

Feminist engagements with sex work
Imported polarisations and a «feminist alliance»
model in jeopardy

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1. *Introduction*¹

The last thirty years have seen a remarkable transformation in the sex industry in Europe, with the increased visibility of migrants operating and being exploited in the sector, and a move towards internet-based work (Kempadoo *et al.* 2015; Sanders *et al.* 2018). Correspondingly, in the last decade, issues linked to sex work and trafficking have attracted renewed attention from policy makers, international institutions, as well as activists in Europe – and campaigns have reached growing numbers of people (Jahnsen, Waagenar 2018).

Within this scenario, understandings of paid sex and approaches to this field of policy are increasingly presented as «feminist» or about «gender equality», and feminists find themselves being called to the forefront of this transformation. Feminists oppose the abolitionist policy approach previously advocated on the basis that it has proven unfit for policing the complexities of the contemporary sex industry. Their resistance is based on two significantly different positions: one supporting the so-called «Swedish model» which criminalizes the purchase of sexual services, and the other demanding the de-criminalisation of sex work based on the recognition of sex workers' rights. These two positions, in turn, have come to constitute a profound line of division and conflict within feminism itself (Selmi 2016). While the contentious engagement of feminists with sex work has long

¹ This article is the outcome of the joint work of the authors. However, if for academic reasons individual authorship has to be identified, Giulia Garofalo Geymonat wrote paragraph 3 and 5 and Giulia Selmi wrote paragraph 2 and 4. Paragraph 1 and 6 have been written jointly.

been analysed in the Anglo-American scene (Bell 1987; Nagel 1997; Kesler 2002), much less has been said about other contexts (Ward, Wylie 2017).

The present article takes Italy as a case in which contemporary feminists have a rich tradition of engagement with the field of sex work and anti-trafficking since the 1980s. Drawing upon the analysis of texts that have engaged in this field from various feminist perspectives over the last four decades², we identify the main actors, and explore the alliances and discursive frames active in the field in order to look at the various factors that have produced the current configuration.

In particular, we found that for quite some time diverse stances on sex work have coexisted among feminists within a pragmatic alliance that has been oriented toward supporting organisations directly engaged in struggling for the emancipation of women selling sex, and since the 1990s, for migrant victims of trafficking. However, by the 2010s, the debate started to radically shift, jeopardising the delicate balance that had successfully kept feminists (with or without experience of sex work) together.

The article allows us to make sense of this change by accounting for the complex contextual dynamics prevalent in Italy, and by linking these dynamics to the global circulation of discourses related to sex work. Namely, we identified key strengths of the «feminist alliance» model developed in Italy in the 1980s and 1990s, and, in particular, its capacity to acknowledge the diversity of experiences of women in sex work and to position sex work within a broad analysis of migration and social vulnerability, focusing on the concrete intricacies of the industry. These same strengths came to represent weaknesses when feminists had to face austerity, anti-migrant sentiment and new security approaches introduced at the end of the 2000s, as well as the 2011 Berlusconi

2 We analysed 53 documents produced from 1982 to 2018. Among these, 34 were produced by six organizations in the field of sex work and anti-trafficking that we chose through theoretical sampling (Glaser, Strauss 2017) taking into account their different stance on sex work and sex work policies: *Comitato* and *Ombre Rosse* as sex workers led organisations, *Resistenza Femminista* and *Non Una di Meno* as feminist organisations with opposed views on sex work policies, *Rete delle unità di strada* and *Tavolo nazionale anti-tratta* as key players in anti-trafficking policies. We then, we added 19 documents by other feminist activists and organisations. Documents includes articles in feminist blogs and feminist journals, Facebook notes, working documents, political statements, manifestos and academic articles.

sexual scandals. The changing landscape was conducive to the «importation» of a polarised debate around the «pro-sex work» and «sex work as a form of violence» approaches. While different visions of sex work have coexisted within Italian feminism, we argue that the current change has to do with the way in which these positions are constructed against each other and conceived as irreconcilable, as well as with the way in which the debate appears to be organised around standardised international policy solutions that fail to take into account national contexts (Dewey *et al.* 2019; Munro, della Giusta 2008).

