



## COVID-19 & Vaccinations

### Introduction

The College of Naturopaths of Ontario (the College) has prepared this Fact Sheet to guide Ontario naturopathic doctors on issues relating to COVID-19 and the COVID-19 vaccinations.

### COVID-19 not in scope

COVID-19 is not within the scope of practise of the profession. There are two primary reasons for this.

NDs do not have access to the tests necessary to diagnose the presence of the virus. While NDs, like all regulated health professionals do have access to a Point of Care (POC) test, this test will not be conclusive and any positive results from the POC test will need to be verified with the PCR test conducted by a Public Health Laboratory. NDs cannot order that test for patients.

NDs also do not have access to the drugs and devices that would be necessary to treat COVID-19. While some patients have only mild symptoms, these can potentially become moderate to serious in nature. When this occurs, patients typically need medications to address their symptoms and may require hospitalization.

This is not to say that an ND could not co-manage a patient with non-serious symptoms or provide support to COVID-19 patients post recovery.

### NDs and free speech

Given that COVID-19 is likely the most important medical and political issue of our time, is the College inhibiting free speech for NDs in Ontario when we prohibit them from discussing the topic?

Individuals are entitled to discuss whatever they would like to discuss in any forum they wish. They have the right of free speech. A person who also happens to be an ND has those same rights. However, speaking as an ND is different. When you make public comments using “Dr. Jane Doe, ND”, you are no longer offering a personal opinion but rather a professional opinion. In some cases, even not using the titles but posting information that is easily linked by the public to your professional ND status can move a personal opinion into a professional one.

When you use the Dr. and ND titles, directly or indirectly, it conveys a degree of medical “authority” to the public, and it may be assumed by the reader that you are offering your opinions as a naturopathic

doctor, using all your training and experience.

To offer a professional opinion, the topic must be within the scope of practice of your profession, and you must have the knowledge, skill and judgement to do so. As COVID-19 and the vaccinations are not within the scope of practice of the profession, you cannot comment on them as an ND.

### Can we talk about our vaccine status?

The Standard of Practice on Scope of Practice requires that NDs not speak to patients about health matters that are beyond their scope of practice. This includes COVID-19 and the COVID-19 vaccinations. A person who posts publicly as an ND and says that they support people being vaccinated or that the vaccinations are safe and effective is equally breaching the rules as someone who says these vaccinations are experimental and dangerous. Both may receive a cautionary letter or become the subject of an investigation.

A person who indicates that they are vaccinated or another person who indicates that they are unvaccinated for the purposes of the awareness of their patients, provided that they are not speaking about the

pros and cons or dangers or benefits of vaccinations in the context of health care, would not likely receive a cautionary letter or be the subject of an investigation.

The difference is that indicating whether you are or are not vaccinated is answering an important and pressing question that many patients have today, and it is relevant to the patient having access to information to aid in their decisions about from whom they wish to seek services.

**By not allowing NDs to speak out on COVID-19 matters, the College is infringing on their Charter right to freedom of speech.**

The College has heard this said several times in various communications. First, it should be noted that as a person, you are entitled to say what you wish wherever you wish to. No one is taking that away from you as individuals. It is when you speak as an ND or in a way that allows a clear association with you as an ND that your rights are limited. They are limited because COVID-19 and vaccinations are outside of your scope and the legislative frameworks prevents you from speaking about such matters.

Second, the claim that the Charter of Rights and Freedoms guarantees your right to free speech may be somewhat of an overreach.

Section 1 of the Charter reads “*The Canadian Charter of Rights and Freedoms guarantees the rights and freedoms set out in it to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society*” (emphasis added).

Many people today forget or are unaware of these limitations embodied within the Charter, instead preferring to believe that their rights and freedoms are without limit and inalienable. As Section 1 notes, there are reasonable limits to the rights set out in the Charter that may be set out in law provided they can be demonstrated as justified in our society. The place for that to happen is before the parliament and later before the courts.

**NDs should be able to use natural treatments proven to benefit people with viral infections.**

The College notes that many substances authorized to NDs may provide benefit to patients with viral infections, such as the flu or common cold. These

substances include vitamin D and glutathione.

COVID-19 is not the common cold nor is it the annual flu that most people will encounter. While many people might have taken this perspective very early in the pandemic, it is no longer as pervasive.

The following is information provided via the Johns Hopkins University & Medicine<sup>1</sup>: The flu and COVID-19 are caused by entirely different viruses. The symptoms of COVID-19 are far more extensive and treatment of serious cases of COVID-19 can typically only be performed in hospital. While both illnesses have long term complications as possible outcomes, those from COVID-19 are more extensive and involve the lungs, heart, kidneys and brain.

According to [Worldometers.info](http://Worldometers.info) there have been over 220 million cases of COVID-19 worldwide and over 4.5 million deaths. These numbers are similar to the rates published by [Johns Hopkins University & Medicine](http://JohnsHopkinsUniversity.com).

Comparatively, the [Centre for Disease Control](http://CentreforDiseaseControl.org) in the US tracks cases and deaths due to the flu. Finalized data from 2016-2017 indicates that there were 29 million cases of the flu and 38,000 deaths.

<sup>1</sup> Information may be found at [HopkinsMedicine.org](http://HopkinsMedicine.org).

