

Draft Regulations

Draft Regulation

Professional Code
(chapter C-26)

Podiatrists — Code of ethics

Notice is hereby given, in accordance with sections 10 and 11 of the Regulations Act (chapter R-18.1), that the Code of ethics of podiatrists, adopted by the board of directors of the Ordre des podiatres du Québec, may be submitted to the Government which may approve it, with or without amendments, on the expiry of 45 days following this publication.

The draft Regulation replaces the current Code of ethics of podiatrists to take into account the new realities in which the profession is practised and to better regulate the profession, considering that the ethical rules must be adjusted to the provisions of the new Regulation respecting the practice of podiatry within a partnership or a joint-stock company.

The draft Regulation has no impact on enterprises, including small and medium-sized businesses.

Further information may be obtained by contacting Martine Gosselin, Director General and Secretary of the Ordre des podiatres du Québec, 7151, rue Jean-Talon Est, bureau 1000, Anjou (Québec) H1M 3N8; telephone: 514 288-0019 or 1 888 514-7433; fax: 514 844-7556; email: mgosselin@ordredespodiatres.qc.ca

Any person wishing to comment on the matter is requested to submit written comments, before the expiry of the 45-day period, to the Chair of the Office des professions du Québec, 800, place D'Youville, 10^e étage, Québec (Québec) G1R 5Z3. The comments may also be forwarded by the Office to the Minister of Justice; they may also be sent to the professional order that made the Regulation as well as to interested persons, departments and bodies.

JEAN PAUL DUTRISAC,
*Chair of the Office des
professions du Québec*

Code of ethics of podiatrists

Professional Code
(chapter C-26, s. 87)

DIVISION I GENERAL DUTIES OF PODIATRISTS

1. A podiatrist must take reasonable measures to ensure that persons who collaborate with the podiatrist in the carrying on of professional activities comply with the Podiatry Act (chapter P-12), the Professional Code (chapter C-26) and their regulations.

A podiatrist who carries on professional activities within a partnership or joint-stock company must take reasonable measures to ensure that the partnership or joint-stock company complies with the Podiatry Act, the Professional Code and their regulations.

2. The duties and obligations under the Podiatry Act, the Professional Code and their regulations are not changed or reduced by the fact that a podiatrist carries on professional activities within a partnership or joint-stock company.

3. A podiatrist must ensure that the obligations towards the partnership or joint-stock company of which the podiatrist is a director or officer are not incompatible with the obligations towards patients.

DIVISION II DUTIES AND OBLIGATIONS TOWARDS THE PUBLIC

4. A podiatrist must promote improvement in the quality and availability of professional services in the field in which the podiatrist practises.

5. In the practice of the profession, a podiatrist must

(1) bear in mind all the foreseeable effects which the podiatrist's opinions, advice, research and work may have on the public;

(2) promote measures of education and information in the field in which the podiatrist practises and do what is required to ensure such education and information;

(3) contribute to the development of the profession through the exchange of the podiatrist's knowledge and experience with colleagues and students and by the podiatrist's participation in courses and continuing training periods;

(4) keep his or her theoretical and clinical knowledge up-to-date in accordance with the evolution of podiatry;

(5) collaborate in the safe recovery of outdated or unused medications for purposes of destruction.

6. A podiatrist must behave with moderation, dignity and a concern for protecting the health and well-being of the people the podiatrist serves, individually as well as collectively.

DIVISION III

DUTIES AND OBLIGATIONS TOWARDS THE PATIENT

§1. *General*

7. Before rendering any professional service, a podiatrist must bear in mind the extent of the podiatrist's proficiency, knowledge and the means at the podiatrist's disposal.

A podiatrist must, in particular, offer professional services only if the service is deemed to be justified and opportune. Also, the podiatrist must not offer services for which the podiatrist is not sufficiently prepared.

8. A podiatrist must practice the profession in accordance with the recognized standards of practice and the present state of knowledge in podiatry. For that purpose, the podiatrist must

- (1) make a podiatry diagnosis with great care;
- (2) use the appropriate scientific methods and, where necessary, consult knowledgeable sources;
- (3) refrain from resorting to insufficiently tested examinations, investigations or treatments, unless they are part of a recognized research project and carried out in a recognized scientific milieu; and
- (4) observe the generally recognized rules of hygiene and asepsis.