2. *Promoting sex workers' voices against patriarchy*

In the Italian context, it is possible to identify the beginning of contemporary feminist engagements with sex work³ with the birth of the first sex workers' collective in 1982, the Comitato per i Diritti Civili delle Prostitute (Committee for the Civil Rights of Prostitutes, hereafter *Comitato*). At that time, almost thirty years had passed since the approval of the abolitionist law, the so-called Merlin law which closed down State-controlled brothels and put an end to regulations long-recognised as exploitative for sex workers. It did so by making indoor sex work illegal, and criminalising all forms of exploitation, soliciting, aiding and abetting. Almost a century following the abolitionist movement headed by English suffragettes (Walkowitz 1982), the Merlin law was passed in 1958 after ten years of harsh parliamentary debate, and framed as a tool to promote women's rights and move gender relationships towards equality (Bellassai 2006). However, in the 1960s and 1970s, its implementation and its ability to concretely promote women's rights and oppose exploitation proved difficult. Making soliciting a crime exposed street-based sex workers to random charges against public morality and to expulsion orders, while the possibility of being charged with aiding and abetting for anyone who had economic relationships with women selling sex (including their landlord, partners or

³ In English the terms «prostitution» and «prostitute» have a negative connotation, therefore throughout the article we use the terms «sex work» and «sex worker», even when they do not reflect the actual language used by sex workers themselves during the historical period analyzed.

husband) increased stigmatisation and social exclusion (Teodori 1986; Corso, Landi 1991). Rather than an issue of women's rights and gender equality, in the 1980s prostitution was framed as a public order problem in political discourse. The *Comitato* emerged from this context and in its 1983 founding conference titled *Prostitution in the 80s: an issue of marginality or a social issue?* denounced police abuse and demanded a partial reform of the Merlin law, introducing within its abolitionist framework some elements of de-stigmatisation, decriminalisation and civil rights (Covre 1983).

From the beginning the *Comitato* positioned itself within a feminist genealogy recognizing the legacy of 1970s second-wave feminism and endorsing some of its watchwords such as self-determination and empowerment (Corso 1991). In so doing, the *Comitato* also created an alliance with non-sex worker feminists who recognized the importance of sex workers speaking out for themselves and supported their claims against abuse and stigmatisation (Staderini 1985). However, the underlying question of abolitionism remained unsolved. In other words, whether the feminist struggle in this field should ultimately be oriented towards the elimination of sex work as a patriarchal institution, or towards obtaining better conditions under which sex work could be practiced was not resolved. Such ambivalence did not prevent the creation of feminist alliances and the development of a feminist debate around sex workers' rights (Tatafiore 1983). In fact, between 1983 and 1985 the *Comitato* published a magazine with an editorial team that included famous names of the left feminist scene. The magazine was named *Lucciola* – «firefly», an old, poetic word to refer to street-based workers – and, bringing together feminists with and without sex work experience, it became a reference point for feminist reflections about the field.

This experience arguably contributed to the creation of shared political practices that oriented feminist engagements with sex work in Italy until very recently. Remarkably, this orientation revolved around what can be identified as three basic principles of feminist political practice, rather than conceptualisations of sex work or sex work policy approaches. First, feminists largely agreed on the centrality of sex workers' voices in the debate, and recognised an authority to their collective knowledge and analyses. Second, there was a consensus on the importance of recognising the variety of women's experiences of commercial

sex, including both those of violence and those of empowerment. Third, and this was central for action, there appeared to be a shared understanding that fighting against prostitution as a patriarchal institution does not necessarily imply an adversarial relationship with sex workers either as individuals or in their collective struggle.

