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Talking While “Gray Zone” Fighting: China Expands Its Military Coercion Tactics to an International Audience

By: Eric Chan

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The recently concluded Shangri-La Dialogue (SLD) was widely covered in international media as a [tense standoff](#) between the United States and the People’s Republic of China (PRC), with dueling narratives from US Secretary of Defense Lloyd Austin and PRC Defense Minister Li Shangfu (李尚福). The media also extensively covered Beijing’s refusal to conduct any private discussions between Austin and Li on the sidelines of the SLD (as had been requested by the United States), [ostensibly over the fact that Li was sanctioned by the United States in 2018](#).

However, the PRC’s disinterest in regular military communications with the United States has been a long-term issue, even prior to the rise of a more aggressive PLA during the Xi Jinping (習近平) era. Established military exchanges are routinely used as a [symbolic reward-punishment mechanism](#) by the Chinese Communist Party (CCP, 中國共產黨) and thus have been [subject to frequent “freezes.”](#) Hotlines such as the Defense Telephone Link are rarely used, as PLA leaders are not empowered to make immediate crisis decisions. Thus, the coverage regarding the blame game over the lack of military communications misses a more concerning trend that was demonstrated during the summit.

Over the last year, the number of unsafe intercepts and maneuvers by the PLA have markedly increased—not just against the United States, but also against Canada and Australia. In the days before the summit and during the summit itself, the PLA conducted a series of unprofessional, risky maneuvers in the Taiwan Strait and the South China Sea against US aircraft and ships; then, at his summit speech, Li talked about preventing “[hegemony of navigation](#),” while former PRC Ambassador to the United States Cui Tiankai (崔天凱) added that the United States needed to “[ease off military deployments close to China](#)” if the United States wanted military communications. In short, the PRC has adapted gray zone warfare concepts, previously used against Taiwan, to work against an international audience.

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In this article, I will discuss how the PRC has changed its messaging strategy at international forums such as SLD, and how unsafe military maneuvers are integrated into its strategy. Finally, I will consider some of the implications of this “talking while fighting” strategy for the US and Taiwan.

Jaw-Jaw as a Form of War-War

The SLD, hosted annually in Singapore by the International Institute of Strategic Studies (IISS), is Asia’s premier ministerial defense summit. Since 2002, it has [afforded the opportunity](#) for “national leaders, ministers, and policymakers from across the Asia-Pacific, North America, Europe and the Middle East to gather together to discuss the most pressing regional security issues and to share policy responses.” The forum is designed for defense ministers to [outline their vision of Indo-Pacific security](#), while providing space for bilateral discussions.

In a timeline that mirrored its rise as a great power, the PRC first participated in 2007 by sending a deputy chief of general staff, and in 2011 [the PRC defense minister attended for the first time](#). (However, it is important to note that the PRC defense minister holds a state, and not party role, and serves as the international face of the Chinese Communist Party’s armed wing—without the negotiation powers and authorities usually given to other defense ministers or secretaries).

This was followed by an eight-year hiatus of high-level representation, as the PRC [tried to supplant the Shangri-La Dialogue with its own Xiangshan Forum](#). With the failure of that attempt, the PRC has sent its defense minister to the SLD since 2019, all while lambasting the SLD as a “[treacherous trap](#)” used by the United States and its “petty followers” to smear the PRC.

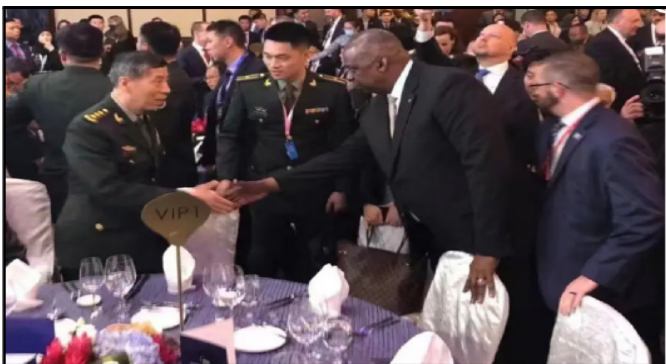


Image: PRC Defense Minister Li Shangfu shakes hands with US Secretary of Defense Lloyd Austin at the SLD, 2 June 2023. While the United States requested a meeting between the two at the SLD, the PRC refused, variously citing the 2018 US sanctions on Li or a more general need to “[work practically to respect China’s sovereignty](#).” PRC military diplomacy prioritizes symbolism and information warfare, versus engagement and risk-reduction. (Source: [Frontline](#))

Accordingly, PRC participation at the SLD has been [traditionally defensive in tone and reflexive in substance](#); the speeches usually given by the defense minister have not been significantly different from the lower-level PLA press conference rebuttals to the US defense secretary speech. Li’s remarks at the 2023 SLD were also defensive in tone, with the standard grievances about the United States’ presence in Asia, its alliance network, and engagement with Taiwan. However, it was not reflexive in substance. He combined these grievances in a coherent, strategic message to advocate a “new path to security” through the PRC’s alternative to the US-led world order: the “Global Security Initiative” (GSI, 全球安全協定).

The GSI was [first rolled out by Xi](#) at the Boao Forum (博鰲亞洲論壇) in April 2022, with few details other than that it represented Xi’s vision of future global security, a security counterpart to the [alternate global economic vision of the Belt and Road Initiative](#) (BRI, also known as “One Belt, One Road,” 一帶一路). Over the last year, the GSI has been fleshed out, with “[six commitments](#)” to replace the current rules-based world order:

1. Maintaining common, comprehensive, cooperative and sustainable security;
2. Respecting the sovereignty and territorial integrity of all countries;
3. Respecting the purposes and principles of the United Nations charter;
4. Peacefully resolving differences and disputes between countries;
5. Maintaining security in traditional and non-traditional domains; and
6. Upholding “indivisible security.”

These commitments seem to be milquetoast statements. However, two major elements of the GSI indicate a broad intent. The first of these is their derivation from existing propaganda. For instance, Commitment 6, “upholding ‘indivisible security,’” was originally a Russian propaganda phrase [used by Russian President Vladimir Putin](#) to justify his war on Ukraine. Xi explicitly mentioned this phrase in the initial rollout in April 2022, while think tanks of both the PRC Ministry of Foreign Affairs and the Ministry of State Security have written concept papers blaming the US for causing the Ukraine war by ignoring Russia’s “legitimate concerns” over its “indivisible security.”

Second, PRC descriptions of the GSI indicate that it is seen as an “international projection” of Xi’s 2014 [Comprehensive National Security Concept](#) (CNSC, 總體國家安全觀). The CNSC [expand-](#)

[ed the party's definition of national security to cover sixteen major areas](#), essentially empowering state security organs over all of domestic society. In the GSI's case, Commitment 5 is aimed at legally justifying the international deployment of PRC law enforcement assets—the infamous covert “overseas police stations”—as “maintaining security in a non-traditional domain.”

Thus, GSI's intent is to replace the current US-led world order with a 19th-century style sphere of influence model. Given this goal, [GSI's international rollout has not proven to be popular](#) on its own merits. Instead, the PRC is now seeking to use dangerous activity to persuade its regional neighbors, as well as the United States, that upholding the rules-based international order is not worth the potential cost.

