

5. Decriminalisation of Prostitution in Papua New Guinea

KAREN FLETCHER AND BOMAL GONAPA

Prostitution, as the concept is understood in Western law, was criminalised in Papua and New Guinea in the early 20th century by the colonial governments of Queensland and Australia.¹ The Queensland Criminal Code of 1889 was imported into the laws of Papua in 1902² and, in a slightly different form, into New Guinea in 1921.³ With independence in 1975 the two codes were replaced with a single code to apply throughout Papua New Guinea.⁴ That code and its associated criminal laws, with their quaint British references to the keeping of ‘bawdy’ and ‘disorderly’ houses and ‘houses of ill-repute’, are still in force today and remain largely foreign to the experiences, customs, traditional laws and cultural norms of the vast majority of people living in PNG. Like so much of the criminal law of PNG, they were grafted onto the colony and, with Independence, onto the nation.⁵

This chapter deals with these relatively recent laws (which we will refer to as ‘formal’ or ‘written’ law) rather than with the plethora of much older traditional laws and customs that still operate, to some degree, to regulate sexual and economic behaviour in PNG’s constituent societies (see Eves this volume; Hammar this volume; Haley this volume). To that extent the chapter is, like so much legal writing on PNG, inadequate to the complex task of comprehensively exploring the new nation’s intricate and pluralistic legal environment.

1 Papua, the southern half of present-day Papua New Guinea, was annexed by Britain in 1884 but effectively administered as an extension of the Colony of Queensland until the Commonwealth of Australia assumed responsibility in 1906. Australia took military control of the German colony of New Guinea, in the northern half of present-day Papua New Guinea, in 1914 and administered it as a mandated territory of the League of Nations from 1921 till World War II. During the war and until independence, the Australian administrations of both territories were combined, but their legal codes remained distinct.

2 Criminal Code Ordinance 1902.

3 Laws Repeal and Adopting Ordinance 1921.

4 Criminal Code Act (No. 78 of 1974).

5 Bruce Ottley, a Magistrate in the National Capital District from 1976 to 1977, and Jean Zorn, Principal Projects Officer with the PNG Law Reform Commission from 1975 to 1976, produced an interesting account of attempts to give recognition to customary law in the colonial criminal courts and under the 1975 Constitution. (Ottley and Zorn, 1983).

The purpose of the legal research upon which this chapter is based was very specific. It was initiated by the PNG National AIDS Council (NAC) in 2003/4 to explore the possibilities for reform of national prostitution laws in the context of NAC's central mission: to control and prevent the transmission of HIV in PNG. Following further work supported by NAC, civil society organisations and interested parliamentarians, changes to legislation criminalising sex work and homosexuality have been drafted for preliminary discussion in 2010 and the sensitisation of key stakeholders (Papik 2010).

The NAC, and other agencies involved in work to reduce the transmission of HIV in PNG, such as the Institute for Medical Research (IMR), the Department of Health (DoH) and a range of CBOs and NGOs, acknowledged grave difficulties in attempting to carry out HIV prevention with and amongst people identified, or who self-identify, as 'sex workers' and 'clients' of sex workers (Temu 2000). In her report on the Transex Project, which was funded by AusAID in cooperation with DoH from 1996 to 1998 to promote HIV prevention among sex workers and their clients in the transport and security industries, Jenkins noted:

Rapport building with sex workers proved to be a long and delicate process, as police continued to harass them, even arresting them for prostitution. The sex workers thought the project was contributing to their problems. After one such arrest of nineteen sex workers in November 1996, many of whom had become involved with the project, they scattered, some leaving the city... (Jenkins 2000; see also Jenkins this volume).

The original intention was for the Transex Project eventually to be implemented through an urban, community-based NGO with the IMR acting as a major adviser. However, attempts from 1995 to 1997 to find an NGO willing to take on the fully funded project were unsuccessful because of the stigma, as well as security and legal problems, involved in working with sex workers (Jenkins 2000).

Today, Save the Children in PNG (SCiPNG) is the main NGO working among sex workers and their clients to prevent HIV, mainly through its Poro Sapot Project (PSP), meaning 'friends who help friends'. SCiPNG operates 'drop-in' centres for sex workers in Port Moresby, Goroka and other centres that provide condoms, information on HIV and AIDS and basic training for peer educators and is currently implementing a project to reduce STI prevalence in the Eastern Highlands Province. Yet SCiPNG continues to face difficulties arising from the status of sex workers. The Three-Mile Guesthouse raid offers one widely publicised illustration (see also Stewart this volume; Stewart 2006).