9. A podiatrist must provide a service or give prescriptions only when they are necessary from a podiatry point of view.

10. A podiatrist must avoid performing unwarranted or unnecessarily increase the number of professional acts and refrain from performing any act that is inappropriate or disproportionate to the needs of the patient.

11. A podiatrist must at all times acknowledge the patient's right to consult another podiatrist or any other competent person. The podiatrist offers his or her cooperation to the person consulted.

12. A podiatrist must not practise under conditions or in situations likely to impair the quality of the services.

13. A podiatrist must seek to establish a relationship of mutual trust between himself or herself and the patient. The podiatrist must refrain from practising the profession in an impersonal manner.

14. A podiatrist must not interfere in the personal affairs of the patient in matters that do not fall within podiatry.

15. A podiatrist's physical, mental and emotional behaviour toward all persons with whom the podiatrist comes into contact in the practice of the profession, particularly toward all patients, must be beyond reproach.

§2. *Integrity*

16. Podiatrists must discharge their professional duties with integrity.

17. A podiatrist must avoid any misrepresentation with respect to the podiatrist's level of competence or the efficiency of the podiatrist's own services and of those generally provided by the members of the profession. If the good of the patient so requires, the podiatrist must, with the latter's authorization, consult another podiatrist or another competent person, or refer the patient to one of these persons.

Similarly, a podiatrist must avoid any misrepresentation with respect to the competency or efficiency of the services generally provided by the persons with whom the podiatrist carries on professional activities within the same partnership or joint-stock company.

18. Before giving advice or expressing an opinion, a podiatrist must endeavour to have full knowledge of the facts. The podiatrist must refrain from expressing an opinion or giving advice that is contradictory or incomplete.

19. A podiatrist must set out in a simple, complete and objective manner to the patient the nature and scope of the problem which, in the podiatrist's opinion, arises from the patient's condition.

The podiatrist must inform the patient of the extent, the therapeutic procedures and the costs of the indicated treatment plan and obtain an explicit consent thereto.

20. A podiatrist must inform the patient as soon as possible of any complication, incident or accident occurring while offering professional services.

21. A podiatrist must take reasonable care of goods entrusted to the podiatrist by a patient.

§3. *Availability and diligence*

22. A podiatrist must display reasonable availability and diligence towards the patient.

23. A podiatrist may not cease to offer professional services to a patient unless the podiatrist has sound and reasonable grounds to the contrary. The following constitute sound and reasonable grounds:

- (1) absence or loss of the patient's trust;
- (2) lack of cooperation on the part of the patient and, in particular, refusal by the latter to submit to the treatment prescribed by the podiatrist;
- (3) the fact that a podiatrist is placed in a situation of conflict of interest or a situation such that the podiatrist's professional independence could be called in to question;
- (4) inducement by the patient to illegal, unfair or fraudulent acts;
- (5) refusing the treatment indicated by the podiatrist or refrain from following the podiatrist's opinions or advice.

24. Before terminating the professional services to a patient, a podiatrist must advise the patient of his or her intention and ensure that such termination of services is not detrimental to the health of the patient.

§4. *Responsibility*

25. A podiatrist must commit his or her personal civil liability for acts the podiatrist has performed, whatever the conditions under which the podiatrist provides the services. The podiatrist may not elude or attempt to elude liability, nor request that a patient or another person renounce any recourse in a case of professional negligence on the podiatrist's part. Furthermore, the podiatrist may not invoke the liability of the partnership or joint-stock company within which the podiatrist carries on professional activities, or that of another person also carrying on activities in said partnership or joint-stock company, as a ground for excluding or limiting the podiatrist's personal civil liability.

§5. *Independence and impartiality*

26. A podiatrist must subordinate his or her personal interest and the interest of the partnership or joint-stock company in which the podiatrist carries on professional activities or has an interest to that of the patient.

27. A podiatrist must act with objectivity whenever persons other than patients request information from the podiatrist.

28. No podiatrist may conclude any agreement that could jeopardize the independence, impartiality, objectivity or integrity required to carry on the podiatrist's professional activities. In particular, no agreement may

- (1) exclude categories or brands of podiatric orthoses from those the podiatrist offers to the public;
- (2) limit the freedom to buy and sell;
- (3) determine or restrict the professional services the podiatrist may offer to the public.

