

SHOULD CITIZENS WHO REFUSE TO GET VACCINATED HAVE THE SAME RIGHTS
AND FREEDOMS AS THOSE WHO DO GET VACCINATED?

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*“This sense of freedom sounds great, but it also causes anxiety because this unbridled freedom hampers people’s safety.”*¹ Rev. Geoffrey Angeles, when asked about his thoughts on Manitoba’s reduced Covid-19 restrictions, expressed his desire to keep his parishioners safe, even if it meant implementing more stringent restrictions than the government required. It appears that Rev. Angeles, in this situation at least, believes that greater freedom means lesser safety. Yet, it is freedom that has made our societies as safe as they are – the freest nations in the world have ended mass poverty, extended average lifespans, and created greater prosperity, for themselves and for others.² Around the world, personal freedom is positively correlated with security, social capital, and personal health.³ To Rev. Angeles, freedom and safety may be opposed, but history demonstrates that this is untrue. The wellness of societies, including their safety, is not hampered but improved when personal freedoms are present and protected. Benjamin Franklin concluded that *any society that would give up a little freedom to gain a little safety deserves neither and will lose both.*⁴

Thesis: Given that honoring freedom fosters the development of successful nations and given that this conclusion is codified as law in Canada by The Canadian Charter of Rights and Freedoms, this essay will argue that Covid-19 vaccine mandates, which limit the freedom to make a decision about vaccination, cannot be demonstrably justified and result in dangerous societal division.

¹ Brenda Suderman, “Keeping the faith, in masks,” *Winnipeg Free Press*, August 7, 2021.

² Daniel J. Mitchell, “How Free Markets Made Us Rich,” *Townhall Finance* (October 6, 2021), <https://finance.townhall.com/columnists/danieljmitchell/2021/10/06/how-free-markets-made-us-rich-n2597049>; Marian Tupy, “The Most Important Graph in the World,” *Reason* (December 13, 2016), <https://reason.com/2016/12/13/the-most-important-graph-in-the-world/>. See also: Meriam Webster, “Safety,” last modified October 23, 2021, <https://www.merriam-webster.com/dictionary/safety>.

³ Legatum Institute, “The Legatum Prosperity Index 2020,” accessed October 6, 2021, <https://www.prosperity.com/rankings>.

⁴ Benjamin Franklin, “Benjamin Franklin Quote About Liberty and Safety,” accessed October 29, 2021, <https://wisdomquotes.com/liberty-safety-benjamin-franklin/>. See also: Leya Delray, “A QUOTE IN CONTEXT – What did Franklin really think about Liberty and Safety,” *Leya Delray* (May 4, 2020), <https://www.leyadelray.com/2020/05/04/a-quote-in-context-what-did-franklin-really-think-about-liberty-and-safety/>. Note: italicized section is my own paraphrase of Franklin’s quote.

The Promise of Freedom

Soon after the Covid-19 pandemic began, over a year and a half ago, the world began looking to scientists to provide a vaccine. For nervous societies in lockdown across the world, a vaccine was the promise of freedom we put our hope in. While we cautiously anticipated a vaccine, the fear of Covid-19 was intensified by poor estimates about the risk and transmissibility of the virus.⁵ On March 12, 2020, Canada's Federal Health Minister reported that 30% to 70% of Canadians would likely acquire Covid-19.⁶ Nineteen months later, less than 5% of Canadians have contracted the virus.⁷ Yet, these faulty estimates united Canadians in the global goal of "flattening the curve" – and there was an unmistakable camaraderie as we dutifully surrendered our freedom in the fight against Covid-19.⁸

Such "small sacrifices" of our freedom in the constantly extended lockdowns could surely be made with the hope of a vaccine to inspire us. Toward the end of 2020, our hopes were realized when four vaccines were authorized for emergency use in North America and promised to be 100% effective at preventing serious outcomes.⁹ By that time we knew that the risk of Covid-19 is strongly positively correlated with age and other significant comorbidities, so those who were older were first to receive a vaccine.¹⁰ (In Canada, 93.4% of reported Covid deaths have occurred in those over the age of sixty; the American CDC has reported that 94% of those

⁵ Peter St. Onge and Gael Campan, "The Flawed COVID-19 Model That Locked Down Canada," June 4, 2020, <https://www.iedm.org/the-flawed-covid-19-model-that-locked-down-canada/>.

