

5 Swedish, Nordic, European

The journey of a ‘model’ to abolish prostitution

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Introduction

The governance of prostitution across Europe is characterized by different regulatory approaches and models of intervention that are shaped by, amongst other factors, national traditions and histories, contingent problem definitions, specificities of local prostitution markets, as well as by the global influence of policy models and discourses. In the past two decades, prostitution has become a highly contentious and divisive policy area in Europe. Animated political and public debates have been unfolding around which of the prostitution policy approaches currently in place is the most effective and whether there is scope for legal harmonization across the region. While sex worker advocacy groups and alliances, and many prominent international organizations, academics, and some politicians have been advocating for the decriminalization of sex work, the criminalization of sex buyers with a view to abolishing prostitution and promoting gender equality has gained particularly strong political support in and beyond Europe. This approach was first conceptualized in Sweden where it was passed into law (the Swedish Sex Purchase Act) in 1999 and has since been hailed as a model for other countries to conform to. But conform to what? As we show in this chapter, the original scope of the Swedish approach has been detached from its actual application in Sweden and throughout its rise to global popularity. Nevertheless, in its multiple redefinitions as Swedish, Nordic, pan-European, end demand, or equality ‘model’ it has acquired potent symbolic capital globally, serving as a tool of convergence and consensus for the many who ascribe to it a superior moral status and who view it as the solution to the ‘problem of prostitution’.

In presenting the increasing global popularity and application of the ‘Swedish model’,¹ in this chapter we show how key ideas underpinning it evolved and were adapted over time, and how currently the adoption of its multiple interpretations is pursued by countries with limited or no proximity and little socio-economic, political, and social welfare resemblance to the Nordic region. In this journeying from one context to another, the ‘model’ has taken a life of its own in at least three meaningful ways which we introduce here and further discuss in the rest of the chapter.

Firstly, the ‘Swedish model’ as it is conceptualized and understood globally today is very much detached from its empirical roots and shows limited resemblance to its original intention. However, while the link to Sweden and the Nordic countries has been severed and the ‘weight’ of Swedish-ness and/or Nordic-ness has lost importance, the symbolic capital of the ‘Swedish model’ has stayed, even if the intent of the original approach is diluted or strayed from. Such symbolic capital is used to validate and build consensus around new model adaptations and new model brands, such as ‘gender equality model’ or ‘end demand model’, that can appeal and make better sense globally.

Secondly, today, those who promote the ‘Swedish model’ more vigorously are political actors far removed from the Swedish and Nordic contexts. In the name of the gender equality that the model claims to promote and defend, these advocates invoke its moral superiority and go as far as shaming the values and character of their *own* nations for not having implemented it yet.

Thirdly, the Swedish approach was conceptualized at a particular historical moment, and a lot has changed since then, both politically and in the shape and organization of sex industries across the world. Debates about the best way to regulate prostitution and prostitution policy conformity remain unabated, but new problem definitions and actors have come into the picture, sex markets have become increasingly international, and prostitution as a policy sphere has become more and more entangled with the issues of migration and human trafficking. The Swedish feminism of the late 1990s that contributed to conceptualizing ‘the model’ was exclusively focussed on cis men’s violence against cis women, which was assumed to be experienced in the same way by all cis women and to damage all cis women’s worth in society, all the while neglecting intersectionality and the much more diverse landscape of people who buy and sell sex. The strong commitment that was later made by Sweden to be an LGBTIQI+ inclusive society (for a critique of this, see Lilja and Johansson, 2018) does not sit comfortably with the hetero-cis normativities of 1990s feminist advocacy that led to the Swedish Sex Purchase Act.

It is in this dynamic context that harm reduction, not contemplated until recently as a practice to be pursued by social workers operating in this field in Sweden and very much against the ethos of the law (Florin 2012), is no longer seen so unfavourably, approaches to prostitution are diversifying, and the Sex Purchase Act is no longer as unassailable as it appeared just a decade ago, even in Sweden.