29. Where a podiatrist holds direct or indirect interests in a business engaged in the manufacture of podiatric orthoses, the podiatrist must

- (1) inform the patient before giving a prescription;
- (2) insert an indication to that effect in any advertisement promoting podiatric orthoses, including the podiatrist's business cards, website and invoicing, and in any advertisement.

30. Podiatrists must safeguard their professional independence and ignore any intervention by a third person which could influence the performance of their professional duties to the detriment of their patient.

31. Podiatrists may not practice podiatry if they are in a situation of conflict of interests. Podiatrists are in a situation of conflict of interests if, in particular, they

- (1) share their professional income, in any form whatsoever, with a person, trust or undertaking, except for:
 - (a) a person who is a member of the Ordre des podiatres du Québec;
 - (b) a person, trust or undertaking referred to in the Regulation respecting the practice of podiatry within a partnership or a joint-stock company (*enter the date of coming into force of the Regulation*);

(c) a partnership or a joint-stock company within which the podiatrist carries on professional activities;

(2) grant any commission, rebate, advantage or other consideration of a similar nature relating to the practice of podiatry;

(3) accept, in their capacity as a podiatrist or by using their title of podiatrist, any commission, rebate or material benefit with the exception of customary presents and gifts of modest value;

(4) rent or use the premises, equipment or other resources of any person, including a plantar orthoses laboratory or a manufacturer of medications or other products associated with the practice of podiatry, unless the podiatrist has a written agreement containing a statement that the obligations under the agreement are in compliance with the provisions of this Code, and a clause authorizing disclosure of the agreement, on request, to the Order;

(5) practice podiatry jointly, in a partnership or joint-stock company or for a person or within a partnership or joint-stock company, unless the partnership, joint-stock company or person is:

(a) a podiatrist;

(b) a government, a governmental or municipal organization, a university or an institution within the meaning of the Act respecting health services and social services (chapter S-4.2) or the Act respecting health services and social services for Cree Native persons (chapter S-5);

(c) a business retaining their services for the sole purpose of providing podiatric advice or services to its employees;

(d) a partnership or joint-stock company referred to in the Regulation respecting the practice of podiatry within a partnership or a joint-stock company.

32. A podiatrist must take the necessary measures to ensure that information and documents relevant to professional secrecy are not disclosed to a partner, shareholder, director, officer or employee of a partnership or joint-stock company within which the podiatrist carries on professional activities or in which the podiatrist has an interest, as soon as the podiatrist becomes aware that the partner, shareholder, director, officer or employee has a conflict of interest.

The following factors must be considered in assessing the effectiveness of such measures:

(1) size of the partnership or joint-stock company;

(2) precautions taken to prevent access to the podiatrist's file by the person having a conflict of interest;

(3) instructions given to protect confidential information or documents related to the conflict of interest;

(4) isolation, from the podiatrist, of the person having a conflict of interest.

33. Despite paragraph 3 of section 31, a podiatrist is not in a situation of conflict of interest if the podiatrist accepts a discount from a supplier for one of the following reasons:

(1) for prompt regular payment, when the discount is indicated on the invoice and complies with marketplace rules in similar matters;

(2) due to the volume of products purchased other than medication, where the discount is indicated on the invoice or the account statement and complies with marketplace rules in similar matters.

§6. Professional secrecy

34. A podiatrist must respect the secrecy of all confidential information acquired in the practice of the profession.

35. A podiatrist may be released from professional secrecy with the authorization of the patient or whenever so ordered by law.

36. No podiatrist may reveal that a person retained the podiatrist's services except for the purposes of the internal administration of the partnership or joint-stock company within which the podiatrist carries on professional activities.

37. A podiatrist must avoid indiscreet conversations concerning a patient and the services rendered to the patient.

38. A podiatrist must not make use of confidential information which could be prejudicial to a patient or with a view to obtaining a direct or indirect benefit for the podiatrist or for another.

39. A podiatrist must ensure that any person with whom the podiatrist carries on professional activities does not disclose to a third party the confidential information of which the person may have taken cognizance.

40. The communication by a podiatrist of confidential information to ensure the protection of persons, pursuant to the third paragraph of section 60.4 of the Professional Code, must

(1) be made within a reasonable time to achieve the purpose intended by the communication; and

(2) be noted in the patient's record, along with the name and contact information of any person to whom the information was communicated, the information in question, the reasons for the decision to communicate the information and the method of communication used.