Using the Risk of Military Confrontation as a Weapon

On May 26, a USAF RC-135 surveillance aircraft operating in the South China Sea was [intercepted](#) by a PLA Air Force (PLAAF) J-16 fighter. These interceptions happen frequently, and for the most part, professionally. In this case, however, the J-16 rapidly cut across the nose of the much slower RC-135, which subjected the RC-135 and its crew to significant turbulence.



Image: PLA Air Force J-16 fighter flying in front of US Air Force RC-135V Rivet Joint surveillance aircraft, 26 May 2023. The lumbering RC-135 was conducting routine operations over the South China Sea when the PLAAF fighter cut across the nose of the RC-135, forcing it to fly through significant wake turbulence. (Source: [US Department of Defense](#))

The dangerous PLAAF maneuver in May was followed by a similar incident involving the PLA Navy two days before Li's Shangri-la speech. During a standard bilateral (US and Canada) Taiwan Strait transit, a PLA Navy destroyer cut in front of the *USS Chung-Hoon*. The PLAN destroyer announced this move over the radio, and demanded that the US Navy ship alter course to avoid collision.

In both cases, the PRC anticipated some level of US response, and rolled out both a domestic and external media campaign.

The [PLA](#) and the [Ministry of Foreign Affairs](#) all rapidly came out with statements that the PLA acted professionally; that the United States had made a “provocation” by “intruding” into areas where the PLA was operating; and that it was the United States that should follow “international law and agreements.” The PRC media also quickly followed with a narrative that US highlighting of these unsafe behaviors was meant to provide “[ammunition](#)” for the secretary of defense's Shangri-la speech. The irony is that the PRC military, political, and media engagement over these incidents has shown considerably more coordination to further PRC goals during the SLD. This contrasts greatly with the [sham-bolic messaging during the PRC spy balloon incident](#), which caught party leadership off-guard.

This type of unsafe behavior from the PLA has [escalated over the last two years](#). This has been true not just against American aircraft, and in places far away from even the PRC's vastly expanded definition of what constitutes PRC territorial waters. Canadian forces have [also reported a spike](#) in dangerous behavior, [as have the Australians](#). Interestingly, the dangerous intercepts against the Canadian aircraft were done while the Canadians were conducting operations as part of a multinational, UN-approved effort to prevent North Korean sanctions evasion. Similarly, some of the dangerous behaviors exhibited by the PLA against the Australians—in this case, a PLA Navy ship illuminating a P-8 surveillance aircraft with a laser— were conducted in Australia's own Exclusive Economic Zone (EEZ).



Image: PLA Navy guided missile destroyer CNS Suzhou (蘇州) cuts across the bow of US Navy guided missile destroyer USS Chung-Hoon (June 2, 2023). The USS Chung-Hoon and the Canadian HMCS Montreal were conducting a bilateral transit through the Taiwan Strait when the PLAN ship maneuvered in front of the US ship, coming within 140 meters of collision. (Source: [US Navy](#))

Implications

US messaging over these incidents has remained the same over several decades, particularly since the April 2001 EP-3 incident, wherein an amateurish PLAAF J-8 pilot engaging in highly dan-

gerous maneuvering ultimately crashed into a US Navy EP-3. The US military tends to characterize PLA dangerous behavior as “unsafe and unprofessional” while calling for [greater military communications to reduce miscalculation](#), or employing military channels such as the [Military Maritime Consultative Agreement](#) (MMCA) to discuss “rule of behavior.” While these incidents are unsafe, from a PRC perspective they are not unprofessional at all: the PLA has been ordered to leverage operational risk to create a tense strategic environment. The party can then play up the possibility of a dangerous confrontation as the result of the US or coalition defense of the existing rules-based order. These incidents must be considered in light of the concurrent [escalating PLA maneuvers and incursions around Taiwan](#). While the PLA has been much more cautious about the use of risky air intercepts at this sensitive flashpoint, [there are signs](#) that this, too, is changing.

For the United States and Taiwan, then, there should be a focus on developing a coordinated messaging campaign against this type of aggressive PRC behavior. This should be part of a greater cost-imposition strategy as the PRC attempts to expand the GSI, and redefine [international laws](#) to warp the rules-based order into an order based on sphere of influence. Finally, both the US and Taiwan will need to develop coordinated standard operating procedures in case the PLA does miscalculate and drag the region into a crisis.

The main point: The PRC is accelerating a campaign to actively replace the rules-based world order with a Beijing-led sphere of influence model. PLA aggressive maneuvers should not be seen as a symptom of an “unprofessional” military, but rather as a part of a deliberate attempt to use operational risk to undermine efforts to safeguard the rules-based international order. The United States and Taiwan should consider a messaging and cost-imposition strategy to deter the PLA from expanding this campaign further.

Taiwan’s Indigenous Submarine Program Announces Milestone Goals for 2023

By: John Dotson

John Dotson is the deputy director of the Global Taiwan Institute and associate editor of the Global Taiwan Brief.

The acquisition of a fleet of more modern submarines for the Republic of China Navy (ROCN) has long been one of the highest-priority—and sometimes controversial—defense

acquisition programs for Taiwan’s armed forces. For many years, the ROCN has fielded only two effective operational submarines, both of the venerable [Hai Lung \(海龍\) class](#). [1] Based on the Dutch *Zwaardvis* class, these two submarines were constructed in the Netherlands and delivered to Taiwan in the late 1980s. After more than three decades, these vessels are past their standard service life, and obsolete in the face of the more modern submarines being fielded by navies in the Indo-Pacific region—particularly those operated by the rapidly advancing [submarine force of China’s People’s Liberation Army Navy \(PLAN\)](#).

In the intervening decades since the two *Hai Lung* acquisitions, Taiwan’s Ministry of National Defense (MND, 中華民國國防部) explored a number of options for foreign submarine purchases, none of which ever came to fruition. In terms of foreign acquisition, the fundamental problem for Taiwan has been that European defense contractors, who in the 1980s and early 1990s were more willing to sell advanced weapons systems to Taiwan (such as the [1992 sale of French Mirage fighter jets](#)), have become increasingly subject to pressure levied by the People’s Republic of China (PRC). As a result, the United States has increasingly become the only advanced weapons manufacturing country still willing to supply defense systems to Taiwan.

However, the US Navy submarine fleet currently consists entirely of nuclear-powered vessels, and the US naval shipbuilding industry therefore lacks the infrastructure and experience to produce diesel-electric submarines. [2] While nuclear power confers substantial advantages to submarines, such a program is far more expensive than a diesel program, and further requires an extensive personnel training and qualification pipeline—as well as butting up against political controversies regarding the mooring of active nuclear reactors near densely populated port facility areas.

Furthermore, Taiwan’s defense needs—namely, for a more modern submarine platform capable of effective local sea-area operations, without significant concerns for longer-range patrols or at-sea endurance—point more in the direction of conventional, diesel-electric propulsion. With no foreign manufacturer willing to sell Taiwan diesel submarines, and the United States being incapable of doing so, Taiwan’s defense policymakers have increasingly turned toward the creation of an indigenous manufacturing program in recent years, despite the attendant start-up costs.



