College of
COMPLEMENTARY HEALTH
PROFESSIONALS OF BC

THE COLLEGE OF COMPLEMENTARY HEALTH PROFESSIONALS OF BRITISH COLUMBIA (the "College")

In the matter of a Regulatory Complaint under the *Health Professions and Occupations Act*, SBC [2022] c 43 ("HPOA"), regarding:

Brent Barlow, Naturopathic Physician
INQ-2025-00081ND

CONSENT ORDER
(pursuant to section 158 of the HPOA)

BY THE REGISTRAR:

WHEREAS:

A. On June 19, 2025, pursuant to section 33 (1)) of the *Health Professions Act*, RSBC 1996, c 183 (the "HPA"), the College initiated an investigation following a complaint submitted by a patient (the "Complainant") alleging that Brent Barlow, ND (the "Respondent"), failed to provide adequate patient care by ordering excessive testing which could not reasonably be expected to provide therapeutic benefit, at an inflated price. The complaint further alleged that the Respondent failed to diagnose the Complainant's stage 4 liver cancer (the "Complaint").

B. On October 2, 2025, the Respondent was provided with notice of the investigation regarding the Complaint.

C. On April 1, 2026, the HPA was repealed and replaced by the HPOA. Pursuant to section 428 of the HPOA, the Complaint continued under the provisions of the HPOA.

D. The investigation was conducted in accordance with Part 3 of the HPA and Division 12 of the HPOA.

E. The Respondent was provided with an opportunity to respond to the investigation before the College's Investigation Committee deliberated on the disposition of the Complaint.

F. On June 11, 2026, a panel of the College's Investigation Committee assessed the Complaint pursuant to section 134 (2) (b) of the HPOA.

G. Pursuant to section 136 of the HPOA, the Panel determined it had reasonable grounds to believe the Respondent committed an act of misconduct by:

i. Failing to order appropriate tests in these circumstances given that the Complainant's Alkaline Phosphatase levels were elevated, which should, despite their Aminotransferase levels being within the normal range, reasonably have indicated a liver function concern requiring further investigation in violation of sections 2 and 3 of the *Naturopathic Physicians Scope of Practice* (in place at the time).

ii. Describing the tests to be conducted as 'comprehensive' without providing adequate detail to the Complainant about the limits and parameters of each test and confirming that they understood same in violation of sections 1, 2 and 5 of the *Naturopathic Physicians Informed Consent Practice Standard* (in place at the time).

iii. Commissioning tests that could not reasonably have been expected to provide therapeutic benefit to the Complainant's liver function concerns in violation of sections 3.e and 8.f of the *Naturopathic Physicians Code of Ethics* (in place at the time).

iv. Performing chelation therapy on the Complainant before carrying out further investigation regarding the Complainant's liver function and suitability to receive chelation therapy in violation of sections 2 and 3 of the *Naturopathic Physicians Scope of Practice* (in place at the time).

v. Failing to adequately consider the financial impact on the Complainant of commissioning tests and treatments that could not reasonably have been expected to provide therapeutic benefit to the Complainant's liver function concerns, thereby engaging in behaviours that would reasonably be regarded by members as unprofessional, in violation of the *Naturopathic Physicians Code of*

Conduct (in place at the time).

H. Pursuant to section 136 (2) (a) of the HPOA, the Panel directed the Registrar to dispose of the Complaint by making an order with the Respondent's consent pursuant to section 158 of the HPOA.

I. The Respondent consents to the making of this Consent Order pursuant to section 158 of the HPOA.

J. The Respondent acknowledges that he has read and understood the terms of this Consent Order and was given the opportunity to seek independent legal advice before consenting to the terms of the order.

K. The Respondent acknowledges that, in accordance with section 256 of the HPOA, the Registrar must publish the terms of the Disciplinary Order and the reasons for the Disciplinary Order.

L. The Respondent acknowledges that a breach of the terms of this Consent Order constitutes misconduct pursuant to section 11 of the HPOA and any alleged breach may result in an investigation under the HPOA and lead to further regulatory consequences.

DISCIPLINARY ORDER

PURSUANT TO SECTION 158 (2) (b) AND 269 OF THE HPOA, THE REGISTRAR ORDERS THAT:

1. The Respondent acknowledges that he engaged in misconduct and consents to a reprimand for the following conduct:

    a. Failing to order appropriate tests when provided with evidence that the Complainant's Alkaline Phosphatase level was elevated, despite their Aminotransferase levels being within the normal range, which should reasonably have indicated a liver function concern requiring further investigation in violation of the *Naturopathic Physicians Scope of Practice* (in place at the time).

    b. Charging the Complainant for tests which could not reasonably have expected to garner therapeutic benefit to the Complainant's

liver function concerns in violation of the *Naturopathic Physicians Code of Ethics* (in place at the time).

c. Failing to adequately consider the financial impact on the Complainant of commissioning tests and treatments that could not reasonably have been expected to provide therapeutic benefit to the Complainant's liver function concerns, thereby engaging in behaviours that would reasonably be regarded by members as unprofessional, in violation of the *Naturopathic Physicians Code of Conduct* (in place at the time).

d. Failing to provide adequate information about the limits and parameters of laboratory testing to the Complainant and to confirm that they understood same to allow them to make an informed choice about their care, in violation of the *Physicians Informed Consent Practice Standard* (in place at the time).

2. The Registrar accepts the Respondent's undertaking not to repeat the following conduct, which constitutes a breach of the current College Bylaws, Professional Standards and Clinical Practice Standards:

a. Failing to provide patient-centered care in violation of Principle 1 of the Integrated Person-Centered Care Professional Standard;

b. Failing to practice according to evidence-based principles in violation of Principle 1.4 of the Scope of Practice Professional Standard;

c. Falling to competently apply Knowledge in assessing and managing care in violation of Principles 1.3 and 1.4 of the Scope of Practice Professional Standard;

d. Failing to provide sufficient information about the tests to be performed to allow a patient to give valid consent to proceed in violation of Principle 3 of the Scope of Practice Professional Standard and the Informed Consent Professional Standard.

e. Failing to ensure that a patient has the reasons, parameters and limitations of the tests to be performed thereby violating the

Informed Consent Professional Standard

f. Providing professional services (laboratory testing} that is excessive in volume and without adequately considering the financial impact on a patient, in violation of Principles 1.2 and 1.3 of the Integrated Person-Centered Care Professional Standard;

3. Failing to exercise reasonable diligence and care when commissioning testing in violation of Principle 3 of the Scope of Practice Professional Standard;

4. Within six months of consenting to this order, the Respondent must complete the following courses and provide confirmation to the College:

   a. '*Lab Testing Series*' offered by the Canadian College of Naturopathic Medicine.

   b. *'Ethical Decision Making for Clinicians: A 7-Step Framework for Navigating Complex Situations*' offered by PESI Canada.

College of Complementary Health Professionals of British Columbia:

Marta Kumor Fane
Deputy Registrar

Dated at Vancouver this 12th day of November, 2026.