What seems to emerge in terms of the conceptualisation of sex work is a view of it as an individual resource that women can use (and should be able to use) in a context in which they try to emancipate themselves from their systematic material dependence on husbands, fathers, capitalists and employers (Staderini 1983; Tabet 1989). This «individual resource approach» is quite distinct from thinking of sex work as a form of work, in particular with regards to policy claims (Danna 2004). The demand for legalization was not formulated by Italian feminists at the time – including by *Comitato*. The memory of abuses under the system of State-controlled sex work was still alive and legalisation was identified as a form of control over women's bodies. Instead, feminists recognised the value of the abolitionist Merlin law, and proposed some modifications to avoid forms of women's criminalisation and stigmatisation. It is interesting to see how these framing elements, as well as the practices of alliance developed by feminists during the 1980s proved useful in tackling the changes that the Italian sex industry underwent beginning at the end of the 1980s, and they arguably allowed feminists – including sex workers – to occupy a central role in developing what has been called «the Italian model» in fighting trafficking for sexual exploitation.

3. *A successful alliance against sexual exploitation and trafficking*

At the end of the 1980s, migrant women and trans people started to appear on Italian streets, mainly from Eastern Europe, the Balkans, West Africa, and Latin America (Carchedi *et al.* 2000). Due to their undocumented migrant status, these new subjects were highly vulnerable in terms of citizenship rights and had little or no access to public health and welfare services. Moreover, some of these new migrants worked under highly exploitative conditions within trafficking networks (Castelli 2003). In the public sphere, the debate became strongly polarised

between a representation of migrant sex workers as a social and sexual threat, or alternatively as victims (Crowhurst 2012a). Quite quickly, a sex work landscape consisting of mainly Italian citizens working independently gave way to a more complex scenario where sex work deeply intersected with migration, trafficking and growing racism (Bimbi 2001). Given these changes, the feminist scene responded in a remarkable way. Throughout the early 90s, thanks to EU initiatives and funding that encouraged member States to take action against trafficking, a diverse network came together to create connected outreach projects to promote health and access to public services for migrant street workers, as well as to support the emancipation of those who were in situations of severe exploitation (On the Road 2000). Key players in the network included the *Comitato*, some feminist organizations, in particular the newly created women's shelters, trans organizations, such as the MIT (Movement for Transgender Identity), as well as grassroots Catholic organizations, such as Caritas.

Within this large network of alliances, different views of sex work coexisted: from seeing it as violence to considering it a legitimate activity; yet, there was nevertheless a common understanding of the struggle against trafficking as rooted in a shared practice of social work and grassroots intervention (Sapio 2007). This understanding put at its centre the complexity of migrant women's experiences, including their desire to migrate, their ambivalent and dependent relationship on their exploiters who could also be helpers, and their justified mistrust of public authorities that systematically violate their rights as migrants (Corso, Trifirò 2003; Morniroli 2003).

This network of projects was successful in gaining trust and recognition as experts in the field not only from other feminists but also from progressive policy makers. Their analysis of trafficking also spread, and in the process, anti-trafficking projects were able to lobby for an innovative piece of legislation against trafficking that was introduced as early as 1998 as part of the migration law, and quickly became a model of good practice. So-called «Article 18» (Law n. 40/1998) integrated elements of the victim-centered approach that feminist and human rights groups were discussing at a global level, and the country's legal tradition of fighting against organised criminal networks in a way that incentivised people to leave them. Compared to other anti-trafficking initiatives, art.18 is unique because it introduces not

only the possibility for victims of trafficking to access a social rehabilitation program offering safe housing, health and legal support, but also, and crucially, to get a long-term residence permit to remain legally in the country, either working or studying (Garofalo Geymonat 2014). However, as they contributed to the making of this system, feminist and sex workers' organisations turned most of their energies to service provision for migrant women in the sex industry, rather than supporting the organising and political subjectivities of sex workers and of migrant sex workers in particular. This transformation was to be crucial in influencing what would ultimately prove to be the less effective way feminists contributed to the debate and the policy arena in the years to follow.