Image: A model of Taiwan's planned indigenous submarine class on display at Taiwan CSBC Corporation in Kaohsiung, May 2019. (Image source: [CNA](#))

Taiwan's Indigenous Submarine Construction Program

Taiwan's [Indigenous Defense Submarine](#) (IDS, 自製防禦潛艦) program, also referred to as the “*Hai Chang Program*” (海昌計畫), was launched in 2016. The program included plans to produce a total of eight vessels, with the first vessel scheduled to be completed by 2025. It was reported in 2017 that the [design phase of the project would cost NTD \\$2 billion](#) (approximately USD \$65.4 million), but the overall costs for actual construction of the eight boats will be orders of magnitude higher. Officials from Taiwan CSBC (台灣國際造船股份有限公司), the Kaohsiung-based lead manufacturer for the vessels, have previously indicated that the prototype vessel would cost NTD \$49.3 billion (approximately USD \$1.6 billion), and take about five years to build.

Although the design details for the IDS have not been made public, it is believed to be a composite design, with some [observers noting](#) that public models of the IDS resemble the *Soryu*-class submarine in service with the Japanese Maritime Self-Defense Force (JMSDF), particularly in terms of the “X”-shaped stern end of the hull. [Taiwan CSBC officials have indicated](#) that the planned prototype will have approximate dimensions of 8 meters wide and 18 meters high, with a length of 70 meters and a displacement weight between 2,500 to 3,000 tons. Naval engineers and former submarine personnel from multiple countries—including the United Kingdom, South Korea, India, and Japan—have reportedly been [recruited to assist with the program](#). In addition to Taiwan CSBC, other [institutions in Taiwan reportedly involved with the IDS program](#) include the Naval Shipbuilding Development Center, the ROCN 256th Submarine Squadron, and the Chungshan Institute of Science and Technology (國家中山科學研究院).

While many aspects of the IDS program remain shielded from public view, the Tsai Ing-wen (蔡英文) Administration has sought to give the program significant exposure for public relations purposes, promoting it as another example of a major initiative taken to improve Taiwan's defense capabilities. Since the announcement of the program, Tsai has made [publicity trips](#) during her tenure to visit the ROCN's existing submarines and their crews, and appeared alongside senior ROCN and defense officials at the November 2020 [ribbon-cutting ceremony](#) held to officially open the CSBC administration building from which the IDS program would be managed. Personnel from the [ROCN's 256th Submarine Squadron](#) are reportedly working in tandem with Taiwan CSBC officials at the Kaohsiung shipyard facility to supervise the project towards completion.



Image: Taiwan President Tsai Ing-wen (third from left), along with civilian officials and senior ROC Navy officers, at a November 2020 ribbon-cutting ceremony held at a Taiwan CSBC facility in Kaohsiung to mark the official opening of the IDS program administration building. (Image source: [Liberty Times](#))

The US Role in Taiwan's Indigenous Submarine Program

The United States has played at least a limited supporting role in providing the IDS project with US-designed submarine technology. In spring 2018, the Trump Administration reportedly [approved an export license](#) to US defense contractors to provide submarine technology to Taiwan—without further public disclosure as to what, specifically, those systems might be. In May 2020, the Defense Security Cooperation Agency (DSCA) [announced the sale](#) of eighteen MK-48 Mod6 Advanced Technology (AT) Heavy Weight Torpedoes (HWT) and associated equipment (for an estimated cost of USD \$180 million). In December 2020, the US [approved the sale of an unspecified digital sonar system](#) to Taiwan, presumably intended for the IDS project.

This process has continued under the Biden Administration:

in March 2021, comments by ROC Defense Minister Chiu Kuo-cheng (邱國正) indicated that the United States had [approved export permits](#) for further submarine technology sales to Taiwan. These systems were not identified, but MND officials have reportedly signaled that their primary acquisition interests are for digital sonar systems, combat management systems, and periscopes. The lack of specificity regarding the systems (or designs) transferred likely reflects continuing sensitivities regarding the operational security of the IDS program, and the imperative to keep from public disclosure the specific expected capabilities of the IDS boats.

Taiwan's MND Announces Benchmarks for 2023

Public policy discussions regarding the IDS program have re-emerged into public view over the past year, as the program has moved nearer to producing the first functional prototype. In July 2022, Executive Yuan (EY, 行政院) officials indicated that the program was on track, and further indicated future intent to budget NTD \$300 billion (USD \$9.78 billion) for the [procurement of seven additional boats](#), to round out the projected eight. (Design and manufacturing costs will always be highest for the initial unit in any new naval class, with per-unit construction costs expected to decline as production of subsequent units continues.)

[Taiwan press reporting](#) from January of this year indicated that six sections of the vessel's hull had been completed, with only the topmost sail section (i.e., the section containing the raised conning tower) remaining to be finished. On May 10, Taiwan CSBC Chairman Cheng Wen-lon (鄭文隆) [stated at a press conference](#) that the prototype IDS vessel would be ready for final testing in September of this year (although it was unclear in this context what, exactly, final testing might mean). [3] Cheng indicated that Taiwan had obtained 107 unspecified technologies from abroad to aid in constructing the submarine, but that his company's shipyard had manufactured many of the ship's key components: including airtight doors, hydraulic systems, a water filtration system, and a silent air-conditioning system.

Conclusions

The announced September timeframe of testing certifications for Taiwan's initial IDS unit—whatever that “final testing” might mean in specific terms—could mark a potential major milestone in terms of both Taiwan's indigenous defense production, and its future defense posture. [Taiwan's indigenous naval shipbuilding programs](#) have demonstrated significant advances in recent years in terms of producing

lighter surface combatants, such as the Tuo Chiang (沱江) class of guided-missile patrol craft (PGGs) catamarans. If the initial IDS prototype unit is indeed on track, as government and Taiwan CSBC officials have indicated, it would represent a significant success in a technically challenging endeavor—and one in which Taiwan's shipbuilding industry possessed no previous experience or institutional expertise.

Many questions remain, however. The production of a total of eight platforms is an ambitious undertaking, and it remains to be seen what the timeline would look like for Taiwan's existing naval shipbuilding infrastructure to produce the full series of vessels (especially alongside competing production capacity and budgetary requirements for indigenous surface ship construction). There also remain open questions regarding the crew training and certification programs for a dramatically expanded submarine branch of the ROCN, as well as implementation of the procedures for the potential deconfliction of both peacetime and wartime patrol areas with allied and regional countries.

The biggest questions, however, may be the larger questions as to how a force of more modern diesel-electric submarines would fit into Taiwan's overall defense strategy. The existence of such a submarine force—particularly one built with Taiwan's own engineering know-how, albeit with considerable foreign assistance—would carry with it a certain amount of prestige, as well as an undeniable level of deterrent value against a naval aggressor. Yet there are a variety of potential operational models for a submarine force to follow: ranging from Nazi Germany's commerce-hunting “wolfpacks;” to the US Navy's controversial 1980s “Maritime Strategy” of challenging the Soviet Navy in its bastion areas; [4] to a more passive posture of a submarine “fleet in being” intended to complicate the work of PLA planners contemplating either a blockade or invasion of Taiwan. Working out the underlying strategy and operational concepts for a submarine force could prove to be just as complicated, if not more so, than producing the submarines in the first place.