On Friday 12 March 2004, two weeks after the authors had visited the PSP to interview staff and participants about the way prostitution laws affect their HIV-related work, a number of the peer educators supported by the PSP (including some we had met) were caught up in a police raid on a licensed club, the Three-Mile Guesthouse, which police alleged was a brothel. The raid occurred around 3 pm when patrons were enjoying a few drinks and a live band, Keke, at the end of the working week. According to witness statements gathered by the legal defence team (which included the authors), around 20 Mobile Squad police officers broke down the gates to the venue with hammers and pushed past guesthouse security to gain access. Several witnesses said that some of the police seemed drunk and they were all armed with guns, police batons and rubber implements that appeared to be car fan belts. Once inside the officers rounded up all the women on the premises (around 40) and ordered them to sit in a circle in a cement courtyard. The 40 to 50 men were ordered to stand behind them. Those who resisted were beaten with batons, sticks and other implements.

According to statements taken later that night by the legal defence team, the women seated on the cement were showered by police with food, soft-drink and masticated *buai* (betelnut) from the small market stalls that had been operating in and around the guesthouse. Each of them was issued with two or three Karamap condoms and ordered, under threat of further bashings, to chew and swallow one or more of them and inflate the others. Several of the women reported that cash was stolen from them by officers. Residents of the guesthouse reported that police looted 45 cartons of beer, three cases of whiskey and a number of electronic appliances. There were also reports that several young girls were raped by police at the premises (cf. HRW 2006; 2005).

The prisoners were then force-marched as a group several kilometres to the Boroko police station, women in front and men behind. According to witness statements, the police jeered at the women as they marched, ordering them to hold the inflated condoms above their heads and inciting bystanders to deride them as *pamuks* (prostitutes) and carriers of AIDS. When they arrived at the station they were videoed and photographed by a waiting media throng who had been summoned by police to observe the arrests. According to *The National* newspaper the next day, Metropolitan Superintendent Emmanuel Hela advised the media that 'those arrested would be charged with prostitution' because 'prostitution is the main cause of HIV/AIDS virus spreading like bushfire in the country' (Pilimbo 2004).

All the male patrons of the club were released, without charge, on the evening of March 12, but around 40 women, including several girls under the age of 18 and one infant, were held in Boroko Police Station for two days and eventually charged with 'living on the earnings of prostitution' under section 55(1) of the

Summary Offences Act. They were released on condition they appear in court on Monday 15 March 2004. As evidence of 'prostitution', referred to in the Statements of Facts that accompanied the Complaints on Information filed at the Boroko District Court, police largely relied upon sightings of condoms on the premises and in the possession of the accused women (cf Luker and Dinnen this volume).

The prosecution, however, collapsed. Nearly a month after the raid, on 8 April 2004, all charges against the accused women and girls were withdrawn on the basis that no warrant to enter the guest house premises had been obtained by the raiding police. Nevertheless, the impact of the Three-Mile raid on the PSP was profound, provoking intense security concerns for both project workers and participants. Also of grave concern to the NAC was that the police, and the media in their reporting of the case, associated the possession of condoms (most of which were Karamap condoms, funded by AusAID and distributed by the NAC, National HIV/AIDS Support Project and many NGOs and CBOs) so strongly with illegal activity and social stigma.

The Three-Mile Guesthouse case and similar events, before and after, have served to reinforce the authors' view that prostitution law reform should be a vital concern for public health institutions and practitioners concerned with the prevention of Sexually Transmitted Infections (STIs) in PNG, including HIV. Whilst the legal status of sex work was clearly not the only factor that gave rise to the raid, the view amongst police, the media and the general public that prostitution was illegal gave the police operation perceived legitimacy.

Is Prostitution a Criminal Offence in PNG Today?

On examination, does formal law really prohibit prostitution in PNG? The current PNG Criminal Code clearly criminalises 'brothel-keeping' (the ownership and operation of 'a house, room, set of rooms or place of any kind for purposes of prostitution')⁶ and the detention or 'procurement' of women and girls for 'immoral purposes' including prostitution.⁷ A set of recent amendments to the Code, enacted in 2002, also specifically criminalises the commercial sexual exploitation of children, which will be discussed later in this chapter.⁸

6 Ss 231 and 235.

7 eg. ss 221, 620 and 621.