⁶ CTV News, "COVID-19 could infect 30 to 70 per cent of Canadians: health minister," last modified March 12, 2021, <https://www.ctvnews.ca/health/coronavirus/covid-19-could-infect-30-to-70-per-cent-of-canadians-health-minister-1.4850181>.

⁷ Government of Canada, "COVID-19 daily epidemiology update," last modified October 28, 2021, <https://health-infobase.canada.ca/covid-19/epidemiological-summary-covid-19-cases.html>. Assuming a population of 38 million, 1,709,536 cases is 4.5% of the population.

⁸ CBC News, "Are Canadians ready for sustained sacrifices in the age of COVID-19? We're about to find out," last modified March 29, 2020, <https://www.cbc.ca/news/politics/covid-19-pandemic-coronavirus-sacrifices-1.5513330>.

⁹ CBC News: The National, "Which COVID-19 vaccine is better? (spoiler, they're all good)," YouTube, last modified April 2, 2021, <https://www.youtube.com/watch?v=V4cyYvmU5Cc>.

¹⁰ Statistics Canada, "COVID-19 death comorbidities in Canada," last modified November 16, 2021, <https://www150.statcan.gc.ca/n1/pub/45-28-0001/2020001/article/00087-eng.htm>; Government of Canada, "Coronavirus disease (COVID-19): Prevention and risks," last modified October 28, 2021, <https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/prevention-risks.html>.

who are reported to have died from Covid also suffered from an average of four comorbidities).¹¹ As of October 29, 2021, over 90% of those over the age of sixty in Canada have been fully vaccinated against Covid-19.¹² And yet – and yet – a year and a half later, we continue to forfeit more and more freedom as the actual threat of Covid becomes smaller and smaller. If the vaccines are effective, as the Government of Canada claims they are, then the majority of those most at risk are substantially protected and Covid-19 in Canada is no longer a significant threat.¹³ And if the vaccines are not effective, the Government of Canada has lied. It is in this context that governments across Canada have begun to implement vaccine mandates.

Vaccine mandates across Canada have been implemented and encouraged by various authorities, including provincial and federal governments, creating a patchwork of mandates that grant many rights and freedoms only to those who have been vaccinated. Provincial vaccine mandates focus on limiting access to indoor theatres, restaurants, gyms, and other similar venues to those who are fully vaccinated.¹⁴ The Government of Canada has introduced a vaccine mandate for all federal workers and for nearly all interprovincial and international travel.¹⁵ Provincial health authorities have mandated vaccination for health care workers, and many

¹¹ Government of Canada, “COVID-19 daily epidemiology update”; Centers for Disease Control and Prevention, “Weekly Updates by Select Demographic and Geographic Characteristics,” last modified October 17, 2021, https://www.cdc.gov/nchs/nvss/vsrr/covid_weekly/index.htm?fbclid=IwAR3-wrg3tTKK5-9tOHPGAHWFO3DfslkJ0KsDEPQpWmPbKtp6EsoVV2Qs1Q#Comorbidities.

¹² Government of Canada, “COVID-19 vaccination in Canada,” last modified October 22, 2021, <https://health-infobase.canada.ca/covid-19/vaccination-coverage/>.

¹³ Government of Canada, “COVID-19: Effectiveness and benefits of vaccination,” accessed October 6, 2021, <https://www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/vaccines/effectiveness-benefits-vaccination.html>.