The main point: Taiwan shipbuilding industry officials have announced that the prototype unit of Taiwan's “Indigenous Submarine Program” (IDS) will complete basic construction by September of this year. The construction of such a vessel—the first of a reported series of eight diesel-electric submarines intended for service with Taiwan's navy—would represent a major success for Taiwan's indigenous naval shipbuilding industry. It would also raise many questions regarding the underlying defense strategy and operational con-

cepts connected to how such a force of submarines would be employed.

Notes

[1] The ROCN also has in its order-of-battle the [Hai Shih \(海獅, “Sea Lion”\)](#) a *Guppy*-class submarine—which is based on World War II-era designs, and is over 70 years old. The vessel reportedly underwent limited upgrades in 2017 intended to extend its service as a training vessel. However, this antiquated vessel is unlikely to be a deployable unit fit for either peacetime patrols or wartime service.

[2] The last diesel-electric boats operated by the US Navy, the [Barbel-class submarines](#), were built in the late 1950s and decommissioned by the late 1980s.

[3] US naval vessels, for example, will pass through multiple certification processes before entering active service, to include: certification of the completion of construction, also involving a “pre-commissioning” status during later stages of construction; a “commissioning” of the unit into the service’s active vessel inventory; and “sea trials” during the early stage of service, to confirm the vessel’s seaworthiness and operability of its systems, and to train the crew. It is unclear what the September 2023 “final testing” for the IDS prototype will be, but it is presumably a benchmark for the completion of basic unit construction and systems installations.

[4] Christopher A. Ford and David A. Rosenberg, “The Naval Intelligence Underpinnings of Reagan’s Maritime Strategy,” *The Journal of Strategic Studies* 28, no. 2, April 2005.

Reform Taiwan’s Labor Laws to Better Prevent Forced Labor

By: Bonny Ling

Dr. Bonny Ling is a scholar and practitioner who works on international human rights, with a focus on responsible business and decent work.

The challenge of countering exploitative labor is not only one of effective inspection, investigation, and prosecution. It is also one of terminology and definition—a matter of properly understanding the differences between terms that are related, so that we can ground our discussions in accuracy and better identify gaps that hinder more effective enforcement of legal protections. These considerations bear direct rele-

vance to ongoing developments in Taiwan: for, although the international [treaties](#) on forced labor (強迫勞動) under the purview of the International Labour Organization (ILO) were codified far away from Taiwan, the island is neither immune nor siloed from these extreme cases of human exploitation.

The Issue of Forced Labor

In February 2023, some 20 bodies were found dead in the waters off the western coast of Taiwan. They were initially thought to be victims of [human trafficking](#), possibly kept in a situation of forced labor by their unscrupulous employers. Investigators later found that the deceased had likely fallen victim to [migrant smuggling](#) while searching for employment in Taiwan.

Reporting on this tragedy speaks to the challenge of terminology and definitions in the effort to eliminate extreme labor exploitation in Taiwan. Terms such as “human trafficking,” “migrant smuggling,” and “forced labor” can often appear together, and nearly interchangeably. (This is especially the case in the early stages of an investigation when facts are still being gathered.) Investigators need to ascertain if there was an intended purpose of exploitation—such as forced labor—that would make the circumstances meet the threshold of human trafficking, as opposed to cases that involve only the smuggling of migrants across a state border.

In regards to Taiwan and human trafficking, the US State Department’s annual [Trafficking in Persons report](#), which includes a ranking of states and territories on a tiered system based on their anti-trafficking efforts, often inspires lively debates between government and civil society groups. The report—and the discussions that accompany it—have been successful in pushing the term *renkou fanyun* (人口販運) (“human trafficking” or “trafficking in persons”) into the local lexicon.

However, a broad understanding of human trafficking is removed from the everyday reality of employment in Taiwan. The focus is often placed on the label of trafficking, and less on the details of terminology and definitions that come under the scope of trafficking. It is therefore crucial to look at the definition of “forced labor” as a key purpose of exploitation under the human trafficking framework, while also examining any gaps that may exist within international standards in developing labor protections in Taiwan.

It is in this context that Taiwan must absolutely embark on what I—alongside domestic legal scholars and [labor advo-](#)

[cates](#)—have consistently raised in dialogues with Taiwan’s government and civil society groups: Revise the [Labor Standards Act](#) (勞動基準法) to bring it into full alignment with the international definition of forced labor.



Image: Protestors for the rights of migrant fisherman in Taiwan’s fishing industry stand outside the site of a government forum on human trafficking issues (September 2020). (Image source: [Global Labor Justice – International Labor Rights Forum](#))

The Labor Standards Act’s Gaping Hole

Provisions barring forced labor in Taiwan’s domestic legal system are most readily seen in the *Labor Standards Act*, the centerpiece of Taiwan’s labor protection regime. Article 5 of the *Act* states clearly that “[n]o employer shall, by force, coercion, detention, or other illegal means, compel a worker to perform work” (雇主不得以強暴、脅迫、拘禁或其他非法之方法，強制勞工從事勞動). Employers who violate Article 5 can be sentenced under Article 75 to imprisonment for a term not exceeding five years, detained, and/or fined a sum of no less than NTD \$750,000 (USD \$24,000).

Notably, Article 5 focuses exclusively on employer actions (force, coercion, detention, or other illegal actions). It does not include a provision requiring the free and informed consent of the worker. By not including the worker’s voluntary engagement in labor, the *Act*’s language does not fully mirror the ILO’s [definition of forced labor](#): “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.”

In this context, the element of non-voluntary performance of labor connects to the fundamental aspect of human agency: that of free and informed consent to undertake the work in question, and the freedom of job mobility. It goes beyond extreme physical abuses, such as abduction and use of physical constraints against the worker. This is a gaping hole in the most fundamental piece of legislation in Taiwan intended to address labor protections for workers.

The *Labor Standards Act* is insufficient in addressing involuntary work, which tends to be more obscured and insidious, and frequently escapes attention. This does not mean that there is no provision in Taiwan’s domestic law to address work that is done without consent.

Language addressing coerced work is included in Article 296 of the [Criminal Code of the Republic of China](#) (中華民國刑法) under the chapter on offenses against personal freedoms. This section criminalizes the enslavement of another person or placing them “in a position as not free as a slave.” Relevant language can also be found in the detailed provision in Taiwan’s [Human Trafficking Prevention Act](#) (人口販運防制法), where it criminalizes the use of less overt means such as “hypnosis, fraud, purposeful concealment of important information, illegal debt bondage, withholding important documents, making use of the victim’s inability, ignorance or helplessness, or by other means against his/her will,” for the purpose of exploiting the person for labor or organ trafficking.

Yet, Taiwan’s current body of labor law requires a more clear and forceful repudiation of the totality of forced labor—of work that is not free.

Risks of Non-Alignment with International Definition

Inconsistencies in domestic law related to forced labor are not a problem unique to Taiwan. The United States, for instance, does not specifically reference involuntariness as a factor in the definition for the federal crime of forced labor, per [18 US Code 1589](#). However, the element of involuntariness is present in other relevant legislation. This is most readily seen in the US Customs and Border Protection’s (CBP) reliance on a definition of [forced labor](#) nearly identical to the international definition: specifically, it uses Section 307 of the *US Tariff Act* ([19 US Code 1307](#)), which bars the entry of goods made with forced labor into the United States.