4. *The Berlusconi era: from decency to pride in «good women»*

While during the 90s the Merlin Law had become an increasing object of public attack, under Berlusconi the government proposed a reform of the law, with two drafts in 2002 and 2008 aiming to introduce restrictive regulations for indoor sex work and the criminalisation of street-based sex work for both sellers and buyers. The draft laws kept together a frame of sex work as an issue of a public order and morality through the notion of «decency» (*decoro*), with a rhetoric of helping victims of trafficking (see Pitch 2013). In practice, these proposals included repressive measures against migrant street-based sex workers that had already been introduced in other European countries in the name of anti-trafficking (Jahnsen, Wagenaar 2018). While the Merlin law was never actually amended, within a context of increased public discourse against immigrants, implementation of severe cuts to health and social services and the framing of poverty and marginality as problems of public order, the government was able to adopt larger reforms with respect to public security (Law n. 125/2008 *Pacchetto Sicurezza*). The reforms gave more power to mayors, who became responsible for newly defined issues of public security, such as homelessness, begging, street-vending, and street-based sex work. This, in turn, opened the way to introduce local administrative decrees allowing the persecution of street sex workers and their clients for reasons such as «kerb-crawling» or indecent (*osceno*) public behaviour

or clothing. While the persecution of street-based workers had *de facto* existed in the country, these new local policies focused public attention on clients for the first time.

These moves on the part of the Berlusconi government provoked the mobilisation of the *Comitato* and other sex workers' local groups, such as Le Graziöse in Genoa and CODIPEP in Rome, which organised several local rallies and public meetings since 2007, and a national demonstration in 2008 supported by harm-reduction organisations and grassroots feminist groups. These activists agreed on opposing repressive sex work policies, even though many of them did not have a shared view of what other policies were to be supported, or how to conceptualise commercial sex (Bonomi Romagnoli 2014). Harm-reduction projects were clear about the inefficacy of repressive measures in tackling trafficking and supporting migrant women. Moreover, from a feminist perspective, the notion of «decency» and the «security approach» were denounced as a sexist and racist device to discipline all women's bodies, and needed to be counteracted alongside the rest of the rhetoric that increasingly proposed security as a solution to gender-based violence (Bonfiglioli 2010; Peroni 2018).

None of the draft laws were passed by parliament and what had become the «problem of street-based migrant sex workers» gradually disappeared from the political agenda. This policy failure is to be understood in light of the first Berlusconi scandal on escorting that made a repressive approach to the purchase and sale of sex too embarrassing for the government (Crowhurst 2012b). The news about the prime minister's relationships with escorts, including an underage woman, came to occupy such an important space in the Italian public debate that it became one of the key factors that led to the fall of the Berlusconi government in November 2011.

As some feminist critics have pointed out, the feminist debate that followed Berlusconi's scandals was much larger than sex work itself. In fact, sex work and its regulation hardly appeared in the debate at all, while feminists initiated a public discussion that focused on the «dignity» of women within sexual-economic exchange, and addressed commercial sex as part of their wider critique of the objectification of women's bodies in the public sphere (Gribaldo, Zapperi 2012). In 2011 the left-wing journalist Concita De Gregorio – through an article eloquently called *The*

Other Women – called for action against Berlusconi, arguing that the time had come for mothers, daughters, grandmothers and wives to strike back and restore a virtuous image of femininity jeopardised by Berlusconi and by a minority of women willing to sell sexual services. Together with the feminist movement *SNOQ* *Se non ora quando* (If not now, when), which was launched shortly after and rapidly gained consensus in relation to the same issues, this call helped to shape the political and feminist debate around the dichotomy between «good women» – who work in the official labour market, make sacrifices, raise children and take care of the family – and «bad women», embodied by Berlusconi's escorts (Peroni 2012; Saitta 2015).