¹⁴ British Columbia, “B.C. launches proof of vaccination to stop spread of COVID-19,” last modified August 23, 2021, <https://news.gov.bc.ca/releases/2021HLTH0053-001659>; Ontario, “Ontario to Require Proof of Vaccination in Select Settings,” last modified September 1, 2021, <https://news.ontario.ca/en/release/1000779/ontario-to-require-proof-of-vaccination-in-select-settings>; Saskatchewan, “Province Implements Interim Mandatory Masking Effective September 17, Proof of Vaccination Requirement Effective October 1,” last modified September 16, 2021, <https://www.saskatchewan.ca/government/news-and-media/2021/september/16/province-implements-interim-mandatory-masking-effective-september-17-proof-of-vaccination-requiremen>; Nova Scotia, “Coronavirus (COVID-19): Nova Scotia COVID-19 Proof of Vaccination,” accessed October 6, 2021, <https://novascotia.ca/coronavirus/proof-of-full-vaccination-policy/>.

¹⁵ Government of Canada, “Mandatory COVID-19 vaccination requirements for federally regulated transportation employees and travellers,” last modified October 6, 2021, <https://www.canada.ca/en/transport-canada/news/2021/10/mandatory-covid-19-vaccination-requirements-for-federally-regulated-transportation-employees-and-travellers.html>.

universities across Canada have mandated vaccination for faculty, staff, and students.¹⁶ Manitoba has extended vaccine mandates to limit private gatherings, weddings, funerals, and faith-based gatherings.¹⁷ Because the freedom to participate in society is now accessed through vaccination, the decision to be vaccinated is no longer a free decision.

To Such Reasonable Limits

Before suggesting that such decisions should be free, one must first understand that freedom is the ability to act, think, or speak without coercion.¹⁸ Freedom does not exist apart from reality – a person who is free to act, speak, or think will have to accept the natural consequences for his actions, words, and thoughts. For example, the natural consequences for acts of violence may be reciprocal acts, or perhaps hatred or slander. Occasionally, societies replace natural consequences with artificial consequences. Fines, for example, help to create a more tangible dissuasion for causing unnecessary risk to those sharing the highways. Where it can be justified that an artificial limit is in the “interests of society,” and where the artificial consequences are proportional to the risk the limit aims to mitigate, an artificial limit may be placed on the freedom of citizens.¹⁹ Where a limit on freedom is not justifiable, whether it is violently enforced or not, such a limit is coercion.²⁰ Free citizens may act, think, and speak without coercion, within the natural and justifiable artificial limits placed on that freedom.

As a nation, Canada has determined what limits may be placed on the freedom of its citizens through the development of The Canadian Charter of Rights and Freedoms (The

¹⁶ Alberta Health Services, “Alberta Health Services implementing immunization policy for physicians, staff and contracted providers,” last modified August 31, 2021, <https://www.albertahealthservices.ca/news/Page16165.aspx>; Quebec, “Mandatory vaccination of health and social services workers against COVID-19,” last modified September 31, 2021, <https://www.quebec.ca/en/health/health-issues/a-z/2019-coronavirus/progress-of-the-covid-19-vaccination/mandatory-vaccination-covid-19>; CBC News, “Post-secondary students share the new hoops they're jumping through for on-campus learning,” September 19, 2021, <https://www.cbc.ca/news/campus-vaxx-policies-portrait-1.6176661>.

¹⁷ Manitoba, “Province Steps Up Preparedness For Covid-19 Fourth Wave, Moves To Restricted (Orange) Level On Pandemic Response System,” last modified October 1, 2021, <https://news.gov.mb.ca/news/index.html?item=52562&posted=2021-10-01>.

¹⁸ Meriam Webster, “Freedom,” last modified October 27, 2021, <https://www.merriam-webster.com/dictionary/freedom>.

