



**Memo No.** ILS-2017-19  
**Date:** 13-Jun-2017  
**Memo To:** Naturopathic Clients  
**Re:** Notice of GST/HST Revision

Please note commencing with the July 2017 Invoice which you will receive in August, the following changes will be made.

- Tests available in a hospital lab will not be charged GST/HST
- Specimen collection services will not be charged GST/HST
- Tests NOT available in a hospital lab will continue being charged GST/HST
- Practice location by Province will determine the tax rate

Refer to the ILS Fee Schedule attached for the taxable status of each test. For further explanation, please see below.

**Practitioners asked why ICL applies GST/HST to all test services.** ICL engaged health care and tax law experts at the legal firm of Fasken Martineau to provide an interpretation of the appropriate Acts and Regulations to provide advice on the applicability of GST/HST to lab tests and specimen collection services.

The CRA interpretation of GST/HST applicability and tax rate on test fees charged to the ND is based on two critical aspects of the transaction:

1. Is the test taxable?
2. What is the applicable tax rate?

**1. Is the test Taxable?**

Tax exempt fees occur when the test is available in a health care facility, e.g. a hospital, as described in the GST/HST Technical Bulletin B-109, July 2015 ([http://www.cra-arc.gc.ca/E/pub/gm/b-109/b-109-e.html#\\_Toc421596742](http://www.cra-arc.gc.ca/E/pub/gm/b-109/b-109-e.html#_Toc421596742)). Taxable fees occur when the test is NOT available in a health care facility.

**2. What is the applicable tax rate?**

The tax rate for the test is determined by the location of the practice. The location of the lab is not relevant to the tax rate determination. If a test is taxable, the taxable rate charged is determined by the location of the practice.

Practice Location	Tax Rate
AB, BC, MB, QC, SK, NWT	5% GST
ON	13% HST
NB, NL, NS, PEI	15% HST

If you have further questions or to order kits, please contact **ICL Client Care at (416) 422-3000 Ext. 300** or [info@ICLabs.ca](mailto:info@ICLabs.ca).

***ICL Integrative Laboratory Services, working together for your laboratory service needs!***

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