COVID-19 is a new, never seen version of a virus and one that is mutating at rates and in ways not previously well documented or studied. Many in the profession might debate whether the ND is treating the virus or treating the symptoms and attempting to boost the immune system to increase the likelihood of stopping the infection before it takes over and incapacitates the entire immune system.

According to the Johns Hopkins article referred to earlier, there is no treatment for either the flu or COVID-19. Instead, the medical community is treating the symptoms as best they can.

Given the most serious illnesses associated with COVID-19, the medications used in treatments for these symptoms are not authorized to Ontario NDs.

While glutathione and vitamin D may be helpful in supporting patients with the flu or the common cold, the unknown and volatile nature of COVID-19 makes providing those treatments a significantly higher risk.

**COVID-19 Vaccines are Experimental and Contravene the Nuremburg Code.**

The Nuremberg Code contains 10 principles with which doctors are expected to conform when conducting experiments on humans. Since many individuals believe the COVID-19 vaccinations to be experimental, they cite that their use among the population is a violation of the Code.

The misnomer here is that the COVID-19 vaccinations are experimental, which they are not.

The COVID-19 vaccinations are approved for use by Health Canada, having first undergone extensive clinical trials that were carefully monitored. Information about the vaccine safety and clinical trials can be found on the [Health Canada website](#).

According to Dr. Alexis Paton, Chair of Ethics for the U.K. Royal College of Physicians, “these are approved medications that are outside the auspices of the Nuremberg Code”.<sup>2</sup>

### Your Oath as an ND

The College has noted that some NDs refer to their oath and believe that not protesting the COVID-19 public health

measures and vaccinations is potentially violating that oath.

The “oath” that an ND swears is administered by naturopathic educational institutions across North America. It is not included within the regulatory framework in Ontario and carries no weight with the regulation of the profession in Ontario. It could not likely be used as a protection in the face of a complaint investigation.

The documents that are within the regulatory framework include the [Code of Ethics](#) and the [Standards of Practice](#).

The Code of Ethics begins with “Naturopathic Doctors have an obligation to act in a manner that justifies public trust and confidence, that upholds and enhances the integrity of the profession, that serves the interests of society and above all, that safeguards the interests of the individual patients” (emphasis added).

The interests of individual patients are best served by NDs who follow the standards of practice of the profession and provide services that fall within the scope of practice and within their individual knowledge, skill and judgment.

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<sup>2</sup> CTV Edmonton, [“No, COVID-19 vaccines do not violate the Nuremberg Code.”](#)

The Standards of Practice inform the public and patients on what to expect in terms of their naturopathic care. They govern important topics such as what is within the scope of practice, advertising, billing among many, many others. For those who continue to believe that the Oath sworn upon graduation is an important document to follow, it may be worth noting that the oath begins with “I dedicate myself to the service of humanity as a practitioner of the art and science of naturopathic medicine.”

It is of considerable interest that the oath does not refer first and foremost to a patient or to the interest and beliefs of NDs but rather the “service of humanity” clearly implying a degree of “the greater good” or where the interests of the many may outweigh the interests of the few.

The principles of naturopathic medicine begin with “First do no harm” which is often cited to refer to fighting against the COVID-19 public health measures and vaccinations. NDs today must ask themselves some important questions. In light of the scope of the pandemic, the virulence of the associated illnesses, the ever-changing variants of the illness and the lack of any meaningful treatment, what carries the most risk, the vaccination or the virus?

Perhaps only history can answer that question, however, NDs are not currently positioned to be in this epic battle.

### Vaccine Mandates

The College has been asked by several Registrants whether the College might introduce a vaccine mandate and whether it would oppose such a mandate if the Ontario Government decided to introduce one.

It is the position of the College, confirmed by Legal Counsel, that the College does not have the statutory authority to require NDs to be vaccinated or tested. This view is generally supported by several other health regulatory Colleges in Ontario.

Should the Ontario Government introduce a vaccine mandate, as has been done by the [Government of Quebec](#), the role of the College would be to enforce such a mandate. It is the College’s legal obligation to enforce all legislation and regulations governing the profession.

The College is accountable to the Ontario Minister of Health and if the Minister—or the Chief Medical Officer of Health (CMOH) for that matter—were to bring in a vaccine mandate as has been done in other health sectors, the College would have no alternative but to

enforce such a mandate. Failure to do so could result in the College being placed under the authority of a supervisor chosen and appointed by the Minister and the removal of the Council and CEO.

It is worth noting that the current mandate brought in by the Government thus far requires that a person either:

- a) Be vaccinated (or have a medical exemption letter from a physician or nurse practitioner), or
- b) Complete an educational course (on-line) about the benefits of vaccinations, and
- c) In some limited settings, undergo regular COVID-19 tests.

### Vaccine Exemption Letters

The College has been asked by several Registrants and the public about whether NDs can complete the exemption form for the COVID-19 vaccine.

Directive #6 issued by CMOH pursuant to the provisions of section 77.7 of the *Health Protection and Promotion Act* (HPPA) requires that written proof of a documented medical reason for not being fully vaccinated against COVID-19 can only be provided by a physician or registered nurse in the extended class.

As such NDs are not authorized to provide patients with vaccine exemption letters and doing so

would be a breach of the  
HPPA.