¹⁹ Government of Canada, “Section 1 – Reasonable limits,” last modified September 1, 2021, <https://www.justice.gc.ca/eng/csj-sjc/rfc-dlc/ccrf-ccdl/check/art1.html>.

²⁰ Meriam Webster, “Coerce,” last modified October 26, 2021, <https://www.merriam-webster.com/dictionary/coerce>.

Charter), which outlines the basis of freedom in Canada, the process for establishing limits on freedom, and what specific freedoms are protected.

“Whereas Canada is founded upon principles that recognize the supremacy of God and the rule of law:

1 The Canadian Charter of Rights and Freedoms guarantees the rights and freedoms set out in it subject only to such reasonable limits prescribed by law as can be demonstrably justified in a free and democratic society.

2 Everyone has the following fundamental freedoms:

(a) freedom of conscience and religion;

(b) freedom of thought, belief, opinion and expression, including freedom of the press and other media of communication;

(c) freedom of peaceful assembly; and

(d) freedom of association.”²¹

The Charter also recognizes many democratic rights, mobility rights, legal rights, equality rights, and minority language educational rights. As set forth in Section 1, each of these rights and freedoms are afforded to Canadians without limit, except where such a limit is demonstrably justified. In Canada, artificial limits on freedom must be demonstrably justified and “the onus of proof ... is on the person seeking to justify the limit, which is generally the government.”²²

The Moral and Legal Obligation

Because vaccine mandates limit, at minimum, the freedom of peaceful assembly, they may be analyzed with the *Oakes* test. To be upheld, governments would need to provide proof that the legislative goal is “pressing and substantial,” that there is “proportionality between the objective and the means used to achieve it,” that mandates are “rationally connected to the objective,” and that mandates impair Charter freedoms “no more than is reasonably necessary to accomplish the objective.”²³ As discussed above, if vaccines are effective and the majority of those most at risk are fully vaccinated, then Covid-19 no longer appears to be a pressing and

²¹ Government of Canada, “CONSTITUTION ACT, 1982,” accessed October 6, 2021, <https://laws-lois.justice.gc.ca/eng/const/page-12.html#docCont>.

²² Government of Canada, “Reasonable limits.”

²³ Government of Canada, “Reasonable limits.”

substantial threat. Although vaccine mandates may fail the first condition of the *Oakes* test, it is useful to consider each of the conditions, to determine whether vaccine mandates might otherwise be justified.

First, the most obvious natural consequence of not being vaccinated is an increased risk of serious outcome from Covid-19, while the artificial consequences created by the patchwork of vaccine mandates is near complete exclusion from society, as described above. To the person who is not vaccinated, this is not a beneficial trade-off. Vaccine mandates significantly limit the freedom to go to a gym, participate in a sport, meet with friends, and pursue an education – all activities which contribute to overall wellbeing. And one gives up these freedoms to reduce a risk that is already statistically negligible for those who are under sixty. As of October 22, 2021, of those under sixty who have tested positive for Covid-19, 99.867% have lived (and of those under twenty, more than 99.995%).²⁴ Further, being fully vaccinated does not mean fully protected. In fact, *among those who have tested positive for Covid-19* since the beginning of the vaccination campaign, about 1.25% of those who were fully vaccinated have died (as compared to 1.07% of those who were not vaccinated).²⁵ The artificial consequences created by vaccine mandates do not seem to be proportional to the natural consequences, nor do they seem to benefit the individual who chooses not to be vaccinated.

Second, it would be difficult to imagine that vaccine mandates could be justified as having a clear benefit to *society* if the most significant benefit is to the *individual* who is not vaccinated. Incidentally, there are also a couple of societal consequences which are said to result from the decision not to be vaccinated; first, an increased risk to the stability of the healthcare system and, second, an increased risk of spreading Covid-19.²⁶ The first objective, then, is to use vaccination to maintain health services that, arguably, have not been maintained for years; it was not Covid-19 (nor unvaccinated people) that caused our healthcare system to be susceptible to a strain, but years of chronic underfunding and poor management.²⁷ The second objective is to use

²⁴ Government of Canada, “COVID-19 daily epidemiology update.”