8 ss229J-229V of the Criminal Code 1974, inserted by the Criminal Code (Sexual Offences and Crimes Against Children) Act 2002.

These laws (against brothel-keeping and procurement) mirror the archaic values underpinning Queensland and Australian laws on prostitution, inherited in turn from 19th-century English common law, according to which brothel-keeping and procurement were considered more serious offences than the practice of prostitution itself. For most of the 20th century, in contrast, 'soliciting for the purposes of prostitution' and other lesser, prostitution-related offences were often included in 'police', 'vagrancy' or 'summary offences' laws that drew together a range of 'street' offences such as obscene language and public drunkenness, for which fines were frequently available as an alternative to imprisonment.

Similarly, in New Guinea the colonial Police Offences Act (in force from 1925 to 1974) contained a grab-bag of minor offences including 'soliciting', ⁹ 'living on the earnings of prostitution' ¹⁰ (applicable only to men) and brothel-keeping. ¹¹ In preparation for Independence in 1975, the PNG Law Reform Commission (LRC) conducted a review of these laws and recommended, controversially at the time, that the offence of 'soliciting' should not be included in the new nation's Summary Offences Act ¹² (Papua New Guinea Law Reform Commission 1975).

Jean Zorn, a US lawyer who at that time was Principal Projects Officer with the LRC, has stated that the Commission's intention was that prostitution should be decriminalised: while pimps, madams and others profiting from prostitution should be penalised, the Commission adopted 'the latest thinking of criminologists and social workers' in developed countries and advocated social services, not prison, for prostitutes (Ottley and Zorn 1983). The provisions of the LRC's proposed Summary Offences Act were therefore designed to criminalise 'pimps' and 'madams' were modelled on the NSW Vagrancy Act of 1902, though the LRC had one important difference: that the offence should be made gender neutral, so that both men ('pimps') and women ('madams') who knowingly live on the earnings of prostitution would be liable to prosecution. ¹³

Section 55 of the Summary Offences Act of 1977 was enacted by the PNG Parliament precisely as recommended by the LRC. It provided, and still provides, that a 'person' who 'knowingly lives wholly or in part on the earnings of prostitution is guilty of an offence' and liable to a fine not exceeding 400 *kina* or imprisonment for a term not exceeding one year. Like the NSW provision, it further provides that proof that 'a person lives with, or is constantly in the

⁹ s 38.

¹⁰ s 79.

¹¹ ss 80 and 81.

¹² Later enacted as the Summary Offences Act 1977.

¹³ s 4(2)(o).. That Act, derived in turn from English law, provided that a man who 'knowingly lives wholly or in part on the earnings of prostitution' is guilty of a criminal offence and that proof that a man lives with, or is 'habitually in the company of' a prostitute and 'has no visible means of subsistence', is *prima facie* proof that he is knowingly living on the earnings of prostitution.

company of a prostitute', or 'has exercised some degree of control or influence over the movements of a prostitute in such a manner as to show that that person is assisting her to commit prostitution' is *prima facie* evidence that that person is knowingly 'living on the earnings of prostitution'.

Within months of the legislation's proclamation in 1977, four women (Anna Wemay and three others, unnamed in the law report) were charged with, and convicted of, 'living on the earnings of prostitution' under section 55. Mr Justice Wilson, the expatriate Australian judge who heard their appeal against the convictions in the National Court of Justice in May 1978, said they may have been 'the first prostitutes ever to be prosecuted in this country for any offence directly appertaining to their calling or, as it is sometimes called, their ancient profession'.¹⁴ It is probably more likely that the case was the first reported prosecution of alleged prostitutes as there are no publicly available records of decisions in the lower courts dealing with summary offences.

According to the published report, Anna Wemay and her fellow appellants admitted to police that they were 'prostitutes' and that they received four *kina* per act of sexual intercourse. There was therefore no need for the prosecution to prove these facts and there is no information in the case report as to the circumstances of the women or their alleged offences. The only issue for the appeal was 'whether the prostitute herself, as distinct from the madam, the tout, the bully, the protector, or the pimp, may be convicted of a breach of s 55(1)' (per Wilson J in *Anna Wemay & Others*, p. 3).

