must have a meaningful opportunity to identify risks, examine proposed safeguards and participate in the development of measures intended to prevent discrimination.

Recommendation 3: Require an Independent Examination of Existing Abuses Before the Bill Proceeds

Parliament must commission an independent examination of the existing financial intelligence and enforcement systems before establishing the proposed agency.

This examination must include:

1. FINTRAC's financial intelligence indicators, guidance, educational products and other services, including their discriminatory consequences for women who do sex work and the adequacy of existing GBA+ and human rights assessments.
2. The documented history of police discrimination, abuses of authority and failures of protection involving women who do sex work, including findings from the Missing Women Commission of

Inquiry.

3. The application of proceeds-of-crime legislation to sex workers, including reported seizures of lawful earnings, prolonged recovery proceedings and cases where funds were never returned.
4. Existing asset-forfeiture arrangements and the possibility that proceeds from forfeited property may create financial incentives affecting law enforcement priorities.
5. The interaction between PCEPA, the *Criminal Code*'s proceeds-of-crime provisions and the proposed Financial Crimes Agency's investigative and asset-recovery mandate.
6. The potential for discriminatory financial intelligence to be shared between FINTRAC, banks, police, foreign authorities and the proposed agency.

The findings must be made available to Parliament and used to inform amendments to Bill C-29 before the legislation advances.

Recommendation 4: Make Preventing Discrimination an Express Statutory Obligation

Bill C-29 must impose an explicit and enforceable duty on the agency to identify, prevent and remedy systemic discrimination arising from its policies, investigative criteria, intelligence products, information-sharing activities and asset-recovery practices.

This obligation must include mandatory GBA+ and human rights impact assessments developed with the participation of affected communities.

The agency must not be permitted to adopt existing financial intelligence indicators or investigative criteria without first examining whether they reproduce discriminatory assumptions about women who do sex work.

Independent oversight must extend beyond complaints concerning the conduct of individual police officers to include the agency's institutional policies, intelligence practices and systemic impacts.

Recommendation 5: Prevent Financial Incentives From Encouraging Discriminatory Enforcement

The legislation must establish safeguards to ensure that investigative and asset-recovery decisions are not influenced by the financial value of property that may be seized or forfeited.

Parliament must examine existing arrangements through which forfeiture revenues are distributed to participating jurisdictions or used to support law enforcement activities.

No investigative agency should have a financial incentive to seize the earnings, homes, vehicles or other property of women who do sex work.

The government must demonstrate that enforcement priorities will be determined by credible evidence of criminal conduct, rather than discriminatory assumptions, the visibility of particular groups or the potential value of recoverable assets.

Independent reporting and review mechanisms must be established to identify and prevent discriminatory patterns in asset seizure and forfeiture.

Parliament must specifically examine the Canadian Association of Chiefs of Police's October 23, 2026 recommendations concerning the distribution of recovered assets and determine whether participating police organizations have an institutional financial interest in the expansion of the

powers they are advocating.

10. Conclusion: Parliament Must Not Expand an Already Discriminatory Enforcement System

Bill C-29 must be understood within the broader context of Canada's existing criminal laws and financial intelligence practices affecting women who do sex work.

For more than a decade, the criminalization of purchasing sexual services has placed women in a contradictory legal position: protected from criminal liability for selling our own services while remaining exposed to the consequences of laws criminalizing the transactions through which we earn our living.

The financial intelligence system has compounded these difficulties.

FINTRAC's indicators, guidance and educational products have contributed to practices that BCCEC has challenged as discriminatory, including the classification of our lawful activities as suspicious, restrictions on access to banking services and the denial of payment processing.

Women in our community have also reported having their earnings seized under proceeds-of-crime authorities and being forced to spend months or years attempting to recover their money.

Against this background, Bill C-29 is not a neutral expansion of law enforcement capacity. It presents a foreseeable risk of further entrenching the criminalization, financial exclusion and discriminatory treatment of a large, identifiable group of women.

The proposed agency would operate within the same financial intelligence and law enforcement environment that has already produced these concerns, while acquiring additional capacity to investigate financial crimes and contribute to asset recovery.

Of particular concern is the potential interaction between the criminalization of purchasing sexual services, the definition of proceeds of crime, and existing asset-forfeiture arrangements.

The government must explain how women who do sex work will be protected from having our lawful earnings, bank accounts, vehicles, homes and other property improperly seized or forfeited because of the criminal conduct of purchasers.

It must also explain how the financial incentives associated with asset forfeiture will be prevented from influencing investigative and enforcement priorities.

Parliament must confront the possibility that police and other enforcement authorities could misuse these powers to seize property from women who do sex work, with resulting forfeiture revenues potentially supporting further enforcement activities.

This creates an unacceptable risk of a self-reinforcing system in which an identifiable group of women may be subjected to financial surveillance, deprived of property, and then exposed to further enforcement supported by revenues generated through forfeiture.

The existence of such financial arrangements makes independent oversight, transparency and enforceable safeguards essential.

The government cannot simply assure Parliament that the proposed agency will operate responsibly.

How can we be expected to trust that a new federal financial enforcement agency will not reproduce or intensify existing discrimination when FINTRAC's activities and services have not been

subjected to an adequate examination of their consequences for women who do sex work?

How can Parliament justify granting additional investigative and asset-recovery powers without first determining whether existing proceeds-of-crime laws have been improperly applied against women who have committed no offence?

And how can the government claim to be protecting women from exploitation while establishing additional enforcement mechanisms that could deprive those same women of our earnings, housing security, independence and personal safety?

The consequences of financial enforcement are not confined to bank accounts and property.

For women living in poverty, the seizure of even modest earnings can mean homelessness, hunger, increased dependence upon others and exposure to violence.

These are not incidental considerations. They are foreseeable human rights consequences that Parliament has a responsibility to prevent.

BCCEC calls upon the Standing Committee on Justice and Human Rights to recommend that Bill C-29 not proceed until an independent examination has been completed of FINTRAC's existing activities and services, the application of proceeds-of-crime legislation to women who do sex work, and the financial incentives associated with asset forfeiture.

That examination must meaningfully involve women who do sex work and must address the absence or inadequacy of gender-based analysis, human rights risk assessment and accountability within the existing financial intelligence system.

Parliament must also require the Attorney General of Canada to provide a clear legal explanation of how the earnings and property of women selling their own sexual services are protected from proceeds-of-crime investigations, seizures and forfeiture arising from the criminalized conduct of purchasers.

The Government of Canada must not be permitted to deepen the criminalization and financial exclusion of women who do sex work by expanding an enforcement system whose existing discriminatory consequences it has failed to adequately examine or remedy.

Nor should it establish additional opportunities for the misuse of asset-forfeiture powers without investigating whether such powers have already been applied discriminatorily against our community.

Women who do sex work are entitled to the same protection of our income, property, privacy, security and equality as other women in Canada.

We must not be treated as a convenient source of criminal intelligence, recoverable assets or enforcement revenue simply because the government has criminalized the conduct of those who purchase our services.

Parliament must not create the conditions for further widespread abuse of financial enforcement powers and then leave women who do sex work to fight for years to recover our money, our homes and our rights.

The time to prevent these harms is before Bill C-29 becomes law, not after they occur.

Submitted by:

BC Coalition of Experiential Communities (BCCEC)
Susan Davis, Executive Director
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susan.1968@hotmail.com
(604)671-2345