²⁵ Government of Canada, “COVID-19 daily epidemiology update.”

²⁶ Manitoba, “Province Steps Up Preparedness;” British Columbia, “B.C. launches proof of vaccination to stop spread of COVID-19.”

²⁷ CBC News, “Manitoba Nurses Union reaches tentative collective agreement after 7 weeks of mediation,” last modified October 6, 2021, <https://www.cbc.ca/news/canada/manitoba/manitoba-nurses->

vaccination to reduce transmission, something vaccination has not been proven to accomplish, especially with the Delta variant.²⁸ In neither case does it appear that vaccine mandates are strongly rationally connected to the objective.

Finally, it appears that all objectives vaccine mandates apparently aim to accomplish may be accomplished in other ways. One suggestion could be to employ a “focused protection” strategy, a strategy endorsed by nearly 15,000 medical and public health scientists and nearly 45,000 medical practitioners worldwide.²⁹ Such a strategy would see those most at risk from Covid-19 most protected, and those at less risk encouraged to continue to pursue a well-balanced life with minimal restrictions.³⁰ A second strategy that could be employed in tandem with the first could be to invest more resources in strengthening the healthcare system, both to serve the immediate need and to serve the ongoing need for efficient medical care. A third strategy could be to invest in developing and promoting treatments for Covid-19. Extensive and growing scientific evidence suggests that early treatment of Covid-19 is possible, safe, and effective.³¹ It

union-tenative-collective-agreement-1.6202287; Theresa Boyle, “Surge in patients forces Ontario hospitals to put beds in ‘unconventional spaces’,” *Toronto Star* (April 16, 2017), <https://www.thestar.com/news/canada/2017/04/16/surge-in-patients-forces-ontario-hospitals-to-put-beds-in-unconventional-spaces.html>. Also note: This idea is corroborated by the author’s conversations with a long-time Manitoba nurse and a current Manitoba hospital chaplain.

²⁸ Smriti Mallapaty, “COVID vaccines cut the risk of transmitting Delta — but not for long,” *Nature* (October 5, 2021), <https://www.nature.com/articles/d41586-021-02689-y>; Centers for Disease Control and Prevention, “Outbreak of SARS-CoV-2 Infections, Including COVID-19 Vaccine Breakthrough Infections, Associated with Large Public Gatherings — Barnstable County, Massachusetts, July 2021,” last modified August 6, 2021, https://www.cdc.gov/mmwr/volumes/70/wr/mm7031e2.htm?s_cid=mm7031e2_w; S. V. Subramanian and Akhil Kumar, “Increases in COVID-19 are unrelated to levels of vaccination across 68 countries and 2947 counties in the United States,” *European Journal of Epidemiology* (September 30, 2021), <https://rdcu.be/cAbB4>.

²⁹ Great Barrington Declaration, “Signatures,” accessed October 26, 2021, <https://gbdeclaration.org/view-signatures/>.

³⁰ Great Barrington Declaration, “Focused Protection,” last modified November 25, 2020, <https://gbdeclaration.org/focused-protection/>.

³¹ World Council For Health, “Early Covid-19 treatment guidelines: A practical approach to home-based care for healthy families,” last modified October 2, 2021, <https://worldcouncilforhealth.org/resources/early-covid-19-treatment-guidelines-a-practical-approach-to-home-based-care-for-healthy-families/>; Front Line Covid-19 Critical Care Alliance, “Prevention and Treatment Protocols for COVID-19,” accessed October 11, 2021, <https://covid19criticalcare.com/covid-19-protocols/>; Peter A. McCullough, et al., “Pathophysiological Basis and Rationale for Early Outpatient Treatment of SARS-CoV-2 (COVID-19) Infection,” *The American Journal of Medicine* 134, no. 1 (January 2021): 16-22, <https://doi.org/10.1016/j.amjmed.2020.07.003>. See also: Justus R. Hope, MD, “India’s Ivermectin Blackout - Part V: The Secret Revealed,” *The Desert Review*, last modified October 4,

appears that there are “less rights-impairing means of achieving the objective[s]” than vaccine mandates, given that other strategies could likely accomplish the same objectives “in a real and substantial manner.”³²

