



Use of Diagnostic X-Ray by Chiropractors in Ireland Under European Union (Council Directive 2013/59/Euratom-Basic Safety Standards for Protection Against Dangers Arising from Medical Exposure to Ionising Radiation) Regulations 2018

Opening Statement:

Meeting with JOC 25th April, 2018

As President of the Chiropractic Association of Ireland I would like to thank the members of the Joint Oireachtas Committee on Health, for agreeing to meet with us today.

While our requests are technically complex – the principle is very simple. Regulations that place the delivery of Chiropractic in Ireland, at a serious disadvantage and remove the capacity of legitimate chiropractors to conduct x-ray examinations of patients, or to refer patients for x-ray; should not be introduced. This rule change will have a profoundly negative impact on the highly professional service that chiropractors render to the members of the public, thus seriously impeding the ability to practice which will be to the detriment of patients.

Chiropractic is a primary contact healthcare profession which specialises in the assessment, diagnosis, treatment and management of musculoskeletal disorders, particularly those relating to the spinal column and related joints.

The World Health Organization recognises Chiropractors as “primary healthcare providers safe to competently practice independently or as part of healthcare teams at a community level”.

Chiropractic is statutorily regulated in almost 50 countries around the world. Ireland remains the only English-speaking country in the world without Chiropractic legislation.

The Chiropractic Association of Ireland (CAI) is a professional association representing 85% of Chiropractors in Ireland established in 1985 and maintains professional standards in the absence of statutory regulation. These standards are consistent with the criteria that the Health and Social Care Professionals Act 2005 require of professions to be considered for regulation. The CAI has 110 members working in private clinics nationwide who deliver over 600,000 treatments per year to patients with musculoskeletal conditions.



Chiropractic undergraduate educational programmes involve a minimum of 4-5 full time academic years at University, followed by a postgraduate clinical based training scheme.

Chiropractors use radiography to assist in clinical decision making regarding diagnosis, management and prognosis of their patients.

In 2014 the European Commission published **Guidelines on Radiation Protection, Education and Training of Medical Professionals in the European Union (Radiation Protection 175)**. The guidelines were prepared by the European Society of Radiology of which the Irish Faculty of Radiologists are a member society.

The guidelines clearly specify the training requirements for Chiropractors **“referring for, justifying and delivering radiography procedures”**.

As part of their undergraduate training all CAI members **meet** these requirements.

The CAI has actively sought full participation in the relevant statutory structures in respect of X-ray use by Chiropractors in Ireland for over 20 years. In 2002 the Department of Health undertook to include Chiropractors under the remit of the current regulations SI478 (2002) by creating a register of Chiropractors competent to take and refer for X-ray. This work was never completed by the Department of Health. Chiropractors have continued to have access to private X-ray facilities under SI 478(2002) and some Chiropractors operate their own X-ray facilities, licensed by the EPA under SI 125(2000).

European Union (Basic Safety Standards for Protection Against Dangers arising from Medical Exposure to Ionising Radiation) regulations 2018 are due to be signed by Minister Harris in the coming weeks. These regulations have failed to include Chiropractors under their remit even though Chiropractors clearly meet the training requirements specified in the European Commission guidelines, to carry out the roles of “practitioner” and “referrer”.

In the UK, Chiropractors are identified as competent to take and refer for skeletal X-rays under the equivalent regulations.

The CAI has submitted a comprehensive proposal to Minister Harris which will allow the Department to transpose the directive fully while registering competent Chiropractors within the regulations.

The CAI remains fully prepared to assist the Department in terms of provision of supporting documents on undergraduate training or legal assistance with drafting.



We remain ready to immediately implement any additional CPD or audit requirements that the Department might indicate would satisfy its concerns in relation to the inclusion of Chiropractors under the remit of the regulations. We are open to and willing to engage on any practical solution the Department might suggest to resolve matters promptly.

Respectfully submitted,

Chiropractic Association of Ireland

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