The debate was controversial within feminism and many raised their voice against this oversimplification of the sex and relations of power as well as against the dangers of making dignity and decency feminist watchwords. They cautioned against reducing the possibilities of thinking of sex workers as potential allies in the feminist fight against patriarchy by framing them as «enemies» of full gender equality, and warned against oversimplifying women's positions in commercial sex (Chiaromonte, Paolozzi 2011; Deiana 2011; Melandri 2011). Indeed, in the mainstream feminist debate, the escorts and starlets involved in the Berlusconi scandals were framed either as victims of the gender order or as something like «collaborators of patriarchy» who wanted to gain individual success within a postfeminist framework (Benini 2012). While in previous decades feminists had discussed sex work as an economic strategy for working-class and marginalised women, and later turned their attention to migrant victims of trafficking, now, possibly for the first time, feminists focused on forms of sex work that they saw mainly in moral terms (Sarasini 2012). Within this analysis, attention to material conditions, and to women's different class, ethnic and nationality positionings, were rendered invisible. Simultaneously, the macroscopic attention given in the public debate to escorting for the rich and powerful elite contributed to the erasure of the rest of sex work, which is practiced for – and by – the lower and middle classes. The saturation of the symbolic and media space by the Berlusconi scandals arguably significantly contributed to the reframing of the feminist debate on sex work, as well as to fostering divisions and laying the ground for the polarisation and standardisation of the debate.

5. *The ascent of the two (Northern) European feminist «models»*

While Italy was experiencing this peculiar phase of its political history, in other countries the debate on sex work policies was rapidly changing, as was the role played by feminists (Outshoorn 2004). This was particularly the case in Northern Europe, where policy makers began to realise that abolitionism proved unfit for policing the new landscape of commercial sex, which was increasingly made up of undocumented migrant women. In 1998 and 2000, two new policy models were introduced with the push of left-wing governments and women's organisations: neo-legalisation in the Netherlands, and neo-abolitionism in Sweden. The two models are opposed in their premises on commercial sex – yet both policy approaches claim to protect women's rights, to be feminist, and to be a progressive move following from abolitionism. Neo-legalisation promotes a restrictive approach that combines the recognition of sex work as work, the recognition of sex workers' organisations, and the fight against human trafficking (Östergren 2017). Neo-abolitionism instead adopts a repressive, zero-tolerance approach, with the focus on the clients whose act of «buying women's bodies» is viewed as a form of violence against women and therefore needs to be criminalised. Within this frame any difference between forced sex work (so-called «trafficking») and non-forced (so-called «voluntary») sex work is not acknowledged and the claims of sex work as women's self-determined decision are analysed as forms of «false consciousness» (Dworking 1993; Jeffreys 1997; Danna *et al.* 2019).

These two positions define themselves in opposition to one another. The «prostitution as a form of violence» feminists are critical of neo-legalisation, and the «sex work as a form of work» feminists are clearly against the criminalisation of clients. Having said that, within each camp various claims and strategies have emerged over the past decade. Feminists supporting «sex work as work» have become critical of existing models of neo-legalisation and ended up supporting softer forms of State interventions called «decriminalisation». This is because they recognise the risks for sex workers embedded in State intervention and criticise the anti-migrant agenda hidden in most sex work policies (Serughetti 2019). The main alliances they built have been with sex workers' rights organisations which have progressively become more visible – even though they remain quite isolated and underfunded

(Garofalo Geymonat, Maciotti 2016) – as well as with harm reduction networks, LGBT organisations, human rights groups, and public health organisations – including at the international level, WHO (World Health Organisation), UNAIDS Joint United Nations Programme on HIV/AIDS, Amnesty International, PICUM (Platform for International Cooperation on Undocumented Migrants), ILGA (International Lesbian Gay Bisexual Trans and Intersexual Association), NSWP Global Network of Sex Work Projects and ICRSE (International Committee on the Rights of Sex Workers in Europe).