To be clear, the freedom to be or not to be vaccinated is not an explicitly guaranteed freedom in Canada, nor is discrimination based on vaccination status explicitly prohibited by human rights codes.³³ Further, “The Charter is not intended to govern relations between private actors,” so vaccine mandates introduced by companies or universities are not prohibited by The Charter.³⁴ Still, The Justice Centre for Constitutional Freedoms maintains that vaccine mandates, if applied without regard for personal risk factors, age, or prior infection, may violate Section 7 of The Charter, which guarantees the “right to life, liberty and security of the person and the right not to be deprived thereof.”³⁵ What is certain is that it is the moral obligation of anyone implementing a vaccine mandate to justify the limits it places on others’ freedom, and it is both the moral *and* legal obligation for governments to demonstrably justify the limits governmental vaccine mandates place on Charter freedoms.

Into The Future

Vaccine mandates were introduced as a temporary measure to stop Covid-19, but now that it is becoming clear that Covid-19 may become endemic, it appears that the governments of Canada are becoming comfortable with extending vaccine mandates far into the future. Just as lockdowns were to be a short-term effort to flatten the curve, Prince Edward Island recently

2021, https://www.thedesertreview.com/opinion/columnists/indias-ivermectin-blackout---part-v-the-secret-revealed/article_9a37d9a8-1fb2-11ec-a94b-47343582647b.html.

³² Government of Canada, “Section 1 – Reasonable limits.”

³³ The Manitoba Human Rights Commission, “Factsheet: COVID-19 and The Human Rights Code,” accessed October 6, 2021, <http://www.manitobahumanrights.ca/v1/education-resources/resources/pubs/fact-sheets/covid19factsheet.pdf>; Ontario Human Rights Commission, “OHRC policy statement on COVID-19 vaccine mandates and proof of vaccine certificates,” last modified September 22, 2021, http://www.ohrc.on.ca/en/news_centre/ohrc-policy-statement-covid-19-vaccine-mandates-and-proof-vaccine-certificates.

³⁴ Government of Canada, “Section 32(1) – Application of the Charter,” last modified September 1, 2021, <https://www.justice.gc.ca/eng/csj-sjc/rfc-dlc/ccrf-ccdl/check/art321.html>; Julie Lowe and Samuel E Trosow, “Surfing the Fourth Wave: Riding out a Charter Challenge to University and College Vaccination Mandates,” *CanLII Authors Program* (August 2021), <https://canlii.ca/t/tb1c>.

³⁵ The Justice Centre for Constitutional Freedoms, “The Issue of Mandatory Vaccines,” last modified August 13, 2021, <https://www.jccf.ca/the-issue-of-mandatory-vaccines/>; Government of Canada, “CONSTITUTION ACT.”

introduced their “Vax-Pass” stating, “The Vax-Pass program will be time-limited and will lift when the risk of outbreak is reduced.”³⁶ Yet, the “risk of outbreak” may be with us for years, so the end is far from being within sight.³⁷ The Canadian government has embraced long-term vaccine mandates with a new “pan-Canadian” vaccine passport.³⁸ Manitoba’s Chief Provincial Public Health Officer summarized, “If you are waiting until the proof of vaccine requirement ends, you will be waiting for a long time.”³⁹