In making his decision on that issue, Justice Wilson declined to look at the intention of the LRC, or indeed of the parliament, in enacting s 55. He argued that the language of the provision was clear and unambiguous and therefore should be interpreted according to its plain meaning. On this basis, and contrary to the intention of the LRC and parliament, he decided that 'the prostitute herself may be just as much a "person" for the purposes of s55(1) as the madam, the tout, the bully, the protector or the pimp' (per Wilson J, *Anna Wemay & Others*, p. 3). Thus the convictions of Anna Wemay and her three co-accused for 'living on the earnings of prostitution' were upheld by Mr Justice Wilson, although he reduced their prison sentences from five months to the six weeks they had already served.

The only other record of a prosecution of 'prostitutes' in PNG came two years after Anna Wemay's case. In August 1980 Mr Justice Narakobi in the National Court heard the appeals of three women, Monika Jon, Margaret Bima and Kuragi Ku against their convictions for 'living on the earnings of prostitution' (*Monika Jon and Others v Dominik Kuman and Others* 8/8/1980 (Unreported N253

14 (1978). *Anna Wemay and Others v Kepas Tumdal* [1978] PNGLR 173 N138. per Wilson J @ p5.

Narokobi J). Monika Jon and Margaret Bima had been questioned by police at a wharf in Lae in early 1980. Ms Jon had reportedly admitted she had 'slept' with a Filipino sailor in return for ten Australian dollars. Margaret Bima, too, had reportedly admitted to 'spending the night' with a Filipino sailor and the police had reportedly found an Australian ten dollar note in her wallet and another in her *bilum* (string bag). But details in the women's testimony seemed to indicate that they were unaccustomed to prostitution. Ms Bima had said in her evidence, 'That was our first time'.

The police case against the third woman, Kuragi Ku, as read to her at her District Court trial, stated that police had seen her at 'Eriku Bush... K2.00' ('two kina bush' is commonly understood in PNG as an outdoor or 'bush' setting where quick, anonymous sex occurs (see Hammar this volume)); under police instructions she had taken off her clothes whereupon two *kina* fell out of her vagina; she had then explained to the police 'that her husband did not give her some money so she sold her body'. But Ms Ku had told the District Court that the police case against her was 'half true and half lies'. From her testimony it was clear that she had been angry because her husband had given her no money that Friday night and was drinking, and she had heard that he was sleeping with another woman. 'I was angry and I took three men into the bush, and they paid me K2.00 each and after that, I returned and I was eating betelnut near Eriku Store and they arrested me.' She explained that she wanted to make her husband angry—and her behaviour and explanation make sense in many PNG contexts (see Wardlow 2004).

Mr Justice Narokobi upheld the appeal of all three women on the basis that the evidence did not indicate that any of the three were 'living on the earnings' of prostitution. Monika Jon and Margaret Bima, he said, admitted to sleeping with a sailor and receiving ten Australian dollars, but there was no evidence of any past association or 'work history' in prostitution. Kuragi Ku, he pointed out, was 'a married woman... who wished to *mekim save* her husband', that is, teach him a lesson. 'She wanted to punish the husband. There is no evidence that she was separated from him. Nor is there evidence that in the past she was in the habit of earning K2.00 in the bush.' In his view: 'Proof of repeated receipts of earnings of prostitution, enough to show that the accused was relying for bread and butter, or rice and tinned fish and smoke and buai on the earnings of her immoral associations are required to sustain a conviction under section 55'.

It is therefore arguable that, under current PNG legislation and common (judge-made) law, a *single* exchange of sex for money without a 'work history' of prostitution, is *not* a criminal act. Following Narokobi's reasoning, a 'prostitute' can only be convicted of a criminal offence if there is evidence that she or he depends on the income from prostitution for daily living. In the course of his judgment, Narokobi (unlike Mr Justice Wilson who had rejected the relevance of

parliament's intentions) recalled the LRC's approach: that 'The act of prostitution would not be legalised, nor would it be made a crime'; and that neither the LRC nor Parliament 'ever intended this legislation to punish the so-called "K2.00 bush" lady' (Monika John v Dominik Kuman, per Narokobi AJ, p 12).