Prostitution policy conformity and the appeal of a uniform ‘model’: an overview

The precedent for prostitution policy conformity in modern Europe takes us back to the 19th century, when the widespread optimism about the effectiveness of regulationism resulted in the containment and regulation of prostitution across many European cities. Regulationism was a system whereby national penal law was set aside and only applied if women who sold sex did not abide by local police

by-laws and health regimes that controlled where they lived and how they worked, and subjected them to regular checks for sexually transmitted infections. The aim of this approach was public harm reduction: under this widespread public health regime, ‘common women’ were tolerated as long as they operated in ways that were not seen as harmful for society at large (Harsin 1985; Levine 2003). Public health, more specifically ill-health prevention, had become a legitimate argument for policies, including repressive ones (Porter 1998). While some European countries retained a regulationist approach well into the 20th century—including Sweden which maintained it in Stockholm until 1918 (Svanström 2017)—many others gave in to the demands of the movement to abolish regulationism. With few exceptions, by the mid 20th century regulationism had been formally repealed, effectively putting an end to the one time in modern history when most European nation states had a shared understanding of prostitution primarily as a public health issue and implemented very similar prostitution policy approaches.

The idea that Europe *should* have a common understanding of, and approach to, prostitution re-emerged in the 21st century when the aspiration for a unified European policy approach to prostitution returned to the political agenda of supra-national entities, as well as national and non-governmental actors. This time, however, debates about harmonization have been taking place in the context of deep disagreements over what approach is best, and for whom. In the 19th century, policy harmonization had been facilitated by the shared identification of ‘common enemies’: syphilis and the de-domestication of sexuality, both viewed as a threat to the normative family. Today prostitution policies have different objectives. Some aim to eradicate or limit commercial sex through criminal law, others aim to integrate it into society and tightly control it (Östergren 2017a). Moreover, even when policy goals are shared, there are substantial differences over how these can be achieved. To align policies across Europe mandates a harmonization of problem definitions, a difficult task to achieve. Nevertheless, the allure of having a unified model of prostitution regulation, expected to have the same standardized outcome no matter where it is implemented, continues to drive prostitution policy agendas in and beyond Europe. Despite the fact that an expanding body of research warns against pursuing a one-size-fit-all ‘harmonized’ approach in prostitution regulation that would end up ignoring the unique conditions and needs of the different contexts to which it is applied (Scoular 2015; Östergren 2017a; Crowhurst and Skilbrei 2018; Wagenaar 2018), attempts to promote a uniform understanding of, and response to, prostitution across highly diverse jurisdictions have been prompted and promoted around what has become known as the ‘Swedish model’. Self-proclaimed as a superior policy approach, the ‘Swedish model’ has served as a space of ideological convergence by framing prostitution as a matter of gender inequality and as the best viable way to abolish prostitution once and for all.

Given the ideological and symbolic capital of policy models (Bowling 2011), it is not uncommon for their proposers to expect them to exhibit a nation’s character and core values, both to its citizens and globally. Much energy is invested in presenting principles and understandings that inform policy models as more

sophisticated and/or more enlightened than others, and in ensuring that they are effective, or at least viewed as such. This is especially the case with morality politics, in which prostitution is viewed as an archetypal case that rouses uncompromising value conflicts in both societal and political spheres (Foret and Calligaro 2018; Wagenaar 2018). With the passing of the Sex Purchase Act in 1999, Sweden asserted its moral authority as the pioneer of a conceptualization of prostitution that it viewed as transcending religious moralizing and sexual double standards, has gender equality as its key objective instead, and has the capacity to ‘contribute to changing debates [on prostitution] also in Europe’ (the Swedish Minister of Social Affairs, Lars Engqvist as cited in Langford and Skilbrei 2022: page 178).

The popularity of this model, the efforts invested by Sweden to advertise and export it, the implementation of (some of) its principles in a number of other countries globally, the enhanced appeal it garnered in its extended configuration as ‘Nordic model’, and the momentum this has given to the abolitionist movement that supports it, are all factors that have contributed to enhancing divisiveness and confrontations over whether this is really the model of prostitution governance that all countries should aspire to have. As mentioned earlier, sex workers’ rights movements and various esteemed international organizations, amongst others, have condemned this approach for producing, rather than reducing, harm to sex workers (see, for example, World Health Organization 2012; Amnesty International 2016; Human Rights Watch 2019). However, if anything, the popularity of the ‘Swedish model’ has expanded over the past two decades and many countries (Canada, Finland, France, Iceland, the Republic of Ireland, Israel, Northern Ireland, and Norway) have adopted the key principles that constitute it (with crucial variations)²: that buyers of sexual services should be criminalized and punished, not sellers.

