Massage Therapy
ASSOCIATION OF MANITOBA INC.

June 15, 2021

Re: Proposed changes to the DBIW By-law as it pertains to Adult Orientated Businesses

To: The City of Winnipeg Executive Policy Committee

The Massage Therapy Association of Manitoba (MTAM) represents almost 1200 Registered Massage Therapists (RMTs) in Manitoba. Until regulation of the massage therapy profession is formalized in Manitoba, MTAM serves as a voluntary self-regulator which sets standards of practice and code of ethics for our members and administers a complaints and discipline process to help protect the public.

MTAM has actively been working toward regulation of the massage therapy profession in Manitoba for over 20 years and expect it may be a few more years until the process is complete and we have a functioning regulatory college in place under the Regulated Health Professions Act (RHPA).

In the meantime, MTAM continues to educate the public on what registered massage therapy is, the education standards and qualifications of RMTs, and the benefits of using massage therapy as part of a person's health and wellness plan.

Despite the progress we've made in educating the public, we still battle outdated public perception and terminology that links massage to sexual connotations and services.

We are grateful for the work of our predecessors who advocated for the City of Winnipeg discontinue the use of the term *massage parlour* in favour of *body rub parlour* and *adult entertainment business* however we still find our members fending off potential "patients" displaying inappropriate behavior, innuendo and requesting sexual services.

Our members frequently report incidents ranging from verbal harassment to physical assault. It's believed that many incidents go unreported due to the frequency of the occurrences – for some, they have become part of a normal day in the clinic.

In the coming months, MTAM will take part in a national survey coordinated by the Canadian Massage Therapist Alliance (CMTA) to better understand the incidence of sexual harassment and assault of RMTs and how we can work to help prevent it.

In reading the proposed by-law change we ask that the Executive Policy Committee delay their decision until stakeholders like MTAM have been included in the process.

While MTAM supports policy changes with public protection at heart, we're concerned that the proposed changes may inadvertently have a negative impact on the massage therapy profession and the safety of RMTs.

There are several questions and concerns that we would like to have addressed before the city moves forward with any change to this by-law.

1. There have been a number of license fee reductions over the years. Have any of those reductions resulted in more businesses becoming licensed?
    - The document does not provide evidence that the proposed changes will have the desired impact of reducing barriers which would then resulting in more businesses applying to be licensed and monitored.
    - No evidence has been presented to support that a reduction in fees for body rub parlours will make any difference in the current situation. In fact - there have been several fee reductions in the past and none appear to have resulted in more of body rub businesses becoming licensed and monitored. Why do you feel things will be different this time?

2. Will the proposed changes allowing body rub parlours to operate outside of the downtown area result in those businesses that are already operating in the suburbs to become appropriately licensed and monitored?
    - There are a number of body rub businesses that are known to MTAM and the Winnipeg Police Service that currently operate in Winnipeg suburbs under the guise of massage therapy clinics or wellness centres. Is there evidence to support that they will choose to become appropriately licensed as a body rub parlour and monitored as such if given the opportunity?
    - Will those businesses cease using the word "massage" as a service they provide and instead advertise "body rubs" to avoid confusing the public?

3. In the education component of the revision, will there be content included that educates the operators/practitioners on how to avoid misleading the public with their communication and advertising?
    - RMTs face a constant challenge with inappropriate calls, texts, and emails. Current advertising guidelines are ineffective or non-existent and do nothing to prevent misleading or false claims such advertising as an RMT or providing "licensed/certified therapists" when they are not.
    - If a body rub business/practitioner now has a license to operate it could lend legitimacy to misleading advertising claims as they could then be seen as having

"licensed" practitioners. Without additional clarification on what the license means, this could increase public confusion.

4. Will the reduced fee attract more people into body rub businesses and further legitimize and create a larger market for the business and in turn add to the above mentioned concerns?

While MTAM is in favour of a by-law that improves public safety in general, we would not support a change that could be at the expense of the safety of our members/RMTs and which may result in increased risk of verbal and physical harassment and/or assault.

We ask to be involved in the consultation process so that future changes take into account the potential impact on the registered massage therapy profession.

We also ask that the City of Winnipeg do what they can to advocate to the Provincial Government for quicker inclusion of the massage therapy profession under the RHPA.

Respectfully submitted by



Tricia Weidenbacher RMT
Executive Director

CC MTAM Board of Directors