Nevertheless, it is extremely important that Taiwan’s government recognizes that its domestic definition of forced labor must be consistent with the internationally accepted definition of the same. Lower standards in Taiwan’s labor law provide a false haven for businesses that believe compliance with Taiwan’s domestic law will be enough to safeguard against risks of forced labor. This is far from reality.

During the course of preparing a [guidebook](#) on understanding the ILO’s 11 forced labor indicators in the context of Taiwan’s small and medium enterprises, my research team and

I found several publicly reported cases in which local standards were incompatible with international standards. The most notable is in migrant workers' payment of recruitment fees and related costs, in the form of the legally permitted [monthly services fees](#) to labour brokers in Taiwan. This practice does not align with ILO's [General Principles and Operational Guidelines for Fair Recruitment and Definition of Recruitment Fees and Related Costs](#).

Because the *Labor Standards Act* is the keystone legislation addressing basic labor protections in Taiwan, employers looking for compliance on forced labor may be satisfied by only looking for overt acts of a menace of penalty, instead of conducting a deeper probe to identify whether there is free and informed consent in the employment relationship. [1]

Examples of involuntariness can be as varied as: workers doing a job that is different from the one promised; abusive requirements for overtime or on-call work that have not been agreed upon; hazardous work to which the worker has not consented; work with very low or no wages; living in degrading living conditions imposed by the employer, recruiter, or other third-party; work for employers other than those agreed upon; work for longer periods than agreed upon; or work with no or limited job mobility.

Harmonizing Article 5 of Taiwan's *Labor Standards Act* with the international definition of forced labor would go a long way towards promoting a more accurate understanding of work that is not voluntarily offered.

Opportunities Presented by "Made in Taiwan"

Beyond leaving workers vulnerable to forced labor, the gaps in Taiwan's *Labor Standards Act* also put employers' business interests at risk. Goods that are believed to have involved forced labor are subject to a "[Withhold Release Order](#)" (WRO) and are detained at all US ports. Certain Taiwanese-harvested fish have already been [barred](#) from entering the US market under suspicion of having used forced labor.

Inability to export to the United States undeniably is a costly penalty for businesses. But the WROs are also a business opportunity for Taiwan to be different. If Taiwan is able to reform its legal framework for combating forced labor, it could help to distinguish Taiwanese products from those emanating from China and many other countries with active WROs— which cannot get past US ports due to their connection to forced labor. Amending the law in Taiwan then would be more than an academic and legislative exercise: it would

be one that contributes to Taiwan's economic competitiveness in an age of growing emphasis on social returns that can benefit the environment, community, and people.

The legal system in Taiwan is strong, transparent, and predictable. Taiwan has the rule of law that is fundamental to the functioning of democratic institutions. This makes the need for reform all the more imperative. Taiwan must recognize that the *Labor Standards Act* is missing clear, decisive language on the misery of involuntary labor—which, with the element of threats and penalties, makes up the totality of forced labor as is understood internationally.

The main point: While Taiwan has a strong and durable legal system, it lacks effective language addressing the totality of forced labor. In order to ensure the island's place as an international leader in the rule of law and human rights, Taiwan must add such language to its keystone Labor Standards Act, with the goal of bringing it into alignment with international labor standards.

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Notes

[1] Per the [ILO](#), menace of penalty refers to a wide range of penalties used to compel someone to work. The threat of penalty can be arrest or jail or in the suppression of workers' rights or privileges, such as the withholding of wages. Threats and intimidations may be realized in different forms, including the use of violence, threat against the security of the person, or threat of denunciation of irregular workers to immigration authorities.

Taiwan's Electrical Grid and the Need for Greater System Resilience

By: Jordan McGillis

Jordan McGillis is an adjunct fellow and GTI and a Paulson Policy Analyst at the Manhattan Institute.

Taiwan is engaged in a multifront effort to add resilience to

its electrical grid. The centerpiece of this campaign is the [Grid Resilience Strengthening Construction Plan](#) (強化電網韌性建設計畫), announced by Taiwan Power Company (Taipower, 台灣電力公司) in September 2022. The essence of the plan is to reduce the likelihood of vulnerable chokepoints making wide swaths of the system susceptible to blackouts when things go wrong. In other words, the plan is to decentralize and compartmentalize Taiwan's grid. "The new project aims to enhance power grid resilience by deploying microgrids, rather than relying on major grids for electricity supply," Taipower acting Chairman [Tseng Wen-sheng](#) (曾文生) told members of the media in September. This Taipower decentralization initiative pairs with broader political efforts to eliminate nuclear power and reduce coal-dependence, in favor of the distributed generation provided by wind and solar power.

Rising Power Consumption in Taiwan

The catalyst for the NTD \$564.5 billion (USD \$18.1 billion) plan was Taiwan's recent history of major power disruptions. Blackouts in 2017, 2021, and 2022 have revealed a concerning degree of grid vulnerability for an economy that is uniquely dependent on electricity.

Based on 2021 [GDP](#) and [population](#) numbers from the World Bank and the International Energy Agency's (IEA) [most recent electricity consumption figures](#), Taiwan's economy is more electricity-intensive than those of its contemporaries. This can be observed by comparing units of electricity consumption per unit of economic output—for example, kilowatt-hours per US dollar (kWh/\$). In Taiwan's case, this metric comes out to around 0.348kWh/\$. For such an advanced economy, this is rather high, placing Taiwan about halfway between South Korea (0.309kWh/\$) and the People's Republic of China (PRC) (0.418kWh/\$)—a much poorer economy per capita. Japan, Germany, and the United States, meanwhile, log kWh/\$ figures of 0.196, 0.124, and 0.176, respectively. [1]

These figures highlight the different economies' relative places in today's global industrial system. While [Japan](#), [Germany](#), and the [United States](#) have seen manufacturing as a portion of their economies shrink to less than 20 percent as services have become predominant, manufacturing remains more central to the economies of South Korea, China, and Taiwan. According to the World Bank, South Korea's manufacturing constitutes [25 percent](#) of its economy; the PRC's constitutes [27 percent](#); and Taiwan's constitutes a stunning [34 percent](#).

The Taiwan manufacturing sector's prominence has translated into broad economic growth, with its national economy now close to the top 20 globally in GDP, despite its population being outside of the top 50. In 2021, Taiwan's economy grew at an astonishing [6 percent](#). And while 2022 saw the economy slow down as global demand slumped, Taiwan still grew at more than [3 percent year-on-year](#). This economic growth has resulted in a [power-consumption increase](#) of 10 percent in less than a decade.

Taiwan's world-beating manufacturing sector, anchored by firms like Taiwan Semiconductor Manufacturing Company (TSMC, 台灣積體電路製造股份有限公司) and Formosa Plastics (台灣塑膠公司), has a voracious appetite for power. According to the Bureau of Energy (BOE, 經濟部能源局), industrial production accounts for [57 percent](#) of total electricity consumption in Taiwan, up from 49 percent 20 years ago. Of this 57 percent, electronics manufacturing (including chipmaking) accounts for [37 percent](#), or more than one fifth of the island's total. [TSMC alone](#) accounted for 6.4 percent of Taiwan's electricity consumption in 2021.