The ‘Swedish model’: origin, ethos, and contestations

In 1999, with the Sex Purchase Act, Sweden introduced a unilateral ban on the purchase of sex. It did so after several years of discussion of how prostitution is best regulated, and in the process, prostitution became firmly situated as an issue to do with gender equality. This marked a notable shift away from dominant perspectives that had previously guided how states and societies approached prostitution, i.e., as a matter of public health or as related to sexual morality. Within this framework of understanding, the link between gender equality and prostitution works both ways: it is gender inequality that causes prostitution to exist, and the existence of prostitution itself perpetuates gender inequality. Other matters were also drawn into national debates preceding the passing of the law,³ but in the end, the Sex Purchase Act was integrated into a larger law package on women’s rights, the Women’s Peace Bill (for an analysis of the debates, see Svanström 2004; Östergren 2017b; Erikson 2018), and this firmly severed the ties between prostitution policy and previous problem definitions.

The Sex Purchase Act builds on an abolitionist stance on prostitution, in other words, the aim was to design a policy that would ultimately abolish prostitution,

although not at any cost. The view that prostitution results from gender inequality and is harmful for women who sell sex meant that completely criminalizing the sale of sex was politically impossible. The Act was intended to work toward gender equality by combating prostitution: in the short run by curbing the market, and in the long run by changing social norms. Importantly, it was also introduced to set an example for other countries to follow (Holmström and Skilbrei 2017), something we return to below. Policy making on prostitution in various contexts has considered gender equality (see e.g., Dodillet 2005), but the latter is especially and explicitly central in the Swedish approach with the clear formulation of the Sex Purchase Act as a gender equality legislation designed to protect sellers specifically, and gender and sexuality norms more generally. As mentioned previously, prostitution has historically been defined as different kinds of problems, and Swedish policy makers wanted to make a clear break with earlier understandings of prostitution as immoral and especially so as pertaining to the immorality of the seller. The law emerged from several decades of feminist debates wherein the aim to destigmatize sellers became increasingly important.⁴

The scope of the ‘Swedish model’ is presented differently in different contexts (Langford and Skilbrei 2022), but the common denominator is the criminalization of the purchase of sex. While there are many policy approaches globally where only one party in prostitution is criminalized, this is usually the seller, whereas in other instances, both parties are criminalized. The unilateral ban on sex buyers, therefore, represented a novelty in the contemporary prostitution policy landscape.⁵ Sometimes, however, the ‘Swedish model’ and its extended version the ‘Nordic model’ are wrongly presented in debates outside the region as being about criminalizing buyers and decriminalizing sellers. Indeed, selling sex is not illegal *per se* in Sweden, but this has been the case already since 1918—the Sex Purchase Act did not decriminalize the selling of sex, selling sex was already legal in Swedish law (Östergren 2017b). Similarly, in Finland, Norway, and Iceland, partial criminalisation of the sale of sex was removed in the last two decades through policy initiatives that were unrelated to the introduction of bans against buying sex. The mis-representation of the Swedish approach as being one of simultaneously criminalizing the purchase and decriminalizing the sale of sex can be observed in the European Parliament resolution recommending that EU Member States follow the Nordic lead, which stated: ‘Sweden changed its prostitution laws in 1999 to prohibit the purchase of sex and decriminalize the prostituted person’ (European Parliament 2014: 17, for more on this, see below). Scholars have misrepresented this too (see e.g., Waltman 2011) by portraying the decriminalization of the sale of sex as part of the legal shift taking place in Sweden, and later in other Nordic countries, which, as explained, amounts to a factual error. Such widespread misrepresentation of the Act contributes to reinforcing the symbolic power of ‘the model’ as an approach that is conceived specifically in the interest of sellers as victims. Furthermore, the premise that ‘the Swedish model’ only aims at enforcing punitive approaches against clients and never at sellers, is also not accurate. While the sale of sex is in itself legal across the region, there are prohibitions in place that target the sale of sex, for example

