

This is Exhibit # 2  
In CONO vs. Natasha Turner  
(DC20-02) Date: October 29, 2021

**DISCIPLINE COMMITTEE OF  
THE COLLEGE OF NATUROPATHS OF ONTARIO**

B E T W E E N:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER

**AGREED STATEMENT OF FACTS AND ADMISSION OF PROFESSIONAL MISCONDUCT**

The parties hereby agree that the following facts and attachments may be accepted as true by the Discipline Committee of the College of Naturopaths of Ontario (the "College"):

**The Registrant**

1. Dr. Natasha Turner, ND (the "Registrant") registered with the Board of Directors of Drugless Therapy – Naturopathy on or about October 28, 1999. The Registrant then became registered with the College of Naturopaths of Ontario (the "College") on July 1, 2015. Attached as **Tab "A"** is a printout from the College's Naturopathic Doctor Register.
2. At the relevant times, the Registrant owned and worked at Clear Medicine and was responsible for the website [www.drnatashaturner.com](http://www.drnatashaturner.com) (the "website").

**Advertising protection against and treatment of COVID-19**

3. As of March 1, 2020, Canada and the province of Ontario were responding to the evolving COVID-19 pandemic. It is agreed that, at all material times, there was no known cure to COVID-19 and/or immunization to COVID-19.
4. On or about March 24, 2020, the College received a complaint that the Registrant was promoting an immune boosting kit to help prevent and protect individuals from COVID-19.

Attached at **Tab “B”** are excerpts of the Registrant’s website.

5. It is agreed that the Registrant posted and/or permitted to be posted the following information on her website (see Tab “B”):

“We are also providing an immune boost kit found on shop.drnatashaturner.com. Dr. Turner, ND created a researched based selection of products that can help to protect you from the virus and also to be taken in higher doses should you test positive.”

6. It is agreed that the information identified in paragraph 5 remained on the Registrant’s website from on or about March 14, 2020 until March 25, 2020.
7. It is agreed that the Registrant posted and/or permitted to be posted the following information on her website about the alleged benefits of the “immune boost kits” (see Tab “B”):

“COVID-19 Prevention Build-Your-Own Kit (Science-Based) 1-2 months’ supply – Recommend 3 months

✓ Aids In Immune Function

✓ Provides Antioxidant Activity

✓ Provides Natural Antiviral Support Due To The Olive Leaf Extract In The Clear Immune Essential

✓ Can Protect Against The COVID-19 Virus Due To Immune And Antiviral Support

✓ Suggested For Use During The Pandemic

✓ Can Help To Treat The Symptoms Should An Infection Arise.

✓ Safe For Use For Men And Women. If You Are Taking Immuno-Suppressive Drugs Contact Your Medical Professional

✓ Exception For Those Who Are Immune Compromised Or HIV Positive.”

8. It is agreed that the information identified in paragraph 7 remained on the Registrant’s website from on or about March 14, 2020 until March 25, 2020, and that sales of the “immune boost kits” remained active during that time.
9. It is agreed that between March 14, 2020 and March 25, 2020, the Registrant sold approximately 5 of the “immune boost kits” through Clear Medicine.

10. It is agreed that the “immune boost kits” are a substance and that the Registrant sold them for an improper purpose.
11. It is agreed that the information identified in paragraphs 5 and 7 above:
  - a. is not accurate, verifiable, comprehensible or professionally appropriate;
  - b. appeals to the public’s fears about COVID-19;
  - c. is unnecessary and ineffective; and
  - d. cannot be supported as reasonable professional opinion.
12. It is agreed that the treatment of COVID-19 is beyond the Registrant’s knowledge, skill or judgment.
13. It is further agreed that the Registrant acted in a conflict of interest by engaging in advertising that could improperly influence her professional judgement and duty to act in the best interest of her patients.

#### **Confirmation to the College’s CEO**

14. On or about March 25, 2020, the Chief Executive Officer of the College (the “CEO”) wrote a letter to the Registrant, a copy of which is attached as **Tab “C”**, and requested that she do the following:
  - a. immediately cease and desist any advertising related to the COVID-19 pandemic; and
  - b. sign a confirmation that she read and understood the letter, and had ceased advertising and making public statements about the prevention and/or treatment of COVID-19.
15. On or about March 26, 2020, the Registrant returned the signed confirmation to the College. Attached at **Tab “D”** is a copy of the signed confirmation.

#### **Prior History**

16. The Registrant has a prior history with the College, which included concerns with the

Registrant's compliance with the Advertising Standards and Guidelines. On November 2, 2017, the Inquiries, Complaints and Reports Committee ("ICRC") of the College considered concerns that the Registrant was performing a controlled act that she was not authorized to perform, that the Registrant contravened the standards of the profession and that the Registrant used or permitted the use of a testimonial from a patient, former patient or other person in respect of the Registrant's practice in her advertising. The ICRC ordered the Registrant to complete a SCERP, including requiring the Registrant to review the Advertising and Conflict of Interest Standards, complete a report of 750-1000 words providing an analysis of her online presence, and her compliance with the standards and guidelines. The ICRC also ordered the Registrant to attend for an oral caution.

### **Admissions of Professional Misconduct**

17. It is agreed that the above-noted conduct constitutes professional misconduct pursuant to section 51(1)(c) of the Health Professions Procedural Code, being Schedule 2 to the *Regulated Health Professions Act, 1991* (the "Code"), as set out in the following paragraphs of section 1 of Ontario Regulation 17/14 made under the *Naturopathy Act, 2007*:
- a. **Paragraph 1** – Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, including but not limited to the following:
    - i. Advertising standard of practice (attached as **Tab "E"**);
    - ii. Scope of Practice standard of practice (attached as **Tab "F"**) and
    - iii. Conflict of Interest standard of practice (attached as **Tab "G"**);
  - b. **Paragraph 7** – Recommending or providing treatment that the Registrant knows or ought to know is unnecessary or ineffective;
  - c. **Paragraph 8** – Providing or attempting to provide services or treatment that the Registrant knows or ought to know to be beyond the Registrant's knowledge, skill or judgment;

- d. **Paragraph 14** – Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose;
- e. **Paragraph 17** – Acting in a conflict of interest when acting in a professional capacity;
- f. **Paragraph 26** – Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion; and
- g. **Paragraph 46** – Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by Registrants as unprofessional.

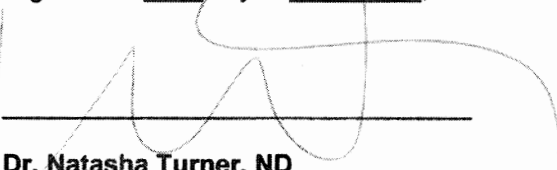
### **Acknowledgement**


18. By this document, the Registrant states that:

- a. She understands fully the nature of the allegations made against her;
- b. She has no questions with respect to the allegations against her;
- c. She admits to the truth of the facts contained in this Agreed Statement of Facts and that the admitted facts constitute professional misconduct;
- d. She understands that by signing this document she is consenting to the evidence as set out in the Agreed Statement of Facts being presented to the Discipline Committee;
- e. She understands that by admitting the allegations, she is waiving her right to require the College to prove the allegations against her at a contested hearing;
- f. She understands that the decision of the Committee and a summary of its reasons, including reference to her name, will be published in the College's annual report and any other publication or website of the College;
- g. She understands that any agreement between her and the College with respect to the penalty proposed does not bind the Discipline Committee; and

h. She understands and acknowledges that she is executing this document voluntarily, unequivocally, free of duress, and free of bribe and that she has been advised of her right to seek legal advice.

All of which is respectfully submitted.