§7. Accessibility and rectification of records and release of documents

41. A podiatrist must respond promptly, at the latest within 10 days of its receipt, to any request made by a patient to consult or obtain a copy of documents that concern the patient in any record made in the patient's respect.

The same applies to any written request made by a patient, for the purpose of taking back a document entrusted to a podiatrist by a patient.

42. A podiatrist may charge the patient reasonable fees that do not exceed the cost of reproduction or transcription of the documents and the cost of transmitting a copy of them.

A podiatrist who intends to charge such fees must inform the patient of the approximate amount to be paid before reproducing, transcribing or transmitting the information.

43. A podiatrist must provide a patient or anyone designated by the patient, upon request, with all information that would allow the patient to obtain a benefit to which the patient may be entitled.

44. A podiatrist must respect the patient's right to have his or her prescriptions filled at the place and by the professional of the patient's choice.

45. A podiatrist must, at the written request of the patient and at the latest within 10 days of the date of such request, provide anyone designated by the patient with the relevant information in the podiatric record that the podiatrist holds or maintains in the patient's respect.

46. A podiatrist must respond promptly, at the latest within 10 days of its receipt, to any request made by a patient to have information that is inaccurate, incomplete, ambiguous, outdated or unjustified corrected or deleted in any document concerning the patient. The podiatrist must also respect the patient's right to make written comments in the record.

A podiatrist must give the patient, free of charge, a duly dated copy of the document or part of the document filed in the record so that the patient may verify that the information has been corrected or deleted or, as the case may be, give the patient an attestation stating that the patient's written comments have been filed in the record.

47. On written request from the patient, a podiatrist must forward a copy, free of charge, of the corrected information or an attestation stating that information has been deleted or, as the case may be, that written comments have been filed in the record, to every person from whom the podiatrist received the information that was the subject of the correction, deletion or comments, and to every person to whom the information was communicated.

48. A podiatrist who denies a patient access to information contained in a record established in the patient's respect or who refuses to grant a request to correct or delete information must provide the patient with written justification explaining the refusal, enter the written justification in the record and inform the patient of his or her recourses.

§8. Fixing and payment of fees

49. A podiatrist must charge only fair and reasonable fees.

50. Fees are fair and reasonable if they are justified by the circumstances and proportionate to the services rendered. In fixing the fees, the podiatrist must give consideration to the following factors, among others:

(1) the time spent in performing the professional service;

(2) the difficulty and importance of the service;

(3) the providing of unusual services or of services requiring exceptional promptness or skill;

(4) where applicable, the cost, for the podiatrist, of the products or material used in the performance of the professional services.

51. No podiatrist may demand the payment of an account for professional services of which a third party assumes the cost unless the podiatrist legally has concluded an explicit agreement to the contrary with the patient.

52. No podiatrist may charge fees for a professional service provided but not required.

53. No podiatrist may charge fees for professional services not provided or fees which do not correspond to the services actually rendered.

54. A podiatrist must provide the patient with all the explanations necessary to understand the statement of fees and the terms of payment and, on request, a detailed statement of the fees and the cost of the products or material used in the performance of the professional services.

55. No podiatrist may require advance payment of professional fees. The podiatrist may, however, require an advance to defray the expenses necessary for the performance of the professional services needed.

56. A podiatrist may charge interest on the accounts only after duly advising the patient thereof. The rate of the interest charged must be reasonable.

57. Before taking legal action, a podiatrist must exhaust all the other lawful means available to the podiatrist for obtaining payment of the fees.

58. A podiatrist must refrain from selling his or her accounts, except to a colleague upon the transfer of the business office.

59. When a podiatrist entrusts another person with the collection of the accounts, the podiatrist must ensure that the latter usually acts tactfully and with restraint.

60. Where a podiatrist carries on professional activities within a joint-stock company, the revenue generated by the podiatrist while rendering professional services within and on behalf of the joint-stock company belongs to the joint-stock company, unless agreed to otherwise.

In such a case, the setting, billing and payment of fees are subject to the conditions set out in sections 49 and 50 of this subdivision and the podiatrist remains personally responsible for their application.

DIVISION IV **DUTIES AND OBLIGATIONS TOWARDS** **THE PROFESSION**

§1. Incompatible duties and responsibilities

61. The following are incompatible with the practice of podiatry:

(1) the practice of another profession in human health governed by the Professional Code;

(2) the practice of an activity or a trade related to bodily care and, in particular, the practice of the trade of reflexologist, aesthetician, kinesitherapist, masseur or massotherapist, naturopath or osteopath.