third country nationals are forbidden from selling sex in Sweden and are at risk of deportation and banned from re-entry if they do sell sex, even though selling sex is legal *per se* (Skilbrei and Holmström 2013). This predicament shows the incorrectness of claims made about the ‘Swedish model’ that it works in ways that people who sell sex are supported with welfare measures rather than being punished (see e.g., European Women’s Lobby 2017). Indeed, the Sex Purchase Act in Sweden was intended to be followed by investments in social work to aid sex sellers, but this did not materialize (Florin 2012), and to this day, support services are mainly offered to women in street prostitution in the three largest cities in Sweden, and migrants and sex workers who do not wish to/are not able to exit prostitution face obstacles in accessing assistance (Vuolajärvi 2019).

Assumptions that the ‘the Swedish model’ entails the active policing of sex purchasing is also not entirely correct. Looking at law in action, it is evident that the Sex Purchase Act is not uniformly implemented across Sweden, but mainly enforced in the three largest cities. Moreover, over 20 years (1999–2019) only 3,594 individuals have been convicted of buying sex and almost all of them received a fine, not a prison sentence (Olsson 2021). This is the background for the claim made by some that in Sweden buying sex is *de facto* legal (if not *de jure*), as most men who buy sex do not have much to fear as far as being criminalized (see e.g., Lööf and Hedin 2021). This has, in part, contributed to the Swedish Parliament voting in the summer of 2022 to exacerbate punishments for sex buyers, removing fines from the list of punishments, leaving only imprisonment (The Swedish Government 2022).

Finally, the ‘Swedish model’ is discussed in international scholarship on prostitution, in policy debates, and in various jurisdictions as either a negative or positive example depending on how its end results are considered, something that for over two decades has been highly contested. When assessing its effects, some have argued that the Sex Purchase Act has dramatically reduced the extent of prostitution in Sweden (Waltman 2011), while others argue that it has made conditions worse and more dangerous for people who sell sex (Levy 2014). As far as the normative goals of the Sex Purchase Act are concerned, some have argued that the Act has shifted societal norms on prostitution and people involved in it in Sweden (Jacobsson and Kotsadam 2011), although there isn’t more recent research on this. Relevant to our argument here, as shown further in the paragraphs that follow, is that the Act and its promotion have contributed to positioning Sweden as the homeland of gender equality, arguably achieving the goal of serving as an inspiration to other countries.

In sum, the Swedish Sex Purchase Act has received much attention because it is considered to be the first law to criminalize only buyers and not sellers of sexual services, and because it is linked to a feminist interpretation that links prostitution to gender inequality and views it as an expression of men’s power over women in society. However, there remains much disagreement over the assumed beneficial effects of ‘the model’ and a number of problematic and wrongful assumptions and claims are made about its scope and effects. Ultimately, the Sex Purchase Act is only one piece of the puzzle if one is to look at how prostitution is approached

through hard and soft policies in Sweden. The Act operates in a context where many other developments are also taking place that impact the size, organization and management of the phenomenon, and the prostitution market is also quite resilient to control (Holmström and Skilbrei 2017).

From Swedish to Nordic to European: the transformations of ‘the model’

Over time, the ‘Swedish model’ has become detached from the Swedish context where it originated. After Finland introduced a partial ban against the purchase of sex in 2006 and Norway and Iceland criminalized the purchase of sex in 2009, the ‘Swedish model’ started being referred to internationally as ‘the Nordic model’. As mentioned earlier, however, while some form of client criminalization has been introduced in four of the five Nordic countries, and no general ban exists against selling sex in the region, there is great diversity among these countries in how laws are enacted and how they interact with other legislations, such as the Aliens Act, tax regulations, and police bylaws (Skilbrei and Holmström 2013). Thus, the association to the Nordic region made reference to in ‘the Nordic model’ is less about how prostitution is actually regulated in the Nordic countries, and rather more about the centrality of welfare and gender equality that exist there and the supposed moral authority/superiority that derives from it.