On the other hand, the «prostitution as violence» feminists still appear to strongly identify with the policy model of neo-abolitionism and have been lobbying national and international policy makers. Some of their best allies have therefore become States that have passed this policy change – such as Sweden – or that did not pass it but officially support it – such as the US and the Vatican, and organisations that support it on the basis of religious belief, which feminists would not otherwise usually pair up with (Bernstein 2012; DeStefano 2008). This policy has gained success outside the Nordic context and at the European level (Waagenar, Jahnsen 2018). In fact, in many contexts, they have managed to make the criminalisation of clients the norm of the field that one can be either pro or against (Ward, Wylie 2017).

In the mid-2010s, these international changes in feminist engagements with prostitution policies started to resonate within the Italian context, where feminists began to explicitly engage with the polarised debate around sex work policy solutions and models. This change coincided with a new wave of feminism that developed under the frame of a movement called *Non Una Di Meno* (hereafter NUDM). NUDM is a grassroots anti-violence movement that presents itself in radically anti-capitalistic and intersectional terms, and was developed in connection with a global feminist mobilisations that, since 2016, have promoted large demonstrations on the International Day Against Violence against Women as well as the Feminist Strike on March 8th. While sex work did not figure explicitly as issues in the NUDM agenda (NUDM 2017), this movement has become the space where the «work» and «violence» feminist approaches to sex work manifested themselves in their typical oppositional form. The first is a new collective of «sex workers and other feminists

who are their allies», *Ombre Rosse* (Red Shadows), which was born on the occasion of a large NUDM demonstration against violence on November 25th 2016, with the slogan «no violence against sex workers, respect and rights for those who work in the selling of sex» and claiming «the full decriminalisation of sex work and migration» (Ombre Rosse 2016). The collective sees itself as feminist, anti-capitalist and intersectional, and it explicitly connects to the organisations led by sex workers that are active in Europe and internationally, in particular ICRSE (International Committee on the Rights of Sex Workers in Europe), and they have made strong demands not only against the criminalisation of clients but also for the recognition of sex work as work and the decriminalisation of sex work and migration.

During the same period, some feminist groups, most notably the grassroots organisation *Resistenza Femminista* (Feminist Resistance), together with a number of influential feminist thinkers, positioned themselves explicitly within the «prostitution as violence» international frame and as strongly opposing the feminist positions that support sex work as work (Zobnina, Carpita 2018; Danna *et al.* 2019). *Resistenza Femminista* translated and organised a presentation of two books that have influenced the international feminist debate in supporting the criminalisation of sex purchase: *Paid For. My Journey Through Prostitution* by Rachel Moran (2013), translated in 2017, and *The Pimping of Prostitution: Abolishing the Sex Work Myth* by Julie Bindel (2017) translated in 2019. This network has been very active in promoting client's criminalisation through a public manifesto and the creation of the *Italian Abolitionist Network for the Approval of the Nordic Model* (2018). On the one hand, they found allies in fundamentalist Catholic organisations, in particular *Associazione Papa Giovanni XXIII* which is well known in Italy for its fight against abortion rights and its «salvific» and moralist approach to sex work. On the other hand, they built an alliance with parts of the lesbian movement, which has been debating issues of sex work in close connection to issues of surrogacy. Indeed, surrogacy became a particularly divisive issue for public opinion, as well as for the LGBT+ movement during the parliamentary debate that eventually led to the Law n. 76/2016 (which introduced civil unions but no parental rights for same-sex couples; Lasio, Serri 2017). In this context, the main national lesbian organization, *Arcilesbica*, took a strong public stand both against surrogacy and

against sex work, considering them both not only as effects, but also as central causes of, the marketisation of women's bodies within a neoliberal frame (Arcilesbica 2017). According to this perspective, it is impossible for women to be agentive subjects in sex work or in surrogacy, and therefore a strong prohibitionist intervention by the State is required (Serughetti 2016).