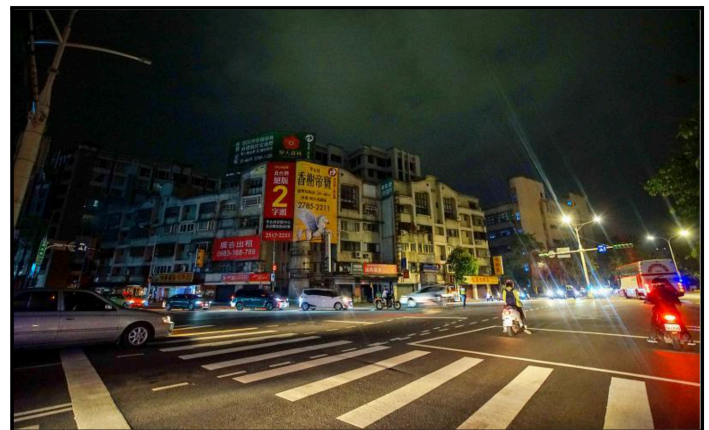


Image: An intersection in Taipei's Neihu District during a rolling blackout, which was necessitated by high levels of power consumption that strained the electrical grid (May 17, 2021). (Image source: [Taipei Times](#))

The Threat of Black Outs

In August 2017 a [malfunction](#) at the large Tatan natural gas power plant (大潭發電廠) [knocked out power for 151 companies](#) in industrial parks and export processing zones, resulting in losses of NTD \$87.47 million (USD \$2.89 million). More than 6 million households, or close to half of Taiwan's total, lost power as well. According to the natural gas supplier CPC Corporation Taiwan (台灣中油), the trigger for the event was a human error that occurred during the replacement of equipment. In May 2021, a [malfunction at a high-voltage substation](#) in Kaohsiung knocked four genera-

tors at the Hsinta Power Plant (興達發電廠) offline, resulting in rotating power outages for 4 million households. Four days later, the problem recurred.

The threat of blackouts emerged once again in [March 2022](#). The incident, now known colloquially as the “[303 Blackout](#)” (303停電事故), raised the political salience of grid resilience to a level that demanded the subsequent Taipower plan. According to [Taipower’s own reporting](#), the 303 Blackout also started at Hsinta Power Plant when an operator committed an error that caused a chain reaction from an extra high-voltage substation further south in Tainan. Subsequently, generators at the Chiahui plant (嘉惠電廠), the Maanshan nuclear plant (馬鞍山核能發電廠), the Talin plant (大林發電廠), and the Nanpu plant (南部發電廠) also went offline. As a result, Taiwan’s power grid lost a third of its capacity, and more than 5 million households were left without electricity. Moreover, the semiconductor, petrochemical, and steel industries suffered disruptions estimated to have [cost more than NTD \\$5 billion](#).

Each of these examples highlighted the centralization problem that Taipower has created for itself. Taiwan’s power is generated mostly in the south—such as at the Hsinta plant outside of Kaohsiung—but needed mostly in the urban centers of the north. As the power is moved via a central transmission system, what should be isolated errors can instead become cascading island-wide cataclysms.

To avoid such chain reactions in the future, Taipower has instituted the [Grid Resilience Strengthening Construction Plan](#) for “promoting distributed grid projects,” “improving grid reinforcement projects,” and “strengthening grid protection capabilities.” The total investment of NTD \$564.5 billion will come in installments over 10 years.

Additionally, the plan will attempt to protect the industrial parks from disruptions in the wider grid with its plank of “Direct Electricity Supply from Power Plant to Science Parks.” The plan will, for example, provide electricity directly to the Hsinchu Science Park (新竹科學園區, home to TSMC) from the Tunghsiao power plant (通霄發電廠) and offshore wind farms; the Taichung power plant will supply electricity directly to the Central Taiwan Science Park (中部科學園區); and the Hsinta plant will supply electricity directly to the Southern Taiwan Science Park (南部科學園區) and the Kaohsiung Ciaotou Science Park (橋頭科學園區). Taipower also argues that reducing the power transmission distance is among the best ways to reduce risks to the power grid, and it will there-

fore seek to reduce stress on the major south-north cables.

Gaps in Power Generation

But despite the well-documented travails of power transmission and the plan’s focus on resolving them, Taiwan also continues to face looming questions regarding power generation. Taipower spokesman Chang Ting-shu (張廷抒) revealed as much in the wake of the May 2021 blackout, stating that “We calculate our expected electricity needs based on historical demand, but yesterday’s demand was much higher and was not far from the all-time record.” Taiwan not only needs to deliver power more effectively—it also needs the firm capacity to generate more of it.

As of a [2022 Bureau of Energy report](#), coal generated 42.5 percent of Taiwan’s power, natural gas generated 38.1 percent, nuclear power generated 8.5 percent, and renewable sources—including hydropower, wind, and solar—generated 8.1 percent, with the remainder generated by assorted small categories. This electricity mix is just the latest makeup in an ever-changing Taiwanese power landscape.

In the 1970s, coal was Taiwan’s dominant power source, contributing more than 75 percent of the island’s generation. However, amid Chiang Ching-kuo’s (蔣經國) drive for modernization in the 1980s, nuclear energy ascended in importance. By the mid-1980s, nuclear power from three plants in New Taipei and Pingtung County contributed more than half of Taiwan’s power. This relative crest was to be short-lived, however, with the Democratic Progressive Party (DPP, 民進黨) staking out an [anti-nuclear stance](#) that has persisted to this day.

As Taiwan’s electricity demand continued to rocket upward through the 1990s and into the new millennium, nuclear power generation remained stagnant. President [Tsai Ing-wen](#) (蔡英文), with her promise of a “nuclear-free homeland,” consigned the zero-carbon resource to terminal decline. The [Tsai power plan](#), released shortly after her 2016 election, called for a generation mix of 50 percent natural gas, 30 percent coal, and 20 percent renewables by 2025. It left no place for nuclear power. Given its emphasis on natural gas generation, the Tsai Administration has, to its credit, improved [natural gas infrastructure](#) in the north of Taiwan. However, its plan to replace nuclear power with wind and solar courts disaster.

The eight-year schedule to install 5.6 gigawatts of offshore [wind capacity](#) and the target of 1.5 gigawatts of [battery stor-](#)

[age](#) by 2025 have both been knocked off track by manufacturing challenges, cost overruns, and local opposition. While remaining committed to the planned phase out of nuclear power, the Tsai Administration has had to [lower its 2025 target](#) for renewables to 15 percent.

This trajectory leaves Taiwan vulnerable to slim reserve margins and the recurrence of rolling blackouts as demand consistently challenges supply. Circumstances such as [those seen in 2022](#)—when peak power usage of 40.74 gigawatts jumped beyond the Bureau of Energy’s peak projection of 39.7 gigawatts—could become commonplace.

The Nuclear Option

Taipower’s strengthening and construction plan will make needed improvements to the island’s grid resilience. However, those upgrades must be accompanied by sober analysis of the power generation side of the equation. Variable generation from wind and solar power, even if it reaches capacity targets, cannot replicate the attributes of baseload power from the coal and nuclear plants Taiwan is phasing out. Batteries at the scale necessary are not yet within the realm of possibility. Natural gas, the new workhorse of Taiwan’s power plan, presents its own problems, be they from global price volatility or the threats that exist to its import.