The international support and popularity for the ‘Nordic model’ was further enhanced in 2014, when thanks also to the strong backing of Swedish female Members of the European Parliament, a non-binding resolution in favor of the criminalization of the purchase of sex was supported by a majority European Parliament vote. The resolution was based on a controversial report drafted by the MEP Mary Honeyball for the Committee on Women’s Rights and Gender Equality (commonly known as the Honeyball report) which condemned the, allegedly, failing prostitution policy approach adopted in the Netherlands and Germany. Instead, the resolution advocated the ‘model implemented in Sweden, Finland and Norway (the so-called Nordic model)’ which, the motion for the resolution stated (European Parliament 2014: 14), is considered ‘the most effective way of combating the trafficking of women and girls for sexual exploitation and improving gender equality [...] where the purchase of sexual services constitutes the criminal act, not the services of the prostituted persons’. The process leading to the 2014 European Parliament resolution to harmonize prostitution policy across Europe was ripe with references to Sweden, to other Nordic countries and to the Nordic region as a whole. Before the European Parliament voted on the resolution, a group of academics published a letter in which they claimed to ‘draw on both our practice-based evidence and our academic studies to strongly endorse the Honeyball report and its recommendation to adopt ‘the Nordic model’ as a pan-European approach to prostitution’.⁶ The Nordic model, the letter stated, offers the potential to replicate progress achieved in Nordic countries across Europe, and following their ‘pioneering example’, it ‘has an historic opportunity to act as a global beacon on gender equality’.

What is especially relevant for the scope of this chapter, is the way in which the Nordic model was presented as a symbol of a European commitment to gender equality. The trajectory that the Swedish model has taken over time and through the active advocacy of its supporters shows a progression from representing a nation first (the ‘original’ Swedish model), a sub-region next (the Nordic model), and finally the aspiration to represent the approach of an entire geographical region and therefore a much larger political unit (a pan-European model). Thus, by championing its implementation across the region and hoping to achieve a European harmonized (neo) abolitionist approach to prostitution, the Nordic model is viewed almost as a ‘pivot’ which could turn the whole of Europe into a model, indeed a beacon, for the entire globe.

The resolution was firmly opposed by many national and international non-governmental and governmental organizations, social movements and scholars and the evidence used to support its claims was shown to be biased and, in some cases, also inaccurate (see e.g., NSWP 2014). Nevertheless, even if non-binding, it carried ‘symbolic and political weight’ (Scouler 2015: 10) and gave strong momentum to neo-abolitionists’ campaigning in and beyond Europe (Outshoorn 2017).

Indeed, in the context of political debates on prostitution in countries in and outside Europe in the past decade, proposals and preferences for the criminalization of clients have often made reference to either the Swedish or the Nordic models. Already in 2015, in the US, Mosley notes (2019: 353), ‘11 metropolitan areas pledged to reduce demand for prostitution by using *Nordic strategies*’, and we can list more examples of what Kingston and Thomas (2019) refer to as the ‘international import’, whether successful or attempted, of the Nordic model. Kingston and Thomas (2019) cite the cases of Scotland and Luxembourg—where the model was seriously considered (in 2013 and 2014, respectively) as demonstrated also by visits to Sweden, albeit plans to adopt the model were eventually rejected—and Canada, France, the Republic of Ireland, and Northern Ireland which introduced the criminalization of clients and which consistently made reference to the Nordic model as the approach they wanted to follow. In 2014, when Canada was still debating the introduction of the criminalization of sex buyers, one of its most vocal supporters, the MP Joy Smith reportedly claimed,

I am pleased that there are many MPs that support the *Nordic model for Canada* [...]. Once you understand the options, the Nordic model is clearly the only approach that effectively addresses the harm and inequality produced by prostitution and targets the buyers of sex⁷ (emphasis added).

In 2017, the European Women’s Lobby supported the Malta Confederation of Women’s Organisations’ campaign for a ‘Nordic Model for Malta’.⁸ In 2018, the Israeli Parliament voted in favour of introducing a ban against the purchase of sex, which became law in 2020 and made Israel, as many reported, the eighth country to adopt the Nordic Model.⁹ In September 2020, an alliance of centre/

conservative parties in Switzerland proposed, albeit unsuccessfully, the introduction of a ‘Nordic Model for Switzerland’.¹⁰ The list of examples could be longer, but the ones presented here convey the geographical breadth of the reach and popularity of the ‘Swedish’/‘Nordic’ model and desire expressed by some political actors to import it and have their own national version of it.