Sept 29 2021  
Signed this \_\_\_\_\_ day of \_\_\_\_\_, 2021  
  
\_\_\_\_\_  
**Dr. Natasha Turner, ND**  
Registrant

Signed this 1st day of October, 2021  
  
\_\_\_\_\_  
**Andrew Parr, CAE**  
Chief Executive Officer  
College of Naturopaths of Ontario

# TAB A




The College of Naturopaths of Ontario

FRANÇAIS CART

## Public Register of Ontario Naturopaths

[Return to Search Page](#)

### Member Details

Name:	Dr. Natasha Sepherha Turner, ND	
Nickname or Abbreviation:	None	
Date Of Registration:	Oct 28, 1999	
Registration #:	0894	
Current Status:	In Good Standing	
Class of Registration:	General Class	
Previous First Name:	None	
Previous Last Name:	None	

### Registration History

Registrant Class	Status	Effective Date	Notes
General Class	In Good Standing	Oct 28, 1999	Date of initial registration with the BDDT-N

### Extended Services

Additional Standards of Practice	Qualified	Effective Date	Notes
Therapeutic Prescribing is a post-registration Standard of Practice. NDs who wish to prescribe, dispense, compound, sell, or administer by injection or inhalation the restricted	No		



substances available to Ontario NDs under the College's General Regulation must first meet this Standard of Practice. NDs who do not wish to access these substances or perform these controlled acts are not required to meet this Standard.			
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<b>Additional Standards of Practice</b>	<b>Qualified</b>	<b>Effective Date</b>	<b>Notes</b>
The Standard of Practice for Intravenous Infusion Therapy (IVIT) is a post-registration Standard of Practice. NDs who wish to administer substances intravenously for therapeutic benefit, must first meet this Standard of Practice and the Standard of Practice for Therapeutic Prescribing. NDs who do not wish to administer substances intravenously are not required to meet this Standard.	No		

#### **Terms, Conditions And Limitations**

<b>Effective Date</b>	<b>Expiry Date</b>	<b>Type Of Conditions</b>	<b>Notes</b>
No Data Found			

#### **Employment Information**

<b>Employer</b>	<b>Address</b>	<b>City</b>	<b>Province</b>	<b>Country</b>	<b>Postal Code</b>	<b>Phone</b>
Clear Medicine	123 Dupont Street	Toronto	ON	CAN	M5R 1V4	(416) 579-9105

#### **Professional Corporation**

#### **Inquiries, Complaints, And Reports Committee Referrals**

#### **Inquiries Complaints And Reports Committee - Outcomes**

#### **Findings**

## Employment Information

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### Professional Corporation

Corporation Name	Shareholder Position	Date
No Company Found		

### Inquiries, Complaints, And Reports Committee Referrals

### Inquiries Complaints And Reports Committee - Outcomes

### Findings

Professional Corporation

Inquiries, Complaints, And Reports Committee Referrals

Allegations:	<p><b>STATEMENT OF SPECIFIED ALLEGATIONS</b></p> <p><b>The Registrant</b></p> <p>1. Dr. Natasha Turner, ND (the “Registrant”) registered with the Board of Directors of Drugless Therapy – Naturopathy on or about October 28, 1999. The Registrant then became registered with the College of Naturopaths of Ontario (the “College”) on July 1, 2015.</p> <p><b>Advertising protection against and treatment of COVID-19</b></p>
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2. As of March 1, 2020 Ontario and Canada were responding to the evolving COVID-19 pandemic.
3. As of March 1, 2020 there was no known cure to COVID-19 and/or immunization to COVID-19.
4. On or around March 23, 2020 the Registrant posted or permitted to be posted the following information on the website, [www.drnatashaturner.com](http://www.drnatashaturner.com):
  - a. “We are also providing an immune boost kit found on [shop.drnatashaturner.com](http://shop.drnatashaturner.com). Dr. Turner, ND created a researched based selection of products that can help to protect you from the virus and also to be taken in higher doses should you test positive.”
5. On or around March 23, 2020 the Registrant posted or permitted to be posted the following information on the website, [www.drnatashaturner.com](http://www.drnatashaturner.com) about the benefits of the immune boost kit:

COVID-19 Prevention Build-Your-Own Kit (Science-Based) 1-2 months supply  
– Recommend 3 months

- a. Aids In Immune Function
- b. Provides Antioxidant Activity
- c. Provides Natural Antiviral Support Due To The Olive Leaf Extract In The Clear Immune Essential
- d. Can Protect Against The COVID-19 Virus Due To Immune And Antiviral Support
- e. Suggested For Use During The Pandemic
- f. Can Help To Treat The Symptoms Should An Infection Arise
- g. Safe For Use For Men And Women. If You Are Taking Immuno-Suppressive Drugs Contact Your Medical Professional
- h. Exception For Those Who Are Immune Compromised Or HIV Positive

### **Acts of Professional Misconduct**

6. It is alleged that the above noted conduct constitutes professional misconduct pursuant to section 51(1)(c) of the *Health Professions Procedural Code*, being Schedule 2 to the *Regulated Health Professions Act, 1991* (the “Code”) as set out in one or more of the following paragraphs of section 1 of Ontario Regulation 17/14 made under the *Naturopathy Act, 2007*:

- a. **Paragraph 1** – Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, including but not limited to the following:
  - i. Advertising standard of practice; and/or
  - ii. Conflict of Interest standard of practice;
- b. **Paragraph 7** – Recommending or providing treatment that the member knows or ought to know is unnecessary or ineffective;
- c. **Paragraph 8** – Providing or attempting to provide services or treatment that the member knows or ought to know to be beyond the member’s knowledge, skill or judgment;

- d. **Paragraph 14** – Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose;
- e. **Paragraph 17** – Acting in a conflict of interest when acting in a professional capacity;
- f. **Paragraph 26** – Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion; and/or
- g. **Paragraph 46** – Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional.

Referred To:	Discipline Committee
Referral Date:	Sep 10, 2020
Hearing Dates:	
Notice of Hearing:	<a href="#">DC20-02 - Turner Notice of Hearing.pdf</a>

*The ICRC may refer specified allegations of professional misconduct or incompetence to the Discipline Committee and matters of incapacity to the Fitness to Practice Committee. The ICRC cannot make any findings, therefore no allegations have been proven and no findings have been made. Findings of professional misconduct or incompetence can only be made by the Discipline Committee. Findings of incapacity can only be made by the Fitness to Practice Committee.*

### **Inquiries Complaints And Reports Committee - Outcomes**

#### **Findings**

#### **Member Reported And Other Findings**

#### **Registrar's Notation**

## **Public**

**Professional Corporation****Inquiries, Complaints, And Reports Committee Referrals****Inquiries Complaints And Reports Committee - Outcomes**

<b>Outcomes</b>	<b>Effective Date</b>	<b>Regulator</b>	<b>Details</b>
Specified Continuing Education and Remediation Program (SCERP)	Nov 02, 2017	College of Naturopaths of Ontario	On November 2, 2017, a panel of the Inquiries, Complaint and Reports Committee (ICRC) of the College determined that the Member shall review the Standards of Practice for Advertising, Conflict of Interest