In December 2021 voters spurned nuclear power in a [referendum](#), rejecting the idea of restarting construction of what would be Taiwan’s fourth nuclear power plant, the Lungmen nuclear facility (龍門核能發電廠). However, recent geopolitical developments have created a new political opening for nuclear power initiatives that could support Taiwan’s grid. Just three months after that referendum, Russia initiated its war of aggression against Ukraine—sending Europe into an energy spiral and prompting a global rethink of the turn away from nuclear, as exemplified by Germany’s *energiewende*. [2]

Though DPP spokesman Chang Chih-hao (張志豪) [said in late May](#) that the party’s promise of a “nuclear-free homeland” remains unchanged, current vice president and 2024 party nominee for the presidency [Lai Ching-te](#) (賴清德) has flirted with the possibility of renewing nuclear generation “in the case of an emergency.” New Taipei City Mayor and Kuomintang (KMT, 國民黨) presidential nominee Hou You-yi (侯友宜) has also indicated openness to [nuclear power](#).

Ending the planned phase out, restarting decommissioned reactors, and putting Lungmen into service could yield [nearly 8 gigawatts](#) of total dispatchable nuclear capacity, equivalent

to almost 20 percent of Taiwan’s peak demand.

Exogenous Threats

Taiwan’s grid also faces risk from a triad of exogenous factors that deserve mention: seismology, weather, and regional geopolitics.

Taiwan’s biggest electricity failure prior to the 2017 outage resulted from an [earthquake in 1999](#). Typhoons also pose a risk, particularly when high winds damage power lines. This threat was demonstrated in 2009, when [Typhoon Morakot](#) left more than 1.5 million Taiwanese without power; and again in 2016, when [Typhoon Meranti](#) wreaked similar havoc. Fortunately, while the United Nations [Intergovernmental Panel on Climate Change](#) projects that the peak wind speeds from tropical cyclone activity will increase globally in the coming decades, the northwestern portion of the Pacific Ocean, where Taiwan sits, is expected to experience a meaningful decrease in tropical cyclone activity. This phenomenon is due to an observed merging of high-pressure zones in the upper atmosphere over the Pacific and Southeast Asia, which Taiwanese climatologist Chia Hsin-hsing (賈新興) [has called](#) a “golden bell force-field.”

The geopolitical risks to the fuel supplies of Taiwan’s electrical network (as discussed in a [previous Global Taiwan Brief article](#)) need not be rehashed here. Suffice it to say the physical security of offshore resources and the delivery of fuels like natural gas are increasingly vulnerable. The grid’s cybersecurity *vis-à-vis* geopolitical contingencies is also a pressing issue. Ongoing and future efforts to shore up these vulnerabilities must further be considered as part of securing greater resilience for Taiwan’s electrical grid.

The main point: Taiwan’s electricity-intensive economy demands a world-class power system—which in turn will require both investment in grid upgrades and a re-embrace of reliable sources of electricity generation, such as nuclear power.

Notes

[1] Figures based on the author’s research.

[2] [Energiewende](#), or “energy transformation,” refers to Germany’s “planned transition to a low-carbon, nuclear-free economy.”

Wave Makers and Copycat Killer: How Taiwanese Productions are “Making Waves” and “Copying” Successful Strategies

By: Adrienne Wu

Adrienne Wu is a research associate at Global Taiwan Institute and the host of Taiwan Salon, GTI’s cultural policy and soft power podcast.

In the months since *Incantation* (咒, 2022) became [Netflix’s most-watched Taiwanese film](#), two other Taiwanese productions have broken through previously established barriers, clearly demonstrating the positive effects of the [memorandum of understanding \(MOU\)](#) between Netflix and the Taiwan Creative Content Agency (TAICCA, 文化內容策進院). The success of *Wave Makers* (人選之人—造浪者, 2023) in displaying Taiwanese politics has reignited [discussions](#) of whether Taiwanese media can show Chinese people living in the People’s Republic of China (PRC, 中華人民共和國) that democracy is a “viable alternative” to their current political system. At the same time, *Copycat Killer* (模仿犯, 2023) was the first Taiwanese TV show to make it into Netflix Global Top 10 (for non-English productions), making it [the first Taiwanese production after Incantation](#) to break out of the Chinese-speaking market. Taken together, these productions could potentially serve as a model for future efforts to export Taiwanese cultural projects, both within the Chinese-speaking world and beyond.

Can the Tail Wag the Dog?

The hope that Taiwan could influence China towards becoming more democratic is not new to discussions of cross-strait relations. In addition to comments such as former Vice President Mike Pence’s [statement](#) that “Taiwan’s embrace of democracy shows a better path for all the Chinese people,” many have noted Taiwan’s role as a “[beacon of democracy](#)” and its potential to be a model for [China’s transition to a fully-fledged democracy](#). In the 1970s, Taiwanese radio broadcasters [projected Teresa Teng’s \(鄧麗君\) songs](#) to China in the hope that Chinese soldiers would be swayed and even successfully convinced a pilot to defect. Late Academia Sinica Research Fellow Yun-han Chu (朱雲漢) noted in a [2011 article](#) that Taiwan’s cultural similarities with China, the Chinese public’s positive impressions of Taiwan, and numerous interactions between private actors demonstrate that Taiwan could use public diplomacy and soft power to influence China’s policies toward Taiwan—effectively becoming a tail that

could “[wag the dog](#).”



Image: Screenshots of Weibo posts discussing *Wave Makers* (English translation via Google translate). (Image source: Screenshots taken by the author)

Wave Makers is a character-centered show about Taiwanese politics, whose central characters are campaign staffers. By showing Taiwan’s democratic processes from such a close and personal perspective, it provides the viewer with a peek into the inner workings of Taiwanese democracy. Posts on Weibo praised the show, stating things [such as](#) “Mainland Chinese people should go and see what kind of progress the distant world has made, and what a normal social environment for conversation looks like” and “I can’t help but be envious of the Taiwanese people.”

A quick search of “人選之人” on Weibo shows users commending the show for its discussions of sexual harassment, comparing China and Taiwan, and noting Taiwan’s support for LGBTQ+ rights. Due to the show’s discussion of gender rights and the depiction of women in politics, [many fans of the show are likely well-educated, wealthy women](#). Additionally, *Wave Makers* might have resonated with viewers because it was released just six months after the “[white paper revolution](#),” a series of demonstrations protesting COVID-19 restrictions that some protestors used to voice criticisms of the government and political system. *Wave Makers* was [blocked in China](#), and [deleted from Douban](#) (a Chinese film site analogous to IMDB), and the show does not appear on the director’s Baidu, so it is surprising to see that it has not (yet) been blocked on Weibo. One user even stated that because the show was not on Douban, they wanted to watch it even more (as shown in the image).

Despite the buzz that *Wave Makers* generated on Weibo and from Taiwanese media and public figures—even Presi-

dent Tsai Ing-wen (蔡英文) [posted about the show on her social media](#)—the show itself fell short of previous rankings achieved by Taiwanese productions. In fact, the production only made it to [Netflix’s top 10 list](#) in two countries: Hong Kong (for one week) and Taiwan (for two weeks). This indicates that the show was unable to break out of the Chinese-speaking market in any significant way. Still, not every Taiwanese show needs to be geared toward a greater international audience. Furthermore, it is important to note that since [Netflix is not technically available in China](#), any viewership data from viewers in the PRC is completely unknown. Thus, while *Wave Makers* may have been comparatively unsuccessful by international viewing measures, the show could have had a greater—and potentially even more important—impact on Chinese audiences.

