



February 28, 2020

Shu-Wan Wang, Technical Specialist
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Taiwan Food and Drug Administration
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Via email: sww123@fda.gov.tw

Dear Ms. Wang,

Thank you in advance for your time. I am writing to you on behalf of People for the Ethical Treatment of Animals (PETA) and our 6.5 million members and supporters worldwide. **We respectfully request that the Taiwan Food and Drug Administration (TFDA) revise its guideline on health food safety evaluation to accept non-animal test methods endorsed by international validation organizations – in addition to the ones TFDA already supports that are recommended by the Organization of Economic Cooperation and Development (OECD) – such as the European Union Reference Laboratory for Alternatives to Animal Testing (EURL ECVAM) and the U.S. Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM).**

The TFDA recently updated its guideline for health food safety evaluation and is currently soliciting feedback from stakeholders.¹ The new draft guideline states that in addition to the original list of safety tests for health foods, applicants can choose to perform tests recommended by OECD's Guidelines for the Testing of Chemicals, which includes many approved non-animal test methods. We welcome TFDA's move towards international harmonization in using non-animal test methods for safety evaluation. In addition, we encourage TFDA to also recommend non-animal test methods that other international validation bodies have endorsed, such as EURL ECVAM and ICCVAM.

For your convenience, the PETA International Science Consortium regularly updates the list of non-animal test methods endorsed by EURL ECVAM, ICCVAM, OECD, and a few other government agencies,² and the list is also available in traditional Mandarin.³ Based on the 3Rs principle, which TFDA should follow pursuant to the Taiwan Animal Protection Act,⁴ animal tests should only be used after exhausting all available non-animal test methods first.

¹ Email from TFDA to PETA. February 5, 2020.

² <https://www.piscltd.org.uk/alternatives/>

³ https://www.piscltd.org.uk/wp-content/uploads/2019/10/2019.10.05-Alternative-Test-Methods_Chinese.pdf

⁴ <https://law.moj.gov.tw/ENG/LawClass/LawAll.aspx?pcode=M0060027>

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You can contact me by e-mail at FrancesC@peta.org. Thank you for your consideration of our request, and I look forward to your response.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Frances Cheng', written in a cursive style.

Frances Cheng, Ph.D.
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