Regardless of whether the courts find vaccine mandates to be demonstrably justified, Canadians have a responsibility and the authority to decide for themselves whether long-term vaccine mandates are desirable. To implement permanent vaccine mandates is to divide society into classes based on vaccine status. In a cruel twist, this division is lauded in the media as a sort of “peer pressure” or “mild coercion” to those who have not been vaccinated.⁴⁰ CBC News eagerly reported that Manitoba’s new vaccine mandates will “create a bit more of a divisive line in communities,” and it is frequently suggested that those who are not vaccinated are driving the pandemic, as if by some evil intent.⁴¹ While it is difficult to know precisely what the consequences of dividing our society and demonizing one group of people could be, it is not

³⁶ CTV News, “Our window to flatten the COVID-19 curve is narrow, says Dr. Theresa Tam,” last modified March 16, 2020, <https://www.ctvnews.ca/health/coronavirus/our-window-to-flatten-the-covid-19-curve-is-narrow-says-dr-theresa-tam-1.4853951>; CTV News Atlantic, “P.E.I. reports three new COVID-19 cases Tuesday; will introduce vaccine passport on Oct. 5,” last modified September 21, 2021, <https://atlantic.ctvnews.ca/p-e-i-reports-three-new-covid-19-cases-tuesday-will-introduce-vaccine-passport-on-oct-5-1.5594110>.

³⁷ Katherine S. Xue, “Coexisting with the Coronavirus,” *The New Yorker* (July 21, 2021), <https://www.newyorker.com/science/annals-of-medicine/coexisting-with-the-coronavirus>.

³⁸ Government of Canada, “Canada moving forward with a proof of vaccination for international travel,” last modified August 11, 2021, <https://www.canada.ca/en/immigration-refugees-citizenship/news/2021/08/canada-moving-forward-with-a-proof-of-vaccination-for-international-travel.html>.

³⁹ CBC News, “Manitoba rules target gatherings involving unvaccinated people, stores in area with worst immunization rate,” last modified October 1, 2021, <https://www.cbc.ca/news/canada/manitoba/manitoba-covid19-public-health-update-1.6196061>.

⁴⁰ CBC News, “Manitoba’s new pandemic orders target people who haven’t heeded any other restrictions,” last modified October 5, 2021, <https://www.cbc.ca/news/canada/manitoba/manitoba-pandemic-restrictions-1.6199473>; Jason Horowitz, “Italy Puts in Force Tough New Law Requiring Workers to Test or Vaccinate,” *The New York Times* (October 15, 2021), <https://www.nytimes.com/2021/10/15/world/europe/italy-vaccination-law-covid.html>. Full quote: “Western democracies...have struggled to balance public health needs with civil liberty concerns. For many Western governments, that has resulted in refraining from national mandates while seeking other ways to encourage, coax and even mildly coerce people to get vaccinated.”

⁴¹ CBC News, “Manitoba’s new pandemic orders.”

difficult to observe examples of this being done in history and conclude that the consequences could be extremely negative.

While vaccine mandates will be challenged in court, and the case will be difficult for governments to defend, it is imperative that Canadians decide for themselves whether permanent, divisive vaccine mandates will protect and shape the kind of society Canadians want to live in and pass on. In Canada's democratic system, it is individuals who determine the trajectory of the nation; vaccine mandates can only continue if Canadians permit them to continue. We can settle for a society that will continue to sacrifice more and more of its freedom in the fleeting pursuit of a little more safety, or we can boldly nourish a society that treasures its freedom and creates greater prosperity, security, and social capital – enough to thrive and enough to share.

“We have created a society where individual rights and freedoms, compassion and diversity are core to our citizenship. But underlying that idea of Canada is the promise that we all have a chance to build a better life for ourselves and our children.”⁴² – Justin Trudeau, 2012

⁴² Justin Trudeau, “Canadian middle class left out of the growth equation,” *Toronto Star* (October 30, 2012), https://www.thestar.com/opinion/editorialopinion/2012/10/30/canadian_middle_class_left_out_of_the_growth_equation.html.