Yet, any impact that Taiwanese media can have remains hindered by the Chinese Communist Party’s (CCP, 中國共產黨) censorship practices. In Freedom House’s [2022 Freedom on the Net report](#), China was rated as “not free,” and only scored an Internet Freedom Score of 10 out of 100. In order to access content on websites such as Netflix, Chinese netizens have to [rely on virtual private networks \(VPNs\)](#) or [reposted content](#) on video hosting platforms such as [Bilibili](#). Moreover, Freedom House found that only [a minority of Chinese internet users use VPNs](#), and technological upgrades that [block data packets](#) are making it more difficult for even VPN users to access censored content. This is not to mention that these access restrictions come on top of other content restrictions—[reduced opportunities for Taiwanese representation, pressure to self-censor, and limited funding](#)—that inhibit Taiwanese productions.

Overall, the existence of *Wave Makers* on Netflix indicates that Taiwanese productions are finding ways to operate within restrictions on their creative content. In a past interview with Ketagalan Media, *Island Nation* (國際橋牌社, 2020) producer Isaac Wang (汪怡昕) discussed the difficulties of finding a platform that would stream the political drama, ultimately [stating](#) that “platforms are not necessarily afraid of hosting political shows. The real concern is the reality of Taiwan-China relations as it is presented.” When I reached out to *Wave Makers*’ production company, [DaMou Entertainment \(大慕影藝\)](#), to ask if the omission of Taiwan-China relations was an intentional choice, a company representative pointed out that the focus of the story was the lives of the campaign staff. Accordingly, they wanted to keep the story centered on those individuals. (They also noted that they did

not have much to say about the positive reception the show was receiving on Weibo, although they appreciated all positive reviews from around the world.)

In the end, an absence of cross-strait tensions in the show could have both positive and negative implications; while it could indicate that Taiwanese productions still need to be careful when addressing more politically sensitive topics, the result is a show that focuses more on the individuals, depicts [an idealized version of Taiwanese politics that is not permanently framed as “amid tensions,”](#) and perhaps is more palatable to Chinese viewers.



Image: A promotional graphic for the Taiwan crime drama *Copycat Killer*. (Image source: [Netflix](#))

Can Taiwan Be the Next South Korea?

After South Korea’s success in the global market with *Parasite* (2019) and *Squid Game* (2021), it is understandable that many observers of Taiwan see [South Korea as the model](#) for branding the nation on the international stage. As a result, experts often debate [whether South Korea’s government intervention has been effective](#) and which policies should be adopted—including [import quotas, screen quotas, and subsidies](#)—and what interventions are even viable in today’s globalized world. However, South Korea’s success has also been fueled by its willingness to embrace globalization and cultural hybridity.

In contrast to *Wave Makers*’ focus on domestic issues, *Copycat Killer*, Netflix’s newest mystery-thriller addition—alongside other Taiwanese shows such as *The Victims’ Game* (誰是被害者, 2020) and *Light the Night* (華燈初上, 2021)—represents a more globalized approach to Taiwanese productions. In addition to [being based on a Japanese novel](#), *Copycat Killer* also [features](#) American television writer Neal Baer, known for his work on *ER* and *Law & Order: SVU*. While the production company, directors, cast, and setting are Taiwanese, the strategy of drawing upon foreign skills in production

mimics South Korea's strategy of adopting Hollywood styles and skills in the service of creating unique local content with higher production value. [1] Isaac Wang made a similar observation at Taiwan NextGen Foundation's (台灣世代教育基金會) [Global Taipei Dialogue XII](#), pointing out that the South Korean film industry trained for 20 years by "[copying Hollywood's production model](#)."

In another move to embrace globalization, *Copycat Killer* also made sure to offer dubbing in multiple languages. At the time of its premiere, *Copycat Killer's* production company, Greener Grass Productions, had [seven different audio tracks available](#) (Chinese, English, Japanese, Thai, Indonesian, Spanish, and Brazilian Portuguese), [the first Taiwanese production](#) to do so. Producer Hank Tseng (曾瀚賢) credited the dubbing for the success of the show internationally, [stating](#) that "dubbing in multiple languages has overcome cultural differences, and resonated emotionally with viewers in different countries and markets." This could very likely be the case, as Netflix [revealed](#) that they found that US consumers that viewed an English-dubbed version of a French show by default were more likely to finish watching the show to the end.

Although [Copycat Killer's record of making it into the top 10 in 20 countries](#) falls short of [Incantation's peak of 29](#), the show was the first Taiwanese production to reach the top 10 in several countries. These included Bangladesh, Greece, Kuwait, Oman, Romania, Saudi Arabia, United Arab Emirates, and Uruguay. [2] In line with Greener Grass Productions' aim of capitalizing on this greater global interest, Tseng also announced the launch of a USD \$17.4 million media fund that would "[invest in up to 15 feature film and drama projects over the next three years](#)," with the long-term goal of giving Taiwan a competitive advantage when breaking into international markets.

Shifting focus away from Chinese-speaking markets gives Taiwanese productions [more freedom of expression](#). Even though Taiwanese creators may still face difficulties in the form of distributors or funders who are hesitant to upset Beijing, the restrictions are much looser than they would be if Taiwan was attempting to enter the Chinese market directly. Additionally, the greater outreach that Netflix provides could bring new international collaborators to Taiwan, which would further benefit the growth of the country's entertainment industry.

While creating content that appeals to a wider audience provides notable benefits, there also comes the danger

that [the origin of the productions or its endogenous qualities could become indistinguishable](#). As the Taiwanese industry matures, perhaps the successes of *Wave Makers* and *Copycat Killer* will set the stage for more productions that focus on Taiwan's democracy, while also appealing to a wider audience. In the meantime, productions such as *Wave Makers*, despite having a smaller reach, show the potential for Taiwan's creative content to influence PRC citizens and the Chinese diaspora, while *Copycat Killer's* success shows the potential for Taiwan's industry to grow beyond the Chinese-speaking market.

The main point: Despite the CCP's continued efforts to ramp up media and internet censorship, *Wave Makers* has reignited the hope that Taiwan can influence PRC citizens and the Chinese diaspora by showcasing democratic values in more character-centric political dramas. At the same time, *Copycat Killer* has embraced globalization in production by drawing on skills from talents abroad and prioritizing dubbing. Both productions represent notable achievements for Taiwanese productions—*Wave Makers* for bringing a modern political drama to an international streaming platform, and *Copycat Killer* for successfully breaking out of the Chinese-speaking market.

Notes

[1] Dal Yong Jin, "Cultural Globalization in Korean Cinema," in *New Korean Wave: Transnational Cultural Power in the Age of Social Media* (Chicago: University of Illinois Press, 2016): 68–90.

[2] Based on [data made available by Netflix](#), the full list of countries in which *Copycat Killer* made the top 10 (non-English productions) are: Bahrain, Bangladesh, Greece, Hong Kong, Indonesia, Japan, Kuwait, Malaysia, Maldives, Oman, Philippines, Qatar, Romania, Saudi Arabia, Singapore, Taiwan, Thailand, United Arab Emirates, Uruguay, and Vietnam.