<p>SCERP completed on February 14, 2018</p>			<p>and Restricted Titles, as well as the Practice Guidelines for Advertising and Conflict of Interest, and, within 45 days of the date of the Decision, deliver to the Registrar a report of 750 - 1000 words acceptable to the Registrar, providing a detailed analysis of her online presence, including her professional websites, online publications and television appearances, in terms of her current and future compliance with the aforementioned standards and guidelines.</p>
<p>Appearance for a Caution</p>	<p>Nov 02, 2017</p>	<p>College of Naturopaths of Ontario</p>	<p>On March 1, 2018, the Member attended before a panel of the Inquiries, Complaints and Reports Committee to be cautioned.</p> <p>At the outset, the Panel noted that the Member's website indicated that the Member was trained in bio-identical hormone replacement and that she was able to prescribe this form of treatment prior to having met the Standard of Practice for Prescribing. The Member was reminded that the Prescribing course and exam are required by the College in order to ensure that appropriate knowledge, skill and judgment exist with regards to therapeutic prescribing. The Panel cautioned the Member that having BHRT training did not permit her to prescribe drugs or substances and that her failure to comply with this statutory requirement might have put her patients at risk.</p> <p>The Panel further outlined its concerns with respect to the Member's advertising, which included issues with testimonials, prescribing, conflict of interest as well as use of restricted titles.</p> <p>The Panel acknowledged that the Member had taken steps to amend her advertising in order to comply with the professional standards. Nevertheless, as the Member's website appeared to continue to advertise brand name products to the public, she was cautioned that endorsing products is in contravention of the College's Advertising Standard, and may also be perceived as a conflict of interest, regardless of whether or</p>

not the products were designed or formulated by the Member.

It was also concerning to the Panel that the Member appeared to advertise product kits, sell drugs or substances and recommend non-scheduled substances outside the context of the naturopathic doctor-patient relationship. The Panel reinforced with the Member that naturopaths in Ontario are only able to recommend or sell a compounded drug or substance to their patients within the context of the naturopathic doctor-patient relationship. In addition, members are expected to conduct a thorough assessment of the patient, to monitor and document the patient's response to the therapy and any adverse reactions, and adjust dosage or discontinue the therapy as appropriate.

The Panel further outlined its concerns with regard to the Member's billing practices. The Member was reminded that block fees are not available to naturopaths in Ontario and that issuing an invoice, bill or receipt that the Member knows or ought to know is false or misleading is an act of professional misconduct under the Naturopathy Act.

In conclusion, the Panel noted that should the Member commit similar or analogous conduct, the Panel will have no choice but to take stronger action, including a referral to the discipline committee.

## Findings

## Member Reported And Other Findings

## Registrar's Notation

## Public



## Employment Information

## Professional Corporation

## Inquiries, Complaints, And Reports Committee Referrals

## Inquiries Complaints And Reports Committee - Outcomes

## Findings

No Data Found

## Member Reported And Other Findings

## Employment Information

## Professional Corporation

## Inquiries, Complaints, And Reports Committee Referrals

## Inquiries Complaints And Reports Committee - Outcomes

## Findings

## Member Reported And Other Findings

No Data Found

No Data Found

## Public

### Overview

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### COVID-19

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### The College and You

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### About NDs

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### Complaints and Reports

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### Discipline

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### Fitness to Practise

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### Patient Rights

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### The Public Register

#### About the Register

#### ND Register

#### Corporations Register

#### IVIT Premises Register

#### Unauthorized Practitioners

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### Preventing Sexual Abuse

### About Naturopaths

### Find a Naturopath

### Complaints & Reports

### Preventing Sexual Abuse

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## CONTACT US


150 John Street, 10th Floor  
Toronto, Ontario, M5V 3E3  
Tel. 416.583.6010  
Toll Free: 1.877.361.1925  
Fax. 416.583.6011

**TAB B**

[HOME](#) > [SUPPLEMENTS FOR CONDITIONS](#) > [IMMUNE SUPPORT](#)  
> [COVID-19 PREVENTION BUILD-YOUR-OWN KIT \(SCIENCE - BASED\) 1- 2 MONTHS SUPPLY - RECOMMEND 3 MONTHS](#)

-  **ALL CATEGORIES**
- [SALES 10-25% OFF](#)
- [New Arrivals](#)
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- [Supplements For Conditions](#) >
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- [Detox](#) >
- [Digestive Health](#) >
- [Exercise & Fitness](#) >
- [Protein & Foods](#) >
- [Plant-Based Hormone Diet](#) >
- [Vitamins & Minerals](#) >
- [Anti-Aging & Natural Skincare](#) >
- [Dr. Natasha Turner ND's Books](#)

**DR NATASHA TURNER ND**



MEET DR. TURNER ND

**ABOUT DR TURNER ND**

Dr. Natasha Turner ND a New York Times bestselling author and one of North America's leading naturopathic doctors, a sought-after speaker, natural health expert and the founder of Clear Medicine Naturopathic Clinic in Toronto

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CAD ▾

≡ SIDEBAR



🔍 Click to zoom in



## COVID-19 Prevention Build-Your-Own Kit (Science - Based) 1- 2 months supply - Recommend 3 months

☆☆☆☆☆ Write a review

CAD \$254.04

Would you like to add Clear C Boost (1 month supply) to your kit?: Required

Choose Options

Would you like to add Clear D3 Drops (2 month supply) to your kit?: Required

Choose Options

Would you like to add Clear Flora (Shelf-Stable) (1 month supply) to your kit?: Required

Choose Options

Would you like to add Clear Zinc 30 (2 month supply) to your kit?: Required

Choose Options

Would you like to add Clear Greens (1 month supply) to your kit?: Required

Choose Options

Would you like to add Clear Immune Essential (22 days supply) to your kit?: Required

Choose Options

Would you like to add Quercetin + Nettles (1 month supply) to your kit?: Required

Choose Options

Quantity:

1 ▲ ▼

Add to Cart

Add to Wish List ▾

### 4 GREAT REASONS TO BUY FROM US:



#### DESCRIPTION

### Kit Benefits:

- ✓ Aids In Immune Function
- ✓ Provides Antioxidant Activity
- ✓ Provides Natural Antiviral Support Due To The Olive Leaf Extract In The Clear Immune Essential
- ✓ Can Protect Against The COVID-19 Virus Due To Immune And Antiviral Support
- ✓ Suggested For Use During The Pandemic
- ✓ Can Help To Treat The Symptoms Should An Infection Arise.
- ✓ Safe For Use For Men And Women. If You Are Taking Immuno-Suppressive Drugs Contact Your Medical Professional
- ✓ Exception For Those Who Are Immune Compromised Or HIV Positive.

### Medical Studies:

This [Maclean's article](#) highlights the use of Quercetin supplementation as one of the possible treatments for COVID-19.

The [benefits of vitamin D](#) are outlined in this for the benefits of immune support.

For the [benefits of zinc](#) the article is very beneficial



CAD ▾

[Vitamin C](#) is a practical tip to provide immune support

The Clear Immune essentials is a phenomenal product because it contains [plant phytosterols](#) that strengthen immune and olive leaf extract that is a natural antiviral. It can be used for prevention

## Bulk Pricing:

Save 10 % if you purchase 3 or more kits. You may need to add more of an individual item depending on how long you would like to take it for.

See the bolded notes below to know how long each bottle will last you.

## Ingredients:

**Clear C-Boost:** Per capsule: Vitamin C (from Calcium ascorbate, Magnesium ascorbate, and Potassium ascorbate) 750mg, Calcium (from Calcium ascorbate) 65mg, Black Pepper Extract (95% piperine)(BioPerine®) 7.5mg

Recommended Dose: 2 capsules 3 times per day. If you get symptoms increase the dose to every few hours.

**For 3 months supply order 3 bottles.**

Contraindications: Consult a health care practitioner prior to use if you are pregnant, breastfeeding, or if you are taking any other medications or natural health care products, as black pepper may alter their effectiveness

**Clear D3 Drops:** Per drop: Vitamin D3 (as Cholecalciferol) 1000IU

Recommended Dose: 5 drops per day. If you get symptoms increase the dose.