In recent years, we also find several examples of how policy proposals with an abolitionist aim outside of Europe are addressed as ‘equality model’ and ‘end demand’ approach, further detaching the policy from its Nordic geopolitical origin. In these cases, despite the empirical loss of ties to Sweden and the Nordic region, it is reasonable to assume that ‘the model’s’ starting point in the Nordic region has been key in establishing these new ‘equality’ and ‘end demand’ model redefinitions as the progressive, gender equal, and modern policy that all countries should apply. However, while ‘end demand’ and ‘equality’ models are associated with an abolitionist approach to prostitution whereby only buyers of sex are punished, their critics denounce them as causing sex workers to be aggressively policed and as having detrimental impacts on gender equality. Moreover, third party criminalization, i.e., the criminalization of ‘pimping’ which is rarely described as a part of ‘the Swedish’ model, is often included as a key component (see e.g., McBride et al. 2020) in what appear to be substantial adaptations of the ‘Swedish model’, as opposed to simple re-incarnations or re-definitions. For example, as the Global Network of Sex Work Projects (NSWP) write in their 2018 report ‘The Impact of “End Demand” Legislation on Women Sex Workers’ (NSWP 2018: 1):

‘End Demand’ legislation ranges from national criminal laws, which can lead to imprisonment, to city laws, which fine or ban individuals from certain areas for a period of time for soliciting or paying for sex; from purchasing sex anywhere in the world to purchasing sexual services in public places, not in licensed brothels or within designated ‘prostitution-free’ areas. ‘End Demand’ laws are often accompanied by laws criminalising third parties. Selling sex is criminalized or penalized in all but three countries with ‘End Demand’ legislation.

Shame on us!

The evolution and international journeying of the ‘original’ Swedish model unfolded with what can be identified as an ethnocentric intent. By ethnocentrism we mean, to apply Nelken’s (2009) definition to this context, ‘assuming that what we do, our way of thinking about a [particular policy problem] is universally shared or, at least, that it would be right for everyone else’. Indeed, as discussed earlier, the growth of the ‘Swedish model’ has been facilitated by the financial and political efforts put by Sweden to promote it ‘as part of its own identity-shaping in the international realm’ (Ward and Wylie 2017: 4).

What happened next, after the ‘Swedish model’ became better known as the ‘Nordic model’ and the appeal of its ideological underpinnings widened and was

inscribed in the laws and policies of other countries, is that its most fervent supporters are no longer the Swedes (the other ‘Nordics’ were never as intent in international proselytizing), but other actors, governmental and non, in countries well beyond the Nordic region. These other Nordic model entrepreneurs have appropriated the symbolic capital of the model and promote its implementation with a strong moralizing rhetoric, as the ‘right thing to do’, and are able to execute this also through the notable financial support invested globally in neo-abolitionism.¹¹ A process of shaming, and often of self-shaming, is involved in national campaigns that promote and advocate for the implementation of this approach. Not having implemented it is viewed as an affront to gender equality and women’s rights, and this is especially contemptible if the country in question has a regulationist approach in place.

To provide an example of how this process of self-shaming can manifest itself, we describe the campaign video ‘A message from Sweden to the people of Switzerland’ produced by the Swiss organization Zurich Women’s Centre in 2018.¹² The video, produced by the Swiss organization and targeted at a Swiss audience, starts with smiling people of different ages, recognizable as Swedish from their accent, greeting the viewers and stating: ‘Switzerland and Sweden are constantly confused with each other. Perhaps you Swiss don’t have a problem with this. But we do’. ‘We are completely different countries’, emphasize the now very serious Swedes. ‘Look at how you treat women’, a man states, followed by a series of comparisons where the Swiss record is clearly lagging behind the Swedish one and is therefore ridiculed. Women were given the right to vote in 1921 in Sweden and in 1971 in Switzerland. ‘1971?’ some of the actors in the video incredulously ask. In Sweden women who give birth receive 78 weeks’ pay, in Switzerland they are paid only for 14 weeks. ‘And then there is the sex business’: in Sweden ‘if a man pays a woman for giving him sex’, an actor explains, he is fined or jailed, ‘it is forbidden’. ‘In your country: it’s legal’; ‘legal’ repeat the actors with a disbelieving expression. ‘It’s totally crazy’, states a woman. Others explain that ‘75% percent of prostitutes are migrants’ and that young girls are brought to ‘your country’ as cleaners to make pimps rich.