However, to establish beyond doubt the proposition that a single act involving exchange of sex for material recompense is not in itself a crime in PNG, there would need to be a successful test case in the National Court that directly addresses Wilson's reasoning and decision in Anna Wemay's case. Whilst Narokobi expressed clear differences with that reasoning, he stopped short of directly challenging Wilson's decision, accepting instead that 'Wilson J. made it plain that the [offence in section 55] includes the prostitute herself'. He distinguished his own decision in the Monika Jon case by pointing out that in Wemay's case the point as to whether an isolated occasion of prostitution fell within s 55 (1) was not at issue and therefore not part of that case's reasons for decision. A 'test case' on the criminal liability of 'prostitutes' is therefore one strategy that is worthy of consideration by those who advocate decriminalising prostitution in PNG (see also Stewart 2006, 19).

Child Prostitution Laws

Amendments to the Criminal Code introduced in 2002 were designed to toughen criminal penalties for sexual violence and child abuse. The Criminal Code (Sexual Offences and Crimes against Children) Act 2002 was sponsored by the PNG Family and Sexual Violence Action Committee of the Consultative Implementation and Monitoring Council and was introduced as a private members bill by Social Welfare and Development Minister Lady (now Dame) Carol Kidu.

Division 2B of the Act creates a number of new offences including 'obtaining the services of a child prostitute'; 'offering or obtaining a child for prostitution'; 'facilitating or allowing child prostitution'; 'receiving a benefit from child prostitution'; and 'permitting premises to be used for child prostitution'. But section 229Q provides:

No person under the age of 18 years shall be charged with an offence under this Subdivision of any sexual service by that child for financial or other reward, favour or compensation.

This provision was intended by the sponsors of the bill, and by its mover Carol Kidu, to decriminalise prostitution by children less than 18 years of age (FSVC 2003).

The legal defence team in the Three-Mile case raised this provision. Mr Gonapa argued in the Boroko District Court that the prosecutions of the girls under 18 who had been arrested in the raid should be dismissed on the basis that child prostitution had been decriminalised. This argument was rejected by the Boroko magistrate on the basis that the new provisions did not amend or repeal section 55 of the Summary Offences Act and therefore only applied to 'an offence under this subdivision', that is, of the Criminal Code. It therefore appears that children under 18 may still be prosecuted under section 55 of the Summary Offences Act.

Further amendments to Division 2B of the Criminal Code are therefore required before it may be said that child prostitution has been decriminalised in PNG. This is a second issue ripe for attention from public health authorities and others concerned with prostitution law reform and the strengthening of laws to protect children.

Admissibility of Condoms as Evidence of Prostitution

As stated earlier, the PNG Criminal Code is based on the Queensland Criminal Code. In response to HIV prevention concerns, the Queensland code was amended in 1992 so that the presence or possession of condoms is not admissible as evidence that a place is being used 'for the purposes of prostitution'. Section 229N of the Queensland Criminal Code provides that the use of a place for the purposes of prostitution may be inferred from evidence of 'the condition of the place, material found at the place and other relevant factors and circumstances'. It goes on to provide, however, that 'evidence of condoms and other material for safe sex practices is not admissible against a defendant'.

This amendment has not been adopted in PNG. Yet in light of the starring role that condoms played in the Three-Mile prosecutions we recommend that a similar amendment to the PNG Criminal Code should be considered. The distribution of condoms is a key strategy for HIV prevention in PNG but changing attitudes towards them is proving difficult. Whilst the legal reform we are advocating will not act as a magic bullet, we submit that it will contribute to building an 'enabling environment' for such attitudinal change.

Decriminalisation, Legalisation and Regulation

In this chapter we have restricted ourselves to a discussion of the basic decriminalisation of prostitution, that is, the abolition of any laws that penalise an individual for providing sexual services in exchange for material recompense. The wider decriminalisation debate, however, is not so simple.

There are those who argue that decriminalisation of the prostitute herself (or himself) is not sufficient and that associated offences, such as pimping and brothel-keeping, should also be abolished. Proponents of this view argue that the existence of any laws against adult prostitution-related activities serve to reinforce negative attitudes towards adult sex workers (who, they argue, should be treated as workers and therefore subject only to the general laws to which all workers are subject) and thus legitimate abuse of their human rights (Banach and Metzenrath 2000). Others accept that prostitution should be decriminalised in some circumstances, for public health and/or human rights reasons, but favour strict regulation of the practice. This is the view that has been adopted in Queensland¹⁵ where it is legal to operate a registered brothel under strictly supervised conditions and to work as a home-based, sole-operator sex worker.