**For 4 months supply order 2 bottles.**

Contraindications: Consult your healthcare practitioner prior to use. Individuals taking medication should discuss potential interactions with their healthcare practitioner. Do not use if tamper seal is damaged.

**Clear Flora:** Per capsule: Lactobacillus acidophilus 14.4 billion, Lactobacillus Plantarum 0.3 billion, Bifidobacterium longum 0.3 billion per capsule

Recommended Dose: 1 capsule on rising.

**For 3 months supply order 3 boxes..**

Contraindications: None known at time of publication

**Clear Zinc 30:** Per Capsule: Vitamin B2 - 5mg; Vitamin B6 - 50 mg; Zinc glycinate chelate - 30 mg; Molybdenum glycinate chelate - 250 mcg; Taurine - 400mg; Malic acid - 30mg

Recommended Dose: 1 capsule at bed.

**For 4 months supply order 2 bottles.**

**Clear Greens:** Per 1.5 scoops: Lecithin 2500mg; Spirulina (speciality grade) 1500mg; Broccoli Powder 1000mg; Parsley Leaf Powder 1000mg; Barley Grass Juice 600mg; Wheat Grass 600mg; Chlorella 500mg; SunFiber® (partially hydrolyzed Guar Gum) 500mg; Red Beet Root 500mg; Rose Hips 500mg; Beta Berries™ Antioxidant Blend 300mg; Dandelion Root 4:1 200mg; Quercetin 150mg; Carrot Powder 100mg; Ginger Root 100mg; Grapeseed Extract 95% 100mg; Nettles 1% 100mg; Spinach Powder 100mg; Burdock Root 50mg; Biocore® Optimum Enzymes 20mg

Recommended Dose: 1 serving per day.

**Order 3 bottles for 3 months supply.**

Contraindications: Consult a health care practitioner prior to use if you are taking prescription medication, as resveratrol may alter the effectiveness of these medications. Consult a health care practitioner prior to use if you have diabetes, a gastrointestinal lesion/ulcer, are taking an anticoagulant/blood thinner or anti-inflammatory, or are having surgery. Do not use if you are pregnant or breastfeeding, or if you have celiac disease.

**Clear Immune Essential:** Per capsule: Vitamin C (ascorbic acid) 333.3mg; Olive leaf (Olea europaea, Leaf) (20% Oleuropein) 333.3mg; Beta (1.3/1.6) - Glucan (Saccharomyces cerevisiae -whole) 62.5mg

Recommended Dose: 2 capsules twice per day. If you develop symptoms increase the dose to 3 caps twice daily.

**For three months supply order 4 bottles.**

Contraindications: Consult a health care practitioner prior to use if you are pregnant or breastfeeding.

**Quercetin + Nettles:** Per capsule: Quercetin 200mg; Nettle (Urtica dioica) (1% Silicic acid, 12:1) 200mg

Recommended Dose: Take 3 capsules per day with meals.

**For three months supply order 3 bottles.**

Contraindications: Consult a health care practitioner if symptoms persist or worsen. Do not use if you are pregnant or breastfeeding.

## Other top rated products



Clear Detox - Hormonal ...  
★★★★★(5)



Dream Protein (720g)  
★★★★★(6)



Clear Nova Scotia Marine...  
★★★★★(4)



Pure Form Omega - Org...  
★★★★★(2)



Clear Detox - Dig...  
★★★★★(1)

Powered by YOT

☆☆☆☆☆

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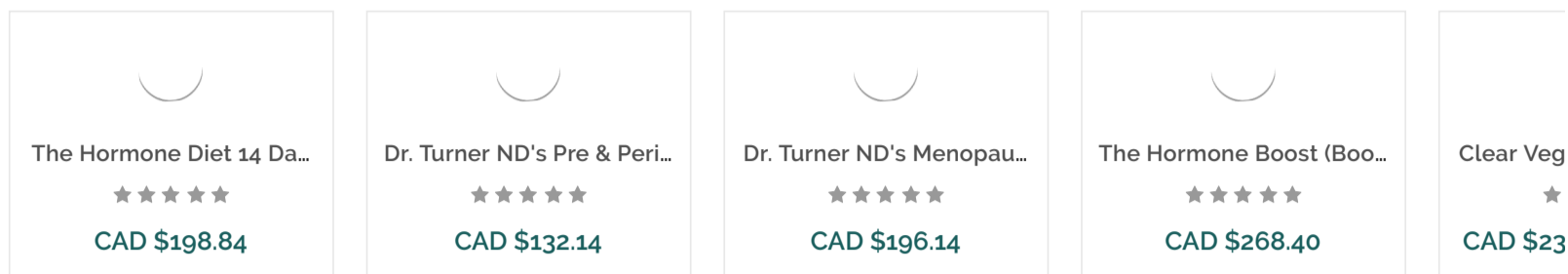
CAD



BE THE FIRST TO WRITE A REVIEW

## RELATED PRODUCTS

## CUSTOMERS ALSO VIEWED



## DELIVERY

Minimum Purchase \$250



## CONVENIENT

Visa &amp; Mastercard



## EXCELLENT SERVICE

A perfect gift

## DR. NATASHA TURNER ND

- > [CM Patients](#)
- > [Shipping & Returns](#)
- > [Customer Service](#)
- > [Terms & Conditions](#)
- > [Payments](#)
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## CLEAR MEDICINE CLINIC

- > [Clear Medicine](#)
- > [Biophora](#)
- > [Mediherb](#)
- > [Designs For Health](#)
- > [Love Fresh](#)
- > [View All](#)

## ALL CATEGORIES

- > [SALES 10-25% OFF](#)
- > [New Arrivals](#)
- > [Hormonal Health](#)
- > [Supplements For Conditions](#)
- > [Treatment-Specific Kits](#)
- > [View All](#)

## GET TO KNOW US BETTER



Addresses : Clear Medicine Clinic  
123 Dupont St.  
Toronto Ontario, M5R 1V4



Call us now : Call us at 416 579 9105



Email : [orders@clearmedicine.com](mailto:orders@clearmedicine.com)



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★★★★★ 107 Reviews < >

★★★★★ 02/23/20

#### Hormone cleanse



*Best cleanse support ever!!! I have been an avid hormone cleanser using this product for years! Dr Turners book the Super Charged ...*

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Nicole C.

★★★★★ 12/28/19

#### Dream Protein,Clear Collagen, Clear Complete and B-Up ...



Clear Nova Scotia Marine Collagen + C

*All these products are very high quality . All taste very good but am getting addicted to the chocolate chip cookie dough B-up bar...*

[Read More](#)

Lynne M.

★★★★★ 02/17/20

#### Detox Hormonal Health



*I have been taking this for almost two weeks. Noticed that I did get a headache the first few days like I do when I do a detox so ...*

[Read More](#)

Leanne S.

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be kind. look good. feel *even* better.™

Mar 18, 2020 / COVID-19 (<https://clearmedicine.com/category/covid-19/>)

Dr. Turner ND and the Clear Medicine Team COVID-19 Update

We are exercising caution during COVID-19

As of March 17, 2020 Clear Medicine remains open but to encourage social distancing and to help those that are self isolating we will be completing all patient appointments virtually or by phone only.

Those of you that would like to purchase supplements we are still open however we invite you to read the information below.

March 14, 2020

Clear Medicine is committed to the safety and well being of all of patients and clients. It is important that all of us work together to protect ourselves and our community from potential illness. We are committed to providing a safe place for supportive health care, particularly in a time of high stress and anxiety.

We continue to monitor COVID-19 developments closely and are following the guidance of Canadian health officials. We will continue to update our protocol should new information become available.