§2. Derogatory acts

62. In addition to the acts mentioned in sections 57, 58, 59.1 and 59.1.1 of the Professional Code, the following acts are derogatory to the dignity of the profession:

(1) unduly urging someone to use the podiatrist's professional services;

(2) delivering, issuing or giving to anyone a false report, certificate or prescription;

(3) issuing to anyone, for any reason, a false certificate or attestation or any other document containing false or unchecked information;

(4) resorting to insufficiently tested examinations, investigations or treatments, unless they are part of a recognized research project and carried out in a recognized scientific milieu;

(5) guaranteeing the effectiveness of services;

(6) using or administering medication whose period of usage as indicated by the manufacturer has expired;

(7) lending the podiatrist's name to a person for the purpose of permitting the person to recommend or to promote the sale, distribution or utilization of medications or instruments used in the practice of podiatry, or with a view to permitting that person to recommend or promote a treatment;

(8) altering or removing notes in a patient's record which are already entered, or replacing any part thereof without justification;

(9) giving permission or allowing a person other than a professional authorized by law to perform acts in foot care or surgical assistance or knowingly profiting from the fact that such a person performs these acts;

(10) participating in or contributing to the commission of a violation of the Professional Code or the Podiatry Act (chapter P-12), or knowingly profiting from such a violation, particularly the illegal practice of the profession or the misuse of the title;

(11) failing to inform the Order as rapidly as possible of any person performing acts which may only be performed by a podiatrist;

(12) resorting to legal proceedings against a patient during the 45 days following receipt of a copy of an application for the conciliation of accounts;

(13) communicating with the person who has requested the holding of an inquiry without the written and prior permission of the syndic or of the syndic's assistant when informed of an inquiry into the podiatrist's professional conduct or competence or when a complaint is served against the podiatrist;

(14) taking legal action against a colleague in connection with a matter related to the practice of the profession before having previously requested conciliation by the syndic;

(15) charging, offering, accepting or agreeing to accept a sum of money or advantage for the purpose of having a proceeding or decision of the Order adopted or rejected;

(16) furnishing false information to the Order;

(17) failing to inform the Order when a podiatrist has reason to believe that a podiatrist is incompetent or does not comply with the professional ethics;

(18) refusing to provide professional services to a patient for the sole reason that the patient has had or intends to have the prescription filled by a third party;

(19) practising podiatry without identifying himself or herself by name and profession;

(20) carrying on professional activities within, or having an interest in, a partnership or joint-stock company whose name compromises the dignity of the profession of podiatrist or with a person who, to the podiatrist's knowledge, acts in a manner that compromises the dignity of the profession of podiatrist;

(21) carrying on professional activities within, or having an interest in, a partnership or joint-stock company, where a partner, shareholder, director, manager or employee of the partnership or joint-stock company has been suspended for more than 3 months or whose professional permit has been revoked, unless the partner, shareholder, director, manager or employee

i. ceases to occupy the position of director or manager within the partnership or joint-stock company within 15 days of the date on which the suspension or the revocation of the podiatrist's permit takes effect;

ii. ceases to attend shareholder meetings and to exercise the voting right within 15 days of the date on which the suspension or the revocation of the podiatrist's permit takes effect;

iii. disposes of the voting shares or transfers them to a trustee within 15 days of the date on which the suspension or the revocation of the podiatrist's permit takes effect;

(22) intimidating, hindering or denigrating in any way whatsoever a representative of the Order acting in the performance of the duties conferred upon the person by the Professional Code, the Podiatry Act or their regulations, or any person who has requested the holding of an inquiry, or any other person identified as a witness who could be summoned before a disciplinary body.

§3. Relations with the Order and the members

63. A podiatrist who is asked by the Order to be on one of its statutory committees must accept unless the podiatrist has reasonable grounds for refusing.

64. A podiatrist must promptly reply to all requests from the secretary of the Order, the office of the syndic, an investigator or a member of the professional inspection committee and make himself or herself available for any meeting deemed relevant.

65. A podiatrist must not abuse a colleague's good faith or be guilty of breach of trust or disloyal practices towards the podiatrist. In particular, the podiatrist must not take credit for work done by a colleague.