6. *Discussion and conclusion: a «feminist alliance» model in jeopardy?*

The present article has analysed Italy as a case in which contemporary feminists have had a rich tradition of engagement with the field of sex work and anti-trafficking since the 1980s and have managed to build alliances on this issue both within and beyond feminist organisations and movements. These engagements are currently endangered by increasingly divisive and entrenched discourses and policies on sex work (Abbatecola 2018). This process resembles what has happened in other European countries such as France and Ireland, which appear to have «imported» the polarisation between neo-abolitionism and neo-legalisation from Northern/Anglo-American contexts, often considered more progressive on issues of gender and sexuality (Kaplan *et al.* 1999; Mukhopadhyay 2015). The change that we see taking place does not concern the conceptualisations of sex work *per se*, such as the sex work as violence against women or the sex work as work position – which in fact were present all along within Italian feminisms. We argue that the current change has to do with the way in which these positions are constructed against each other and conceived as irreconcilable, and with the way in which the debate appears to be organised around standardised policy solutions that fail to take into account national contexts (Dewey *et al.* 2019; Munro, della Giusta 2008). Moreover, this new debate that focuses on sex work policies runs the risk of marginalising issues of increasing inequality, as well as austerity and anti-migration policies, potentially deflecting attention from the responsibilities of States and obscuring the constraints specific to each national context.

Moreover, the Italian case shows how the «importation» of this debate may jeopardise some key features of what we have defined the «feminist alliance model» as it developed in Italy between the 1980s and 2000s. As our analysis has shown, Ital-

ian feminists had been able to elaborate an original approach to sex work that acknowledges first the diversity of women's experiences in sex work – including as a form of work and as a form of violence, second the epistemic centrality of the knowledge produced by sex workers' groups, and third a radical critique of sex work as a patriarchal institution. Furthermore, by building a large alliance, feminists were able to create effective interventions to support women in situations of serious exploitation and trafficking, and this was crucial to framing sex work within a wider analysis of migration and social vulnerability and to the ability to focus on the specific complexities of the industry. Rather than trying to reach an agreement on a unified and shared conceptualisation of all forms of paid sex, for a long time Italian feminists developed a case-by-case view of sex work as an individual resource that women could use to emancipate themselves from their systematic material dependence within patriarchy (Staderini 1983; Tabet 1989). Correspondingly, rather than looking to the State for the best feminist policy solution, they kept a cautious position *vis-à-vis* innovation in sex work policy, which was presented as the way to promote gender equality.

Interestingly, some of these same positive aspects of the «feminist alliance» model came to represent its limits, which manifested themselves over time. These limitations have allowed for the importation of new polarised positions which have been gaining traction in Europe since the mid-2010s. More particularly, the coexistence of a variety of positions and experiences, the cautious approach to large reforms related to sex work, and the stress on the importance of migration and poverty, meant that feminists avoided direct discussion of prostitution laws. They kept a defensive position upholding the 1958 abolitionist law while opposing right wing proposals for repressive regulations. As a consequence, they avoided the formulation of specific legal proposals, and were not able to take a leading role in the national debate on prostitution reforms. This limit has become even more visible as the abolitionist regime entered a time of crisis around Europe beginning in the 2000s.

Moreover, while the «feminist alliance» in Italy was at the forefront of developing an anti-trafficking system, feminist and sex workers' organisations turned most of their energies to service provision for migrant women exploited in the sex industry.

This meant that the relationship with migrant sex workers was inevitably framed as one between service providers and users, and for this very reason failed to promote the organising of migrants as political subjects. Moreover, the focus on trafficked women came at the expense of other kinds of work that can support and create alliances with other subjects active in the industry, namely, people working indoors and increasingly online, including Italian workers.