To protect the health of our patients, clients, staff and practitioners, effective immediately, we require all clients and visitors to complete a health self-assessment before entry into the clinic.

IF

You have a fever and/flu like symptoms or the new onset of a cough or difficulty breathing

OR

In the last 14 days you have:

- Been to a COVID-19 impacted area
- You have been in close contact with a confirmed or probable case of COVID-19
- You have been in close contact with a person with acute respiratory illness who has been to a COVID-19 impacted area

DO NOT COME TO CLINIC for appointments, or to purchase supplements, however we can accommodate you in the following ways;

- Book a phone appointment with your practitioner (Naturopath/Nutritionist) or Facetime
- We will reschedule your manual treatments (Osteopath/Pelvic Floor) to later date and waive the cancellation fee.
- Ship your supplements, with a reduced fee of \$7 down from a minimum of \$12 for phone orders (within Ontario)
- Regarding the current Bootcamp, Dr T will be teaching it in person this coming week and the next for classes 4 and 5, but if you do not want to attend within the clinic we can arrange Zoom conferencing in.

Clear Medicine does not treat Covid-19

If you suspect you have contracted the illness please call;

Telehealth Ontario (1-866-797-0000) and follow the instructions provided.

It is important to emphasize that we cannot diagnose or treat COVID-19 at Clear Medicine. Telehealth will direct you. It is important that potential cases are screened over the phone to ensure those affected are supported and guided to the correct health resources while limiting contact to others.

The top questions we are receiving from clients:

1. What should I do if I am not well but I would like to consult with Clear Medicine on my health and well being?

- You may access your regular appointments with your Naturopathic Doctor or nutritionist via phone.
- Supplements can be ordered online and shipped directly to your home,
- Through [shop.drnatashaturner.com](https://shop.drnatashaturner.com) Dr. Turner also created a COV-19 kit (<https://click.icptrack.com/icp/relay.php?r=&msgid=1192228&act=111111&c=371327&destination=https%3A%2F%2Fshop.drnatashaturner.com%2F covid-19-prevention-build-your-own-kit-science-based-1-2-months-supply-recommend-3-months%2F>) to help prevent you from getting the illness based on her research.
- Your Osteopath/pelvic floor or other hands-on therapy can be rescheduled to a later date without fee or penalty.

## 2. How can I best prepare and strengthen my immune system?

Your Naturopathic Doctor can help you support your immune system and strengthen your overall health and resilience to infection. Most people will recover on their own from COVID-19, particularly if they are in good health. We are also providing an immune boost kit found on [shop.drnatashaturner.com](http://shop.drnatashaturner.com)

([https://click.icptrack.com/icp/relay.php?](https://click.icptrack.com/icp/relay.php?r=&msgid=1192228&act=1111111&c=371327&destination=http%3A%2F%2Fwww.shop.drnatashaturner.com%2F)

[r=&msgid=1192228&act=1111111&c=371327&destination=http%3A%2F%2Fwww.shop.drnatashaturner.com%2F](https://click.icptrack.com/icp/relay.php?r=&msgid=1192228&act=1111111&c=371327&destination=http%3A%2F%2Fwww.shop.drnatashaturner.com%2F)). Dr. Turner ND created a researched based selection of products that can help to protect you from the virus and also be taken in higher doses should you test positive. The research studies are posted with the COVID-19 Kit

([https://click.icptrack.com/icp/relay.php?](https://click.icptrack.com/icp/relay.php?r=&msgid=1192228&act=1111111&c=371327&destination=https%3A%2F%2Fshop.drnatashaturner.com%2F)

[r=&msgid=1192228&act=1111111&c=371327&destination=https%3A%2F%2Fshop.drnatashaturner.com%2F](https://click.icptrack.com/icp/relay.php?r=&msgid=1192228&act=1111111&c=371327&destination=https%3A%2F%2Fshop.drnatashaturner.com%2F) covid-19-prevention-build-your-own-kit-science-based-1-2-months-supply-recommend-3-months%2F) which you can customize to your own needs. I also suggest zinc lozenges (they appear to help reduce the respiratory symptoms), which can be used in conjunction to the zinc 50 recommended at night which also contains 300mg of fat-soluble vitamin c.

Naturopathic care may include:

- Helping you to choose the right professional-grade supplements that will support your immune system
- Optimizing your sleep and recovery so that your immune system can do its job.
- Reducing your stress to improve your immune response.
- Supporting your digestive system so that your barrier defenses are strong.
- Optimize your nutrition so that your body has everything it needs to fight illness.

## 3. What can I do if I am feeling overwhelmed and anxious?

Anxiety is a normal response to the increased stress in our community. Many are expressing fears around the unknown, including financial and work-related stresses as Toronto prepares. Your Naturopathic Doctor can also help you refer you to services and support if you are in a high-risk or are feeling run down due to stress and anxiety.

For mood and anxiety, exercise every 48 hours is essential. If further apart it will not help your mood

## 4. How is Clear Medicine ensuring safety

- We use professional protective supplies, including, masks, gloves, hand sanitizer, and medical-grade disinfecting wipes.
- We are controlling access to the clinic by requiring self-assessments and offering phone appointments to those who need or want it.
- We are limiting staff in the office and advising anyone with cold/flu symptoms to stay home until full recovery

Your health is our highest priority. The team at the Integrative Health Institute is taking all appropriate measures to prepare for and mitigate the risk of contracting the virus.

Thank you for your continued support. Be safe and be well.

To schedule a phone appointment or make changes to your appointment please visit our booking site. <https://clearmedicine.janeapp.com/> ([https://click.icptrack.com/icp/relay.php?](https://click.icptrack.com/icp/relay.php?r=&msgid=1192228&act=1111111&c=371327&destination=https%3A%2F%2Fclearmedicine.janeapp.com%2F)