66. Where a podiatrist is asked for advice by a colleague, the podiatrist must provide his or her opinion and recommendations promptly.

DIVISION V **ADVERTISING**

67. A podiatrist's advertising must contain only information that will help the public to make an enlightened choice and that will facilitate the public's access to useful or necessary podiatric services.

The information must be such that it informs persons having no particular knowledge of podiatry.

68. A podiatrist may not, by any means whatsoever, advertise or make a representation to the public or to a person having recourse to the podiatrist's services or allow such advertising or representation to be made in the podiatrist's name, about the podiatrist or for his or her benefit, that is false, misleading or incomplete, particularly as to the podiatrist's level or competence or the scope or effectiveness of the podiatrist's services, or favouring a medication, product, or method of investigation or treatment.

69. A podiatrist may not engage, by any means whatsoever, in advertising that is likely to unduly influence persons who may be physically or emotionally vulnerable because of their age, their state of health or their personal condition.

70. A podiatrist must refrain from using comparative advertising.

71. A podiatrist must clearly indicate in the advertising and on all other items of identification used to offer professional services, the podiatrist's name as well as the podiatrist's status as podiatrist. The podiatrist may also mention the services offered and the pathologies treated.

72. No podiatrist may use or allow the use of an endorsement or a statement of gratitude concerning the podiatrist when advertising, using social media or speaking or appearing in public.

73. All podiatrists who are partners or work together in the practice of their profession are jointly responsible for complying with the rules respecting advertising, unless one of them demonstrates that the advertising was done without the podiatrist's knowledge and consent and despite measures taken to ensure compliance with those rules.

74. A podiatrist must avoid, in advertising, all methods and attitudes likely to give a profit-seeking or commercialistic character to the profession.

75. No podiatrist may, by any means whatsoever, engage in or allow advertising that mentions a price, reduction, discount or gratuity on the treatment of local disorders of the foot, including the sale of podiatric orthoses.

76. A podiatrist must keep an integral copy of every advertisement for a period of 5 years following the date on which it was last published or broadcast. On request, the copy must be given to the syndic.

DIVISION VI GRAPHIC SYMBOL OF THE ORDER

77. The Order is represented by a graphic symbol that conforms to the original held by the secretary of the Order.

78. A podiatrist who reproduces the graphic symbol of the Order for advertising purposes must ensure that the symbol conforms to the original held by the secretary of the Order.

79. Where the podiatrist uses the graphic symbol of the Order for advertising purposes, the podiatrist must ensure that such advertising is not interpreted as emanating from the Order, and that it does not bind the Order in any way.

80. This Regulation replaces the Code of ethics of podiatrists (chapter P-12, r. 5) and the Regulation respecting advertising by podiatrists (chapter P-12, r. 12).

81. This Regulation comes into force the fifteenth day following the date of its publication in the *Gazette officielle du Québec*.

102047

Draft Regulation

Professional Code
(chapter C-26)

Podiatrists —Practice within a partnership or a joint-stock company

Notice is hereby given, in accordance with sections 10 and 11 of the Regulations Act (chapter R-18.1), that the Regulation respecting the practice of podiatry within a partnership or a joint-stock company, adopted by the board of directors of the Ordre des podiatres du Québec, may be submitted to the Government which may approve it, with or without amendments, on the expiry of 45 days following this publication.

The draft Regulation authorizes a member of the Order to carry on professional activities within a joint-stock company or a limited liability partnership.

The draft Regulation has no impact on enterprises, including small and medium-sized businesses.

Further information may be obtained by contacting Martine Gosselin, Director General and Secretary of the Ordre des podiatres du Québec, 7151, rue Jean-Talon Est, bureau 1000, Anjou (Québec) H1M 3N8; telephone: 514 288-0019 or 1 888 514-7433; fax: 514 844-7556; email: mgosselin@ordredespodiatres.qc.ca

Any person wishing to comment on the matter is requested to submit written comments, before the expiry of the 45-day period, to the Chair of the Office des professions du Québec, 800, place D'Youville, 10^e étage, Québec (Québec) G1R 5Z3. The comments may also be forwarded by the Office to the Minister of Justice; they may also be sent to the professional order that made the Regulation as well as to interested persons, departments and bodies.

JEAN PAUL DUTRISAC,
*Chair of the Office des
professions du Québec*