



WORLD FEDERATION OF | FÉDÉRATION MONDIALE DE | FEDERACIÓN MUNDIAL DE CHIROPRACTIC | CHIROPRACTIQUE | QUIROPRÁCTICA

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July 6, 2022

Submitted electronically via <https://regulations.gov/>

For the attention of:

Office of the United States Trade Representative (USTR)

Reference: 87 FR 34745
Comments regarding U.S.-Taiwan Initiative on 21st
Century Trade

The World Federation of Chiropractic (WFC) is a non-governmental organization representing the profession of chiropractic throughout the world. Its members are the national associations of chiropractors in over 90 countries across seven world regions. It is a non-state actor in official relations with the World Health Organization.

Chiropractors are regulated in many jurisdictions around the world, including every state and territory of the United States, every province in Canada, in Hong Kong SAR, Macau SAR, Malaysia and Thailand in the Asian region.

We are aware that there are approximately 60 practising chiropractors in Taiwan. The Taiwan Chiropractic Doctors Society is a longstanding member of the WFC. However, chiropractic remains illegal in Taiwan and there are heavy penalties for those found guilty of practising as chiropractors.

In light of the fact that Taiwanese chiropractors are trained to a level that qualifies them to safely and competently practice in the United States and elsewhere, we are troubled that there remains a prohibition on them working in Taiwan. From a public and patient safety perspective, we see no justification for the position that is currently taken by the Taiwanese authorities. Furthermore, the current position means that American educational institutions offering chiropractic programs are unable to recruit from Taiwan, nor are U.S. vendors able to market their chiropractic products in Taiwan.

In the absence of reasonable grounds for outlawing chiropractic or legitimate safety and competency concerns having been expressed, it would appear that chiropractors wishing to work in Taiwan are being unjustly persecuted. We therefore call on the government to review its position and put in place legislation governing the practice of chiropractic such that practitioners may exercise their skills in addressing the many conditions they are qualified to assess, diagnose, manage and treat.

Should you have any further enquiries or seek additional information, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink that reads "Richard Brown". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Richard Brown DC, LL.M, FRCC
Secretary-General