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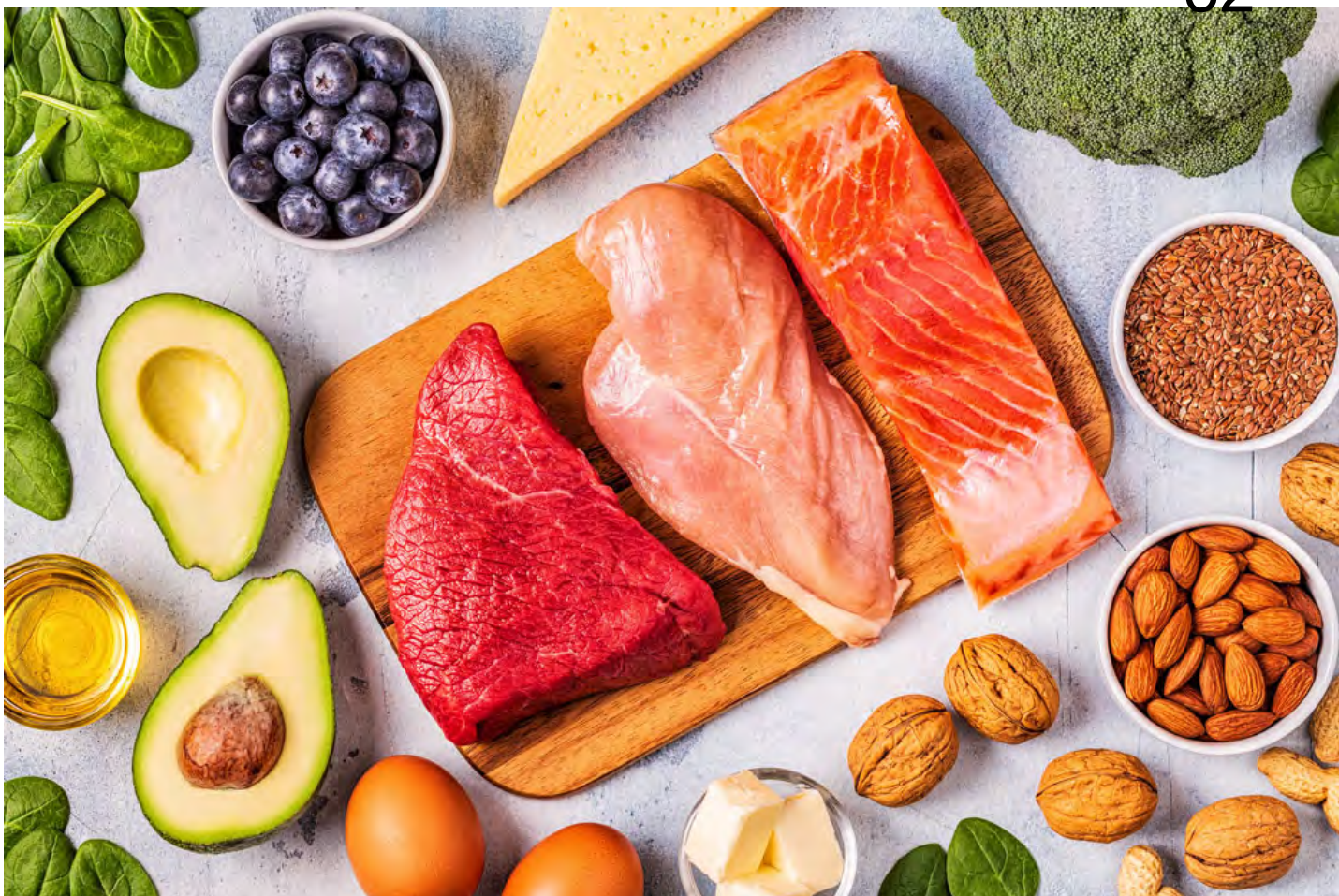
**Our IV Nutrient Therapy Lounge is now open!**

Read More (<https://clearmedicine.com/8423-2/>)



**Why do we need supplements?**

Read More (<https://clearmedicine.com/why-do-we-need-supplements/>)



### Dr. Turner ND's Five Week Metabolic Reset – Week Four

Read More (<https://clearmedicine.com/protein-power-its-thermic-benefits/>)

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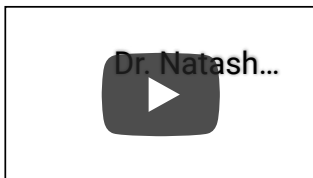
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4.3 Rating 40 Reviews

Book An Appointment Now!



Mar 7, 2020

**Kelly Wall**



Natasha is excellent!



Feb 12, 2020

**Stella Colagiacom**



The staff and Dr. Khoury are so amazing



Jan 27, 2020

**Nora Taylor**

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**TAB C**

March 25, 2020

Dr. Natasha Sepherha Turner, ND  
Clear Medicine  
123 Dupont Street  
Toronto, ON M5R 1V4

Sent via email to  
[drtur@clearmedicine.com](mailto:drtur@clearmedicine.com)

**Cease and Desist letter  
regarding statements about prevention and treatment of COVID-19**

Dear Dr. Natasha Turner, ND:

The College of Naturopaths of Ontario (the College) has become aware that you are making potentially misleading statements regarding COVID-19, providing advice which is outside the scope for naturopaths in Ontario and recommending or selling COVID-19 prevention kits.

Any statements by naturopaths about the prevention and/or treatment of COVID-19, beyond the information made available by public health authorities, are inappropriate, potentially harmful, and likely to violate the College's [Standard of Practice for Advertising](#). Further, as per section 27 of the Professional Misconduct Regulation made under the *Naturopathy Act 2007*, the following is an act of professional misconduct:

Permitting the advertising of the member or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable.

Furthermore, as the services that you are providing are not essential services, you may be in violation of the Directive #2 issued by the Chief Medical Officer of Health under section 77.7 of the Health Protection and Promotion Act (HPPA), R.S.O. 1990, c. H.7. In this directive, a copy of which is attached, all regulated health professionals were ordered to cease or reduce to minimal levels all non-essential and elective services.

**You are, therefore, required to immediately cease and desist any advertising related to COVID-19 pandemic.** Note that the Standard of Practice for Advertising defines advertising as any message communicating information about a Member's practice and/or the professional services he/she offers, the content of which he/she controls or influences, directly or indirectly, which is expressed in any language with the intent to influence choice, opinion or behavior and communicated in any public medium to anyone.

Please confirm that (a) you have ceased the unauthorized conduct and (b) you are now acting in accordance with the Standard of Practice for Advertising by executing the confirmation below within 5 days of receiving this letter.



If you have any questions, please contact Natalia Vasilyeva, Manager, Professional Conduct, via email at [Natalia.Vasilyeva@collegeofnaturopaths.on.ca](mailto:Natalia.Vasilyeva@collegeofnaturopaths.on.ca).

Sincerely yours,  
College of Naturopaths of Ontario

A handwritten signature in black ink, appearing to read "Andrew Parr". The signature is fluid and cursive, with a large loop at the end.

Andrew Parr, CAE  
Registrar & CEO

Encl. Printouts of <https://www.shop.drnatashaturner.com> and [www.clearmedicine.com](http://www.clearmedicine.com) websites as of March 23, 2020

**CONFIRMATION**

**TO: COLLEGE OF NATUROPATHS OF ONTARIO**

**FROM: Dr. Natasha Turner, ND, registration number 0894**

---

I, Dr. Natasha Turner, ND, confirm that I have read and understood this letter and ceased advertising and making public statements about prevention and/or treatment of COVID-19.

**DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.**

---

**NAME**

---

**Witness**

**TAB D**

CONFIRMATION

TO: COLLEGE OF NATUROPATHS OF ONTARIO

FROM: Dr. Natasha Turner, ND, registration number 0894

---

I, Dr. Natasha Turner, ND, confirm that I have read and understood this letter and ceased advertising and making public statements about prevention and/or treatment of COVID-19.

DATED this 26 day of MARCH, 2020

  
\_\_\_\_\_

NAME

  
\_\_\_\_\_

Witness

# TAB E



The College of Naturopaths of Ontario



# Standard of Practice:

## Advertising

### Introduction

The intent of this standard is to advise Members on the appropriate and acceptable methods of advertising that may be used as a part of their practice.

The College supports Members' use of appropriate advertising to communicate the type and availability of services to the public or other health care professionals so that potential and existing patients and referral sources can make choices based on their respective needs.

### Definitions

**Advertisement:** Any message communicating information about a Member's practice and/or the professional services he/she offers, the content of which he/she controls or influences, directly or indirectly, which is expressed in any language with the intent to influence choice, opinion or behavior and communicated in any public medium to anyone.

Advertising is not the same as providing information to prospective referral sources or sending out health care notices and reminders.

**Public Medium:** Any form of communication that is, generally speaking, equally available to anyone who chooses to use it and that is directed to the public, or a specific subsection of the public rather than to an individual person or persons. For example radio, television, websites, flyers, and the yellow pages are all forms of public media. Emails targeted to individuals are not an acceptable advertising medium.

## 1. Advertising

*The Member may use any public medium to advertise professional services offered within the scope of practice of Naturopathic Medicine to members of the public, or other health care professionals, to assist them in making informed choices about the health care services provided by Naturopathic Doctors.*

*The Member's advertisements are accurate, verifiable, comprehensible, professionally appropriate and in compliance with the standards of practice of the profession. The Member is always responsible for advertisements about his or her practice regardless of whether or not the advertisement is made by the individual Member. The Member takes reasonable steps to ensure that advertisements placed by others about his/her services meet these standards.*

### Performance Indicators

The Member ensures the information in advertisements is:

- accurate;
- true;
- verifiable by the Member;
- not misleading by either omitting relevant information or including non-relevant information;
- professional;
- comprehensible to its intended audience;
- in accordance with the generally accepted standards of good taste.