While prostitution is a topic that incites heated controversy in PNG, the introduction of state regulation of legalised prostitution has considerable support amongst those who endorse the public health and human rights arguments in favour of decriminalisation but who believe the state can and should place some restraints on the 'sex industry'.¹⁶ Indeed, the National AIDS Council's policy on prostitution commits it to considering both decriminalisation and regulation (Temu 2000)—and these issues are set to be debated afresh when the National AIDS Council brings forward specific options for law reform (Papik 2010).

Yet Lawrence Hammar (this volume; see also Stewart 2006, 17) identifies several deep problems with any proposal to regulate prostitution in the PNG context. One is that most exchanges of sex for money occur outside of any organised 'sex industry' and on a very broad continuum of sexual and economic behaviour. Any attempt to regulate the country's urban and camp-based brothels would leave the vast majority of acts of technical 'prostitution' criminalised and thus defeat the purpose of decriminalisation entirely. Even in Queensland, critics of that state's regulatory scheme have identified the continuing criminalisation of prostitution-related activities outside the state-approved brothels as the 1999 law's major weakness (Uusimaki 2002).

¹⁵ Prostitution Act 1999 (QLD).

¹⁶ Editors' note: Regulation of prostitution also has support among some clients of sex-workers. Certain soldiers interviewed by Pantumari and Bamne (this volume) favour the proposal.

Our view is that decriminalisation of the practice of prostitution is a desirable law reform goal, despite the controversy it would cause. We do not argue that this would ‘solve’ the problems that plague HIV prevention projects involving sex workers but we do argue that it would reduce those problems and open up new possibilities for effective work. However, broader decriminalisation and/or regulation of the emerging ‘sex industry’ in PNG is, in our view, a much longer-term project and the authors have not reached a shared view on whether such measures would ultimately be judged either beneficial or appropriate in the PNG context.

References

- Anna Wemay and Others v Kepas Tumdal [1978] PNGLR 173 N138.
- Monika Jon v Dominik Kuman Margaret Bima v John Mohin Kuragi Ku v Ilam Michael. 1980. National Court, Papua New Guinea (Unreported).
- Banach, L. and S. Metzenrath. 2000. *Principles for Model Sex Industry Legislation*. Sydney: Australian Federation of AIDS Organisations.
- FSVAC (Family and Sexual Violence Action Committee). 2003. *Rape, Incest, Child Abuse: The PNG Laws have Changed!!!* Port Moresby: Consultative Implementation and Monitoring Council.
- HRW (Human Rights Watch). 2005. ‘Making Their Own Rules’: Police Beatings, Rape, and Torture of Children in Papua New Guinea. New York: Human Rights Watch. www.hrw.org
- HRW (Human Rights Watch). 2006. Still Making their own Rules: Ongoing Impunity for Police Beatings, Rape, and Torture in Papua New Guinea. New York: Human Rights Watch. www.hrw.org
- Jenkins, C. 2000. Female Sex worker HIV Prevention Projects: Lessons Learnt from Papua New Guinea, India and Bangladesh. UNAIDS Best Practice Collection. Geneva: UNAIDS.
- Ottley, B. L. and J. G. Zorn. 1983. Criminal Law in Papua New Guinea: Code, Custom and the Courts in Conflict. *The American Journal of Comparative Law* 31:251–300.
- Papik, John. 2010. PNG Civil Groups Prepare Gay, Sex Work Law Challenge. Pacific Beat, Radio National, Australian Broadcasting Commission. 29 January.
- Papua New Guinea Law Reform Commission. 1975. Waigani: Report on Summary Offences.

Pilimbo, P. 2004. Police Arrest 80 in Brothel Raid. *The National*, 16 March 2004.

Stewart, Christine. 2006 Prostitution and Homosexuality in Papua New Guinea: Legal, Ethical and Human Rights Issues. Gender Relations Centre, RSPAS, ANU, *Working Paper No. 19*.

Temu, P. 2000. Statement on the Possible Decriminalisation of Prostitution in PNG. Port Moresby: National AIDS Council of Papua New Guinea.

Uusimaki, L. 2002. The 'Hypocrisy' of the Queensland Prostitution Act 1999. Paper presented at Social Change in the 21st Century Conference, Queensland University of Technology, 22 November.

Wardlow, Holly. 2004. 'Anger, Economy and Female Agency: Problematizing 'Prostitution' and 'Sex Work' among the Huli of Papua New Guinea'. *Signs* 29 (4): 1017–1039.