‘How can something like this be legal?’

‘Of course anything that makes money is legal in Switzerland’ states an actor scornfully;

‘You guys still live the Middle Ages’

‘With women as paid sex soldiers’

‘More than 80% of the prostitutes would like to quit [long pause] if they could’.

Screenshots of the despondent actors are shown in succession, and the video ends with a young girl staring at the camera, pleading: ‘please do something about it, Switzerland’. The video ends with these two messages in succession: ‘Sweden banned prostitution 20 years ago’, and: ‘Switzerland, it’s time to catch up again’.

The campaign video operates through a strategy of shaming: the core message is delivered by Swedish people who, from a moral high-ground—justified by the progressive and overall positive record and efforts of their country, both contemporary and historical—can afford to chastise the Swiss public for their dismal, regressive, and sexist policies. The focus of the video is not on what the Swedish law is about or what its effects might be on prostitution, but on what supporting gender equality is supposed to entail. Opposing the ‘Swedish model’ or not supporting it is implicitly equated to being against gender equality. The video, importantly, was not produced by a Swedish organization, but by a Swiss one, so the very act of shaming Switzerland is in fact one of self-shaming, possibly to galvanize national pride and push Swiss citizens to mobilize and follow the illuminated example of Sweden and its model.

There are several examples of analysis of how ‘the model’ has similarly been used as a rhetorical device in debates elsewhere (Crowhurst and Skilbrei 2018, for individual cases see e.g., Ireland; FitzGerald and McGarry 2015; Kingston and Thomas 2019; and Israel; Langford and Skilbrei 2022). In an article on the mobilization of shame and disgust by abolitionist movements in Germany and Austria, Birgit Sauer (2019), discusses similar affective strategies enacted to promote the Swedish model in these countries. For example, Sauer cites the case of the German abolitionist activist Ingeborg Kraus who appealed to national pride by shaming fellow Germans who decided to pass a regulationist law in 2002 that, she claimed, transformed the country in the brothel of Europe. While Sweden and France felt indignation and outrage at the plight of prostituted women, Kraus argued, Germans shamefully decided to preserve the status quo and, with it, violence against women (Sauer 2019). Also, in this case, the campaigning for the ‘Swedish model’ is built around how valued gender equality is by a country, its population and leaders, to the extent that aspiring to anything other than these models amounts to a national betrayal of gender equality and of women in particular.

The future of ‘the model’ at home and abroad

Today there are several countries that present their policy as an adaptation of ‘the model’, and that used it to create a momentum in debates leading up to domestic law revisions. The last 20 years have demonstrated that ‘the model’ can be appropriated for diverse political agendas. It is, therefore, a possibility that it will continue to be used as a starting point for debates on prostitution policies in even more countries and in countries very different from Sweden. However, while its international appeal remains strong, various forces and factors are contributing to challenging the ‘Swedish’/‘Nordic’ model. Its hetero-cis normativity is no longer tenable, nor is its lack of applicability to foreign nationals, a situation which creates a double standard that generates even more vulnerability to migrant sex workers. We could even speculate that the strong affective rhetoric deployed in advocating for the ‘model’ in many countries is a last resort to mobilize followers against the accruing evidence of its ineffectiveness and negative impacts and in

light of sex workers' rights movements increasing legitimacy in their advocacy for decriminalization, further supported by prominent organizations. In Europe, as Outshoorn (2017) also points out, resurgent anti-EU sentiments and nationalism might play a role in the future in rejecting any harmonized and super-imposed European approach to prostitution—it is already perhaps harder than before to argue that there might be a pan-European morality that should be expressed in certain policy areas.