References to professional qualifications used in advertisements are consistent with the College's Standard of Practice for Restricted Titles.

Any reference to the cure of symptoms or diseases, or appealing to the public's fears does not meet the standard.

Professional services offered by a Member advertising in her/her capacity as a Naturopathic Doctor are within the scope of practice of Naturopathic Medicine.

Advertisements do not include anything that could be interpreted as intending to promote a demand for unnecessary services.

Reference to fees or prices used in advertisements meet the expectations for truth and accuracy described in this standard. The Member's advertisements may:

- display or distribute a fee schedule and/or explanation of the way fees are calculated;
- provide information about fees or charges in response to a request for this information;
- provide information on the funding models or insurance plans accepted;
- indicate the forms of payment accepted.

The Member ensures that advertisements do not include:

- any information that could be interpreted to be an endorsement by a Naturopathic Doctor including an expressed or implied endorsement or recommendation for the exclusive use of a drug, product or brand of equipment used in her/her practice;
- a guarantee of the success of the service provided;
- a comparative or superlative statement about service quality, products or people;
- a direct, indirect or implied testimonial by any patient, former patient or other person in respect of the Member's practice
- any references to third-party websites or publications that carry testimonials or endorsements of the Member.

The Member avoids directly or indirectly soliciting patients in person, by telephone, e-mail, or any other means of communication that is not considered to be a public medium. This does not prevent the Member from advertising to the general public or calling/emailing a patient to remind him or her of an upcoming appointment/service. Rather, the Member should not target advertising to individuals or use communication techniques that can pressure potentially vulnerable persons.

### Related Standards & Guidelines

Conflict of Interest

Dual Registration

Fees and Billing  
Restricted Titles  
College of Naturopaths of Ontario's Guideline on Advertising

## **Legislative Framework**

[Professional Misconduct Regulation](#)

### **Approval**

**Original Approval Date:** October 15, 2012

**Latest Amendment Date:** December 6, 2017

### ***Disclaimer***

*In the event of any inconsistency between this standard and any legislation that governs the practice of Naturopathic Doctors, the legislation shall govern.*



**TAB F**



The College of Naturopaths of Ontario

# Standard of Practice

## Scope of Practice



### Introduction

The intent of this standard is to advise Members with respect to the expectations concerning Members as providers of naturopathic services and as responders to general health-related questions.

### Definitions

Act: means the *Naturopathy Act, 1990*.

Controlled Act: means any diagnostic or therapeutic procedure listed in section 27(2) of the Regulated Health Professions Act (RHPA) that is authorized to certain regulated health professionals in providing patient care.

DPRA: means the *Drug and Pharmacies Regulation Act, 1990*.

Public Domain: means any diagnostic or therapeutic procedure other than those listed in section 27(2) of the RHPA that any regulated health professional may utilize in the course of providing care.

RHPA: means the *Regulated Health Professions Act, 1991*.

## 1. Scope of Practice

*The practice of naturopathy is the assessment of diseases, disorders and dysfunctions and the naturopathic diagnosis and treatment of diseases, disorders and dysfunctions, using naturopathic techniques to promote, maintain, or restore health.*

## 2. Controlled Acts

*In the course of engaging in the practice of naturopathy, a Member is authorized, subject to the terms, conditions and limitations imposed on his or her certificate of registration, to perform the following:*

1. *Putting an instrument, hand or finger beyond the labia majora but not beyond the cervix.*
2. *Putting an instrument, hand or finger beyond the anal verge but not beyond the rectal-sigmoidal junction.*
3. *Administering, by injection or inhalation, a prescribed substance.*
4. *Performing prescribed procedures involving moving the joints of the spine beyond the individual's usual physiological range of motion using a fast, low amplitude thrust.*
5. *Communicating a naturopathic diagnosis identifying, as the cause of an individual's symptoms, a disease, disorder or dysfunction that may be identified through an assessment that uses*

*naturopathic techniques.*

6. *Taking blood samples from veins or by skin pricking for the purpose of prescribed naturopathic examinations on the samples.*
7. *Prescribing, dispensing, compounding or selling a drug designated in the regulations.*

### **3. Diagnostic and Therapeutic Procedures**

*A Member shall take reasonable steps to ensure that any proposed diagnostic or therapeutic procedure to be used for the benefit of a patient relates to the naturopathic scope of practice.*

*In order to perform a diagnostic or therapeutic procedure, a Member shall:*

- *achieve, maintain and be able to demonstrate clinical competency (e.g., examination, certification, or proof of training) in the diagnostic or therapeutic procedure.*

*A Member shall obtain the patient's consent to the use of the diagnostic or therapeutic procedure, consistent with Standard of Practice for Informed Consent, that is:*

- *fully informed;*
- *voluntarily given;*
- *related to the patient's condition and circumstances;*
- *not obtained through fraud or misrepresentation; and*
- *evidenced in a written form signed by the patient or otherwise documented in the patient health record.*

*If a proposed diagnostic or therapeutic procedure does not fall within the naturopathic scope of practice and the knowledge, skill and judgment of a member, a Member should not use the diagnostic or therapeutic procedures in their professional capacity.*

### **4. Responding to General Health-Related Questions**

*A Member is restricted from treating or advising outside the naturopathic scope of practice, when it is reasonably foreseeable that serious bodily harm may result by section 30 (1) of the RHPA as follows:*

*30 (1) No person, other than a member treating or advising within the scope of practice of his or her profession, shall treat or advise a person with respect to his or her health in circumstances in which it is reasonably foreseeable that serious bodily harm may result from the treatment or advice or from an omission from them.*

*In responding to general health-related questions by patients that relate to controlled acts outside the naturopathic scope of practice (such as questions relating to a drug as defined in the DPRA not authorized to the profession, performing surgery and administering vaccinations), a member shall:*

- Advise the patient that the performance of the act is outside the naturopathic scope of practice and refer the patient to a health professional who has the act within his/her scope of practice;
- Respond in a professional, accurate and balanced manner in the context of providing primary health care to the patient consistent with the naturopathic scope of practice; and
- Encourage the patient to be an active participant in his/her own health care which allows the patient to make fully informed decisions concerning his/her health care.

## 5. Offences

40 (1) Every person who contravenes subsection ... 30 (1) is guilty of an offence and on conviction is liable,

- (a) for a first offence, to a fine of not more than \$25,000, or to imprisonment for a term of not more than one year, or both; and
- (b) for a second or subsequent offence, to a fine of not more than \$50,000, or to imprisonment for a term of not more than one year, or both.