These weaknesses – that, in the end, facilitated the dearth of migrant sex workers organising, and the rendering invisible of the variety of sex workers' experiences in the public sphere – have become particularly significant in the context of right-wing governance which began under Berlusconi. In particular, the 2000s have seen the implementation of welfare cuts and anti-migrant policies, and the spread of a double morality, which, on the one hand justifies the repression of migrant street-based sex workers while on the other, turns a blind eye to sexual economic exchanges and corruption among the political elite. Indeed, the mainstream feminist reaction to the Berlusconi scandals demonstrated a failure to engage with the realities and complexities of the sex industry, and ended up producing the problematic notion of pride in «good women» versus a new representation of «bad women» engaging in prostitution as traitors and collaborators with the corrupted élite. This distinction echoes the view that sees a clear-cut distinction in the sex industry between innocent women, i.e. victims of trafficking and deserving of feminist protection, and the real whores, who have chosen to sell sex and are by definition anti-feminists. This is problematic because it denies the nuances of real-life experiences of people making money through sex work, and views clients as political enemies and pathological individuals. This, in turn, facilitates the spread of neo-abolitionism, which is presented as the successful feminist solution to deal with the transformations of the contemporary European sex industry, and as opposed to the failing anti-feminist solution of neo-legalisation. However, while the neo-legalisation regimes in Germany and the Netherlands appear to have failed to live up to their feminist promises, revealing their restrictive tendencies, the policies implemented in Sweden, Norway, France and Ireland have, in practice, also proved to be repressive zero-tolerance models not only for clients but also for people in sex

work, and migrant women in particular (Calderaro, Giametta 2019; Holmström, Skilbrei 2017; Vuolajärvi 2018).

However, as our analysis has illustrated, there are feminist alternatives to both repressive and restrictive approaches to sex work policies. As Östergren 2017 and Sanders *et al.* 2017 have shown, these stem from the belief that all women, including those who are stigmatised for selling sex, should be protected from all forms of harm, and that policy strategies addressing such a reality must be as nuanced and multifaceted as commercial sex itself (Östergren 2017; Sanders *et al.* 2017). Indeed, conceptually, these alternatives may be particularly useful if we are to consider multifaceted understandings of «body work» (Wolkowitz *et al.* 2013) and «intimate labor» (Boris, Parreñas 2010) as income-generating activities for women – especially racialised, migrant, lower-class and trans women, but also queer youth – in an increasingly unequal neo-liberal world (Agustín 2007). They also provide visibility to the variety of experiences narrated by people selling sex and their associations, ranging from violent and exploitative, to empowering and satisfying (Kempadoo, Doezema 1998). Finally, they may contribute to avoiding a problematic view of sex work either as morally «good» or «bad», and its representation as a kind of power relation between men and women that is necessarily distinct from all other male-female relations. Instead, they allow us to situate sex work within a continuum of sexual-economic exchanges and of sexual stigmatisation processes that shape women's experiences, both in the formal and informal labour market as well as in the intimate sphere, much beyond the narrow realities of commercial sex (Tabet 2004; Pheterson 1993).

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Feminist engagements with sex work. Imported polarisations and a «feminist alliance» model in jeopardy

In the last decade, the field of sex work and anti-trafficking in Europe has been the object of renewed attention, often presented as being about «gender equality». While feminists have been at the forefront of these debates, they appear to be increasingly divided around the «pro-sex work» and the «sex work as a form of violence» approaches. This article argues that by conceiving these two positions as irreconcilable, and by promoting standardised international policy solutions that fail to take into account local contexts, these current feminist engagements jeopardise alternative feminist traditions in which diverse stances on sex work coexisted, and which can be usefully studied in order to overcome some of the current impasses. Taking Italy as its case study, this article shows how between the 1980s and the 1990s feminists were able to develop a «feminist alliance» capable of supporting the emancipation of women selling sex and of migrant victims of trafficking. Drawing upon the analysis of texts, we explore the strengths and weaknesses of such an alliance, and the reasons why in a context of austerity, anti-migrant sentiments, and new security approaches, it is currently at risk of disappearing, leaving the space for the new feminist polarisations.

Keywords: anti-trafficking, sex work, prostitution, feminist policies, Italy.

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