Moreover, the context in which the Swedish approach was conceptualized has changed notably, in and beyond Sweden. Over two decades, while the symbolic capital of the model has gained strength internationally, the effectiveness of its implementation and the inclusivity of its equality agenda have been put into question in Sweden itself. In the last few years, critical voices towards the Sex Purchase Act have been growing in numbers in Sweden. A call for broader legislation and harsher punishment against buyers stemming from feminists and the government has been critiqued from several angles, both from within mainstream political parties (e.g., Tolnai 2021), from key media actors (e.g., editorial by chief political editor of *Svenska Dagbladet* Tove Lifvendahl [2019]), and from large civil society actors (e.g., Swedish Federation for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Rights 2019). Previously, many have stated that it is difficult to voice critique against the Sex Purchase Act in Sweden without being vilified. Sex workers and others are hesitant to take part in debates, and some debaters have chosen to be anonymous or have come forward at great personal cost (Rydström 2021). The Swedish sex workers' rights movement has been critical of the legislation all along but it has been unable to make allies with politicians and other social movements, until recently (Rydström 2021). The first sex workers' rights march in Sweden was organized in 2019 and Swedish sex workers' rights organizations have not had the visibility and traction as those of many other European countries (*ibid.*). Critique of the 'model' has often been interpreted as neoliberal or conservative, or interpreted as supporting men's right to 'access women's bodies', as the Swedish ambassador Per-Anders Sunesson stated at the governmental conference on the 20th anniversary of the Act, with the noteworthy title 'From controversial law to international model' (Andersson 2019). However, Yttergren and Westerstrand (2016) offer an opposite conclusion, instead arguing that being critical of the Act is the hegemonic position.

The analysis over which position is hegemonic thus differs substantially, and this speaks to the polarization of debates. The 20th anniversary of the Sex Purchase Act in 2019 was itself marked by two separate events. One was organized by sex workers with no participants from governmental bodies, and the other event was organized by the government, with no invited sex workers (Rydström 2021). That two events with opposite approaches to the Act took place during this important anniversary, points to a degree of polarization in Swedish debates on prostitution which was unthinkable just a few years ago, where now claims and demands for sex workers' health, labour, and human rights are gaining a platform and momentum also in Sweden. What impact this might have for the 'Swedish model' and its international adaptations remains to be seen.

Notes

- 1 We use quotation marks when referring to the ‘Swedish model’, the ‘Nordic model’, or ‘the model’ to reflect the (problematic) social constructed nature of this approach as a coherent and leading model that others should follow.
- 2 For example, Finland only introduced a partial criminalization of the purchase of sex, i.e. it criminalizes instances of buying sex from victims of human trafficking or from sex sellers who are controlled by pimps.
- 3 For example organized crime, which was seen as the driving force behind prostitution (Eriksson 2018).
- 4 For several analyses of how the Swedish sex purchase act came into being, see Gould 2001; Kulick 2005; Skilbrei and Holmström 2013; Scoular 2015; Östergren 2017b; Erikson 2018.
- 5 It should be noted that the claim that Sweden is the first country to criminalize only the buyer of sex is often repeated, but it has never been investigated empirically. Throughout history and across jurisdictions prostitution has been regulated in a variety of ways. The great diversity in approaches means that we cannot rule out that this particular construction, only criminalizing buyers of sexual services, has happened before.
- 6 <https://www.spaceintl.org/media/submission-in-support-of-mary-honeyballs-report-on-sexual-exploitation>.
- 7 <https://ottawacitizen.com/news/local-news/punish-the-clients-not-the-prostitutes-says-tory-mp-joy-smith>.
- 8 <https://www.womenlobby.org/Nordic-model-for-Malta>.
- 9 <https://www.feministcurrent.com/2020/06/30/whats-current-israel-becomes-8th-country-to-adopt-the-nordic-model-of-prostitution-law/>; <https://nordicmodelnow.org/2020/06/29/israel-becomes-the-8th-nordic-model-country-as-it-implements-its-prohibition-of-consumption-of-prostitution-services-act>.
- 10 <https://www.parlament.ch/it/ratsbetrieb/suche-curia-vista/geschaefft?AffairId=20204216>.
- 11 The political economy of the Nordic Model is an aspect that is beyond the scope of this chapter, nevertheless it needs to be mentioned, as it plays a significant role in subsidizing campaigns and organizations that advocate for it, and therefore their visibility and lobby potential.
- 12 <https://www.youtube.com/watch?v=anflTyvUwBk>.

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