## 6. Mandatory Referral

A member is required under Ontario Regulation 168/15 to make a referral to another regulated health professional under the following circumstances:

1. If a patient's life is or may be at risk, it is a standard of practice of the profession that the member shall immediately call emergency services to transfer the patient to a hospital.
2. If the patient's condition prevents the member from communicating a naturopathic diagnosis because the condition is beyond the scope of practice of the profession, it is a standard of practice of the profession that the member shall refer the patient to,
  - a) a member of the College of Physicians and Surgeons of Ontario;
  - b) a member of the College of Nurses of Ontario who holds a certificate of registration as a registered nurse in the extended class; or
  - c) a member of a another health profession College where the patient's condition would fall within that member's scope of practice under his or her health profession Act.
3. If treatment of the patient's condition is beyond the scope of practice of the profession, it is a standard of practice of the profession that the member shall refer the patient to,
  - a) a member of the College of Physicians and Surgeons of Ontario;
  - b) a member of the College of Nurses of Ontario who holds a certificate of registration as a registered nurse in the extended class; or
  - c) a member of another health profession College where the patient's condition would fall within that member's scope of practice under his or her health profession Act.
4. If the treatment of the patient's condition requires diagnostic, monitoring or treatment related technology that is beyond the scope of practice of the profession, it is a standard of practice of

*the profession that the member shall refer the patient to,*

- a) *a member of the College of Physicians and Surgeons of Ontario; or*
  - b) *a member of another health profession College where the diagnostic, monitoring or treatment related technology would fall within that member's scope of practice.*
5. *If the patient or the patient's authorized representative asks the member to refer the patient to another member or a member of another health profession College, it is a standard of practice of the profession that the member shall immediately make the referral in accordance with the request of the patient or his or her authorized representative.*
  6. *It is a standard of practice of the profession that the member must immediately refer the patient to a member of the College of Physicians and Surgeons of Ontario or a member of the College of Nurses of Ontario who holds a certificate of registration as a registered nurse in the extended class if the patient's laboratory test result from a laboratory licensed under the Laboratory Specimen Centre Collection Licensing Act is a critical value test result.*
  7. *It is a standard of practice of the profession that the member must refer the patient to a member of the College of Physicians and Surgeons of Ontario or a member of the College of Nurses of Ontario who holds a certificate of registration as a registered nurse in the extended class if the response of a patient to the treatment offered by a member is not adequate and is not likely to improve based on alternative treatments available from the member, or if the patient's condition significantly deteriorates and is likely to continue to do so without a referral.*

## **7. Implications of Failure to Comply**

*A member is reminded that they may be the subject of an inquiry, complaint or report concerning the provision of naturopathic services or discussions related to general health-related questions from patients.*

*The Inquiries, Complaints and Reports Committee (ICRC), composed of elected (naturopath), appointed (public) and non-council (naturopath) committee members will review any inquiry, complaint or report to determine the member's compliance with all regulations and relevant standards of practice including this policy.*

*In exercising its discretion, the ICRC may consider if the discussions with the patient relating to general health-related questions were consistent with this policy, the regulations and standards of practice of the profession.*

## **8. Legislative Context**

*In addition to the legislative provisions outlined above, members are reminded that the following are acts of professional misconduct under Ontario Regulation 17/14 (Professional Misconduct):*

1. *Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession.*
3. *Doing anything to a patient for a therapeutic, preventative, palliative, diagnostic or other health-*

*related purpose except,*

- *i. with the informed consent of the patient or the patient's authorized representative, or*
  - *ii. as required or authorized by law.*
4. *Failing to reveal the exact nature of a substance or treatment used by the member following a request by a patient or a patient's authorized representative to do so.*
7. *Recommending or providing treatment that the member knows or ought to know is unnecessary or ineffective.*
8. *Providing or attempting to provide services or treatment that the member knows or ought to know to be beyond the member's knowledge, skill or judgment.*
9. *Failing to advise a patient or the patient's authorized representative to consult another member of a health profession within the meaning of the Regulated Health Professions Act, 1991, when the member knows or ought to know that the patient requires a service that the member does not have the knowledge, skill or judgment to offer or is beyond his or her scope of practice.*
10. *Performing a controlled act that the member is not authorized to perform.*
11. *Performing a controlled act that was delegated to the member by another person unless the member has the knowledge, skill and judgment to perform the controlled act.*
23. *Failing to keep records in accordance with the standards of the profession.*
26. *Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion.*
27. *Permitting the advertising of the member or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable.*
36. *Contravening, by act or omission, a provision of the Act, the Regulated Health Professions Act, 1991 or the regulations under either of those Acts.*
37. *Contravening, by act or omission, a law if,*
- *i. the purpose of the law is to protect or promote public health, or*
  - *ii. the contravention is relevant to the member's suitability to practise.*
48. *Failing to make reasonable attempts to collaborate with the patient's other relevant health care providers respecting the care of the patient, where such collaboration is necessary for the patient's health, unless the patient refuses to consent.*

### **Related Standards**

Communicating a Diagnosis  
 Compounding  
 Consent  
 Dispensing  
 Fees and Billing  
 Injection

Internal Examinations  
Intravenous Infusion Therapy  
Performing Authorized Acts  
Prescribing  
Record Keeping  
Recommending Non-Scheduled Substances  
Selling

## **Legislative Framework**

[Naturopathy Act, 2007](#)

[Professional Misconduct Regulation](#)

[General Regulation](#)

[Regulated Health Professions Act, 1991](#)

[Drug and Pharmacies Regulation Act, 1990](#)

[Health Care Consent Act, 1996](#)

### **Disclaimer**

*In the event of any inconsistency between this standard and any legislation that governs the practice of Naturopathic Doctors, the legislation shall govern.*

**TAB G**





The College of Naturopaths of Ontario

# Standard of Practice:

## Conflict of Interest

### Introduction

The intent of this standard is to help Members understand the concept of conflict of interest and how to recognize it in their practice.

### Definitions

**Conflict of Interest:** When a Member engages in a relationship or arrangement as a result of which the Member's personal interests could improperly influence his/her professional judgment or conflict with his/her duty to act in the best interest of patients.

**Related Person:** A person related to the Member by blood, marriage or adoption, or by living with the Member in a conjugal relationship outside of marriage. A related person may also include an extended family member, close friends, corporations or other businesses, and business partners.

**Financial Benefit:** where a Member's primary interest is influenced and/or directed by financial gain. For the purpose of this Standard of Practice financial benefit does not include charging fees for services as per a fee schedule but rather occurs when the possibility of financial benefits dictate the course of treatment and action. These may include, but are not limited to:

- Payment from a pharmaceutical company for prescribing their drug;
- Receiving a bonus for recruiting patients into a research study;
- Recommending all patients undergo a test that the Member has commercial ownership;
- Referring patients to a spouse's business.

## 1. Conflict of Interest

*The Member conducts his/her practice in a professional manner with the focus of the practice on the health care of patients. Acting while in a conflict of interest is professional misconduct and is not permitted.*

### Performance Indicators

The Member recognizes, discloses and manages any real or perceived conflict of interest appropriately.

Where it is not possible to avoid a conflict of interest, the Member:

- discloses and discusses the situation with the patient before providing any services;
- makes the patient aware of practical alternatives;
- documents the discussion in the patient record.

The Member refrains from participating in any activity or arrangement where his/her participation provides the potential for his/her professional judgment to be compromised.

Members do not recommend products or services to patients that are not clinically indicated.

Members do not recommend the purchase of products or services in which the member or a related person has a financial benefit.

Conflict of interest is not avoided by structuring the arrangement to move any benefit arising to a related person.

## **Related Standards and Guidelines**

Advertising

Dispensing

Prescribing

Recommending Non-Scheduled Substances

Record Keeping

Selling

Conflict of Interest Guideline

## **Legislative Framework**

[Regulated Health Professions Act, 1991](#)

[Professional Misconduct Regulation](#)

## **Approval**

**Original Approval Date:** October 15, 2012

**Latest Amendment Date:** March 6, 2019

## **Disclaimer**

*In the event of any inconsistency between this standard and any legislation that governs the practice of Naturopathic Doctors, the legislation shall govern.*

DISCIPLINE COMMITTEE OF THE  
COLLEGE OF NATUROPATHS  
OF ONTARIO

**AGREED STATEMENT OF FACTS AND ADMISSION  
OF PROFESSIONAL MISCONDUCT**

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